

F.A.O. Ms. Shelley Mason  
European Commission  
DG Energy and Transport  
TEN-T  
B-1049 Brussels

30 April 2009

Dear Ms. Mason,

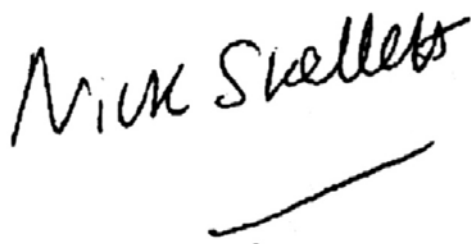
### **TEN-T GREEN PAPER RESPONSE**

The South East Regional Transport Board considered its response to the Green Paper on the Trans European Transport Network at its meeting on 22<sup>nd</sup> April 2009.

Please find attached our response to the consultation questions posed by the Green Paper. Overall, we have resolved that Option 3, the Dual layer structure with the comprehensive network and a core network would best reflect the delivery emphasis of the future TEN-T model.

Please do not hesitate to contact my colleague, Jane Griffin, at the South East England Development Agency on (+44) 1483 470197 or at [janeGriffin@seeda.co.uk](mailto:janeGriffin@seeda.co.uk), should you wish to follow up on any aspect of our response.

Yours sincerely



**Cllr Nick Skellett**  
**Chairman**  
**South East England Regional Transport Board**

# **SOUTH EAST ENGLAND REGIONAL TRANSPORT BOARD CONSULTATION RESPONSE TO THE EUROPEAN COMMISSION**

**Trans European Transport Network Green Paper  
April 2009**

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## **Consultation Questions**

1. Should the Commission's assessment of TEN-T development to date cover any other factors? (referring to the lengthy preceding section on 'foundations on which the future TEN-T policy should rest')

**The South East England partners welcome this Policy review. Of central concern to this region is that the TEN-T process should be more transparent, flexible and as simple and straightforward as possible for those seeking funding to access.**

**We note that the drivers behind the review are climate change, connections to EU neighbouring countries and ensuring that the network plays its part in delivering economic and social Lisbon goals. We also note that these goals are reflective of current English transport policy in the UK Department of Transport's current "Delivering a Sustainable Transport System" process of defining the key transport priorities for the next 10 years.**

2. What further arguments are there for or against maintaining the comprehensive network, and how could the respective disadvantages of each approach be overcome?

**The network should be comprehensive but should also be underpinned by a set of clear goals (the "drivers" identified within the consultation document, as well as the map based approach currently operated. The current relatively inflexible model for allocating funds should evolve into a more responsive framework where flexibility for ambitious funding bids is encouraged subject to the goals of such bids being clearly articulated and linked to the overall outcomes of the TEN-T approach. The current low-intervention 'left-over' pot is unhelpful, does not focus funds in the most effective way possible, and can be wasteful.**

**As set out in our response to questions 12 and 13 below, we favour the third option for the future TEN-T; in this way, we believe that future funding rounds can be responsive to the key drivers identified by the Commission in the consultation document, and that large projects of pan-European significance and benefit such as the Lower Thames Crossing can properly demonstrate their relative benefits in both transport operation and environmental terms.**

3. Would this kind of priority network approach be better than the current priority projects approach? If not, why not and what are the particular strengths of the latter? If so, what (further) benefits could it bring, and how should it be developed?

**The current approach of current priority projects was appropriate in a TEN-T where the emphasis was on connecting key European markets at international borders which required improvement. There is now a need, in light of the Lisbon agenda proposals to ensure that future proposals are approved on the basis of being policy and “drivers” compliant and in this respect Model 3 for future implementation appears to be the best at picking up both pan-European and key areas of emphasis for future TEN-T programmes.**

4. Would this kind of flexible approach to identifying projects of common interest be appropriate for a policy that, traditionally, largely rests on Member States' individual infrastructure investment decisions? What further advantages and disadvantages could it have, and how could it best be reflected in planning at Community level?

**The advantage of Model 3 is that national transport priorities can be recognised as well as those of pan-European significance - the UK DASTS based strategy is one such example and so a “total policy compliance” approach becomes possible. Model 3 also appears to best recognise increased capacity constraints at airports and the need to promote better use of facilities (justifying a move towards HS rail to compete with internal flights for example) and this is an area in which the South East England region has previously positively engaged with Commission officials. Model 3 also best picks up the need for expansion and better use of port infrastructure and increased rail freight connections to prevent road congestion and overall transport emissions.**

5. How can the different aspects outlined above be best taken into account within the overall concept of future TEN-T development? What further aspects should be taken into consideration?

**Intelligent transport systems (ITS) to address safety issues, security, efficiency of operations, tackling congestion and fighting climate change can be cheaper and more effective than hard infrastructure depending on the nature of the problem being addressed and TEN-T should be able to take account of smaller proposals that when implemented cumulatively can positively impact the strategic European transport networks. This also includes better information networks such as Galileo and EGNOS which should continue to be implemented.**

6. How can ITS, as a part of the TEN-T, enhance the functioning of the transport system? How can investment in Galileo and EGNOS be translated into efficiency gains and optimum balancing of transport demand? How can ITS contribute to the development of a multi-modal TEN-T? How can existing opportunities within the framework of TEN-T funding be strengthened in order to best support the implementation of the ERTMS European deployment plan during the next period of the financial perspectives?

**Please see the response to question 5 above.**

7. Do shifting borderlines between infrastructure and vehicles or between infrastructure provision and the way it is used call for the concept of an (infrastructure) project of common interest to be widened? If so, how should this concept be defined?

**A core network is needed with clear European objectives and the highest priorities in the field of transport and other EU policies taking into account: Internal Market, Cohesion, Sustainable Development and Climate change. A “manage and invest” approach should be adopted, ensuring that capacity increases are focused on those locations most critically in need, while ensuring that existing transport infrastructure is used optimally. A manage and invest approach is not necessarily equivalent to a “low-cost” approach but is more akin to a “value-for-money” approach, an area where we feel sure is of central concern to the Commission.**

8. Would this kind of core network be "feasible" at Community level, and what would be its advantages and disadvantages? What methods should be applied for its conception?

**A core network based on the strategic national networks of each Member State should be the starting point; the “hook” upon which other more detailed networks would be considered under Model 3. The advantage is that such a core network would provide a framework for considering the areas of emphasis for attention within the strategic framework, whether these be entirely within a Member State but of pan-European significance, or cross-border in nature with the more “traditional” connectivity focus of previous TEN-T rounds.**

9. How can the financial needs of TEN-T as a whole - in the short, medium and long term - be established? What form of financing – public or private, Community or national – best suits what aspects of TEN-T development?
10. What assistance can be given to Member States to help them fund and deliver projects under their responsibility? Should private sector involvement in infrastructure delivery be further encouraged? If so, how?
11. What are the strengths and weaknesses of existing Community financial instruments, and are new ones needed (including "innovative" instruments)? How could the combined use of funds from various Community resources be streamlined to support TEN-T implementation?
12. How could existing non-financial instruments be improved and what new ones might be introduced?

**A pump-priming fund should be established at the European level to fund start-up services for strategic freight movements by rail; the existing system of Grants and Loans should be simplified and a Risk Capital facility implemented to encourage public-private investment where this is appropriate.**

13. Which of these options is the most suitable, and for what reason? (referring to three listed options for TEN-T development).

**We favour the third option for the future operation of the TEN-T; in this way, we believe that future funding rounds can be responsive to the key drivers identified by the Commission in the consultation document, and that**

large projects of pan-European significance and benefit such as the Lower Thames Crossing can properly demonstrate their relative benefits in both transport operation and environmental terms.

As highlighted above, we also believe that a core network based on the strategic national networks of each Member State should be the starting point; the “hook” upon which other more detailed networks would be considered under Model 3. The advantage of this Model is that such a core network would provide a framework for considering the areas of emphasis for attention within the strategic framework, whether these be entirely within a Member State but of pan-European significance, or cross-border in nature with the more “traditional” connectivity focus of previous TEN-T rounds. It would therefore provide flexibility in responding to future environmental and economic challenges as have become apparent in recent times.

The network should be comprehensive but should also be underpinned by a set of clear goals (the “drivers” identified within the consultation document, as well as the map based approach currently operated. The current relatively inflexible model for allocating funds should evolve into a more responsive framework where flexibility for ambitious funding bids is encouraged subject to the goals of such bids being clearly articulated and linked to the overall outcomes of the TEN-T approach. The current low-intervention ‘left-over’ pot is unhelpful, does not focus funds in the most effective way possible, and can be wasteful.

**South East England Regional Transport Board  
April 2009**

Contact: Jane Griffin, Senior Regional Planner,  
South East England Development Agency

T: 01483 470197      E: [JaneGriffin@seeda.co.uk](mailto:JaneGriffin@seeda.co.uk)