

26 January 2005

Ian Kernohan  
Scottish Executive  
Statutory Regional Transport Partnership Consultation  
2-D  
Victoria Quay  
EDINBURGH  
EH6 6QQ

Dear Mr Kernohan,

**SFDF Response To Scottish Executive Consultation: Scotland's Transport Future:  
Proposals For Statutory Regional Transport Partnerships**

On behalf of the Scottish Food and Drink Federation (SFDF) I would like to thank you for the opportunity to comment on the aforementioned Scottish Executive consultation paper.

**Background**

As you will be aware, SFDF represents the common interests of the food and drink manufacturing industry. We work to improve the environment in which the individual companies who make up the industry operate: be it legislative, economic, social or political. In so doing, we aim to help maximise the competitiveness and profitability of the industry.

59,300 people are employed in the food and drink sector in Scotland (54,000 in food industry alone) – some 11.8% of total British food and drink sector employees. The industry in Scotland also accounts for annual sales of around £4.2 billion (exc. whisky).

**Summary**

As I am sure you will appreciate, an efficient and properly integrated transport system and infrastructure are of considerable importance to food and drink manufacturing companies in Scotland who have to rely on the facilities in place to transport their produce to market. Given the fact that, relatively speaking, producers in Scotland are on the periphery of our major markets, it is extremely important that the system is integrated, efficient and fit for purpose.

For that reason, we welcome the Scottish Executive prioritising the need for a more strategic approach to transport and infrastructure in Scotland. It is therefore important that the proposed national transport agency has sufficient powers and resources to deliver the strategic, integrated approach that is needed and that its programme and initiatives are not undermined by other transport policies being implemented at regional or local level.

Provided the Regional Transport Partnerships (RTPs) can compliment the work of the national transport agency and assist in the implementation of a strategic approach to transport

as well as recognising and addressing the specific transport needs of their respective regions, then the creation of RTPs should be welcomed.

Please find enclosed comments on the specific issues outlined in the consultation paper. I trust that these comments will be taken into account and that SFDF will be kept informed of the outcome of the consultation process and further developments in this area.

Yours sincerely,

**Flora A McLean**  
**Director**

## **Boundaries**

On this issue, we agree with the view expressed by CBI Scotland that the proposed boundaries for the RTPs appear sensible and workable but that these boundaries should be kept under review. Evolution of transport policy at both regional and national level as well as economic development may necessitate a review of the geographic boundaries in the future to reflect new developments and circumstances.

## **Constitution**

**3.) What should the role of external members be?**

**4.) Do you agree that decisions on who are appointed as external members are taken by RTPs themselves in conformity with guidance issued by Scottish Ministers?**

**5.) How should the RTP involve people and stakeholders within its region?**

SFDF welcomes the proposal to have a third of the voting membership drawn from the business sector and other organisations in the RTP region as external members. Restricting voting rights to representatives from constituent councils would create a two tier level of membership and would likely result in apathy from external members due a lack of influence over the decision-making process.

A key role for the external members of the RTP should be to ensure that the regional strategy being formulated identifies and addresses the key transport issues specific to that region (for example, West & South West, Central & Tay etc). These external members can act as a guard against transport strategies being driven by perceived short term benefits or electoral pressures on local authorities.

Another role for external members should be to ensure that stakeholders from the business sector and other organisations can make meaningful submissions and representations that are able to influence the formulation of the strategy.

SFDF does have some concerns in allowing RTPs complete autonomy over the appointment process of external members. If constituent council members have sole control over who is appointed as external members of the board, there is no guarantee that representatives from the business community or other groups as proposed in the consultation paper will actually be invited to join. This could result in key stakeholders and key sectors being denied representation on the board and the loss of the expertise they possess.

Therefore, it may be more appropriate to establish specific categories of external members so that the RTPs will be comprised of members representing a broad section of interests. SFDF believes that each RTP should have at least one designated representative from the business community and that this should be a statutory requirement of all RTPs.

Another option worthy of consideration is to have a representative from the national transport agency as an external member of each RTP. The role of this representative could be to advise the Board of the work programme of the agency and specific aspects that may impact upon the region.

Another role for this member would be to ensure that the RTP strategy does not undermine that of the national agency and vice versa. This type of external member need not necessarily

have voting rights on the board. An integrated and efficient transport infrastructure is a key facilitator of economic development and business growth. The programme of the national transport strategy in delivering this strategic approach must not be undermined by conflicting transport initiatives from the RTPs.

On the issue of consultation, SFDF accepts that not all stakeholders interested in contributing to the work of the RTP and the formulation of the strategy will be able to have voting rights. Therefore, it is important that meaningful opportunities are available to stakeholders who wish to participate and that these are publicised effectively to both local and national based stakeholders.

It is important that stakeholders have the opportunity to submit comments and ideas at regular points of the transport strategy's formulation. Stakeholders must have the opportunity to make suggestions on what transport issues the strategy should address and also to comment on draft versions of the strategy. If stakeholders are restricted to commenting on a near finalised version of their strategy after much of the key decisions have been taken, it is of little value and will quickly lead to disillusionment amongst key stakeholders.

## **Functions**

**13.) Which of these 3 models would you like to see your region adopt?**

**14.) Do you envisage that the RTP in your region will gain further functions as it develops? If so, which ones?**

SFDF agrees with the view expressed in the consultation that it seems preferable to have a reasonably consistent approach across Scotland regarding the models and functions of RTPs so that there is not a proliferation of different arrangements in place. Such an asymmetrical system is likely to result in confusion especially for businesses whose operations may relate to sites in more than one RTP.

There is also an argument for suggesting that some of the models proposed by the consultation may be more effective in ensuring effective implementation of a regional transport strategy. The more an RTP has to rely on other actors including the constituent councils to deliver aspects of the strategy, the greater the likelihood of other factors, such as the policy priorities of local authorities, in undermining its implementation.

For this reason and others, Model 1, which advocates limited powers for the RTP does not seem the most effective model. We also agree with the view expressed by CBI Scotland that the concurrent sharing of powers does not appear to be the most sensible way to proceed.

In our response to the Transport Scotland consultation in December 2003, we noted that using the SPT as a model for the development of new regional partnerships might be an option worthy of consideration. This would suggest that Model 3 – Regional Strategy and Significant Public Transport Powers Transferred would be the preferred option. However, we accept that it may take time for RTPs to evolve to the current level of SPT.

As CBI Scotland point out, the type of model adopted initially should reflect the content of the strategy as this will identify what needs to be done and who is best placed to deliver it. These strategies may identify the RTP as the most effective body to deliver aspects of the strategy and if this is the case, then the principal of subsidiarity must be applied and the

appropriate transport powers transferred to the RPT. Using Model 2 – Regional Strategy and Some Transport Powers Transferred – therefore seems like a plausible starting point which may or may not evolve to Model 3 over time. Another advantage of models 2 and 3 over model 1 is that both would give the RPT a greater degree of control over the implementation of its strategy. The success of its implementation however, is largely dependent upon it having the necessary resources at its disposal (this is discussed later in this submission).

## **Funding**

### **15). Do you agree that there is no alternative to requisition if regional transport partnerships are to have a stable and secure source of funding?**

No. In December 2003, in response to the consultation *Scotland's Transport: Proposals for a New Approach to Transport in Scotland*, SFDF asked on what grounds could requisition be justified given local elected representatives expect to be held accountable for how they spend local funds? Would an ability to “requisition” funds from the budgets of local authorities contribute to the current perception of a democratic deficit?

Whilst there is an argument that funding the RTPs through requisition from constituent councils may increase accountability, as CBI Scotland notes, it may actually run counter to the stated objectives of the RTP. If members of the RTP “base decisions on the amount of money they will have to transfer to the RTP or the amount of Scottish Executive grant funding they will lose, then Regional Transport Partnerships will simply not deliver the strategic planning we need”.

SFDF advocates a system whereby the partnerships are predominantly funded through direct grants from the Scottish Executive which could be accompanied by a corresponding cut in the grants awarded to the local authorities. There are a number of benefits associated with such an approach. Firstly, it will minimise the possibility of regional transport strategies being influenced as outlined above. Secondly, it will ensure that the RTPs have the resources necessary to fully implement the strategy that has been prepared.

If RTPs are to be successful, it is vital that they have the resources required to implement the transport strategy. A reliance on funding from constituent councils not only risks the possibility of ‘half-hearted’ strategies, it also potentially undermines the strategy’s implementation as other local authority spending priorities make take precedence over the commitment to the RTP. Direct funding from the Executive ensures that there will be dedicated funding in place to formulate and implement the strategy.

The consultation paper notes “we do not see advantages in the alternative of direct funding from the Scottish Executive. That would centralise with the Executive decisions on what initiatives to support rather than leaving them devolved with the RTPs themselves.” However it also notes that an effective working relationship between the agency and the RTPs “will be crucial to the success of both”. The funding of the RTPs by the Scottish Executive through the national transport agency could be a dimension of this working relationship.

SFDF are wary that an insistence on requisition will result in the establishment of RTPs that do not have the resources needed to fulfil a vital aspect of their remit, to ensure the successful implementation of the transport strategy.

## The Food and Drink Manufacturing Industry

The Scottish Food and Drink Federation (SFDF) represents the food and drink manufacturing industry in Scotland.

The food and drink manufacturing industry in Scotland has a gross output of around £6.5bn and accounts for circa £2.5bn of total UK exports and 11.8% of the UK sector workforce.

SFDF is a devolved division of the Food and Drink Federation (FDF), the voice of the UK food and drink manufacturing industry. As the largest manufacturing sector in the UK, food and drink manufacturers employ over 500,000 people and have a combined annual turnover of in excess of £67bn. UK food and drink exports in 2003 were over £9bn.

The following organisations are members of the Food and Drink Federation:

abim	Association of Bakery Ingredient Manufacturers
ACFM	Association of Cereal Food Manufacturers
AMPM	Association of Malt Product Manufacturers
BCA	British Coffee Association
BCCCA	Biscuit, Cake, Chocolate and Confectionery Association
BOBMA	British Oats & Barley Millers Association
CFA	Chilled Food Association
CIMA	Cereal Ingredient Manufacturers'
FA	Food Association
FOB	Federation of Bakers
FPA	Food Processors' Association
GPA	General Products Association
ICF	Ice Cream Federation
IDFA	Infant and Dietetic Foods Association
MSA	Margarine and Spreads Association
MG	Meat Group
NABIM	National Association of British and Irish Millers
NACM	National Association of Cider Makers
OHG	Out of Home Group
OFDMLG	Organic Food and Drink Manufacturers Liaison Group
PFMA	Pet Food Manufacturers' Association
SB	Sugar Bureau
SG	Seafood Group
SIBA	Society of Independent Brewers
SMA	Salt Manufacturers' Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SPA	Soya Protein Association
SSA	Seasoning and Spice Association
UKAFFP	UK Association of Frozen Food Producers
UKAMBY	UK Association of Manufacturers of Bakers' Yeast
UKTA	UK Tea Association
VG	Vegetarian (Meat Free) Group