r Integrated Trans-European Transport Network at the Service of the Common

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Background of the respondent	
Country of residence	United Kingdom
Region: Please write down the name of your region (using as base the NUTS 1 or NUTS 2 classification system as relevant, for details see http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2007:039:0001:0037:EN:PDF)	London
TEN-T components/major infrastructure most involved with (you can choose more than one)	Conventional Rail
Name:	Maggie Simpson
Name of your organisation	Rail Freight Group
Type of Organization	Private
Type of involvement in the TEN-T/major transport infrastructure matters	Business representation

Green Paper Questionnaire	
Q01.- Should the Commission's assessment of TEN-T development to date cover any other factors?	The success of the TEN-T programme cannot be fully measured by considering only the completion of schemes. There should be evaluation of the impact on traffic – for example, modal shift, growth in rail freight volumes, journey time improvements for freight etc. This will provide an indication of the types of scheme most likely to meet the future objectives of the Commission. The extent to which the completed project help to deliver the objectives of the First Railway package should also be considered. We note that there is no link between TEN T funding and the achievement of full compliance with the First and subsequent railway packages. We consider that this should be a precondition of funding in the future
Q02.- Should the comprehensive network be maintained or abandoned, and what advantages and disadvantages would either approach involve? Could the respective disadvantages be overcome, and if so by what means?	YES – the comprehensive network should be maintained
Please justify your choice by answering the sub-questions of Q02 as comprehensive as possible	the network should be maintained, but investment targetted at needs of traffic sectors.
Please allocate the advantages as described above to the following categories:	Basis for a broad range of transport policy objectives (Help: rail interoperability, road safety etc.)
Please allocate the disadvantages, as described above, to the following cathegories:	Community added value of many projects of common interest is questionable
Q03.- Would a priority network approach be better than the current priority projects' approach? What would be the advantages and disadvantages of either approach, and how should it be developed?	YES – The priority network approach would be better than a priority projects approach

Please justify your choice by answering the sub-questions of Q03 as comprehensive as possible	The priority network approach is comparable to the freight oriented network currently under development. As a principle, we support such an approach. It is vital to recognise that the barriers to improved performance on any corridor are not just related to infrastructure and technology. By focussing the networks on the needs of traffic, softer factors which inhibit growth can be more readily identified. For example, behavioural attitudes at border crossings need to be addressed not through technological systems but by culture change.
Please allocate the arguments described above to the following categories: - Advantages of priority network approach (compared to priority projects approach)	More rational planning approach at European level, including the possibility for coverage of network benefits Possibility of better reflection of major European traffic flows and Cohesion objectives
Disadvantages of priority network approach (compared to priority projects approach)	Difficult to combine with sovereign national responsibility for infrastructure development
Elements that should be taken into account in the development of a priority network approach (planning method)	Traffic flows Implementation capacities Inter-modal connections Links to third countries
Q04.- Would the flexible approach to identifying projects of common interest, as proposed with the "conceptual pillar", 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?	YES – a flexible approach would be appropriate
Please justify your choice by answering the sub-questions of Q04 as comprehensive as possible	We agree that business oriented measures would be an appropriate way of identifying needs which could be addressed through TEN-T.
Please allocate the advantages, as described above, to the following categories:	Allows to promote measures that stimulate efficient infrastructure use along TEN-T axes through several Member States or at Europe-wide scale (e.g. measures that may involve infrastructure works of smaller scope and are not reflected in major projects' maps; may cover actions like Green corridors or rail freight corridors; ITS applications)
Please allocate the disadvantages, as described above, to the following categories:	Entails uncertainties regarding the specific definition of projects of common interest (consequently uncertainties in terms of cost, needs and possibilities for Community support)
How could the "conceptual pillar" be best reflected in planning at Community level?	

Q05.- How can future challenges in the sectors of waterborne and air transport (especially ports, inland waterways and airports) as well as of freight logistics be best taken into account within the overall concept of the future TEN-T development? Do different requirements for freight and passenger transport require different treatment in the TEN-T policy? What further aspects relating to different transport sectors / common transport policy issues should be given attention?	We acknowledge that freight and passenger traffic can have different needs but there are also areas of commonality. In the UK, progress is being made in developing a strategic freight network, where certain routes are equipped for greater freight capability and capacity alongside the passenger services. Planning approaches need to be developed that recognises the different needs of each sector (passenger and freight – and the different types of freight traffic) on a common infrastructure. Again the freight oriented network recognises this approach.
Q06.- How can Intelligent Transport Systems in all modes, 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?	ITS schemes should be progresses where they will lead to cost effeciencies, reliability improvements and long term sustainability. Such programmes must not be permitted to create signifincant costs for operators, or create barriers to entry for new smaller companies.
Q07.- 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?	NO – there is no need for widening the current concept of the infrastructure project of common interest.
Explain why?	We are wary of projects that require particular vehicle types to be used, as they can easily create a barrier to entry for new operators and give opportunities for incumbent operators to benefit. We would be more comfortable with projects which ensured that the infrastructure was able to accommodate new vehicle types on an open access basis. As such the scope of common interest projects in this area should be limited to the infrastructure, and for schemes which are accessible, at low cost, by all operators in the sector.
Q08.- Would a core network (bringing together a priority network approach as referred to in Q3 and a conceptual pillar as referred to in Q4) be "feasible" at Community level, and what would be its advantages and disadvantages? What methods should be applied for its conception?	YES – a core network approach would be feasible.
Please justify your choice by answering the sub-questions of Q08 as comprehensive as possible	As described previously, we would favour an approach as defined in the freight oriented network, where corridors that are important for certain traffics can be identified and prioritised.
To which categories would you allocate the main advantages?	Capturing benefits of a network Integrating transport infrastructure and transport policy developments in the best possible way
To which categories would you allocate possible disadvantages?	Too many network development priorities
What basis could be used for its conception?	Best practice from national methods (please specify above)

Which are the three aspects that need to be given highest priority in the core network development method?	Common transport policy needs
Q09.01- How can the financial needs of TEN-T as a whole - in the short, medium and long term - be established?	Whilst significant financial needs will still require a combination of national and EU funding, a network approach should yield benefits at much lower cost by addressing non infrastrcuture issues. For example, the corridor co-ordination role proposed in the freight network. There should be a greater focus on low cost activities to meet TEN-T objectives.
Q09.02.- What form of financing – public or private, Community or national – best suits what aspects of TEN-T development?	As above.
Q10.01- What assistance can be given to Member States to help them fund and deliver projects under their responsibility?	Definition of core networks will assist in identifying the most urgent work packages. In many cases, a series of small projects may deliver considerable benefits and reduce/defer the need for major upgrades or new lines. In the UK, around €250m has been allocated for the delivery of a Strategic Freight Network, and we are confident that this will deliver considerable improvements in rail freight efficiency over the next five years. Similar small funds could be assigned to identified networks. Full compliance with the First Railway Package across Europe would also make a considerable improvement to rail freight services and at minimum cost. This should again be progressed ahead of major infrastructure spend. Given the current downturn it is difficult to know how various financing models will develop. As freight pays only the marginal cost, developers are often reluctant to invest in the rail network itself and Government intervention is usually required. However the private sector has typically funded terminals and rolling stock in the UK.
Q10.02.- Should private sector involvement in infrastructure delivery be further encouraged? If so, how?	Full liberalisation and the creation of a competitive rail freight sector will encourage investment.
Q11.01- What are the strengths and weaknesses of existing Community financial instruments used for TEN-T? (TEN-T budget, Cohesion Fund, ERDF, EIB loans)?	The Green Paper indicates that around €400bn has been invested in the TEN-T network Europe wide, of which around 1/3 (€133bn) has come from Community sources. In the UK, we can identify around €11.5m of funding provided directly to rail freight enhancement projects, and a further €39m to enhancement schemes providing passenger and freight benefits. This suggests that rail freight in the UK has received, at most, 0.04% of Community TEN-T funding. Despite this, the UK rail freight market has managed one of the highest levels of growth in Europe. This might suggest that TEN-T funding, for freight, has not historically targeted growth effectively. Funding should therefore be targetted more towards the needs of traffic, not projects.
Q11.02.- Is there a need for new financial instruments (including "innovative" instruments)?	YES
Please explain	New models may potentially be required depending on the type and nature of traffic requirements that emerge. There should be flexibility in approach.
Q12.01.- How could existing non-financial instruments be improved?	
Q12.02.- Which new non-financial instruments should be introduced, for what reason?	

Please classify your proposal above:	
Q13.- Which of the options for developing the TEN-T is the most suitable, and for what reason?	Option C: Dual layer: comprehensive network and "core network"
Please justify	We favour a network approach as with the proposed rail freight network.
Q14.- Would you like to make any further comment or proposal?	