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East of England Development Agency (EEDA)

Response to the European Commission Consultation on the Future Trans-European Transport Network Policy

About EEDA
EEDA is the driving force behind sustainable economic growth and regeneration in the East of England, our task is to improve the region's economic performance and ensure that the East of England remains one of the UK's top performing regions.

Responses to the questions posed in the Commission Working Document: Consultation on the Future Trans-European Transport Network Policy

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?*

EEDA is supportive of the dual layer approach comprising of a "Comprehensive Network" and a "Core Network", providing that within this approach there is continued support and funding for the completion of defined priority projects given the recognised European, national and regional benefits these will bring. For example in the East of England, there is a strong alignment between the TEN-T Priority Projects in the region and the corridors identified as being of particular economic importance in the region's Transport and Economic Evidence Study (TEES) and those identified as 'Strategic National Corridors' by the UK Department for Transport (DfT). EEDA would be happy to provide further details and/or technical information on this if that would be helpful.

EEDA is supportive of the principle that the Comprehensive Network should integrate all existing modal maps and Priority Corridors, as this should encourage better interconnectivity between modes, however the funding of projects should be carefully managed in order to ensure that there is improved **actual** integration between modes as well as improved policy integration.

EEDA would recommend that the Core Network should focus on 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.

EEDA would caution that careful thought should be given to expanding the Comprehensive Network so that it does not become inadequately focused or try to achieve too much with too little funding, as this could lead to a lack of achievement and poor credibility. Any expansion to the network should be based on economic rationale, ensuring that new elements of the network have a high cost-benefit ratio.

EEDA fully supports the goal of achieving reductions in travelling time and improvements in reliability whilst also contributing to climate change goals and maintaining environmental protection. Improving reliability and reducing travel time are of key importance to businesses and result in significant wider economic benefits, contributing to the goals in the Regional Economic Strategy of improving productivity and prosperity in the region. In preparing this response, EEDA have consulted the East of England Business Group who are also supportive of this goal.

Regarding the general principles for the design of the Network, including “de-carbonisation” amongst these principles is important, however the principle of maximising modal shift towards lower-carbon travel modes could also be included.

EEDA supports the Commission’s proposal that network configuration will take in to account nodes of supra-regional importance in terms of the economy, however groups of medium-sized cities can also be of significant economic importance, as is the case in the East of England, and this should also be considered when configuring the network.

EEDA agrees that gateway ports, intercontinental hub ports and airports, plus the most important inland ports and freight terminals should be taken into account when configuring the network and would therefore expect a number of ports and airports in the East of England to be included in this category.

EEDA would agree that corridors connecting main nodes should reflect economically significant long-distance or international (potential) traffic flows: TEN-T Priority Project 26 which covers the Felixstowe to Nuneaton rail line is just one example of such a route. In addition to reflecting economically significant routes and supporting economic growth, network configuration should maximise opportunities for intermodal links and co-modal transport where this supports lower-carbon modes, for example facilitating the shift of freight movements from road to rail or to short sea shipping.

EEDA strongly supports using existing UK Priority Projects as a starting point for developing the UK Core Network. In terms of identifying additional parts of the Core Network beyond these existing Priority Projects, the process for planning the Core Network as set out on pages 6 and 7 seems reasonable.

However one possible weakness with the process is that it doesn't consider the extent of the existing network, or include any assessment of suitable modes of transport. This could be addressed by adding a step after step 1 to 'consider the extent of the existing network and review modal possibilities'. Also, in step 2 when the selection of 'intermediate nodes' is carried out, the economic importance of these nodes should be a key consideration.

Carbon impacts of the routes/nodes could also be considered as part of the criteria.

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

EEDA fully supports proposals for the future TEN-T network to support infrastructure for Intelligent Transport Systems: travel and traffic information; traffic management and efficiency-related measures; applications which interconnect the modes and ensure connection to public transport systems, freight and freight-related services. All of these interventions help to optimise the use of the existing network, resulting in significant economic benefits.

EEDA particularly welcomes the proposal to give priority to transport infrastructure-related measures that stem from EU policy goals from the "Europe 2020" strategy (with its priorities of smart, sustainable and inclusive economic growth).

In EEDA's view, the Commission could play an important role in contributing to the objectives of a future-oriented transport system by ensuring inter-operability between the systems in different member states, by coordinating standards and technical specifications and through sharing best practice.

In terms of infrastructure required for a future-oriented transport system, the consultation document refers to the need to accommodate the new generation of vehicles using alternative fuels (including charging points for electric cars, Liquid Natural Gas for shipping). EEDA agrees that the provision of such infrastructure will be a vital element of our future transport systems, and is currently leading a bid to the UK Government which is seeking funds for a network of charging points across the East of England.

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

The region's Transport and Economic Evidence Study estimates that transport congestion in the East of England alone is costing the UK economy over £1bn per annum and that 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. This clearly demonstrates the potential economic impacts of transport improvements in just one region within the EU, when replicated across the EU, the impacts are clearly of real significance. Here then, there is a real opportunity for TEN-T planning to support the "Europe 2020" Strategy priorities of smart, sustainable and inclusive economic growth.

TEN-T planning could also play an important role in ensuring that best practice from different member states is shared.

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?*

Transport constraints are a consequence of an imbalance of supply and demand, which can be addressed by either addressing the supply side or the demand side, or both. EEDA therefore supports the creation of an integrated funding framework to coordinate EU funding for transport, which would be made available to support both supply side and demand side interventions. EEDA also supports the funding framework being made available to support both infrastructure investments and other transport policy-related components, including technological deployment, Green Corridors, research and development in transport and integrated transport systems (as mentioned in the consultation document). In our view, this funding should also be made available for smarter choices measures and demonstrations of best practice (as exemplified by the EU-funded CIVITAS projects). In addition, equal consideration should be given to providing funding for projects proposed by both the private and public sectors.

However, we would expect that the creation of a new funding framework would not affect the funding of the priority projects or support for other routes already designated as part of the network.

Overall EEDA fully supports the TEN-T programme and would argue that its budget should be substantially increased in order to accelerate the delivery of TEN-T projects and policy objectives. The current focus on a seven year funding framework could also be amended to allow longer timeframes for project funding (eg 14 or 21 years).

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

EEDA supports better coordination with the European Investment Bank where this would allow better mobilisation of private sources of funding through facilitating the use of Public Private Partnerships.

Any EU funding strategy should not seek to restrict or define component sources of a funding package, as this could place unnecessary constraints on project proposals.

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

Yes, providing that funding is set up in an appropriate way to meet the needs of the market and applicants.

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

EEDA welcomes any amendments which allow greater 'flexibility' and which simplify the process of applying for funding and/or reduce administrative costs.

8. *Additional comments*

General Comments

EEDA is supportive of ensuring that the TEN-T network is flexible enough to respond to changes in transport geographies, such as the expansion of existing ports or airports, as this will help to future-proof the network.

EEDA would also emphasise the importance of having a consistent approach to project assessment and cost-benefit analyses. The Commission may wish to consider providing guidance on the assessment of the economic and carbon benefits of projects.

It is also important for the TEN-T network to meet both local and regional transport needs, as well as European and national transport requirements, therefore the involvement of local, regional and national transport agencies in TEN-T policy development is vital. This will also help to ensure consistency between national transport policy and TEN-T policy development.

Comments on the UK Ten-T Network

Comments on the comprehensive road network

In the East of England, there is a strong alignment between the TEN-T Routes and the corridors identified as being of particular economic importance in the region's Transport and Economic Evidence Study (TEES) and those identified as 'Strategic National Corridors' by the UK Department for Transport (DfT). Eddington's 2006 Transport Study identified key inter-urban corridors and international gateways as strategic economic priorities, and a number of the TEN-T routes in the region do link to international gateways (ports and

airports) and should therefore be considered as strategic economic priority routes. For these reasons the current TEN-T routes in the region should continue to be designated as such.

Comments on the comprehensive rail network

Parts of the Great Eastern Main Line (which runs from London to Norwich) are already included as elements of the TEN-T network, however given the economic significance of the route, which serves four key economic drivers in the region (the growing medium sized cities of Norwich, Chelmsford, Colchester and Ipswich) we would suggest that the remainder of the route should also be designated as part of the TEN-T network. The economic benefits of a range of improvements envisioned for the Great Eastern Main Line have been investigated in a recent study undertaken for EEDA, which estimated that such improvements could deliver up to £3.4 billion of conventional transport related economic benefits and £280 million of wider economic impacts.

Comments on TEN-T designated ports

The East of England's ports are of local, regional, national and European economic importance, and currently account for 53% of UK container capacity, this will rise to over 70% once planned expansions are completed. EEDA would therefore suggest that all of the East of England ports currently included in the Comprehensive Network remain included. However, we would also suggest that the TEN-T network should be flexible in order to adapt to changes in the shipping industry and other related sectors, for example there are significant development proposals for a deep sea container port at London Gateway in the Thames Estuary, which in future should form part of the TEN-T network. In addition the offshore wind industry in the region, with its strong links to ports and shipping, is expanding rapidly, which may lead to particular ports/routes becoming of greater economic significance. A TEN-T network which is flexible will allow for changes in designations to be made in order to respond to such changes.

Comments on the proposed changes to the criteria relating to the inclusion of airports in the TEN-T network

EEDA has some concerns about the proposed changes to the criteria where this may result in changes to the network of airports currently designated as UK Ten-T airports, as this may have economic consequences.

An alternative amendment to the criteria would be to look at the economic value of each airport, rather than simply looking at passenger numbers and the tonnage of freight moved.

Again, EEDA would suggest that there should be some flexibility in terms of the TEN-T designated airports, so that any major changes in airport activity can be reflected in the designations applied.