

## **SWWITCH Response to the EU TEN-T Policy Review Green Paper**

### **Background**

The South West Wales Integrated Transport Consortium (SWWITCH) comprises the four local authorities in south west Wales, namely Pembrokeshire County Council, Carmarthenshire County Council, Neath Port Talbot County Borough Council, and the City and County of Swansea.

SWWITCH was formed in 1998 in recognition of the need to work collaboratively to improve access and transport thereby facilitating economic development and improved quality of life.

### **The Regional Transport Plan**

Following the development of the Wales Transport Strategy, issued by the Welsh Assembly Government (WAG) in April 2008, the Assembly requires the four transport consortia in Wales to develop Regional Transport Plans (RTPs) which will help to deliver the outcomes set out in the Wales Transport Strategy. The final RTPs are due for submission to WAG by 30th September 2009.

The evolving RTP for south west Wales has adopted objectives and key priorities for the region, all of which include careful consideration of the future political, economic, environmental and technological challenges and opportunities. This is in line with one of the key messages in the Green Paper where TEN-T policy needs to be open and flexible enough to respond to the same future challenges and opportunities.

### **Comments on the EU TEN-T A Policy Review Green Paper**

It is vitally important that the status of the TEN-T priority network for both South Wales as well as the North Wales corridor is not diluted. Additionally, there is an argument that their status should be increased especially if one takes into account the related benefits to the region as a whole. This is critical for peripheral areas especially in South West and North West Wales with both regions designated as EU Convergence areas.

Furthermore, the SWWITCH region does have a number of major port facilities including those at Port Talbot, Swansea, Fishguard, Pembroke Dock and Milford Haven. All these facilities currently attract considerable traffic in terms of passengers, cars, freight and shipping. For example, in 2008 Irish Ferries operating from Pembroke Dock carried 347,000 passengers, 105,000 cars and 84,000 freight vehicles while in 2007, Fishguard and Milford Haven saw 976,000 passenger movements. Such figures reinforce the fact that ports in South West Wales play a major role in terms of international connectivity.

Therefore, it is critical that both the Northern and Southern Wales corridors are given priority status. The priority route on the plan: 'PP13 UK-Ireland/Benelux road axis' to Ireland goes via Holyhead and Stranraer and not through the SWWITCH region. Integration, sustainability and peripherality issues would warrant the inclusion of the M4/A40 corridor route (eg Cork to

SE England route) via the SWWITCH ports of Swansea, Port Talbot, Pembroke Dock, Milford Haven and Fishguard thus avoiding the congested network around Dublin.

Overall, SWWITCH would strongly support a move to a core network with two links through Wales to the Republic of Ireland being part of any such network and thus of benefit to the more peripheral parts of Wales.

A priority or core network approach is therefore to be commended with the adoption of a flexible approach to the TEN-T, with geographical and conceptual pillars. Furthermore, it is important that the network facilitates co-modality, by being fully integrated (including intelligent transport systems) and able to meet future transport and environment demands, for example contributing to emission reduction objectives.

A move to this option would also assist in helping to extend rail electrification along both North and South Wales to the Irish Sea Ports.

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

The Commission's assessment should include the economic benefits as a result of TEN-T network development together with the issue of peripherality and congested transport networks. The latter is particularly pertinent as the A55 route through Holyhead and Dublin is shown as a Priority route. The M4/A40 corridor through the West Wales ports should also be shown as a Priority.

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

A further argument for the maintenance of a comprehensive network is that this is crucial to underpin the development of regions which are currently in receipt of convergence funding. The network also needs to include the M4/A40 corridor for it to be comprehensive through Wales. Otherwise it may lead to illogical routing (eg. to fit in with the priority network, traffic may be deemed to take detours when in practice they will not).

**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?**

This kind of priority network approach could be significantly better than the current priority projects approach. Currently the priority projects on PP13 and PP26 in North Wales have been very limited in recent years. (Only a small contribution to the A5117 / M56 link in 2007/08) with most of the investments occurring in England.

This new approach would help to ensure that investments in devolved administrations in Wales could take into account benefits which arise to another Member State (Republic of Ireland) and to England and beyond.

The priority projects approach also allows, in principle, the ranking of projects according to net benefits and there would be profit from keeping this within an over-arching Priority Network approach.

**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 level?**

This flexible approach to identifying projects could have difficulties in being integrated into the UK infrastructure development process and with the Devolved Administrations.

**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 different aspects can be best taken account of within the overall concept of future TEN-T development by ensuring that these aspects are clearly set out in the criteria which will attract funding support from the European Union.

Furthermore, the differing needs of local / regional / international traffic should be taken into consideration.

**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 as part of the TEN-T enhance the functioning of the Transport system by ensuring that the funding guidelines support the co-ordination of investments in particularly by making better use of capacity and in improving safety and in fuel efficiency.

**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?**

For example charging points and hydrogen fuelling points may be prioritised on TEN-T routes as this infrastructure is deployed across the EU.

**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 would be feasible and from a Welsh perspective help to ensure that the two TEN-T routes (A55, M4 / A48 / A40) would be protected as routes to the Republic of Ireland.

**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?**

Transport is primarily for the public good and thus is better financed primarily through the public sector. Rigorous accounting and auditing standards should be required from the top down. A realistic framework for projects taking into account planning issues and public consultation, and a more flexible approach (eg an ends based approach), are also required

**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 TEN-T funding programme should be continued, but with a variable intervention (higher) rate particularly on links which are of greater benefit to areas other than just accruing to the area where the link itself is located. (e.g. A40 South West Wales and A55 in North Wales).

**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?**

Increasing public confidence in the integrity of Community finance is to be commended.

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

No response