

### **COSLA response to the TEN-T consultation**

- a. The **Convention of Scottish Local Authorities (COSLA)** is the representative voice of all Scottish Local Authorities both nationally and internationally. COSLA welcomes the opportunity to response to this consultation on the TEN-T review that builds on previous contributions and our work with the Scottish Members of the European Parliament and the Committee of the Regions. The following points have been agreed by successive meetings of our Regeneration and Sustainable Development Executive Group:

#### **General Considerations:**

- b. COSLA supports EU initiatives on transport matters provided it fully respect the principle of conferral – whereby the EU should only intervene on matters that the EU Treaties have explicitly allowed it to – and fully respect of the principle of subsidiarity and proportionality – whereby the respect of local competences and local freedom to organise and provide local transport services is fully observed.
- c. COSLA also believes that EU involvement *should not* take place only where the EU has some legal competences on transport, but also *only when* its actions can provide real EU added value;
- d. COSLA stresses that wherever local transport frameworks and solutions are already well developed, added value from any forthcoming European mobility proposal would be better achieved by supporting the development of existing structures. COSLA would not support any EU measure that would introduce mandatory local transport rules (planning, green zones, organisation of transport, etc);
- e. While transport solutions should start at a local level, especially as regards to urban mobility, COSLA welcomes EU support for local initiatives by the organisation of the exchange of best practice. Likewise COSLA would support the continuation and further development of EU financial support for local innovative transport actions that otherwise could not be financed locally or nationally;
- f. COSLA encourages a holistic approach is needed whereby freight movement should be considered as well as passenger traffic. Likewise, economic development together with sustainable development provisions, including emissions and climate change, should be woven into any action plan to ensure outcomes on the ground are complementary to current local priorities;
- g. COSLA welcomes the development of Intelligent Transport Systems (ITS) and technologies and its implementation at the local level. COSLA supports the EU action to facilitate this, provided it is technology neutral and it is limited to ensure that systems are interoperable across the EU, avoiding gaps and overlapping of systems. We also support the EU facilitation of the expansion of ITS across the EU, including financial support but only if local authorities retain the ability to define the content, timing and ambition of ITS deployment in their area;

#### **Specific on TEN-T review**

- h. We would like to remind that the current TEN-T priority projects 13, 14, 21 and 26 anticipate a number of improved rail, motorway and seaborne links of several parts of Scotland with continental Europe and Ireland. Similarly we have seen with concern the progressive evolution of the new concepts that had been introduced in the Green Paper, notably those of “core networks”, “green corridors” and the bottom up “corridor coordination approach”.
- i. In spite of the further assurances of the latest consultation paper, we remain concerned that these type of approaches, behind a logic of rationalisation could signify a reduction in investment in peripheral areas such as Scotland and not adequately reflect the Territorial Cohesion objective as one of the key criteria to review the TEN-T network.
- j. We would stress the need that, in line with the principle of Territorial Cohesion, all regions of the EU, considered at least on a NUTS II<sup>1</sup> basis, are able to be linked with the Trans European Transport Network;
- k. Therefore we would demand that access to the TEN-T network via secondary links is ensured both at national and EU planning and financing stages of TEN-T deployment;
- l. COSLA would like to emphasize the need that consistency is ensured between the EU transport initiatives TEN-T projects and the local and regional transport plans;
- m. COSLA recognises the need for Member States, Devolved Administrations and local authorities to work in partnership in deciding, planning and financing transport infrastructure;

#### **Specific on maritime links**

- n. Given the geographic situation of Scotland, we would particularly encourage the development within the TEN-T framework of ‘motorways of the sea’ essentially sea links for freight as a sustainable, energy efficient way of improving connectivity, particularly in the North Sea and Baltic Regions.
- o. We believe that should a North Sea Strategy be developed (and indeed COSLA has been fully involved in this process), the development of transport links across this area should be fully integrated in it.

#### **Financial Considerations**

- p. COSLA would like to stress the need for proper coordination and cross-referencing of the ongoing and forthcoming EU transport strategies and initiatives coming from within the Commission Transport Directorate General but also between it and other Directorates such as Regional Policy and Maritime Affairs
- q. Towards the next EU Budget Review, COSLA would express its hopes that EU transport financing is simplified and made fully consistent with national funding and that financial allocations correspond to the stated ambitions, and vice versa.
- r. COSLA is keen to work with the Scottish and UK government, Scottish MEPs our European umbrella CEMR and other related bodies such as CPMR, North Sea Commission to ensure that the needs of Scotland's communities are duly included in the final TENT-T guidelines.

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<sup>1</sup> NUTS stands for Nomenclature of Territorial Units for Statistics and level two refers in Scotland to the four statistical grouping of the 32 local authorities: Highlands and Islands, South of Scotland, West of Scotland and East of Scotland.