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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 South West of Scotland Transport Partnership (SWestrans) regarding the above consultation.

The South West of Scotland Transport Partnership is one of seven Regional Transport Partnerships established under the Transport (Scotland) Act 2005, which placed a duty on Scottish Ministers to create Regional Transport Partnerships covering the whole of Scotland.

TEN-T Policy is highly significant in addressing the constraint of peripherality which affects a rural region such as ours, and we are grateful for the opportunity to respond to this consultation.

I enclose a response to the consultation on behalf of SWestrans.

Yours sincerely,



Councillor Brian J. Collins, Chair
The South West of Scotland Transport Partnership

South West of Scotland Transport Partnership
www.swestrans.org.uk

Chair: Councillor Brian J Collins

Lead Officer and Secretary to the Board: Alistair M Speedie

A Response to the European Green Paper: TEN-T: A policy review

1. The South West of Scotland Transport Partnership

1.1 The South West of Scotland Transport Partnership is one of seven Regional Transport Partnerships established under the Transport (Scotland) Act 2005, which placed a duty on Scottish Ministers to create Regional Transport Partnerships (RTPs) covering the whole of Scotland.

1.2 One of the key aspirations of the Transport (Scotland) Act 2005 was the development of Regional Transport Strategies for Scotland. Ministers were determined to ensure that the creation of comprehensive Strategies set the new RTPs on a firm footing so that they could begin to deliver improved transport services for their regions, and Scotland as a whole, as soon as possible.

1.3 Ministers stressed that the Regional Transport Strategies should be visionary in outlook, yet firmly grounded in the reality of what is possible to deliver. SWestrans' Regional Transport Strategy received Ministerial approval in July 2008.

1.4 The Strategy indicated that:

- “Good Trunk Road links are important to facilitate effective distribution of goods and services, and to maintain Dumfries and Galloway’s position as an attractive location for companies to invest and create jobs.”
- “SWestrans will encourage the Scottish Executive to continue investment in the region’s Trunk Road network, through the provision of increased lengths of dual carriageway, dedicated overtaking opportunities and other improvements targeted at improved safety and reliability.
- **A75**
The A75 Euroroute is a highly strategic road not only in regional but also in Scottish, UK and European terms. It is the only Scottish Trunk Road to feature in the prestigious ESSEN 14 programme as part of the Ireland-UK-Benelux Road Upgrading Project.

The A75 links the ports at Loch Ryan (and hence Northern Ireland and the Republic Of Ireland) with markets in Great Britain and continental Europe and is also used as a tourist route. Maintaining Stranraer / Cairnryan as a

competitive port is critical for the local economy, since port activity supports a large number of jobs.

The former Scottish Executive published a Route Action Plan for the A75 in March 2000. Six schemes have been developed from the Route Action Plan, three of which have been constructed at Planting End (west of Dunragit), at Newton Stewart and at Barfil (east of Crocketford). The other three schemes which are being progressed by Transport Scotland are a bypass for Dunragit, and overtaking improvements between Cairntop and Barlae (east of Glenluce) and at Hardgrove (east of Dumfries).

In recent years, Dumfries and Galloway Council and its partners in the North Channel Partnership (a grouping of transport and economic interests on both sides of the Irish Sea which now includes SWestrans and its neighbouring RTP, Strathclyde Partnership for Transport (SPT) as member organisations), has sought targeted improvements to the route, such as the Springholm / Crocketford bypasses, improved overtaking opportunities and other enhancements commensurate with the A75's strategic role.

Tackling the conflict between strategic and local traffic around Dumfries is also an increasingly apparent operational issue. Addressing the A75's constraints will be essential if its Trans-European Network Status (ESSEN 14) is to be sustained with further upgrades to the route essential to secure the efficient distribution of goods across the region, and also to underpin Stena Line's consideration of a major harbour development at Cairnryan and the Stranraer Waterfront.

The need for improved landside links to Scottish Ports was a main theme to emerge from the former Scottish Executive's Ports Policy review consultation. It is therefore important that the needs of the Ports sector are addressed in prioritising road enhancements through the Scottish Government's investment programme.

- **A77**

Whilst the A77 is a strategic trade route linking Scotland with Northern Ireland, it attracts little traffic travelling to or via England. At present the road is slow south of the dualled / motorway sections in Ayrshire.

The North Channel Partnership, which includes SWestrans, SPT and South Ayrshire Council has aspirations to improve the road (including a by-pass for Maybole and other settlements) and improved overtaking opportunities or full dualling.

In the all Scotland context the role of A77 in providing a strategic link between Loch Ryan and Rosyth should be fully recognised. Indeed, the government of the Republic of Ireland highlights this route's strategic importance given the increasing congestion noted on the English motorway network and ports. The concept of a land bridge corridor from south west to east central Scotland therefore becomes increasingly apparent in this context.

As for the A75, upgrades to the A77 trunk road are also essential for distribution of goods and also to underpin proposed developments at Cairnryan and Stranraer Waterfront. Two schemes are at the construction stage on A77 in South Ayrshire, at Glen App, north of Cairnryan. Five other schemes are being developed by Transport Scotland. Four of these are in South Ayrshire and one in Dumfries and Galloway (south of Cairnryan).

- **Maritime Transport**

Loch Ryan ferry ports are vital gateways for Scotland with only Glasgow and Edinburgh airports handling more passengers from the rest of the UK.

In 1999 34% of all passengers and 24% of all freight crossings entering Scotland used Loch Ryan. 1160 jobs in the Stranraer area (some 2540 jobs in Scotland as a whole), generating £21 million for the local economy, depend on ferry operations from Loch Ryan. In addition, 541,000 tourist trips are made from Northern Ireland to Scotland every year, generating £114 million for the economy and supporting 3800 jobs.

The aim of Dumfries and Galloway Council and the North Channel Partnership is that Loch Ryan retains its competitive advantage over other UK ports (e.g. Heysham, Holyhead, Fishguard) based on a short crossing time, frequency of service and reliability. Yet Loch Ryan ports face growing competition from ports served by better road and rail connections and other regional transport infrastructure.

Although facilities are being improved, freight shipped through Loch Ryan is proportionately declining. Limited investment in key trade routes, particularly the A75 and A77, compromises any potential benefits of investing in port improvements. The need to ensure the continued viability of the ports is clear; the loss of 1160 jobs in the Stranraer area would more than double unemployment in the local economy. Nonetheless, the concept of developing a land bridge from Loch Ryan to Rosyth could emerge as potentially important at the national scale if Scotland's direct links east and west to Europe are to be improved further. There is potential for freight handling at locations along the coastline of the region.

The Stranraer Waterfront development presents the opportunity to implement an integrated transportation strategy that will improve accessibility to Stranraer as a destination, and improve public service access to amenities and services. There is an opportunity to review existing parking and access provision for the Waterfront and Town Centre. This may release land currently used for parking for economic development and public realm improvements.

- **Stranraer and Loch Ryan**

Stena Line have advised that they have not abandoned plans to re-locate ferry services on Loch Ryan and are looking at various options for the future.

The potential planned relocation of the Stena Line ferry operations to Cairnryan presents a complex set of transport problems and opportunities for the wider Loch Ryan area and its communities. The existing Loch Ryan ferry links bring over 1100 local jobs and £21million a year into the local

community. There is currently significant competition from other Great Britain to Ireland routes, which is increasing given significant transport investment elsewhere such as the A5/A55 expressway to Holyhead and the current road building programme in the Republic of Ireland.

Scottish Enterprise Dumfries and Galloway, and Dumfries and Galloway Council have led a development framework for the Stranraer Waterfront, which seeks to grasp the opportunities for renewal presented by the shift in port activities to create a new future for Stranraer. A £2.35 million Scottish Executive award has been secured by Dumfries and Galloway Council for a new Public Transport Interchange to link rail and bus services with ferry operations and other local transport needs.

In its response to the Scottish Government on the National Planning Framework 2 Discussion Draft, Swestrans proposed that a Loch Ryan Ferry Ports Enhancement Project be considered for inclusion in NPF2 as a National Development. This proposal would primarily include enhancements to ferry ports but also include the need for upgrades to A75 and A77 Trunk roads and rail link enhancements.

The Stranraer Waterfront development concept, which covers a 26 acre site, consists of a series of development areas comprising of new business, residential, leisure and retail, anchored by the marina development. The marina development plans to have 400 berths to meet anticipated future demand. It is important that the level of rail services to Stranraer is protected and enhanced following the possible relocation of Stena Line to Cairnryan.

- **Trunk Roads (Text from RTS Draft Delivery Plan)**

Many of the region's most important connections are provided by trunk roads. Improvements to the trunk road network will offer very significant benefits on the regional economy, on accidents, and on accessibility. Responsibility for Trunk Roads lies with Transport Scotland. Trunk road schemes have strong strategic fit to regional transport objectives, namely:

Improve transport links within Dumfries and Galloway and provide fast, safe and reliable journey opportunities to significant markets, including the national economic centres of Edinburgh and Glasgow, as well as England and Northern Ireland;

- Contribute to improved economic growth and social inclusion in the region whilst minimising the environmental impacts of transport;
- Add value to the broader Scottish economy and underpin national economic growth;
- Assist in getting visitors/tourists to the region from other parts of Scotland, England Ireland and beyond;
- Making it possible for more people to do business in and from Dumfries and Galloway by providing sustainable connections to key business centres in the Central Belt and other locations such as Ayrshire and Cumbria;
- Reduce the constraint of peripherality, both between the region's main settlements and its outlying areas, and between the region and its external markets;

- Pursue certain transport schemes in the context of local and national economic development, while at the same time recognising wider context of economic, social and environmental imperatives.

2. Priority Projects

2.1 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”.

2.2 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

2.3 At present three of the High Priority Transport Projects (Essen 14) impact directly on the SWestrans 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).

2.4 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.

2.5 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.

2.6 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.

2.7 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.

3. Recent Developments

3.1 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."

3.2 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."

3.3 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.

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

3.5 Transport Scotland (a Scottish Government agency) has undertaken a Strategic Transport Projects Review:

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 - £250m [*includes other elements as well as A77 upgrade*].

Deliverability:

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

3.6 The Scottish Government has also published its 2nd National Planning Framework:

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.

3.7 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.

4. Summary of SWestrans Concerns with TEN-T Revision

4.1 The South West of Scotland Transport 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 14) as impacting directly on the SWestrans 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 A77 as an extension of the project, linking the ferry ports at Stranraer and Cairnryan with the economic hubs of Scotland's Central Belt and mainland Europe.

5. 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. For the South West of Scotland this would include the A75 and A77 Trunk Roads, which link 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 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 investments 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 14, and building on these as proposed in the Green Paper (in particular the designation of the A77 corridor as an extension of Essen **Project 13**).*