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Date: 22 April 2009

Dear Sir/Madam

Re: TEN-T: A Policy Review – Towards a Better Integrated Trans European Transport Network at the Service of the Common Transport Policy

We have pleasure in forwarding to you the East of England's response to the European Commission's consultation document "TEN-T: A Policy Review – Towards a Better Integrated Trans European Transport Network at the Service of the Common Transport Policy.

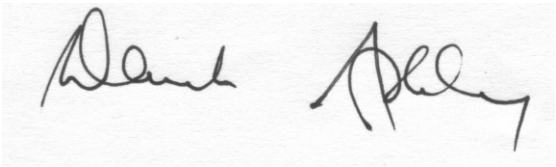
This response has been prepared by a task force set up by the East of England Europe and International Affairs Panel (EIAP); a constituted Panel of the East of England Regional Assembly (EERA) comprising nominated members of EERA and of the East of England Development Agency (EEDA), which is jointly chaired by these organisations. The task force included members drawn from the EIAP and EERA's Regional Planning Panel, which oversees EERA's statutory responsibility for the development and implementation of the regional spatial plan in the East of England. In addition, representatives from the Regional Transport Forum, Government Office for the East of England, EEDA Board and key transport stakeholders have participated in the task force. The task force was chaired by the Chair of the Regional Transport Forum and the response was agreed by the management committees of the Europe & International Affairs and Regional Planning Panels.

In addition to responses to the consultation questions, this document also includes case studies from the East of England, which give valuable context to the use of TEN-T to date and to our responses to the consultation questions.

We look forward to hearing the outcome of the review of the Trans European Transport Network in due course. In the meantime, if you have any questions in relation to our response, or if we can be of further assistance as this review proceeds, please do not hesitate to contact Lesley Rayner (Lesley.Rayner@eera.gov.uk).

Yours faithfully

pp Lesley Rayner



Cllr Kevan Lim
East of England Regional Assembly

Cllr Derrick Ashley
East of England Regional Assembly
Chair of the East of England Regional Assembly's Regional Planning Panel

pp Lesley Rayner

Mr Marco Cereste
East of England Development Agency
Co-Chairs of the East of England Europe & International Affairs Panel

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

The East of England

The East of England is the second largest region in England in the United Kingdom covering 19,120 square kilometres with a population of 5,541,600 (ONS mid year population estimate) for 2005. There are around a dozen medium-sized towns and cities, although there is no major city acting as a regional focus. The five counties of Cambridgeshire, Essex, Hertfordshire, Norfolk and Suffolk and six Unitary Authorities of Bedford, Central Bedfordshire, Luton, Peterborough, Southend-on-Sea and Thurrock make up the East of England. There are 41 district or Borough councils[1].

The region is diverse, stretching from the edge of London in the south to remote coastal and rural areas in the north and east. It is a region facing challenges from the risk of flooding from sea level rise, an ageing demographic profile and yet significant population increases accompanied by high housing growth targets and thus considerable current and future pressure on its infrastructure.

As a result of its proximity to both London and Continental Europe and as the location of the UK's key deep-sea ports, the East of England region serves as a vital conduit between the rest of the UK and other parts of Europe leading to the region accommodating significant passenger and freight flows. Indeed, over 400,000 containers were transported from/to the Port of Felixstowe by rail in 2008, making it the UK's largest intermodal rail hub.

The region's role as a conduit is reflected in the Regional Spatial Strategy (2008) (the strategic development plan for the East of England) which aims to foster and develop European and inter-regional links and the Regional Economic Strategy which seeks to strengthen the role of the region's international gateways and notes the importance of surface access to achieving this. This is supported by the UK Department for Transport and Treasury's Eddington report[2] on the long term links between transport and the economy which concluded that significant benefits could be achieved through enhanced connections to and from international gateways.

In addition, the Regional Spatial Strategy (which incorporates the Regional Transport Strategy) and the Regional Economic Strategy both underline the need for better quality transport infrastructure and services to support future development and growth of the region and also to make best use of the region's networks. The UK Highways Agency estimates an increase in road traffic on the strategic highway network in the East of England of 44% between 2001 and 2021.

[1] For an explanation of the local government structure in England please see www.lga.gov.uk. Essentially, unitary authorities provide all local government services in their area while in a two-tier structure (counties and districts/boroughs) responsibility for services is divided.
[2] Department for Transport - The Eddington Transport Study

Connectivity in the East of England poses a major challenge. Public transport use is relatively low in the region and the East of England has by far the highest personal car usage levels for the whole of the UK (19% higher than the UK average). There is significant congestion on the strategic highway network at present and this is expected to worsen in the future. There is widespread rail overcrowding on nearly all rail routes into London, which constrains opportunities for further passenger growth in the absence of capacity improvements and this is coupled with underinvestment in east-west rail links in parts of the region.

A recent survey on barriers to small and medium sized enterprises (SMEs) in the UK found that the East of England suffered more from traffic congestion as a whole and 54% of respondents were 'very dissatisfied' with local roads and 43% with motorways and trunk roads.[3] The congestion and limited transport networks inhibit economic growth and challenge the region's low carbon ambitions.

East of England Case Study:
Transport and the Economy in the East of England, the Transport Economic Evidence Study (TEES) and Delivering a Sustainable Transport System (DaSTS): the relationship between European, national and regional priority corridors and axes

The TEES report is an independent study commissioned by the East of England Development Agency (EEDA) to quantify how much transport congestion is costing the economy and advise where transport investment should be targeted to maximise transport's contribution to Regional Economic Strategy objectives. The study produced many interesting results, however the key headlines are:

- Transport congestion in the East of England is costing the UK economy over £1bn per annum. By 2021, this will have increased to £2bn per annum.
- For businesses, this equates to up to £900 per employee productivity losses per year (GVA) by 2021.
- 85% of productivity losses are being experienced in the region's "engines of growth", major urban areas and on connections between them.
- The study identified a number of corridors (covering both road and rail) where congestion and overcrowding has a particularly severe productivity impact. There is a clear alignment between several of the corridors and the TEN-T priority networks including:

    - London/London Arc to Milton Keynes South Midlands (this corridor aligns with TEN-T Priority Project 14: The West Coast Mainline)
    - London/London Arc to Haven Gateway (all of these corridors are component
    - Greater Cambridge to London/London Arc parts of TEN-T Priority Project 13:
    - Greater Cambridge to Greater Peterborough UK/Ireland/Benelux Road Axis)

The study also noted the economic importance of completion of works on the Felixstowe to Nuneaton Rail Corridor (a key component of TEN-T Priority Project 26).

In addition to a strong alignment between the TEN-T Priority Projects and those corridors that are regional economic priorities, there are also strong links with those corridors identified as national priorities by the UK Department for Transport in their recent 'Delivering a Sustainable Transport System' documents including:

[3] East of England RES Evidence base, June 2008

- Haven Ports to the Midlands, London to the Haven Ports and the Stansted Corridor (these are all components of TEN-T Priority Project 13: United Kingdom/Ireland/Benelux Road Axis)
- London to the West Midlands, North Wales, North West and Scotland (this corridor aligns with TEN-T Priority Project 14: The West Coast Mainline)
- Haven Ports to the Midlands (this also aligns with the Felixstowe to Nuneaton Rail Corridor which is a key component of TEN-T Priority Project 26)

Retention and completion of the TEN-T Priority Projects in the East of England would therefore address a number of key European, UK national, and regional transport economic objectives.

As a result of these challenges, the region has set itself ambitious low carbon economic growth targets, and has given its Regional Competitiveness (European Regional Development Fund) Programme a low carbon economic growth theme.

The review of the Trans-European Transport Network is therefore of great importance to the East of England and provides an opportunity for the region to share its expertise on the issues raised and, at the same time, to provide a means of tackling some of its most pressing concerns.

The following routes within the East of England are currently incorporated in the TEN-T network:

Priority Project 13: United Kingdom/Ireland/ Benelux Road Axis
Covering the A14 and parts of the A12, A120 and M11

Priority Project 14: West Coast Mainline
A small part of the WCML passes through Hertfordshire and Bedfordshire (Watford Junction being the relevant station).

Priority Project 26: Railway/Road Axis Ireland/United Kingdom/Continental Europe
Covering the Felixstowe to Nuneaton Rail Line.

Priority Project 21: Motorways of the Sea
Covering: Harwich, Felixstowe, Ipswich, Great Yarmouth and Tilbury.

In addition, a number of routes run through the region which are not 'priority' routes but still part of the 'comprehensive' TEN-T network. These are:

Road: the A47, parts of the A1, A1(M), A12, A14, A120, M1, M11 and the M25
Rail: Great Yarmouth–Peterborough, Kings Lynn–London (Via Cambridge), Felixstowe-Norwich, Harwich-London, East Coast Mainline, Midland Mainline and Southend-London
Ports: Felixstowe, Harwich, Ipswich and Great Yarmouth
Airports: Norwich, Luton, Stansted and Southend

The East of England TEN-T Task Force

This response has been prepared by a task force set up by the East of England Europe and International Affairs Panel (EIAP). EIAP is a constituted Panel of the East of England

Regional Assembly (EERA) and comprises nominated members of EERA and of the East of England Development Agency (EEDA). EERA and EEDA jointly chair EIAP. The task force included members drawn from the EIAP and EERA's Regional Planning Panel, which oversees EERA's statutory responsibility for the development and implementation of the regional spatial plan in the East of England. In addition, representatives from the Regional Transport Forum, Government Office for the East of England, EEDA Board and key transport stakeholders such as: the UK Highways Agency, Hutchison Ports, the Haven Gateway Partnership, Sustainable Transport for the East of England Region and the East of England Business Group have participated in the task force. The task force was chaired by the Chair of the Regional Transport Forum and the response was agreed by the management committees of the Europe & International Affairs and Regional Planning Panels prior to being submitted to the European Commission.

Summary

The East of England 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' in light of the significant issues in terms of transport facing many of Europe's regions and cities, not least the East of England.

The East of England European Partnership takes its responsibilities in terms of contributing to the debate on the development of European policy very seriously and has in recent times contributed to major EU debates on territorial cohesion, maritime policy, urban transport and climate change.

As demonstrated above, transport is an important issue for the East of England and, in August 2008, the East of England made an initial submission of its views to the European Commission, prior to the publication of the Green Paper. The comments submitted at that point were as follows:

The region encouraged the European Commission to continue:

- Support for routes which connect ports to the hinterland and more distant regions and markets. This is important both in terms of accessibility to coastal areas and for the competitiveness of ports, which in turn will facilitate more and better trans-European movement of people and goods
- Support for routes which facilitate multi modal transportation of goods ship-road–rail-air
- Support for projects which have less of an impact on the environment such as rail and short sea shipping.
- Support for routes which eliminate bottlenecks in the Trans European Transport Networks and promote polycentric development, releasing the pressure on major capital-capital axes
- Support for increased budget to complete, and to bring improvements to, the TEN-T network
- To encourage Member States to develop Motorways of the Sea to their full potential

and highlighted the:

- Importance of ensuring that the Priority Routes which are set out in the current Community guidelines for the development of the Trans-European Transport Network are fully implemented and that new routes are not introduced in the meantime

- Importance of consulting with regions through the Green Paper as, although projects are submitted by national governments, implementation will inevitably involve regional and local organisations.

The current response builds on these key principles in responding to the questions raised by the European Commission in its Green Paper and is summarised below.

The East of England calls for:

- An increase in the TEN-T budget to more adequately reflect what the programme is seeking to achieve
- Consistency with other European policies for example the developing Transport Policy, the emerging concept of Territorial Cohesion and consideration within the developing EU budget
- A longer timeframe for project funding, beyond the current 7 year period, to reflect the scale of the projects under consideration – possibly 14 or 21 years
- A stronger focus on European objectives, based on the Lisbon and Gothenburg agendas and the fight against climate change, supported by consistency with national and regional objectives
- A consistent approach to project assessment in terms of maturity, quality and cost-benefit analysis
- Continued support for and completion of the currently defined priority projects, given the recognised European, national and regional benefits these will bring and the disadvantages inherent in not completing these projects
- Continuation of support for priority projects rather than a priority network
- Expansion of the list of priority projects to incorporate key elements of the European transport network, including major international gateways such as ports and airports because of the enormous economic benefits these bring, and their hinterland connections, particularly where these use sustainable transport modes
- An end to the comprehensive network because it is inadequately focused and is trying to achieve too much with too little funding, therefore suffering from a lack of achievement and poor credibility
- A clearly defined conceptual pillar, where this supports projects of common interest, e.g. in relation to congestion, capacity management, safety and security issues, both in response to market needs and to exploit new technological approaches
- Future-proofing of the programme to ensure projects can be supported which relate to future needs not just what is already required
- Increased co-ordination of funding streams, particularly where this leads to more innovative solutions to identified problems
- A broader definition of “cross border projects” under the TEN-T programme more in keeping with that used under the Territorial Co-operation programme, which includes maritime borders
- Continued support for both annual and multi-annual calls for proposals to ensure both large scale and smaller projects can be covered by the TEN-T programme
- A review of the options in the Green Paper to allow the following:
    1. an expanded list of priority projects incorporating the currently defined projects and with an additional focus on key nodes such as ports and airports, along with their

hinterland connections, particularly where sustainable transport modes are used, where there is a clearly recognised European as well as national and regional value to the project and where a consistent approach to the assessment of projects has been taken and a satisfactory cost-benefit analysis has been undertaken.

2. a clearly defined and equitably implemented "Conceptual pillar" where this is a means of introducing flexibility by funding projects of common interest dealing with issues such as congestion, safety, security etc using new technologies or responding to market needs.

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

Consistency with other European policies: As a fundamental point, it is crucial that TEN-T policy must be consistent with the new Transport Policy which is currently being developed and is due to start in 2010. Furthermore, it is vital that the review of TEN-T policy is undertaken in tandem with the development of the concept of Territorial Cohesion and also with the on-going review of the EU budget. In terms of the budget, the East of England would argue 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 (i.e. 14 or 21 years).

Motorways of the Sea: In assessing the success so far of TEN-T and reviewing the policy for the future, the East of England would argue that the European Commission needs to radically rethink the Motorways of the Sea concept. The region supports short-sea shipping and is concerned that to date the Motorways of the Sea "project" has failed because it has not taken into account how the short-sea shipping market operates. The East of England would therefore recommend that the European Commission works with the private sector in undertaking a fundamental review of the Motorways of the Sea concept so that short-sea shipping, using the full range of small and medium sized ports as well as larger facilities, is supported and not constrained. What the market needs should take priority over any desire to restrict the concept of Motorways of the Sea. The definition should reflect this and should clearly support short-sea shipping. It is particularly inappropriate and unhelpful for different definitions of Motorways of the Sea to be used in the TENs programme and the Marco Polo programme.

Furthermore, the European Commission must be careful that any measures it introduces in support of short-sea shipping do not provide an unfair advantage to some ports over others. This is relevant not only across seas but also around coasts. For example, European subsidies that encourage cross-border short-sea freight movements at the expense of domestic short sea movements distort competition, encourage sub-optimal freight movements and will have implications for regional competitiveness and employment, as well as associated social and environmental implications.

Assessing value: In assessing increasing demand for transport and then making proposals for provision to meet this demand, including through the designation of TEN-T routes, the European Commission must take into account the implications of the different types of demand. For example, growth in demand for dry bulk products will have different implications for development of inland networks than would growth in container traffic at the same point. EC assessment techniques should therefore consider the true economic value of freight and passenger demand on the networks when considering proposals for intervention.

The ability of projects to address demand must also be a key criterion in assessing the likely effectiveness of projects and therefore whether they should be funded. In this respect, the East of England believes that the European Commission should apply a consistent approach to the assessment of projects in terms of maturity, quality and cost-benefit analysis.

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

There is a strong sense that the comprehensive network has emerged as a means to benefit each individual Member State rather than as a strategic attempt to provide a transport network which can benefit the EU as a whole. This clearly has implications in terms of the financial effectiveness of the programme and ultimately its credibility. The East of England would argue that the European Commission should refocus the TEN-T on common European objectives, based on the Lisbon and Gothenburg agendas and on the fight against climate change, which can be supported by the funding available. This will give the network coherence and strategic importance. By virtue of it being achievable, the credibility of the programme will also be enhanced.

As such, the East of England believes that TEN-T should continue to support the completion of the "priority projects" as having 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. At the same time it is important to realise that there are significant disadvantages inherent in not completing these projects.

This is not to say that the East of England believes that the current "priority projects" should be the only elements in a new TEN-T programme. We would argue that other key elements of a European transport network including international gateways such as airports and ports (both existing facilities and those in the latter stages of development) should be included in future programmes. In terms of the East of England this would include the Haven Ports of Felixstowe and Harwich, London Gateway and London Stansted Airport. Furthermore, the development of hinterland connections which enable the EU to maximise the benefit of these nodes and in some cases to combat congestion problems, need to be included and prioritised in future programmes, particularly where there are environmental gains to be made e.g. by supporting the development of rail projects.

East of England Case Study:
A14 Improvements

The A14 is a strategic road of international and national importance on the UK-Ireland-Benelux Road Axis (Priority Project 13). It runs for 210 km from the Port of Felixstowe to the M1/M6 motorway junction. It is the main east-west strategic route between the east coast ports of Felixstowe and Harwich and central and northern Britain, and ultimately the west coast ports to Ireland. The section between Cambridge and Huntingdon also carries traffic between the M11 and the A1(M). The route carries high volumes of traffic with between 20 and 25% being Heavy Goods Vehicles.

This case study will highlight two projects on the A14:

1. Improvements on the Haughley New Street to Stowmarket stretch; and
2. Improvements on the Ellington to Fen Ditton stretch

Haughley New Street to Stowmarket
The scheme provided for improvements along a 3.7 km stretch of the A14, comprising a new section of dual carriageway, a new two-level junction and the continued use of the former westbound carriageway for local traffic. The former eastbound carriageway has been modified for use by pedestrians, cyclists and equestrians. The cost of the project was: €43.41m; €34.72m from the UK Government and €8.69m from TEN-T for the period 2007-08.

Previously, the stretch of road did not meet current design and construction standards, with the result that visibility along this section of the A14 was poor. This had resulted in a recorded accident rate which was substantially higher than the national average. The project has therefore improved the efficiency of this stretch of the A14, improved safety and provided a safe route for cyclists and pedestrians.

Ellington to Fen Ditton
The project includes: a new section of dual carriageway; widening to three lanes of sections of the A14 and the A1 link road; local access roads to separate local and strategic traffic; and demolition of a viaduct over the railway. This stretch of the A14 is currently operating close to capacity, with an average of 65,000 to 85,000 vehicles per day using the route, resulting in severe congestion and unreliable journey times on what is a key part of the TENs network. There is a high incidence of minor accidents resulting from the congestion, which, because of the traffic volumes and the lack of appropriate alternative routes, quickly cause severe traffic jams over a wide area. This can result in emergency services experiencing difficulties in responding to incidents.

The improvements are expected to significantly reduce congestion and journey times for both freight and cars. This will bring a reduction in the number of accidents. In addition, the improvements will allow for increased capacity for local traffic and improved provision for public transport and non-motorised users. The improvements should also cater for the planned Northstowe development.

Cost of the project: €1155.3m; €924.2m from the UK Government and €231.1m from TEN-T for the period 2007 to beyond 2013.

East of England Case Study:
A120 Improvements

The A120 is a strategic route on the UK-Ireland-Benelux Road Axis (Priority Project 13). It connects the Port of Harwich to the A12 and M11 for onward travel to London, the south of England and the Midlands. The A120 also provides access to the international gateway at Stansted Airport.

Traffic on the existing A120 causes problems of road safety, delays resulting in unpredictable journey times and adverse effects such as noise, air pollution and vibration. With Stansted Airport having experienced significant growth in traffic in recent years and significant planned port expansion at Harwich (Bathside Bay), the existing road is inadequate for the expected level of traffic.

A120 Stansted to Braintree Bypass
In 2005 the section between the M11 and Braintree was dualled at a cost of £130m (TEN-T provided €15m).

A number of alternative routes were considered and the public were asked for their views. The route which was selected avoids major centres of population and passes largely through

agricultural land. Action was taken to minimise the environmental impacts of the route. The road is a limited access all-purpose dual carriageway road, which means access to the road is restricted to a few junctions, including at the airport.

Before and after monitoring of the scheme gave the following results.

- Journey time reliability along the A120 corridor has been identified as particularly important to businesses in the region and beyond. The new road has reduced journey times between the M11 and Marks Farm roundabout by 7 to 9 minutes as well as ensuring a much greater reliability.
- Accident rates along the corridor were reduced to half of the previous levels.
- Significant reductions in noise have occurred in settlements along the B1256 (old A120)
- Air Quality along the old A120 has appreciably improved and air quality targets along this corridor are now being met.
- A modest increase in planning applications occurred following the completion of the new road.

A120 Braintree to the A12

This proposal will replace the existing single carriageway section of the A120 between Braintree and the A12 with a dual carriageway, linking the existing dual carriageway at Braintree to the A12. The existing route between Braintree and the A12 passes through the two communities of Bradwell and Marks Tey and suffers from significant congestion and safety issues exacerbated by numerous direct accesses. Dualling of the A120 will provide a direct route connecting the expanded port at Harwich to its hinterland and improve network resilience as an alternative to the A14 and the A12.

A120 Harwich to Hare Green

The current A120 is part dual carriageway and part single carriageway that does not provide an appropriate highway access to the major port facilities at Harwich. Significant port expansion plans have been approved at Harwich (Bathside Bay) with planning conditions requiring the promoter to improve part of the A120 route between Hare Green and Ramsey, west of Harwich. This provides an opportunity to see the funding from Hutchison Ports (UK) incorporated as a contribution towards a larger scheme still built within the timescale required by HP(UK) to support the port expansion and the regeneration of Harwich.

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?

While it is important that projects supported under TEN-T are based on established European objectives and are of benefit to Europe as a whole, there is a danger in trying to develop a priority network, that the current situation will be replicated, where the programme includes projects to benefit each individual Member State rather than focusing on the European context. The idea of an aspirational network would also inherit the financial difficulties associated with the current system where the funds available are far from being sufficient to support the identified network.

Far better, as is the case with the TENs routes crossing the East of England, to ensure there is a consistent European, national and regional framework which can then be used to determine whether projects are eligible for funding. Projects which then emerged would be

acceptable from a European perspective and also relevant at the national or regional level, and ought therefore to have funding packages attached to them.

As mentioned above, the East of England believes that such a framework should include not only the existing priority projects but also be able to support infrastructure related to key international gateways such as ports and airports as well as their hinterland connections because of the enormous economic benefits these gateways can deliver. Where possible, priority should be given in future to sustainable forms of transport, such as rail. Further evidence on the economic importance of gateways is set out in the UK Department for Transport and Treasury's Eddington report on the long term links between transport and the economy.

In terms of Article 23 of the Community Guidelines, which outlines a definition of "Priority projects", the East of England believes this is largely an appropriate definition. However, the East of England believes that Members States should be expected to have already undertaken studies and (consistent) evaluation procedures to ensure that projects have sufficient maturity and a clear cost-benefit analysis in support of them prior to submission for funding rather than only to "demonstrate commitment" to undertaking this work.

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?

Flexibility is not a concept which sits easily alongside large scale infrastructure, involving long timeframes and large budgets as well as agreement between high level organisations such as governments. However, in terms of other types of projects of common interest, for example those responding to market needs or using new technology to tackle issues such as congestion and capacity management, safety concerns and security of transport networks, it would be extremely useful for the TEN-T programme to have the flexibility to address issues as and when they arise. There would only be a question as to the relevance of the TEN-T programme to such projects and whether they might sit more comfortably under programmes such as the Framework Programme for Research and Development.

The East of England would urge the European Commission to ensure that the "conceptual pillar", should it be adopted, is clearly defined with unambiguous and consistent objectives to ensure a level playing field. Inherent in the definition of the "conceptual pillar" should be an undertaking to review transport developments to ensure that internationally significant changes in transport routes or improvements in technology can be supported.

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 East of England believes that environmental concerns, and particularly carbon reduction, are central to the future direction of the TEN-T programme. The region would therefore support a focus on bottlenecks in the TEN-T network, sustainable forms of transport, for example rail, and on improving the sustainability of transport, for example through the electrification of rail routes such as the Felixstowe to Nuneaton route.

Furthermore, the region would emphasise that the review of the TEN-T policy should be ambitious and should seek to ensure that future needs are taken into account, not just what is required at the present time or forecast for the near future.

The East of England welcomes recognition within the Green Paper that the needs of both passengers and freight must be taken into account in reviewing the TEN-T programme. However, there is a tendency to assume freight is homogenous. This is not the case and partners in the East of England would urge the European Commission to take into account the different needs of container and bulk freight movements as it develops its proposals for the future of the TEN-T network.

The East of England would remind the European Commission that the Trans-European Transport Network is only of value if it is relevant to local communities and businesses. It is therefore essential that local needs and issues are considered alongside the needs of Europe-wide traffic. To this end, it is imperative for regional and local bodies such as regional transport fora and local transport authorities to be involved in the development of policy.

Furthermore, it is essential that there is consistency between national strategic plans and networks, such as the UK's Sustainable Transport Strategy, and the TEN-T network.

Another key issue for European infrastructure is the growth, increasing weight and changing load configurations of Heavy Goods Vehicles. All European countries are experiencing an ever increasing volume of freight traffic, in particular freight on our roads, and these volumes are set to continue to grow significantly in the next decade. This growth, and the increasing gross weights and changing load configurations of Heavy Goods Vehicles (HGVs) has led to significant impacts on road networks, both at the strategic and local level. The East of England Regional Assembly is supportive of increased volumes of freight being moved by rail; however the pace of freight growth is expected to result in further adverse impacts on the road network from HGVs. It is of significant concern that the continuing consideration of Longer Heavier Vehicles at the EU level will undermine the desired modal shift of freight onto rail, as well as result in further adverse impacts on bridge and road infrastructure. The region is very supportive of moving more freight by rail and hopes the EU will not support Longer Heavier Vehicles as an option for the accommodation of increased freight moved on the road network.

East of England Case Study:
East of England Regional Freight Strategy

The vision statement for the East of England Regional Freight Strategy is to:

"Secure the efficient and sustainable movement of freight to maximise the overall competitiveness and productivity of the regional economy, whilst minimising global and local environmental impacts".

This reflects well the Lisbon and Gothenburg agendas and is clearly relevant to regions elsewhere in Europe.

The strategy includes policies that support this vision on:

- Ports and Waterways
- Air Freight
- Rail Freight; and

- Freight on Highways

The strategy includes an Implementation Action Plan that identifies policies or other activities required to deliver the vision, the timescale for action and the key agencies. Key actions include:

- Identifying the need for and criteria for assessing proposals for the expansion of existing port facilities.
- Regional planning and economic strategies to reflect the role of international gateways.
- Feasibility and options for short-sea shipping and inland waterways to be reviewed.
- Support in terms of consents and funding for the development of rail freight schemes.
- Development of a Strategic Freight Network for the railway, including the Felixstowe to Nuneaton line.
- Identification of locations and criteria for the assessment of proposals for inland logistics centres.
- Identification of key locations on the road network for active traffic management where measures can be safely implemented and will improve journey time reliability.
- Review the need for future capacity improvements on strategic road networks, including during the development of regional funding priorities.

The strategy also identifies other issues of importance to delivering the Regional Freight Strategy:

- Roles and responsibilities of stakeholders, and the potential contribution from partnership working, in implementing the strategy
- Potential sources of funding to help secure and deliver the measures identified in the strategy
- Related skills shortages and training requirements, e.g. in the logistics sector and how the strategy can help resolve these.

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 EGNOS[4] 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[5]?

Intelligent Transport Systems have a crucial role to play in enhancing the functioning of the transport system. They can be used to provide data to governments in terms of infrastructure usage and current and future requirements, they can be used to provide information and advice to infrastructure users in terms of congestion and alternative routes, they can be used to provide information to emergency services for the more efficient and effective delivery of their services. Data on freight movements can be used to make more informed decisions on the most effective modes of transport in particular situations and places, facilitating increased modal shift. Logistics companies and customers can be better informed of the whereabouts of items of freight. The possibilities are almost endless.

[4] EU satellite navigation systems
[5] 2014-2020

A key consideration, however, is 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.

East of England Case Study:
National Roads Telecommunications network

The Highways Agency in the UK operates a dedicated telecommunications network which interconnects many thousands of roadside devices (telephones, cameras, signals, etc.) to seven Regional Control Centres (RCCs). This network is made up of fibre optic and copper cables that run along the length of the English motorways. The network makes it possible to transmit CCTV pictures, traffic data and emergency phone calls from the roadside to RCCs and to set signals. It is also of growing importance as the Highways Agency makes greater use of traffic management technology in its developing role as a network operator.

The provision, operation and maintenance of this network has been contracted to GeneSYS through the National Roads Telecommunications Services (NRTS) contract.

As part of this network, a fibre optic cable is currently being provided on the A14, which will be added to the network already in place and will be used to transmit data to/from signs and detectors on the A14 to/from the National and regional Traffic Control Centres.

The NRTS contract will allow the Highways Agency to realise the development of a national, high-speed telecommunications network. In time, much of the traffic information and data currently collected by detectors in the road surface and delivered by message signs will be provided more effectively, directly to drivers using 'in-car' technology. NRTS will play a vital role in promoting these and other Intelligent Transport Systems (ITS) developments leading to safe roads, reliable journeys and informed travellers.

East of England Case Study:
Suffolk County Council work with Performance Products Ltd aka Snooper on a new generation of satellite navigation systems specifically designed for goods vehicles

Performance Products (aka Snooper) have a system call the truckmate. In its different variants, it is meant to cover UK, Eire and Europe for all structure and environmental weight restrictions and low bridges. The County Council has facilitated a small trial on a "truck friendly" SatNav system in Suffolk, and hopes to carry out a larger trial in the near future.

On the 15 December 2008 Suffolk County Council held a meeting with NAVTEQ, Snooper (Performance Products), SatNav Warehouse and representatives from Faber Maunsell to discuss how local authorities could further assist mapping firms in getting accurate highway routing information to them. The meeting was very productive and all parties felt that progress could be made on reducing the number of complaints about SatNav systems and getting consistent information across to all road users.

Some of the actions that came from the meeting were:

- To investigate the possibilities of getting a UK Department for Transport (DfT)/Freight Best Practise Guidance Document on Freight SatNav systems
- To agree what road type (e.g. width, character etc) requires "Unsuitable for HGV" signing
- To look into further case studies on the benefits of SatNav e.g. fuel saving etc, routing
- To investigate the possibility of setting up local Highway authorities as a "higher priority

fault reporter" when reporting mapping faults

It was agreed that a national conference on SatNav would be very beneficial and Suffolk County Council confirmed that they were happy to host an event with DfT support.

The group has offered to assist DfT in helping to develop national guidance on how information is relayed to mapping firms and SatNav providers.

Suffolk County Council organised a further meeting on 20 March 2009 in Ipswich to talk about the possibilities of a national freight map. They are being supported by RHA, FTA, East of England FQP, Southwest FQP and the Tyne and Wear FQP and have urged DfT to engage with this initiative.

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?

The East of England welcomes recognition in the Green Paper of the value of alternative fuels, including hydrogen, in the future and the need to provide infrastructure on routes to future-proof them. However, the commercial use of hydrogen technology is some way off and it is important that TEN-T takes into account all forms of alternative fuels and technology developments, assessing their full environmental impacts, including those which will be able to come on stream much more quickly and will therefore contribute to the EU's environmental and climate change objectives over a shorter timeframe.

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?

The East of England agrees with the European Commission that it is crucial that the TEN-T programme is consistent with European Transport Policy, particularly as a review of this policy is currently getting underway.

As mentioned in our response to Question 3 above, the East of England believes that, as is the case with the TEN-T routes crossing our region, it is more appropriate to ensure there is a consistent "European framework", which can be used to determine whether projects are eligible for funding rather than focus on a predetermined "network". Projects which then emerged would be acceptable from a European perspective. In addition, they would need to be able to prove their relevance at the national and regional level, and ought therefore to have funding packages attached to them.

The East of England believes that such a "European framework" should include not only the existing priority projects but also be able to support infrastructure related to key international gateways such as ports and airports as well as their hinterland connections, in particular where these are environmentally sustainable, because of the enormous economic benefits these gateways can deliver.

In addition, the response to Question 4 above makes clear East of England enthusiasm for flexibility within the TEN-T programme to allow projects of common interest addressing market needs or taking into account technological developments to be supported. At the

same time pointing out the need to ensure a clear definition and consistent objectives for any "conceptual pillar".

In terms of using the TENs network for the deployment of innovative approaches, for example in transport pricing, it is important not to disadvantage the TENs network in relation to other possible networks, thus possibly displacing traffic to the detriment of other networks, with all the attendant consequences for European competitiveness, as well as the social and environmental impacts on these alternative routes. A consistent approach must be taken across the entire European network if a fair system is to be available to all infrastructure users.

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

The East of England 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 East of England believes that 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 (i.e. 14 or 21 years) would be more relevant and would fit more effectively with the planning timeframe. By way of contrast, the East of England's present strategic plan runs until 2021 and is currently being reviewed to extend to 2031.

Partners in the East of England feel it is important that the TEN-T programme applies more rigorous tests in terms of evidence of European value, cost-benefit analysis and project maturity to the projects put forward. This would give a more accurate picture of the cost of projects, would facilitate more effective monitoring and would ensure the relevance of projects to the needs of the EU.

It is important that a range of sources are used to fund TEN-T projects. Community funding is crucial to ensure projects of genuine European benefit take place but the scale of projects in question could not be funded solely by European sources. Indeed, partners contributing an element of the funding package to a project ensures a level of commitment to the timely delivery of projects to acceptable quality standards. It is unnecessary, however, to restrict or define the component sources of the funding package. Individual projects and situations will require and have available to them different funding sources and it is important that they are able to use any opportunities presented to them.

The East of England would agree with the current situation whereby increased funding is available to cross border projects but would argue that the definition of cross border is too restricted and that it should be extended to include maritime borders, e.g. in the case of the route from Nuneaton-Felixstowe and beyond. This would be consistent with the 2007-13 Territorial Cooperation programmes where new maritime cross border programmes are being supported.

Partners would also argue that support for sustainable modes of transport, e.g. rail, should be prioritised over modes such as road or air.

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?

Partners in the East of England 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 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?

The East of England welcomes the fact that the use of European funding for transport infrastructure encourages a strategic view to be taken of transport needs. In addition, regional partners feel it is important to highlight the benefits to 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.

Partners also 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.

However, partners would urge the European Commission to ensure that the mistakes made with the Motorways of the Sea concept, whereby it was developed without a full understanding of the needs of the market, are avoided in the future and in relation to other developments.

Furthermore, partners once again reiterate the need to ensure that a consistent approach is used in the assessment of projects and that 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?

While partners can see that, in certain situations, there may be value in engaging European co-ordinators for more complex projects, as a general rule the East of England feels that this is an unnecessary additional level of control.

However, ensuring an equitable system where grants are allocated fairly and according to objective criteria is critical to the improved implementation of the TEN-T programme.

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

The East of England feels that there is merit in **elements** of both Options 2 and 3.

Option 1
The East of England does **not** support Option 1 because partners feel the Comprehensive network is trying to achieve too much with insufficient resources. As a result the programme suffers from a lack of achievement and poor credibility.

Option 2
The East of England feels it is imperative that the currently defined priority projects, such as those routes crossing the East of England region, must be completed; not to do so would be to lose the benefits at European, national and regional levels which have been recognised as being delivered by these projects and to lose further credibility.

However, the region does not believe that the current list of priority projects is sufficient to achieve the aims of the TEN-T programme. An additional focus on key nodes, such as ports and airports, along with their hinterland connections, particularly where sustainable transport modes can be used, is essential to provide an efficient and effective European transport system sufficient to support the competitiveness of the European economy with the additional social and environmental benefits this brings. This extended definition of priority projects might be termed a "geographical pillar" and would include infrastructure such as that currently covered by the comprehensive network in the East of England.

Furthermore, the region would counsel against the definition of a priority network, which could suffer the same difficulties as the current comprehensive network in terms of lack of focus on key European objectives and trying to achieve too much with too few resources, resulting in failure and a lack of credibility.

Option 3
The East of England would not support the continuation of the comprehensive network for the reasons given above.

In addition, it would not support a core or priority network. However, it would support an expanded list of priority projects as explained under Option 2 above.

At the same time, the East of England welcomes the proposal for a conceptual pillar if this is seen as a means of introducing flexibility into a traditionally rather inflexible area by funding projects of common interest dealing with issues such as congestion, safety, security etc using new technologies or responding to market needs. Once again, though, partners urge the European Commission to ensure that this pillar is clearly defined with unambiguous objectives to ensure fair and consistent implementation across the EU.

In conclusion:
The East of England would support an expanded list of priority projects incorporating the currently defined projects and with an additional focus on key nodes such as ports and airports, along with their hinterland connections, particularly where sustainable transport modes are used, where there is a clearly recognised European as well as national and regional value to the project and where a consistent approach to the assessment of projects has been taken and a satisfactory cost-benefit analysis has been undertaken.

The region would also support a clearly defined and equitably implemented "Conceptual pillar" where this is a means of introducing flexibility by funding projects of common interest dealing with issues such as congestion, safety, security etc using new technologies or responding to market needs.