

15 September 2010

CONSULTATION ON THE FUTURE TRANS-EUROPEAN TRANSPORT NETWORK POLICY

SUBMISSION BY BRITISH PORTS ASSOCIATION

1. *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?*

The creation of comprehensive and core networks is a logical progression and identifies more clearly national and cross border needs. Even so, and certainly in the case of the UK, we do not believe that it will lead to any particularly new information about traffic flows or the need for investment. The UK's island status creates very different transport dynamics from the vast majority of other member states. Our reliance on ports as international gateways is much greater for the UK, bearing in mind that 95% of all freight traffic enters or exits the UK by sea. The necessarily port centric nature therefore of the UK transport network will need to be reflected within both layers. Although connections can be improved through better traffic management the most important element is the willingness of the EU and the member states to fund new infrastructure. Although we can support the principles of the approach, therefore, it will be meaningless unless there is a real commitment to provide the necessary funding.

2. *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 agree that the core network has to be based on the comprehensive network, with the latter as the starting point. The core network in many ways will replicate the previous priority project network, some of which particularly affected ports. However, just taking one case, Priority Project 13 linking Ireland, the UK and the Benelux, the work is still not complete and we are concerned that this latest exercise will only amount to re-badging previous ambitions. We also believe that the most urgent need is for investment in the comprehensive network rather than the core network. Generally, the UK has an efficient and mature transport system in terms of its main infrastructure links; it is the links between the main routes and local infrastructure which can cause significant problems. The efficient completion of the "end to end" journey is an

important aspect of cross border movement, although it might require a very local solution. In this connection, funding might also be better used for “software” schemes, for example, better provision of real time information on traffic flows to the freight industry, or developing expertise in traffic management schemes. Since the TEN-T concept was created, the addition of many new member states should, in our view, lead to a revision of previous priorities. We would accept that there is a real need for investment in the core networks of many of the new member states as the main transport arteries need to be established. The position in other, longer established members is, we believe, different, hence our view that in those countries it is investment in the comprehensive network which should be the priority. So far as we can see, the proposals do not make this distinction, and instead treat all member states in the same way. The Commission should consider a differentiated approach to member states at various stages of development.

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

Transport efficiency in itself contributes to environmental protection by reducing congestion and pollution. There is a strong link between the adequacy and efficiency of infrastructure, which depends primarily on investment, and the reduction in its environmental impacts. Any contribution that TEN-T planning can make to shortening journey times and reducing bottlenecks will have environmental benefits. We would add that, similar to the points we made above, further objectives are being loaded on to the TEN-T framework. Of course we accept that TEN-T cannot ignore wider policy objectives (and indeed that successful completion of projects will contribute to decarbonisation) but the original concept of TEN-T, namely the identification of and investment in a reliable transport network, should predominate.

4. *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?*

5. *How can an EU funding strategy coordinate and/or combine the different sources of EU and national funding and public and private financing?*

6. *Would the setting up of a European funding framework adequately address the implementing gap in the completion of TEN-T projects and policy objectives?*

It is difficult for us to comment on the fine detail of EU funding strategies. We would make two basic points. Firstly, and as referred in our response to Q1, TEN-T can only succeed as a concept if the funding commitment is there. TEN-T has been a major part of transport policy since the early 1990s, but its success rate is inconsistent and there are a number of uncompleted projects. Also, where funding for UK ports has been obtained, and this has been for feasibility study funding, the bureaucracy involved has been a major disincentive to repeat applications. So we would expect that some thought will be given to ways in which the process of dealing with applications and liaising with member state administrations can be simplified and speeded up. This is particularly an issue for ports where commercial opportunities come and go quickly; the results of a feasibility study may be needed within a timescale which the current system is simply not providing.

On funding generally, we are concerned that not enough recognition is given in the proposals to a likely lack of funds and the problems of investing directly in port projects and the competition issues these raise. There remains a focus on “prestige” projects. In the case of the UK, we believe that the most productive investment would be in a range of smaller schemes, often completing the final leg of journeys where congestion and unreliability are evident. Such investment would produce high value for money rates of return.

The opportunity should also be taken to review the effectiveness of Priority Project 21, “Motorways of the Sea”. Resources have been dedicated to this which could have been more effectively used elsewhere and, for ports, there is considerable concern about the competition implications which is shared by a number of member states.

7. *In which way can the TEN-T policy benefit from the new legal instruments and provisions as set out above?*

So far as we understand them, the proposals for the revision of the legal framework for TEN-T guidelines seem sensible and potentially helpful. However, their ultimate objective of these changes should be to ensure that the system delivers and that effort goes beyond a mere legal tidying up.