

**Norfolk County Council's response to
'TEN-T: A Policy Review –Towards a Better Integrated Trans European
Transport Network at the Service of the Common Transport Policy'**

Summary

Norfolk County Council welcomes the opportunity to comment on the European Commission's Green Paper 'TEN T: A Policy Review – Towards a Better Integrated Trans European Transport Network at the Service of the Common Transport Policy.' We welcome the opportunity, particularly as a number of TEN T routes pass through the county including:

- Great Yarmouth's Port is part of the Priority Project 21: Motorways of the Sea
- A number of routes run through the region which are not 'priority' routes but are still part of the 'comprehensive' TEN-T network. These are:
 - A47 Great Yarmouth to Peterborough (Links G.Yarmouth, Norwich, King's Lynn & Peterborough)
 - A12 (Links Great Yarmouth, to Lowestoft, and Ipswich south)
 - Great Yarmouth – Peterborough (via Norwich and Cambridge) rail route
 - Kings Lynn – London (via Cambridge) rail route
 - London-Norwich (via Ipswich) rail route
 - Norwich Airport.

Although these routes are not considered to be part of the priority network, they provide important trans-European links and their role should be recognised and retained in any review of the TEN T network. The A47 is a key link road from Great Yarmouth to Peterborough, connecting the port in Great Yarmouth to the rest of the country. It plays an important role in carrying long-distance freight traffic, through the East of England. The A12 is the key route from Great Yarmouth to Ipswich is an important link from Ipswich to the port in Great Yarmouth.

Norfolk County Council believes that the TEN network should identify consistent standards in order that objectives such as safety could be achieved. Parts of the network through Norfolk are currently poor standard, and need to be improved, eg through dualling the road network, in order that these routes can fulfil their function as part of the wider TEN T network.

Suffolk County Council are aware of the TEN T consultation and are supportive of Norfolk's response to it. Which is as follows:

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

TEN-T policy must be consistent also vital that the review of TEN-T policy is undertaken in with other European policies. It is in tandem with the review of the EU budget. In terms of the budget, Norfolk County Council suggests that the scale of projects supported under the TEN-T programme is such that the current seven year

financial framework is inadequate. A more appropriate timeframe might be to align the programme with two or even three framework periods (ie 14 or 21 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 comprehensive network ensures that there is a legible network connecting across borders, joining important parts of respective nations' infrastructure. Not maintaining the comprehensive network will mean that a number of important cross-border infrastructure links will not be considered at a trans-European level. This will weaken the ability of network planning and enhancement and put at risk the achievement of objectives.

In addition, a small priority network would marginalise the more remote geographical locations and hamper their prospects of economic growth, despite their location as important points for cross-border movement and connections. Any move towards a limited network would run counter to pan-European economic objectives.

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?

It is considered for the reasons outlined above that the network definition should include a comprehensive network and not be reduced to a small priority network, which would result in large parts of the existing TENS network no longer being recognised. It is also considered that TEN-T should continue to support the completion of the "priority projects" as these have substantial recognised benefits at a European, national and regional level; this is particularly true of the priority projects which cross the East of England region. There are significant disadvantages in not completing these projects.

The comprehensive network should be retained, with a conceptual pillar providing direction to selection of projects.

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?

It would be extremely useful for the TEN-T programme to have the flexibility to address issues as and when they arise and take account of the benefit of the TEN network, in order to achieve EU objectives.

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?

The Trans-European Transport Network is only of value if it gives benefit to local communities and businesses. It is therefore essential that local needs and issues are considered alongside the needs of Europe-wide traffic. It is therefore imperative for regional and local bodies such as regional transport forums and local transport authorities to be involved in the development of policy.

6. How can Intelligent Transport Systems (ITS), as a part of the TEN-T, enhance the functioning of the transport system? How can investment in Galileo and EGNOS¹ 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 perspectives²?

Intelligent Transport Systems have a crucial role to play in enhancing the functioning of the transport system. However, it is important to ensure that there is a harmonisation of information, data collection and systems across the EU to ensure fair access to the benefits ITS can bring.

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?

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

No, a core network would be too narrow and would be inequitable to some parts of the region, particularly the more remote parts, even though these areas perform vital cross-border connections. It is crucial that the TEN-T programme is consistent with European Transport Policy. This can be achieved through retaining the comprehensive network and evaluating projects against their contribution to achieving policy objectives.

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

¹ EU satellite navigation systems

² 2014-2020

private, Community or national – best suits what aspects of TEN-T development?

Norfolk County Council fully supports the TEN-T programme and would argue that its budget should be substantially increased to enable it to more closely reflect the needs it is trying to address. The current focus on a seven year funding framework is inappropriate to the scale of projects necessary to provide a trans-European transport network. Aligning TENs funding to two or even three framework periods (ie 14 or 21 years) would be more relevant and would fit more effectively with the planning timeframe. However, there needs to be stability of objectives if priorities are to be achieved, especially if looking over a longer term timeframe.

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?

We would urge the European Commission to ensure above all else that there is a consistent and fair approach across Europe to the support given to projects which are deemed to be in the European interest and of sufficient maturity to proceed. This applies to ensuring that only those projects which meet a defined set of criteria are funded and also to the introduction of fair charging schemes for commercial and private infrastructure users.

Furthermore, it is important that equal financial priority should be given to those projects funded by the private sector as is accorded to public sector projects. There is concern currently that public sector projects are being prioritised over those supported by the private sector.

11. What are the strengths and weaknesses of existing EU financial instruments, and are new ones needed (including "innovative" instruments)? How could the combined use of funds from various EU resources be streamlined to support TEN-T implementation?

European funding for transport infrastructure encourages a strategic view to be taken of transport needs. In addition, benefits can be gained from co-ordinating funding streams, which might include funding from TENs, the Framework Programme, Structural Funds, CIVITAS etc, and which can lead to a more innovative approach to the search for solutions to identified problems. However, the Commission's intention should be to facilitate the development of funding packages, not to provide a strait-jacket which limits the range of funding which can be used.

We support the continuation of the twin-track approach of multi-annual calls and annual calls for proposals because this enables both large scale and smaller projects to be included in the TEN-T programme. A consistent approach should be used in the assessment of projects and only projects which are sufficiently mature and have a satisfactory cost-benefit analysis are approved and in addition that effective monitoring is undertaken of all projects.

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

13. Which of the options is the most suitable, and for what reason?

Norfolk County Council supports either Option 1 or Option 3, but prefers Option 3.

Both Option 1 and 3 have potential to achieve the full range of outcomes that the Commission is trying to achieve. It is not considered that Option 2 will achieve this, as the TEN T network will be focussed on too small a network.

The County Council could support either option 1 or 3. However, the programme needs sufficient direction to ensure that it meets the objectives given the levels of funding available. Option 3 could retain the comprehensive network and, using the conceptual pillar to help integrate the various transport policy and transport infrastructure aspects, provide the direction to the programme, which could be lacking in the priority project approach in Option 1.

Norfolk County Council also considers that it is vital to ensure that the priority projects are completed.