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Our ref: SW5/MAR/NCP

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European Commission
DG Energy and Transport
TEN-T
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Dear Sir/Madam,

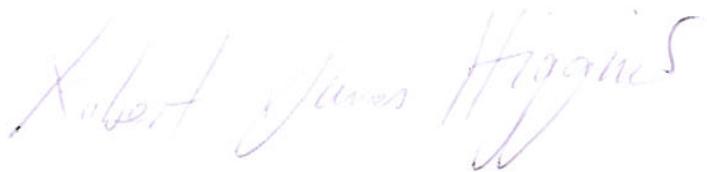
CONSULTATION ON TEN-T POLICY REVISION

I write to you as Chairman of the North Channel Partnership regarding the above consultation.

The North Channel Partnership is a grouping of key public and private sector interest seeking to sustain ferry services between Scotland and the North of Ireland. As outlined in our submission, the main aim of the partnership is to secure an adequate strategy and investment programme for the landward transport links to the ferry ports of Stranraer, Cairnryan, Belfast and Larne.

I enclose a response to the consultation on behalf of the Partnership. TEN-T Policy is highly significant in addressing the constraint of peripherality which affects regions such as South West Scotland and the North of Ireland, and we are grateful for the opportunity to respond to this consultation.

Yours sincerely,



Councillor Robert Higgins, Chairman,
The North Channel Partnership



North Channel
PARTNERSHIP
Fighting for the future

NORTH CHANNEL PARTNERSHIP

Response to 'TEN-T: A policy review' European Green Paper

The North Channel Partnership

The North Channel Partnership is a grouping of key public and private sector interests seeking to sustain ferry services between Scotland and the North of Ireland. The partnership was established in November 1999 following the 'Partners for Progress' conference in Stranraer.

The main aim of the partnership is to secure an adequate strategy and investment programme for the landward transport links to the ferry ports of Stranraer, Cairnryan, Belfast and Larne.

A steering group was set up to develop the partnership's proposals and campaign for their implementation, and includes:

- Dumfries and Galloway Council
- Larne Borough Council
- South Ayrshire Council
- P&O Irish Sea
- Stena Line
- Port of Larne
- IBEC-CBI Joint Business Council
- Scottish Enterprise
- The Freight Transport Association
- The Road Haulage Association
- The South West of Scotland Transport Partnership (SWestrans)
- Strathclyde Partnership for Transport (SPT)
- Parliamentary Liaison

The North Channel Irish Sea corridor, which links Northern Ireland with Scotland, has played a significant role for many years, benefiting from its competitive advantage of a short sea crossing.

The North Channel Partnership is a unique example of cross-border cooperation, with established close-working relationships between stakeholders in Scotland, Northern Ireland, and the Republic of Ireland, to achieve mutual benefits.

Priority Projects

The European Council of Ministers, meeting in Corfu in 1994, agreed to promote the development of eleven High-Priority transport upgrading projects as part of the Trans-European Networks (TENs) initiative. This decision endorsed

recommendations from the Head of the Working Group on Trans-European Networks under the chairmanship of EU Vice-President Christophersen. The “Christophersen” list was subsequently expanded to cover fourteen projects, mainly high-speed rail improvements, but also four important road-orientated schemes. This list of projects was approved by the Council of Ministers at the Essen meeting in December 1994, and is often referred to as the “Essen 14”.

The stated intention of the EU was to see state governments cooperate in the implementation of high-speed rail and road upgrading, mainly to dual carriageway, for completion by 2005. The “Essen 14” list represents a unique and valuable vision to improve essential transportation and access facilities to virtually all peripheral maritime regions

At present three of the High Priority Transport Projects (Essen 14) impact directly on the North Channel Partnership area of interest:

- **Project 9** : Cork – Dublin – Belfast – Larne – Stranraer Conventional Rail Project,
- **Project 13** : Ireland/United Kingdom/Benelux Road Upgrading Project,
- **Project 14** : West Coast Main Line (Rail).

A report from the European Commission (May 2008) provides a status report on the TEN-T priority projects. The report indicates that schemes under Essen **Project 13**, when taken together, will lead to shortened journey times, a reduction in the number of bottlenecks, fewer accidents and a reduced impact upon the environment.

The vital section linking the ports of Stranraer/Cairnryan with the UK motorway network (approx 150 kilometres) is being upgraded to single carriageway incorporating ‘overtaking opportunities’. Many of the towns along the route will continue to experience congestion, with consequent adverse impacts on both the local environment and on transit times. This contrasts with the position in North Wales where upgrades are to dual carriageway.

Progress has been significant on some elements of the Essen 14 programme, particularly continental rail and inter-modal projects, and, within the British Isles, the Irish Rail Upgrade and the London-Channel High-Speed Rail Link. Several projects are of immense importance to peripheral maritime Europe; included in this category are several projects in Continental Europe, as well as the London-Glasgow West Coast Main Rail Line, and part of the all-important Ireland-UK-Benelux Road Upgrading Project, especially relating to links to the ports of Larne and Stranraer/Cairnryan, including the A75 Trunk Road.

Disappointing progress to date on some projects has been due primarily to apparent intransigence on the part of state authorities, and/or funding constraints. The EC status report suggests that of the 1,690 kilometres of the Ireland-UK-Benelux (Essen **Project 13**) corridor identified for upgrade only 18% is complete. However, a change in approach by the Scottish Government described below demonstrates a renewed commitment to TEN-T priority projects for the future.

Developments in Scotland

The Scottish Government Economic Strategy (2007) defines the Government's Purpose:

"To focus the Government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth."

This key document, which represents a new direction of travel for the Scottish Government, suggests that "An efficient transport system is one of the key enablers for enhancing productivity and delivering faster, more sustainable growth. Enhancing transport infrastructure and services can open up new markets, increase access to employment, and help to build a critical mass of businesses that drive up competitiveness and deliver growth."

The Strategy draws on the approaches of similar small independent European economies, adding a new European/territorial dimension to thinking at a Scottish level, with links to mainland Europe at an economic, social and environmental level being given a new significance.

The Scottish Government has fostered a greater degree of cooperation with Ireland, at both a political and an operational level.

Strategic Transport Projects Review (STPR)

The Strategic Transport Projects Review is about delivering a strategic transport network which will benefit the whole of Scotland and deliver on the priorities set out in the Government Economic Strategy, the National Transport Strategy, the National Planning Framework, and the Scottish Climate Change Bill. It identifies improvements on the national rail and road networks in Scotland to meet the challenges Scotland faces from 2012 and beyond.

It includes STPR Project 11: 'Implement targeted programme of measures to improve links to the Loch Ryan port facilities from the Trans-European Network', and STPR Project 22: 'Targeted road congestion / environmental relief schemes,' (including on the A77 Trunk Road).

STPR PROJECT 11 - *Intervention Description:*

This intervention supports the objective to have efficient and effective linkage to the port facilities at Loch Ryan, in particular improving the linkage of the Trans-European Network. This intervention would include measures such as:

- Physical works aimed at providing safer overtaking opportunities such as 2+1 sections, climbing lanes and overtaking lay-bys and improvements to the operation of junctions around Dumfries;
- Improvements to the strategic access around Stranraer (A751); and
- Driver Information System.

It is envisaged that individual elements would be delivered in a targeted programme to improve journey time reliability for travel to the port facilities at Loch Ryan.

Current Status of Project:

Transport Scotland has invested in widening the A75 at a number of sections along the length of the trunk road to provide safe overtaking opportunities. This intervention provides further enhancements to the A75 and ensures the *continuation of localised improvements* to this carriageway to improve safety along the route.

Indicative Costs:

The total estimated cost of this route improvement is in the range £10-£50 million.

Deliverability:

These minor interventions can be developed and implemented within the short-medium term as required. Due to the rural nature of much of the corridor, design work would have to take account of the local terrain in order to minimise disruption to the port facilities which provide important tourist and freight links between Northern Ireland and Scotland.

STPR PROJECT 22 – Intervention Description:

On a number of corridors throughout Scotland objectives have been identified to reduce conflicts between strategic and local traffic. Reducing these conflicts can significantly contribute to road safety, journey time reliability, reducing emissions and reducing severance. This intervention targets specific locations on the road network where improvements would address these issues and includes measures such as:

- Upgrade of the A77 from single to dual carriageway around Ayr, grade separation of key junctions and enhancements south of Ayr.

Current status of project:

Many of the improvements have been known to the public for a number of years and there would appear to be support for them, however the environmental impact could prompt negative public opinion.

Possible costs:

The total cost of this intervention is estimated to be in the range £100m - £250 million [*includes other elements as well as A77 upgrade*].

Deliverability:

The deliverability of this intervention is considered technically and operationally feasible.

National Planning Framework, 2nd Framework (NPF2)

This represents Scotland's national spatial development strategy. It identifies twelve developments which Scottish Ministers consider as being of national significance, including, 6: Port Developments on Loch Ryan.

NPF2 PROJECT 6 - Description of development:

Port developments on Loch Ryan and improvements to road and rail infrastructure to support the Loch Ryan ferry ports as Scotland's main roll-on/roll-off gateway from Ireland.

Elements covered by the designation:

- New passenger and freight transport facilities on Loch Ryan;
- Improvements to the road network (including the A77 and A75 trunk routes) to improve access to the Loch Ryan ports.

Need for the development:

The developments are necessary improvements to an essential element of national infrastructure. Current port facilities impose restrictions on the size of vessels which can operate out of Loch Ryan. The developments will provide additional port capacity and allow the introduction of larger vessels. They will provide a modern international gateway between Scotland and Ireland, contributing to the realisation of Scotland's potential as a land bridge between Ireland and Europe. They will deliver increased freight capacity, reduced journey times and increased potential for tourism and help to secure the continued competitiveness of the Loch Ryan to Northern Ireland ferry links.

In addition to the interventions projected for post-2012 under STPR, three schemes have recently been completed on the A75, with another three due to commence shortly, and two schemes have been completed on the A77, with another five due to commence shortly.

Developments in Ireland

It is important to the economy of Northern Ireland that the ports of Larne and Belfast are serviced by an efficient road link. Northern Ireland Roads Service is investigating the dualling of the A8 which is identified as a TEN-T route. The A8 is a strategically important road within Northern Ireland and is included in the recently published Investment Delivery Plan (IDP) for Roads which has identified the completion of the A8 before 2017/18. In January 2008, in response to a question in the Northern Ireland Assembly, Minister for Regional Development Conor Murphy indicated that this project "...will be delivered more quickly than any other project on these islands." He went on to say that "We will attempt to ensure that the projects are delivered much more quickly than is normal for road-building projects such as these."

In January 2007, the Irish Government announced their new National Development Plan (NDP) 2007-2013. This plan contained proposals for considerable Irish Government investment (€200 million) in North/South projects including the Eastern Seaboard Key transport Corridor of which the A8 is part. The M2 and A8(M) are part of the Eastern Seaboard Corridor (Larne through Belfast to the border at Newry leading on to Dublin), which is part of the TEN-T programme and one of the five Key Transport Corridors identified in the Regional Development Strategy for Northern Ireland. The proposed scheme would improve the strategic link between the A8(M) and the M2. Proposals to improve this strategic link are under development. These will be considered in association with proposals for a new junction to the north of Sandyknowes, which was included in the draft Belfast Metropolitan Area Plan 2015. The scheme will reduce delays for both local and strategic traffic travelling from the South towards Larne to Scotland and beyond. The direct link from the A8 (M) to the M2 will also enhance the benefits of the recently completed M2 widening from two to three lanes.

Within the completed Westlink project lies the York Street Interchange which is currently a traffic signal controlled junction, at the intersection of the A12 Westlink, M2 and M3 motorways. Road users currently experience long delays and congestion at peak periods travelling through this junction. Roads Service has appointed consultants to develop a scheme for York Street Interchange and expects to start the Statutory Procedures from 2011. The DRD Investment Delivery Plan for Roads estimates that the construction of this scheme is to commence between 2014 and 2018. Estimated costs are thought to be in the region of €50 million.

In terms of cross-border links within the island of Ireland, the N16-A4 road (Sligo-Belfast via Enniskillen) has particular significance as a corridor providing onward trade and economic links from the North West and other areas adjacent to the border. The opportunity to build on existing high priority projects identified in the Green paper should be taken to have the A4-N16 corridor designated as an east-west extension of Essen **Project 13**.

Summary of North Channel Partnership Concerns with TEN-T Revision

The North Channel Partnership's primary concerns in the proposed TEN-T revision may be summarised as follows:

- That geographical asymmetries mean that conventional cost-benefit analysis might tend to disbenefit low-population peripheral regions.
- That the TEN-T vision should continue to give priority to addressing and mitigating the constraint of geographical peripherality experienced in the North of Ireland and South West Scotland;
- That TEN-T will continue to recognise and give bias to the particular obstacles to the foundation principles, of ensuring accessibility, and enabling economic, social and territorial cohesion, facing peripheral regions;
- That the three High Priority projects within TEN-T identified above (9, 13 which includes the A75 and A8 roads, and 14) as impacting directly on the North Channel Partnership area of interest will be retained as priority projects.
- That Essen **Project 13** be built on as proposed in the Green Paper by the designation of the A4-N16 corridor in Ireland, and A77 in Scotland as an extension of the project, linking these regions with the economic hubs of Scotland's Central Belt and mainland Europe.

Our Responses to the Questions

Q1: Should the Commission's assessment of TEN-T development to date cover any other factors?

The assessment should take account of changes in the political landscape, particularly in Scotland, where a new approach, represented by the Scottish Government Economic Strategy, Strategic Transport Projects Review (STPR), and 2nd National Planning Framework (NPF2), demonstrates a renewed commitment to TEN-T priority projects, and that the importance of landward transport links to the Loch Ryan ferry ports are now fully recognised.

Q2: What further arguments are there for or against maintaining the comprehensive network, and how could the respective disadvantages of each approach be overcome?

The comprehensive network needs to be retained to maintain the vision of an integrated pan-European transport network. It provides a high level goal to aim for and a framework in which to assess priority projects. However, the approach also needs to incorporate a “conceptual” / outcomes approach (e.g. of ITS).

The need to review and update methodology could be overcome by asking Member States about their own methods for updating and monitoring it in the past 10 years.

Q3: 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?

A priority network approach might have greater potential to achieve network benefits, and core network options could also be evaluated to ensure an optimal network is identified to give a framework for priority projects. However, the priority network should ensure continuity of the current priority projects, and build on them where justifiable. This would include the A8 and A4/N16 roads in Ireland and the A75 and A77 Trunk Roads in Scotland, which link these regions and the ferry ports at Stranraer and Cairnryan with the economic hubs of Scotland’s Central Belt and mainland Europe.

Q4: 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 [i.e. EU] level?

A more flexible approach is more likely to be aligned with evolving Member State needs and policy direction; and over time, it is more likely to produce infrastructure that is needed. It also allows better linkage to, and integration with, the ongoing development of transport and land use planning. However, there is a risk of “short-termism”.

The approach would be best reflected in planning by considering network effects; thus an apparently “sub-optimal” project in one Member State may lead to greater network benefits for EU than the nationally “optimal” one.

A process is needed which is driven by the Commission, and results in priority projects being delivered, with accountability in terms of who is responsible for failure to deliver.

Q5: 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?

These issues could be addressed by considering nodes as part of the priority networks, in particular by identifying ports.

Freight and passenger transport will not have identical infrastructure needs. However, there will be large overlaps. The approach needs to take account of both the differential and common infrastructure needs.

Q6: 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?

ITS can input to traffic control, passenger information, driver information systems, etc as listed in the Green Paper.

Q7: 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?

Yes. The concept could be defined in terms of the TEN-T outcome objectives of accessibility, territorial cohesion, etc.

It would be desirable to focus on issues such as:

- *Strategies to deal with congestion;*
- *Strategies to effectively deal with platooning traffic associated with ferry embarkation/disembarkation;*
- *Goal setting in terms of travel times, and other Key Performance Indicators; and*
- *Partnerships between adjoining Member States and regions on road capacity utilisation, and traffic management and information systems.*

Q8: 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 is feasible in principle. However, agreement on its definition may be difficult part to achieve. It would provide a high-level focus to help identify key priorities, but might prove too inflexible, with core network projects attracting disproportionate levels of investment (and traffic).

Q9: 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?

Within Scotland headline costs have been identified through the Strategic Transport Projects Review (STPR) and 2nd National Planning Framework (NPF2) for a number of projects which would also fall within TEN-T. Some elements will attract private finance (e.g. it is estimated that port developments and investment in vessels on the North Channel crossing - since 2000 and proposed - will total €270 million private finance). However, it

is likely that the bulk of funding will need to be shared by national and European budgets.

Q10: 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?

A higher rate of intervention (currently 10% for most projects) would encourage Member States to give a higher national priority to, and so progress, TEN-T projects.

Financial structures also need to ensure true 'additionality' of funding. In the past, particularly in Scotland, government has been disincentivised to prioritise TEN-T projects as funding was used to replace, and was not additional to the Transport budget.

Q11: 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?

Geographical asymmetries mean that conventional cost-benefit analysis might tend to disbenefit low-population peripheral regions.

Q12: How could existing non-financial instruments be improved and what new ones might be introduced?

Better insight is needed in terms of take-up of non-exchequer funding options, including the Scottish Futures Trust, PPP and EIB (particularly the 'risk guarantee fund')

Q13: Which of these options [Options A, B, C - see attached briefing] is the most suitable, and for what reason?

*We support Option 3 as the most suitable for the reasons given in Table 1, subject to the retention within this of the existing High Priority Projects 9, 13 (which includes the A75 and A8) and 14, and building on these as proposed in the Green Paper (in particular the designation of the A4-N16 corridor in Ireland and A77 in Scotland as an extension of Essen **Project 13**).*