



STRATMOS RESPONSE TO CONSULTATION ON FUTURE TEN-T POLICY

To: EUROPEAN COMMISSION / DG-MOVE TEN-T Policy Revision
From: StratMoS
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STRATMOS RESPONSE TO THE CONSULTATION ON THE FUTURE TRANS-EUROPEAN TRANSPORT NETWORK POLICY

INTRODUCTION

The StratMoS project is funded by EU and the Norwegian government through the Interreg IV B North Sea Region Programme. The core aim of StratMoS is to promote and facilitate shift of cargo from road to seabased intermodal transport, and to improve accessibility within the North Sea Region by supporting the implementation of Motorway of the Sea (MoS) and related transport networks in an integrated logistical chain. This is a joint response from the partners of the StratMoS project.

CONSULTATION RESPONSE

General comments

The TEN-T guidelines (Articles 12a and 13.1) state that Motorways of the Sea (MoS) should reduce road congestion and/or improve access to peripheral and island regions and States. The consultation document produced by the Commission does not refer to MoS and we suggest there is a need to clarify the role of MoS in the future TEN-T policy.

We would also like to take the opportunity to call for stronger emphasis on territorial cohesion and accessibility. These terms receive little or no mention in the consultation document despite being part of the Lisbon Treaty and current legal framework (TEN-T guidelines).

This response from the StratMoS project is therefore focused on peripheral issues. This does not imply that other issues are not relevant for the StratMoS project such as that the nodes of the core network should also comprise dry ports, various technologies and platforms should be regarded as *supplementary infrastructure* in the context of TEN-T, integration of the green corridor concept in the TEN-T planning process, and that ship purchases to be co-funded as *mobile infrastructure*. In this respect reference is made to the North Sea Commission's response to this consultation. We also emphasise, that as with the entire TEN-T network, great care must be taken when developing and strengthening MoS in order to avoid damage to marine habitats and resources, which are important for the EU both from an environmental as well as – in the case of fisheries – from an economic point of view.

The methodology for TEN-T planning

Are the principles and criteria for designing the core network, as set out above, adequate and practicable? What are their strengths and weaknesses, and what else could be taken into account?

Motorway of the Seas (MoS)

We note that Motorways of the Seas (MoS) is not mentioned in the consultation draft of the revised TEN-T policy, despite specific reference to MoS in the planning methodology developed by Expert Group 1. We suggest that the relationship between Motorways of the Seas (MoS) and the revised TEN-T policy needs to be clarified.

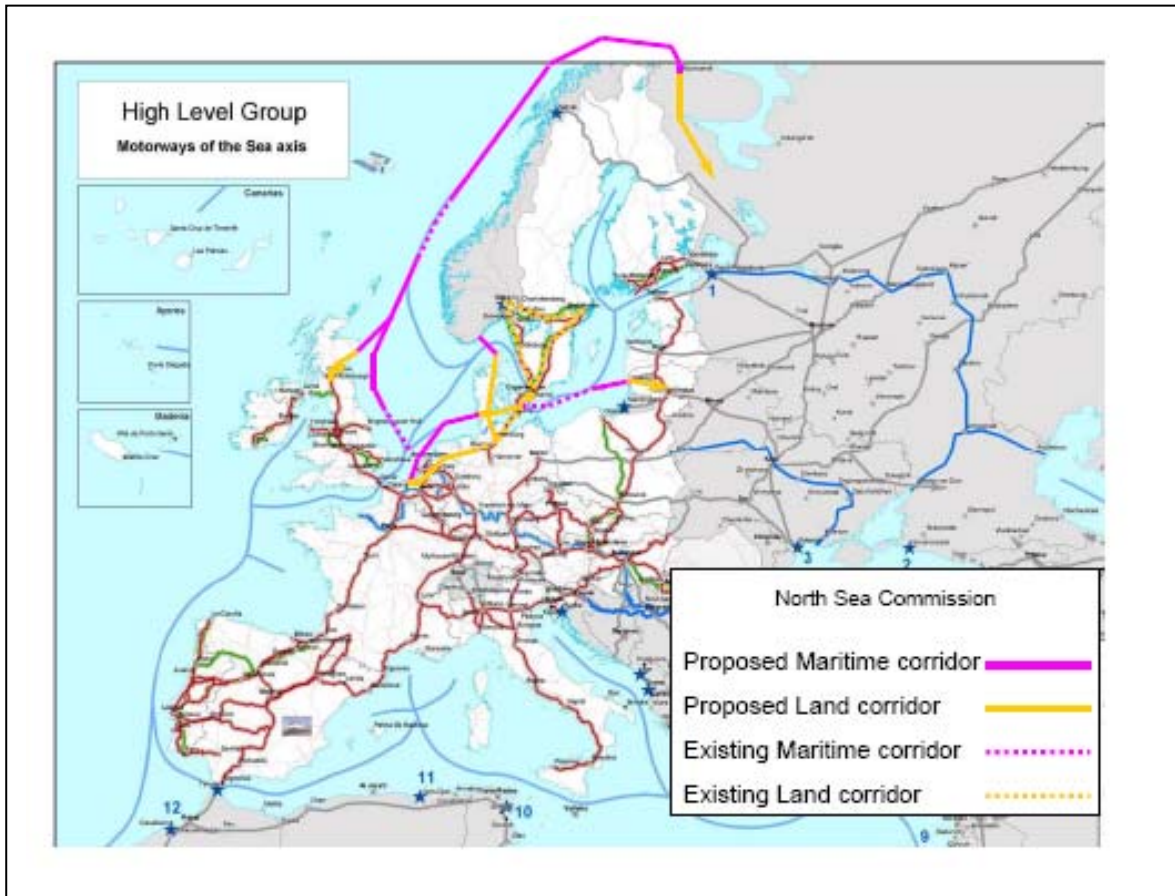
We furthermore suggest that the relationship between MoS and the Comprehensive Network and Core Network needs to be clarified.

A further important overall criterion for developing the TEN-T is to avoid developing parallel road corridors that are seriously negatively affecting the use of sea and rail modes. This would be true for e.g. MoS versus road corridors but also applies to e.g. rail versus road, inland waterways versus road corridors. Doing so would be neither resource efficient nor conducive to achieving modal shift and thus more carbon efficient transport.

Northern Maritime Corridor as a Motorway of the Sea

In particular we want to emphasise that in the context of the Motorways of the Sea and transport axes to neighbouring countries, the transport axis from the North Sea countries to the Barents Sea region is of steadily increased importance, and more recognized as an important axis than envisaged by the High Level Group on "Transport Axis to Neighbouring Countries" and the subsequent "Communication on Guidelines for transport in Europe and neighbouring Regions" prepared by the Commission. The increased offshore petroleum exploration in the Barents Sea, not least the Shtokman field, the natural resources in Northern Russia, and the international shipping interest of utilizing the Northern Sea Route (North-East Passage), are factors that has gained increased attention and importance during the recent years.

In line with the Communication referred to above, the Motorways of the Sea network in Western Europe should be extended and comprising Scotland and Norway continuing all the way up to Northern Norway and North West Russia, being linked to important transport hubs like Murmansk and Arkhangelsk as well as linked to the Northern Sea Route to the Bering Strait and the Far East. The Northern Maritime corridor is connecting large third country cityport of Murmansk via Western Norway coastline settlements connecting to Aberdeen thence by land to the Northernmost UK/EU node of Glasgow and also connecting to the sea routes southwards to the main port cluster on the Benelux coastline (map below). As shown in the map this corridor is one of a select few endorsed by the CPMR's North Sea Commission which has our full support for taking this viewpoint.



Serious consideration should therefore be given to allowing for connections of the core network to third countries or to "designated points in the outer areas" to provide a compensatory access to the transport network for the outer EU areas. The criteria for these "designated points in outer areas" could for example involve substantially less population than in the inner EU where 1million was proposed as a criteria. Suggested "designated points in outer areas" could be an area of 200,000 people in a metropolitan area and surroundings.

Peripheral areas

We suggest that specific consideration is needed to clarify the relationship between peripheral areas and the proposed methodology for TEN-T planning.

Existing TEN-T guidelines (Articles 12a and 13.1) state that the main objectives of MoS are to reduce road congestion and/or to improve access to peripheral and island regions and States. The use of 'and/or' implies that modal shift and accessibility should be on an equal footing and that the MoS funding scheme can be used for projects promoting access to peripheral areas even if those projects do not promote modal shift, and vice versa. However, there have been no accessibility-oriented MoS applications to date, and there is in practice a bias towards projects promoting modal shift in the evaluation criteria and checklist for proposals.

The Commission does not currently have a sufficiently explicit framework for assessing the quality of future periphery based MoS applications, and has no specific criteria for weighing the merits of a periphery based application **as** against cargo shift based applications. We suggest that the aim of territorial/ socio-economic cohesion and improved accessibility for peripheral areas requires further definition to enable prospective applicants to adhere to these overarching aims of MoS.

As such we would like to suggest that specific criteria are developed for MoS applications aimed at improving accessibility and territorial cohesion in peripheral areas. In respect to the core network, this should for example imply a need for a spatial exercise to identify peripheral locations without easy access to the 12 main port cluster areas and **also** those without easy connection via one of the main nodes (capital/ main city), and to identify the hinterlands of the 12 main port clusters (perhaps limited by one days HGV drive away). The hinterlands outwith the 12 main port cluster hinterlands should have a route to at least one of those ports identified as a specific connecting route. not least on the justification that it allows access to intercontinental trade. There is a need for widespread entry points to the Core network, especially from peripheral areas, as maritime links can be much cheaper to provide than land links so maritime links should be integrated into the networks, both core and comprehensive.

To what extent do the supplementary infrastructure measures contribute to the objectives of a future-oriented transport system, and are there ways to strengthen their contribution?

We suggest that greater emphasis on cohesion and accessibility in the new TEN-T guidelines will strengthen the contribution of supplementary infrastructure measures towards a more integrated European transport system which better serves the mobility needs of citizens and businesses and the aims of Europe 2020.

What specific role could TEN-T planning in general play in boosting the transport sector's contribution to the "Europe 2020" strategic objectives?

Europe 2020 puts forward three mutually reinforcing priorities:

- Smart growth: developing an economy based on knowledge and innovation.
- Sustainable growth: promoting a more resource efficient, greener and more competitive economy.
- Inclusive growth: fostering a high-employment economy delivering social and territorial cohesion.

We suggest that strengthening the emphasis on cohesion and accessibility and clarifying the role of peripheral areas in the Comprehensive and Core networks in the revised TEN-T policy would contribute towards delivering the third priority area 'Inclusive growth'.

TEN-T implementation

In which way can the different sources of EU expenditure be better coordinated and/or combined in order to accelerate the delivery of TEN-T projects and policy objectives?

We suggest that a greater coordination of MoS and Marco Polo funding instruments could contribute to strengthen territorial cohesion and accessibility of peripheral areas.