



Członek Zarządu
Województwa Dolnośląskiego

Wrocław, 30 April 2009.

European Commission
Directorate General for Energy and Transport
Ten_T
B-1049 Brussels

e-mail: tren_B1-green-paper_ten-t@ec.europa.eu

COMMENTS OF THE BOARD OF LOWER SILESIA TO THE DOCUMENT:

**GREEN PAPER "TEN-T: A POLICY REVIEW - TOWARDS A BETTER INTEGRATED
TRANSEUROPEAN TRANSPORT NETWORK AT THE SERVICE OF THE COMMON
TRANSPORT POLICY"**

Board of Lower Silesia, Poland (Dolny Slask, Polska) supports the idea of making a profound revision of the European Union's transport policy issues in the planning and the eligibility of individual axes roads, rail, inland and waterways, transport nodes, ports and airports, as part of the trans-European transport network. The change of transport policy should also cover the issue of enlargement and development of instruments for financing European-wide infrastructure projects. In particular, the effectiveness of financial instruments, which determine and condition the pre-planned implementation of network's elements, ought to be a priority objective of the European Commission and the institutions responsible for the preparation of the reformed policy on TEN-T.

Listed in the Green Paper TEN-T, foundations for future planning of Trans-European Transport Networks ought to be complemented by worked out standards typical to the accessibility of transport in all its forms. Precise indicators will allow for the optimal development of networks and its appropriate adjustment to the settlement structure of all the member countries of the European Union. The shape of the TEN-T should furthermore

be taken into account in work and study of the spatial development of Europe. There is a need to develop new and comprehensive European Spatial Development Perspective.

From the Lower Silesia Voivodeship's point of view, the currently existing complex network does not correspond to the real transport perplexities and requires additions in order to link with each other generators of traffic, maintain the continuity of flow and improve the accessibility of transport. Maintaining and developing a comprehensive network will require greater organizational and financial responsibility of the member countries.

The proposed in the Green Paper TEN-T network base, better reflects the European transportation needs than the so far implemented, in an isolated form, priority transport projects. Priority Network – at the base, needs to arise not only from a combination of current, key projects, but should be expanded to include new infrastructure linking the economic and social potentials. The establishment of these potentials ought to be preceded by thorough analysis and evaluations of forecasts. In contrast to the whole TEN-T, the elements included in the level of priority should be given easier access to venture capital financing instruments.

A flexible approach to identifying projects of common interest, being one of the pillars of the new - proposed Community transport policy must be clearly specified. The decision to distribute resources and to choose between investments in infrastructure and commercial investments related to the use of infrastructure may have consequences in the concentration of resources in selected geographic regions. This would be contrary to policy coherence. This issue requires clear presentation, leaving no possibility of ambiguous interpretation.

Out of the three options proposed by the European Commission to shape the network, only one forms a proposal to develop it and complement it, while at the same time changing the transport policy. This is a variant of the TEN-T network with a two-level structure, with a comprehensive network and a base network covering geographically defined priority network and conceptual pillars, making it easier to consider various aspects of the transport policy and transport infrastructure. An indication of this option as the most suitable one out of the options presented in the Green Paper on TEN-T is correlated with the opinion expressed above.

At the same time the Board of Lower Silesia makes note of significant shortcomings in the proposed layout of the transport network in the Republic of Poland, set out in the document - original title: "Draft proposal for a decision of the European Parliament and of the Council on Community guidelines for the development of the trans-European transport network".

Referring to the strongly emphasized in the Green Paper policy against climate change and the promotion of multimodal transport systems, linking important nodes of communication, water and air ports, the Board of Lower Silesia postulates a decision to point out a communications axis for the Central European Transport Corridor, as part of a new base of the TEN-T.

The Board of Lower Silesia also postulates modifications of the comprehensive network TEN-T. It is therefore necessary to maintain the following elements of transport infrastructure located in Lower Silesia in the TEN-T network:

1) in the scope of road transport:

Existing networks:

- Sections of motorways A-4/A18: Olszyna / Zgorzelec - Legnica - Bielany Wroclawskie (Wroclaw), the route continues further beyond the border of the region: Gliwice - Katowice - Krakow - Tarnów - Rzeszów - Przemyśl - country border
- Section of national road No.8: Wroclaw - Oleśnica – Syców, the route continues further beyond the border of the region: Piotrkow Trybunalski - Warsaw - country border
- section of national road No.3: Legnica - Lubin – Polkowice, the route continues further beyond the border of the region: Zielona Gora - Szczecin – country border

Networks in project:

- section of the express road S-3: Legnica - Jawor - Kamienna Góra - Lubawka (country border)
- section of the express road S-8: Wroclaw - Swidnica - Bolków
- section of the express road No.3: Bolków - Jelenia Gora - Jakuszcze (country border)

2) in the scope of rail transport:

Existing networks:

- Railway line C-E 59 in full run on the Polish territory and thereby region of Lower Silesia: country border - Świnoujście - Rzepin - Głogów - Wroclaw - Opole - country border,
- Railway line E-59 in full run on the Polish territory and thereby region of Lower Silesia: country border - Świnoujście - Poznan - Wroclaw - Opole - country border,
- Railway line E-30 in full run on the Polish territory and thereby region of Lower Silesia: country border-Legnica - Wroclaw - Opole - Gliwice - Katowice - Krakow - Tarnów - Rzeszów - Przemyśl - country border

3) in the scope of air transport

Existing Airport: - Wroclaw - Strachowice

In addition, the Board of Lower Silesia postulates complementing the existing comprehensive network TEN-T to include the following elements of infrastructure:

1) in the scope of road transport:

- inclusion of the proposed national road S-5 in full run: Grudziadz - Poznan - Wroclaw - Boboszków (country border) - Brno, as a part of the Central European Transport Corridor (CETC).

2) in the scope of rail transport:

- inclusion of a proposed high-speed railway line Warsaw - Lodz - Poznan / Wroclaw with prospective linkage to Berlin and Prague.

3) in the scope of inland waterway transport:

- inclusion of a shipping route Oder (E-30) over a distance: Nysa Łużycka - Brzeg Dolny - Gliwice, as an essential link of the inland waterways system Oder - Elbe - the Danube.

**Marshal of Lower Silesia, Poland
(Dolny Slask, Polska)**

GRZEGORZ ROMAN