



Consultation Response to the
European Commission
Green Paper on
TEN-T: A Policy Review

30 April 2009



WLGA • CLILC

INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities, the three fire and rescue authorities, and four police authorities are associate members.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.
3. The Welsh Assembly Government, as the executive body for Wales, has devolved responsibility for the implementation of transport policies and for the delivery of transport investment programmes within Wales. Responsibilities include:
 - the management, maintenance, and improvement of the trunk road and motorway network within Wales;
 - the client management role of the Wales and Borders Rail Franchise and delivery of rail infrastructure projects;
 - the implementation of a range of initiatives and grant schemes designed to improve transport services within Wales.
4. In Wales, the principle transport policy document is the **Wales Transport Strategy**, which sets out five key areas where progress is needed. Namely,
 - Reducing greenhouse gas emissions and other environmental impacts;
 - Improving public transport and better integration between modes;
 - Improving links and access between key settlements and sites across Wales and strategically important all-Wales links
 - Enhancing international connectivity; and

- Increasing safety and security

5. To complement this, the Welsh Assembly Government is also in the process of developing a **National Transport Plan**, which will deal with delivery at the national (ie. Wales) level for road, rail, and integrate transport. At the level of **local government**, there are **four Regional Transport Plans**, which set out the regional transport policies, schemes, and priorities, in line with the long-term outcomes and strategic priorities of the Wales Transport Strategy. Local government in Wales takes a view on trunk roads and railways, but is not directly responsible.
6. Also in Wales, is the **Wales Freight Strategy**, which has a close correlation with the Wales Transport Strategy. It places a high priority on meeting the objective of transferring freight from road to rail, ensuring that freight transport plays a major role in a sustainable economy. The Wales Spatial Plan is also key in determining transport policy in Wales, as it deals with integrated land use planning. Together these documents make a comprehensive statement on Welsh transport policy.

Summary of Key Points

It is important to ensure that the TEN-T status of both the North Wales and the South Wales corridors is not downgraded from a priority project as in the case of North Wales or overlooked in the case of South Wales. Indeed, taking in to account the fact that funding these links will lead to greater benefits outside the specific project area, the status should arguably be increased. This is particularly critical for peripheral areas, specifically North West Wales and South west Wales, both of which are Convergence areas.

Indeed, whilst national transport and spatial strategies are important, the European Commission should underline the importance of coordinating investment priorities in neighbouring Member States (such as in our case the United Kingdom and the Republic of Ireland with regard to major road investment and upgrade so as to avoid shifting bottlenecks to new locations for either road passenger or freight transport. These issues are often overlooked in national planning processes and demonstrate the added value of

the TEN T policy if it is successfully integrated with other EU regional and sectoral policies with a territorial dimension.

Both the North Wales and the South Wales corridors have major ports: Holyhead in North West Wales and Fishguard, Milford Haven, Pembroke Dock, Port Talbot and Swansea in South West Wales. Therefore, it is crucial that North Wales remains a priority axis, and that South Wales is added to the list of priority axis. The WLGA underlines the important contribution that the **Motorways of the Sea** concept can make in future and underlines the significant contribution that the capacity of Welsh deep water ports can make to sustainable multi modal transport policy if their hinterland can be successfully integrated to the terrestrial network.

The WLGA would strongly support a move to a core network approach, since it is hoped that the two links to the Republic of Ireland would be part of any such network and, thus would be of benefit, especially to the more peripheral parts of Wales.

A priority or core network approach should adopt a flexible approach to the TEN-T, with geographical and conceptual pillars. The network would have to facilitate co-modality, by being fully integrated (including intelligent transport systems) and be able to meet future transport and environmental demands, for example contributing to emissions reduction objectives. A move to this option would assist in helping to extend electrification along both North and South Wales to the Irish Sea Ports.

West Wales and the Valleys is an EU Convergence Region and East Wales is currently eligible under the Competitiveness and Employment objective of EU Regional Policy 2007-13. The WLGA recently responded to the EU Green paper on Territorial Cohesion where underlined the importance regional and sub regional territories to take account a wide range of EU, national and regional policies that have an impact on the territory. The WLGA would wish to underline the wider economic, social and environment drivers that can make an effective contribution to in peripheral regions TEN-T offers.

Consultation Response to Green Paper questions

Question 1 - Other Factors

The Commission should also include the ability of the TEN-T network to assist in the economic benefits to be gained by agglomeration and city regions as highlighted in recent Green Paper on Territorial Cohesion.

Question 2 - Comprehensive Network

A further argument for the maintenance of a comprehensive network is that this is crucial to underpin the development of EU Convergence regions which are currently in receipt of Structural Funding (i.e. < 75% of EU average GDP). The TEN should also make better reference to Member State and Regional Transport Plans to which local authorities in Wales contribute.

Question 3 - Priority Network Approach

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 approach would help to ensure that investments in Wales could take into account benefits which arise not only from investments in England but from other Members States. (e.g. the Republic of Ireland)

Question 4 - Flexible Approach

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

Question 5 - Different Aspects within overall Concept

A no one size fits all policy approach can work effectively at the EU level. Differing aspects can be best be taken in account of within the overall concept of the future TEN-T through future funding criteria. A variety of modes should be encouraged including ports, regional airports, rail and intermodal developments to ensure a balanced approach to TEN T funding. The differing needs of local / regional / international traffics should also be taken into account. Promoting modal shift, addressing climate change, regional economic and social

development and effective integration of national networks are all aspects that should be effectively address in future.

Question 6 – ITS

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, make better use of capacity, improving safety and in fuel efficiency. It may not however be a solution to all transport problems.

Question 7 - Infrastructure Project of Common Interest

Whilst having due regard for the projects funded by other EU programmes (i.e. EU Research Framework Programme etc) the TEN-T programme could consider in future, charging points and hydrogen fuelling points being prioritised on TEN-T routes as this infrastructure is deployed across the EU.

Question 8 - Core Network

A core network would be feasible and from a Welsh perspective would help to ensure that the two TEN-T routes (A55, M4 / A48 / A40/ A477) would be protected as routes to the Republic of Ireland. The EC should be mindful of the how future TEN-T policy supports the connection to Peripheral and Convergence Regions effectively.

Question 9 – Financial Need of TEN-T in the short, medium and long term

In light of the EC Budget review, TEN-T policies need to align effectively with other key regional and territorial policies across the EU. The important contribution of the European Investment Bank to major infrastructure schemes needs to be encouraged in all EU regions requiring TEN-T investments. Grant funding is important in the early stages of project feasibility or where transnational priorities (particularly in peripheral regions) are not prioritised in national transport plans by Member States.

Question 10 - Funding and Delivery of Projects

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. Acknowledging the future importance of European long term sustainable finance and loans, the WLGA recently visited the European Investment Bank where we have learnt about the role of the bank in relation to supporting large scale transport projects of common interest and the European PPP Centre of Expertise. Welsh Local Government is collaborating closely across the Welsh public and private sectors to explore a variety of financing mechanisms that maybe appropriate to future strategic infrastructure in Wales. We would therefore underline the importance of the European Commission maximising its added value by promoting the sharing and exchange of best practice so that expertise gained in other regions in this field can benefit the development of future TEN-T infrastructure priorities in Wales referred to in this response.

Question 11 – Strengths and weaknesses of Community Financial Instruments

No response

Question 12 – Improvement on non financial instruments

That the scope and definition of criteria for TEN-T policy be rationalised with clearer outputs. TEN-T policies could also benefit from more effective integration with other sectoral EC sectoral with an impact at the territorial level. Whilst the Open Method of Coordination and benchmarking are important for Member State dialogue in the Council of Ministers, the WLGA would argue that the other institutions including the European Parliament, the Committee of the Regions play a key role in the dialogue with local and regional authorities in respect to TEN T policy. WLGA is also a member of the CEMR – the Council of European Municipalities and Regions that brings together local government associations from across the European Union in a working group on transport policy. Informal consultation with the CEMR and other EU networks of local and regional authorities is an important mechanism to gather feedback from local and regional authorities on the emerging priorities for the future of TEN-T.

Question 13 – Suitable Option

Option 3 would be our most preferred option

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