



# Delivering the Goods

## Transform Scotland response to Scottish Government rail freight strategy consultation

Friday 22 January 2016

### 1. Introduction

- 1.1. Transform Scotland is the national alliance for sustainable transport, bringing together organisations from the private, public and voluntary sectors. We campaign for a society where everyone can have their travel needs met within the limits of a transport system that is environmentally sustainable, socially inclusive and economically responsible.
- 1.2. We welcome this consultation and the opportunity to respond. It appears to us to be wide-ranging and covers the many fundamental issues that face the rail freight industry. The haulage of freight by rail has many benefits and sits well with the Government's objectives to reduce climate emissions, road traffic crashes and to achieve modal shift to rail.
- 1.3. Specifically, rail freight typically generates only a third to a quarter of CO2 emissions of road haulage per tonne-mile and rail freight has a vastly better record than HGVs, which are disproportionately involved in fatal accidents. Added to this is the heavy trunk road maintenance burden imposed on the Scottish Government budget by the biggest lorries – surely no better illustrated than by the recent enforced closure of the Forth Road Bridge.

### 2. The Role of Government

- 2.1. Our response will focus principally on the role of government and its ability to create the right climate for rail freight to grow and prosper. This is particularly so as this will at the same time assist the government in meeting its own targets to reduce emissions, crashes, and achieve modal shift to rail.
- 2.2. Rail freight cannot be considered in isolation from the passenger network and vital upgrades to routes such as the Highland Main Line, the Central Belt to Aberdeen, and Aberdeen to Inverness lines will benefit both the freight and the passenger railway. Currently these routes are plagued by single track sections with short passing loops. In stark contrast, the government has embarked on a massive programme of expenditure on the A9 and A96 roads – £6bn in total to fully dual these routes. Without a similar programme of improvements to the parallel rail routes government objectives will not be met, indeed both the passenger and freight railway will most likely lose modal share to the roads with a consequent increase in emissions and crashes. We would draw attention to the Transform Scotland *Inter-City Express* campaign which calls not only for the full upgrade of these routes but also for the recreation of a direct rail route from Edinburgh to Perth. See [intercityexpress.transform.scot](http://intercityexpress.transform.scot) for further details.
- 2.3. We would also wish to draw attention to the recent construction of the Borders Railway designed solely for passenger traffic with no capacity provided for freight or even excursion trains. Indeed all new rail bridges south of Gorebridge have been constructed to single track width while the road over-bridges have been built with large excess capacity – even on minor rural roads. This example coupled with the decision to commit to full dualling of the A9 and A96 roads without carrying out a proper multi-modal study of the rail and road routes along these corridors points very clearly to the lack of a level playing field when considering road and rail enhancement schemes.
- 2.4. This situation is worsened by the implicit subsidy to road freight as a result of the failure for that sector to cover its road damage costs. We note, and endorse, the evidence submitted to this inquiry by the Rail

Freight Group which highlights:

*“[T]he failure of the vehicle taxation system to properly reflect the very heavy damage done to road surfaces by the biggest lorries. Road damage rises steeply with axle weight, and is widely acknowledged to be proportional to the fourth power of the axle weight. This means that doubling the axle weight increases road damage 16 times, and in the case of the heaviest (44-tonne) trucks – the main competition for rail freight – HGVs are up to 160,000 times more damaging to road surfaces than the smallest vehicles.”*

- 2.5. Whilst the Scottish Government does not currently have powers over vehicle taxation, there are many other areas of overall transport policy that the government can use to create a level playing field between road and rail freight. Indeed it may well be the case that for the foreseeable future policy decisions specifically favouring rail freight are needed to correct the previous imbalance and help the government achieve its wider policy objectives. We would suggest that a strategic freight network for Scotland should be defined and the creation of the necessary infrastructure should then become a key Government priority.

### **3. The Role of the Railway Industry**

- 3.1. In our view the railway industry, and specifically Network Rail, could and should do more to encourage rail freight by seeking innovative and low cost solutions to develop new rail freight flows. One example would be the Non-Intrusive Crossover System (NICS) which offers much shorter lead-times than a conventional connection and may be particularly relevant for developing new flows of timber traffic.
- 3.2. The current consultation on the Scotland Route Study provides an opportunity to set-out a strategy for the development of freight traffic and the creation of a strategic freight network for Scotland.

### **4. The Role of Freight Operators**

- 4.1. We believe that others are more qualified to comment on this in detail. However, it appears to us that a more co-operative approach between operators on long hauls such as those to Inverness and Aberdeen would help to improve the economics on such routes.

### **5. Summary**

- 5.1. We have set out above the roles of the key players in the future development of rail freight in Scotland. Whilst Network Rail and the operators must do more to facilitate growth in rail freight the leading role must be taken by Government in defining and providing the appropriate infrastructure and pursuing a set of policies that vigorously promotes the growth of rail freight and at the same time facilitates its own wider policy objectives.

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Transform Scotland is the national alliance for sustainable transport, bringing together organisations from the private, public and voluntary sectors. We campaign for a society where everyone can have their travel needs met within the limits of a transport system that is environmentally sustainable, socially inclusive and economically responsible. Transform Scotland Limited is a registered Scottish charity (SC041516).

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