

# SHAPING THE FUTURE OF SCOTTISH RETAIL

RETAIL INDUSTRY RECOMMENDATIONS  
TO THE SCOTTISH GOVERNMENT FOR  
ITS 2018-19 BUDGET

---



# A SNAPSHOT



**RETAIL:**  
THE LARGEST  
PRIVATE SECTOR  
EMPLOYER IN  
SCOTLAND

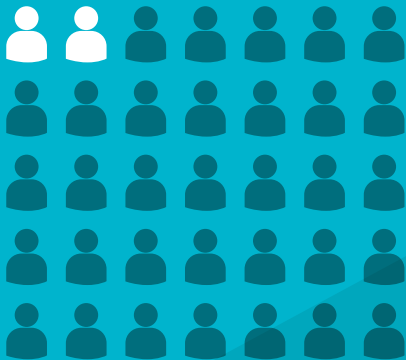


**£10M**  
DONATED  
BY RETAILERS  
TO GOOD CAUSES  
IN SCOTLAND



RETAIL IS A *DYNAMIC*  
INDUSTRY AND  
ACCOUNTED FOR

**13%**  
OF ALL NEW  
BUSINESSES  
FORMED IN  
SCOTLAND LAST  
YEAR



**250,300**  
RETAIL JOBS IN  
SCOTLAND



**1/5**  
IN SCOTLAND,  
RETAIL ACCOUNTS  
FOR A FIFTH OF ALL  
BUSINESS RATES



**5,077**  
RETAILERS PAY  
**£12M**  
SCOTTISH RATES  
SURCHARGE

# CONTENTS

---

FOREWORD	4
ECONOMIC OVERVIEW	6
CHIEF RECOMMENDATIONS	7
DETAILED RECOMMENDATIONS	7
Retail Strategy for Scotland	7
Business Rates	8
Scottish Income Tax	10
Council Tax	11
Value Added Tax (VAT)	11
New Devolved Taxes	11
Apprenticeship Levy	11
Land & Buildings Transaction Tax	12
Fees, Charges & Levies	12
Deposit Return Scheme (DRS)	12
Regulation	13
Infrastructure	13
Windfall Consequentials	14

---

# FOREWORD

---



The retail industry is acutely aware of the delicate balancing act facing the Finance Secretary in this year's Budget. The economy is being buffeted by currency volatility and political uncertainty including over the likely outcome and implications of Brexit. Difficult decisions are the order of the day for Scotland's businesses and Government alike.

Scotland's retailers encounter these challenges and their consequences every day. Data from our industry speaks of the fragile trading environment we face. Accelerating food and raw materials price inflation has brought an end to a near decade long period of falling consumer prices, but the fall in the value of Sterling and the impact of fierce, technology enabled competition means that retailers' margins are actually depressed despite often modestly increased prices for the customer.

These issues, like the continuing decline in the number of shops in Scotland, are just the most visible symptoms of the profound change that the traditional western model of retail is undergoing. The scope of these challenges are global and industry wide. They are structural, not circumstantial or transitory. This, as we explained earlier this year in our publication *'What's Next - The Future of Scottish Retail'*, is the real issue.

The reality is our industry is going through an unavoidable process of transition. As technology enables both customers and new market entrants to conduct their retail business in a more effective and efficient manner, the industry as a whole must evolve rapidly in order to survive. Irrespective of government policy or individual retailer strategies, this process of change is now unstoppable, with the power to arbitrate its pace in the hands of the consumer and global technology companies, not politicians or retail leaders. In response, over the next decade the industry will fundamentally change, becoming more automated and more productive, but ultimately employing significantly fewer people from many fewer physical retail locations.

What can be influenced is the manner in which this process takes place. A failure to stem the flow of financial and regulatory burdens falling on retailers, especially those distinct to Scotland, will inevitably encourage a deeper, faster and more attritional reduction in Scottish retail jobs and stores. The consequence, of hollowed out town centres and significantly reduced employment, is not in the interest of government or retail.

Of particular, specific concern is that this would mean the loss of thousands of entry level roles which give young people from less academic or advantaged backgrounds the opportunity to get into employment within easy reach of their home and gain the opportunity to build a successful career.

---

Retailers across Scotland badly want to avoid that outcome. We want to work with Government to develop the right policy environment to encourage growth, productivity, and innovation in Scotland. That's why we are keen to make a success out of the proposed retail industry strategy that the SRC and the Scottish Government are currently scoping.

Ultimately, the fiscal environment is crucial. A substantially reformed business rates system that adapts to the changing retail world will be fundamental to this. I understand that this is repetition, but there truly is no way around this central fact.

Over the next decade the revenues from business rates from retail will fall. If the government wants that fall to be of a managed nature they need to take swift and decisive action to reduce the counter-productively high share of the total business rates burden borne by retail. Otherwise the revenue fall will be more severe as the economic case for retaining shops becomes less and less sustainable and retailers thus have no choice but to close units and shed jobs at a faster pace than would otherwise be necessary.

Overall, the retail industry looks for a long-term strategic economic vision which will encourage investment, and deliver economic growth. Delivering that environment is the right thing for Scotland, and the right thing for the Scottish retail industry, and so I commend the recommendations in this paper to the Finance Secretary as he determines his tax and spending plans.

**ANDREW MURPHY**  
SRC Chairman



---

# ECONOMIC OVERVIEW

---



The long term trend towards a growing and wealthier population presents genuine opportunities for the retail industry in Scotland. Retail continues to be the largest private sector employer, with 252,000 colleagues, as well as one of its most dynamic sectors<sup>1</sup>. However, this is a challenging time for Scotland's retailers. Retail sales growth has been anaemic for the past three years, against a backdrop of profound structural, economic and regulatory change for the industry aggravated more recently by a lack of clarity over what Brexit will look like.

The SRC's Scottish Retail Sales Monitor has fallen in nine of the past twelve months, and the most recent official Scottish GDP data found the retail sector contracting for a second successive quarter.

Retailers are responding by seeking to become productive through investing in the future. That includes investing in new technology, a higher skilled workforce, and revamped logistics capabilities. Yet this investment is having to take place at a time when public policy costs are growing.

Consumer spending, the mainstay of Scotland's economy and a reliable source of economic growth, faces headwinds in the months ahead as household finances contend with higher overall inflation, weaker earnings growth, and domestic cost pressures. This may have implications for VAT receipts which are soon to be devolved. Competition and innovation within the sector has delivered substantial benefits for consumers and has helped keep down the cost of living, and our Shop Price Index has recorded four years of falling shop prices. However, the era of sustained falling prices at tills is coming to an end, as retailers find it increasingly difficult to absorb a mixture of rising global food commodity prices, fluctuations in the exchange rate since the Brexit vote, and changes in public policy costs.

Areas of discretionary spend are being affected the most, with sales of non-food items struggling whilst groceries and online sales perform better. The shop vacancy rate in Scotland – which has more shops per head of population than in the rest of the UK – nudged up again in the most recent quarter to 9.3%, up from 7.5% a year earlier. Official data shows a net decline of 1,700 shops in Scotland and 10,000 fewer retail jobs over the past seven years.

**DAVID LONSDALE**  
SRC Director

---

1. 13% of all new firms formed are from retail

---

# CHIEF RECOMMENDATIONS

---

The retail industry's chief recommendations for the Scottish Government's upcoming Budget:

- Deliver on the recent welcome commitment to co-produce a Scottish Retail Strategy
- Bolster consumer confidence by ruling out increases in income tax rates, and consider accelerating implementation of a zero-rate income tax band
- Capitalise on the Barclay Rates Review to recast business rates for the decade ahead, to ensure rates better flex with economic conditions and deliver a medium-term plan to substantially lower the rates burden
- Build on the recent increase in the threshold for the Large Business Rates Supplement by setting out a timetable for the restoration of parity with England
- Introduce a moratorium on new or additional rates levies during the remainder of the current parliamentary term
- Ensure levy-payers benefit directly from the mooted Flexible Workforce Development Fund, increase the size of the Fund and tie its future funding growth to the projected overall increase in devolved receipts from the Apprenticeship Levy

## DETAILED RECOMMENDATIONS

---

The SRC shares the Scottish Government's aim of making Scotland the most competitive part of the UK to do business, however that goal has yet to be achieved. This is why the SRC wants to see a bold and ambitious Budget which uses the substantial flexibilities<sup>2</sup> provided to achieve the competitiveness goal. Our detailed recommendations are:

### RETAIL STRATEGY FOR SCOTLAND

The SRC is delighted that the Scottish Government and the Economy Secretary in particular has listened to our representations and that he and his officials are prepared to work with us to develop a Scottish retail strategy.

The retail industry is undergoing seismic change against a challenging backdrop driven by changes in shopping habits, new technology, stiff competition, and burgeoning costs<sup>3</sup>. These changes are already having profound implications for firms' business models and investment plans, jobs and productivity.

---

<sup>2</sup> £191 million underspend carried forward into 2017-18 – Scottish Government's provisional budget outturn, 22 June 2017

<sup>3</sup> The cumulative impact of recent UK public policy has for example meant retailers responding to the National Living Wage and higher employer pension contributions, over and above the Apprenticeship Levy and rises in business rates

---

The changes will also have profound implications too for devolved public policy, particularly for employment prospects in more vulnerable communities more reliant on retail jobs, for our town centres and for future revenues from taxes such as business rates.

The commitment to developing a joint strategy is really positive and welcome and should hopefully result in a more strategic and coherent approach towards public policy which nurtures the growth of the industry over the decade ahead. The strategy ought to include a clear road-map setting out the intended regulatory and tax changes that are likely to impact on the industry over the decade. This will be of benefit to retail and the customers it serves, but also its substantial supply chain and the other sectors it touches.

Retail is the largest private sector employer in Scotland, and accounts for a fifth of business rates<sup>4</sup>. With half of VAT receipts – approximately £5 billion – set to be devolved to Holyrood in eighteen months' time, both government and retailers have a shared interest in improving the conditions for the industry to flourish and succeed.

## BUSINESS RATES

According to the OECD commercial property taxes here are the highest in the OECD<sup>5</sup>. Tax revenues from business rates in Scotland have leapt by 35% over the past six years<sup>6</sup> and firms have faced rises in the headline poundage rate from 40.7p to 46.6p in the £ over the same period<sup>7</sup>. Retail is a property intensive industry but is becoming less so, during the past seven years there has been a net reduction of 1,700 shops in Scotland (7% of the total) which ultimately means less tax revenues for government. As highlighted previously<sup>8</sup>, retailers are keen to see fundamental reform of Scotland's £2.7 billion<sup>9</sup> annual business rates system in order to support investment, business growth and revive our high streets where 1 out of every 10 premises is vacant. Keeping taxes down and predictable helps retailers fund their investment plans, as retained profits are a crucial source of financing investment intentions. We engaged extensively with the Barclay Rates Review and want to see Ministers now recast business rates for the decade ahead and deliver a system which is modern, sustainable, coherent and competitive. A fundamentally reformed rates system which flexes with economic and trading conditions and leads to a substantially lower tax burden would increase retailers' confidence about investing in new and refurbished shop premises and help revive high streets and town centres. At the heart of this agenda should be a medium-term plan to substantially lower the rates burden (just as has been pledged on devolved air passenger duty).

---

4 SPICe briefing 'Non-domestic rates and the 2017 revaluation', 16 March 2017

5 Commercial property taxes in the UK are the highest in OECD: <https://data.oecd.org/tax/tax-on-property.htm>

6 SPICe on local government finances, Table 5, 26 June 2017

7 SPICe 'Non domestic rates and the 2017 revaluation', Table 2, p11; 16 March 2017

8 The SRC published 'Business Rates: Fundamental Reform' in February 2015 and 'Holyrood 2016: Business Rates' in August 2015. The February publication included independent research showing 69% of MSPs agreed business rates are in need of reform.

9 Up from £2.07 billion in 2010-11



---

There are also a number of shorter term measures which Ministers should pursue.

Top of the list should be restoring poundage rate parity with England for medium sized and larger firms by scrapping the annual rates surcharge introduced last year, and which affects 1 in every 10 firms. This doubling of the Large Business Rates Supplement – which applies to the entire rateable value – is emblematic of the many problems with rates as a whole, with little regard paid to trading conditions or the changes affecting industry, no consultation or economic impact analysis underpinning it. Making Scotland a more expensive location to do business than elsewhere in the UK is the very antithesis of the government's stated aim.

Making it more expensive to operate on our high streets is also at odds with the Town Centres Action Plan, undermines support for the funding of Business Improvement Districts through levies, and raises the hurdle for attracting increasingly mobile commercial investment. Retail accounts for a fifth of business rates but almost a quarter of the Supplement. The Finance Secretary has at least acknowledged our concerns by lifting the supplement threshold in 2017-18, which removed some modest-sized premises from this Scotland-only surcharge. This move was welcome and did implicitly acknowledge a problem with the doubling of the Supplement. Yet it remains far from clear why 21,578 premises – including 5,077 shops<sup>10</sup> (the surcharge costs shops £12 million extra each year) – in Scotland should pay more in rates than firms in comparable premises elsewhere in the UK, particularly when many have options over where to invest elsewhere in the UK or abroad or indeed online. Ministers should go further and – as advocated by Barclay – set out a clear timetable for restoring the level playing field with England on the Large Business Rates Supplement, ideally restoring parity by Spring 2019.

The commitment to continue to at least match the headline business poundage rate with that which exists in England is sensible, but too often this is circumvented through ad hoc or supplementary levies such as last year's doubling of the Large Business Rates Supplement. There should be a moratorium on any new or additional business rate taxes and Scottish Ministers should introduce a 'Poundage Rate Rule' so that the actual tax rate levied never exceeds that in England during the remainder of this parliamentary term or until fundamental rates reform is implemented. This would greatly aid firms' ability to plan ahead with greater certainty.

The Small Business Bonus continues to be a welcome recognition of the need to keep down costs for firms, however we are mindful that it is partly funded by a levy on medium sized and larger firms and that three quarters of retail employment in Scotland is within firms which currently receive no relief.

At the last Budget the Finance Secretary appeared to add further complexity to the existing rates system with promises of further reliefs for rural areas. As we highlighted to Barclay, the current rates system is opaque, unwieldy and only seems to function through myriad exemptions and reliefs that continue to grow as an overall proportion of the total income from business rates<sup>11</sup>. We question how sustainable this 'sticking plaster' approach is and how effective it will be. For example, the SRC supports – in the interim prior to fundamental rates reform – the principle behind the local discretionary rates relief introduced through the Community Empowerment Act in October 2015, as it is welcome acknowledgement of the need to keep down costs for business.

---

<sup>10</sup> SPICe briefing on NDR, 16 March 2017

<sup>11</sup> The value of reliefs has leapt by 77% over 9 years according to Ministerial replies to written PQs, with value of the package of reliefs as a proportion of the overall tax take from business rates over the period rising too, up from 17 percent to 21 percent; SRC analysis 22 May 2017

---

However, two years into the functioning of the relief we remain to be convinced that its use by councils will either be widespread or substantive enough to be effective<sup>12</sup>, as only two councils are currently aiming to utilise the power. The policy risks being seen as a flop and we recommend Ministers redouble their efforts to get more councils to capitalise on this opportunity to support high streets.

Recent calls for the poundage rate to be devolved to local authorities or for councils to be able to charge supplementary rates levies would be a retrograde step and is something we oppose. The rejuvenation of the Business Rates Incentivisation Scheme (which allows councils to retain a proportion of the growth in business rates income from their area) is however encouraging but any revenues accruing to councils should be transparently re-invested into town centre regeneration or local economic development.

## SCOTTISH INCOME TAX

We concurred fully with the Scottish Government's assessment at the time of its last Budget in December that "household budgets are already under strain"<sup>13</sup>. That squeeze has since increased, not least due to rising overall inflation. We applauded the Government's refusal to countenance increases in income tax at the last Budget, and believe Ministers should continue the policy of not increasing income tax rates. Disposable incomes do not stretch as far as they used to and are set to be challenged further over the coming 18 months by a combination of inflation, rising council tax and higher employee pension contributions. Some 441,000 Scots<sup>14</sup> participate in auto-enrolment workplace pension schemes and the statutory minimum contribution is set to rise next Spring and again in 2019, which is sound economically over the long term for pension savings but conversely likely to depress disposable incomes in the short term. Against this backdrop income tax rises make little sense. A 1p increase across the three existing income tax rates would reputedly take £475 million out of consumers' pockets, equivalent to almost two percent of total retail sales in Scotland, at a time when retailers' margins are low (circa 3 to 5%) and when 252,000 people in Scotland rely on the industry for employment with many more in the supply chain. Any notions about increasing income tax rates for the vast majority of Scots should be knocked on the head, as it could cast a pall over consumer spending which remains a mainstay of the Scottish economy.

If the squeeze on disposable incomes is set to persist, then Scottish Ministers should be prepared to consider bringing forward their manifesto commitment to create a new £250 zero-rate income tax band. That would effectively increase the tax-free personal allowance over and above existing plans – giving the opportunity to increase the allowance more quickly than in the rest of the UK – which could provide a timely boost to consumers, the economy, and employment.

There has been debate about the growing disparity between the Scottish and UK higher income tax rate threshold, and about the top earners' additional rate of income tax. Too much disparity risks cementing for Scotland an unwanted reputation as a high tax destination, undermining our ability to attract and retain talent as well as depressing consumer spending.

---

12 'Councils fail to take up rates burden powers', Scotland on Sunday, 26 June 2016

13 P1 of Scottish Government's 2017-18 Budget document

14 'Auto-enrolment boosts workplace pension numbers in Scotland', BBC Scotland News online, 28 March 2017

---

## COUNCIL TAX

The level of council tax affects household disposable incomes and the changes which came into effect this year increased council tax in 2017-18 by about £160 million in total<sup>15</sup>. Hopefully the reforms lead to a more durable and sustainable tax, one which reduces demand for wholesale changes to the tax which might place the administrative burden for calculating or collecting any replacement on employers. Future council tax rises must take into account the impact on consumer spending and the Scottish Government's 3% cap on future rises seems sensible.

## VALUE ADDED TAX (VAT)

In eighteen months' time half of the tax receipts from VAT - approximately £4.9 billion per annum<sup>16</sup> - are set to be assigned to the devolved administration, following the 2016 Scotland Act. As a result the devolved government has a direct interest in nurturing higher levels of receipts from this tax as it will directly benefit devolved revenues. We are keen to know how the Scottish Government hopes to maximise the revenues from VAT assignment and how this might influence policy making, however the fact remains that few better opportunities exist than encouraging and facilitating a flourishing retail industry. Retailers will be keeping a close eye on the future of VAT as the Brexit negotiations take place, and we remain sceptical of any notion of devolving control over VAT given the potential impact on the UK single market and administrative and pricing implications.

## NEW DEVOLVED TAXES

As a result of the 2012 Scotland Act the Holyrood Parliament has the ability to levy 'specified' devolved taxes of any description. The Scottish Government has thus far wisely avoided using these powers. The retail industry is a significant payer and collector of tax (e.g. VAT or in some cases the duty on the sale of fuel), and before any new taxes are considered let alone introduced we would wish to see the earliest possible dialogue with industry and a robust and convincing business case and cost benefit analysis. We would be particularly concerned at any new taxes which might make Scotland a more expensive place to invest or live (e.g. workplace parking levy, congestion charging, additional sales tax), as has previously been proposed by the Scottish Government initiated 'Commission on Local Tax Reform'.

## APPRENTICESHIP LEVY

Retailers have a strong record on training and career progression in Scotland's local communities, with many providing a wide range of apprenticeships in diverse areas such as logistics, warehousing and food preparation alongside many other accredited or job related qualifications. That record is under threat by the asymmetric approach to the implementation of the (UK-imposed) Apprenticeship Levy. Retailers in Scotland are estimated to contribute £12-15 million a year towards the Levy, for which it is unclear what they get in return, with many viewing it as simply another cost burden. The SRC welcomed the decision in last year's Budget to establish a flexible workforce development fund with a portion of the receipts from the Levy.

---

<sup>15</sup> P90 of Scottish Government's 2017-18 Budget document: £111m from re-basing the tax plus potentially up to £70m from the 3% cap on increases (p89), albeit in the end only two thirds of councils increased council tax

<sup>16</sup> GERS 2015-16, Table 4.4, p40

---

Indeed, the concept of a flexible skills fund is something we proposed last summer. We also called for changes to the upper age limit for support for Modern Apprenticeships, and a refresh of the retail apprenticeship framework.

However, even though Scottish retailers started paying the Levy in April, we still await details of the mooted £10 million flexible fund. That delay is causing uncertainty for retailers, who are consequently being forced to question their own future training provision. The Scottish Government should urgently announce the details of the flexible workforce fund, setting out how it will operate and how levy-payers can access it. In the Budget the Government should go further. The proposed £10 million fund is less than five per cent of the forecast £221 million devolved Levy revenues. In the Budget we hope to see the amount in the fund increased, and a commitment made that the fund should at a minimum increase in line with any future increases in the Levy revenues – which are set to expand to £239 million in 2019-20<sup>17</sup>.

## LAND & BUILDINGS TRANSACTION TAX

Due to the nature and scalability of the industry many retailers have a choice over where to buy, rent or invest in retail premises and warehouses in the UK. The rates, bands and thresholds for Land & Buildings Transaction Tax – which came into effect two years ago - must therefore ensure Scotland's taxes on purchases of commercial property are competitive.

## FEES, CHARGES & LEVIES

The Scottish Government determines or is highly influential in the setting of a number of fees, charges and levies which are or can be applicable to retailers. These include planning application fees, Business Improvement District levies, charges for alcohol licenses, water and sewerage charges<sup>18</sup>, fees for building warrants, and the carrier bag charge. The SRC is keen to see effective, well-resourced and consistent regulatory services, underpinned by a clear rationale and cost benefit analysis for variations in charges with commensurate improvements in services and based on timely dialogue with the industry. However, government can assist firms' cash flow and investment plans by keeping a firm lid on those costs under its control.

## DEPOSIT RETURN SCHEME (DRS)

Scottish retail is amongst the most climate-conscious industries and retailers have taken a lead in reducing the environmental impacts of both their own direct operations and supporting improvements right along their supply chain and with customers<sup>19</sup>. The SRC has previously<sup>20</sup> outlined its support for a more harmonised local authority recycling scheme and were delighted to see CoSLA work with Government to deliver on this. That said, we remain resolutely opposed – along with more than 30 other business groups - to the mooted Scotland-wide deposit return scheme for drinks bottles/cans and other containers.

---

17 Scot Govt response to UK Govt Apprenticeship Levy, 5 January 2017

18 The methodology applied to calculating water bills for some commercial premises is set to change in April 2018, with around 40% of commercial premises in Scotland expected set to see higher bills as a result

19 'A Better Retailing Climate: Driving Resource Efficiency in Scotland', SRC, 2015

20 See the SRC's 'Holyrood 2016: Environment & Sustainability' policy paper published on 7 October 2015.

---

Such a nation-wide deposit scheme or ‘bottle tax’ would disproportionately penalise the consumer by pushing up prices, by tens of millions of pounds, at a time household finances are coming under strain. A DRS would undermine existing kerbside recycling, for which there are ambitious plans and which already benefits from significant sums of sunk investment from taxpayers.

A nation-wide DRS would increase carbon emissions through extra consumer journeys and retailer haulage operations and place significant costs on business. Asking shops and grocery delivery vans to take waste like this could incur environmental health issues. The equipment required to accommodate a DRS would reduce trading space in shops on our high streets which is incongruous with the Government’s ambitions to revitalise town centres. Indeed, the projected £40 million plus cost to business estimated in a recent government-commissioned report unfortunately fails to take into account several other cost factors including the loss of trading space, costs of storage, associated installation infrastructure, and staff training. Ultimately there is little evidence to suggest a deposit scheme would effectively tackle low recycling rates, which are already higher in places like Wales which don’t have a deposit return scheme.

## REGULATION

The SRC has been at the forefront of the debate on better regulation, working through the Scottish Government’s Regulatory Review Group to seek a regulatory environment that tries to support investment, innovation and economic growth. With a significant number of Scottish retailers operating on a UK and international stage the ease and cost of doing business is a major factor in their decisions over where to invest. Important steps have been taken in recent years such as legislating to allow for the future introduction of Primary Authority which could guarantee greater regulatory consistency across the 32 local authorities, and the Scottish Government’s adoption of SRC proposals to ensure the same rigour is brought to government-inspired voluntary regulation and agreements as is the case with formal, statutory legislation. We are keen to ensure Primary Authority is introduced, despite it being 24 months since the official consultation ended. We are keen too to see future regulations take full account of the profound structural change occurring in industries like retail. In addition to full implementation in this Parliament of Primary Authority and a commitment to ensuring the Scottish scheme is up to date and in line with its UK equivalent, Inception Impact Assessments<sup>21</sup> should be introduced prior to any decision over whether or not to pursue either non-legislative and legislative regulations.

## INFRASTRUCTURE

We support a shift towards allocating a greater proportion of devolved government expenditure that supports wealth creation, for example by investing in GDP-enhancing digital and transport infrastructure and housing.

Transport is vital to the success of retail. With outlets located in cities, towns and communities across Scotland, retailers rely on access to good quality and reliable transport for the daily operation of their businesses – for ease of access for customers, to deliver goods, and to enable employees to reach the workplace.

---

21 SRC’s Holyrood 2016: Better Regulation document

---

We fully support the Scottish Government's plans to dual the A9 and the A96, but would urge a more ambitious timescale for delivery as well as a fully dualled A1. Improved transport connectivity will help unlock the economic potential of these regions, help get goods swiftly to retail outlets as well as, as is increasingly the case, direct to customers. Rail is increasingly used to distribute freight for retailers around the country, and changes in customer demand and how people shop is putting a premium on having effective high speed broadband.

Indeed, digital investment is especially important given the profound shift in shopping habits and the amount of investment that retailers are making into online shopping, payments technology and associated skills and logistics capability. Our Scottish Retail Sales Monitor for example has noted that approximately a quarter of non-food retail sales are now undertaken online.

In terms of the Scottish Government's new ability to borrow, we are supportive of affordable borrowing if it is for investment in productive economic capacity.

## WINDFALL CONSEQUENTIALS

Any windfall consequentials received by the devolved administration from UK Budgets should be used to keep down business taxes and directed towards GDP-enhancing infrastructure and town centre enhancements.

---

## CONTACT DETAILS

### DAVID LONSDALE

SRC Director

David.Lonsdale@brc.org.uk

### EWAN MACDONALD-RUSSELL

SRC Head of Policy & External Affairs

Ewan.MacDonald-Russell@brc.org.uk



---

## ABOUT THE SRC

Retail is an exciting, diverse and dynamic industry undergoing transformational change. The SRC is at the forefront – enhancing, assisting, informing and shaping. Our mission is to make a positive difference to the retail industry and to the customers it serves. Our broad range of stakeholders demonstrates how retailing touches almost every aspect of our culture. The SRC leads the industry and works with our members to shape debates and influence issues and opportunities that will help make that positive difference. We care about the careers of people who work in our industry, the communities retail touches and competitiveness as a fundamental principle of the industry's success – our 3Cs.

In addition to publishing leading bell-weather indicators on Scottish retail sales, footfall and shop vacancies in town centres, our policy positions are informed by our 255-strong membership and determined by the SRC's Board.

---



SCOTTISH RETAIL CONSORTIUM

Box 112, 12 Southbridge, Edinburgh, EH1 1DD  
07880 039 743 | [info@src.org.uk](mailto:info@src.org.uk) | [brc.org.uk/src](http://brc.org.uk/src)

British Retail Consortium - a company limited by guarantee  
Registered in England and Wales No. 405720 | 10259mb17