

Response to the consultation on the future of the Trans-European Transport Networks (TEN-T)

By Pembrokeshire County Council

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1. Observations on the Trans European Network

- The Priority Corridor Plan through Wales (2008) shows the A55 to Holyhead as a priority (thick green line) but the M4/A48/A40 (A477) Trunk Roads and TEN-T route to Fishguard, Pembroke Dock, Milford Haven and Swansea hardly discernable. Pembrokeshire County Council consider that this priority needs to be reviewed with consideration being given to putting more emphasises on access to the ports of south west Wales.
- It is critical that both the Northern and Southern Wales corridors are priority axes. The priority route on the plan: 'PP13 UK-Ireland/Benelux road axis' to Ireland goes via Holyhead and Stranraer and not the Pembrokeshire ports. Integration, sustainability and peripherality issues would warrant the inclusion of the A40 & A477 corridor routes (e.g. so that Cork to SE England trips avoid the congested network around Dublin and the longer south east journey from Holyhead but rather go via the SWWITCH ports and M4 corridor). Strengthening these TEN-T routes would assist Wales attract international investment. A core TEN-T network of the two links through Wales to the Republic of Ireland as part of a network would be of benefit to the more peripheral parts of Wales.
- The network would have to facilitate co-modality, by being fully integrated (including intelligent transport systems) and able to meet future transport and environment demands, for example contributing to emission reduction objectives. A move to this approach would assist in helping to extend electrification along both North and South Wales to the Irish Sea Ports.
- The Commission should also consider the ability of the TEN-T network to assist in the economic benefits to be gained by agglomeration and city regions. This would also cover the issue of peripherality and congested transport networks. The latter is particularly pertinent as the A55 route through Holyhead and Dublin is shown as a Priority route. The M4/A40/A477 corridors through the West Wales ports should also be shown as a Priority.

- The comprehensive network needs to include the M4/A40/A477 corridor for it to be comprehensive through Wales. Otherwise it may lead to illogical routing (e.g. to fit in with the priority network traffic may be deemed to take detours when in practice they will not).
- A core network would be feasible and from a Welsh perspective help to ensure that the two TEN-T routes (A55, M4 / A48 / A40 / A477) would be protected as routes to the Republic of Ireland.
- 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.
- As in the past, the future Comprehensive Network should ensure accessibility of and access to the core network, and contribute to the internal cohesion of the Union and the effective implementation of the internal market. It should address a series of different needs. This is particularly relevant when dealing with the problem of peripherality which would result in focusing resources on improving access from the EU's peripheral regions.

2. Below are responses to particular matters raised in the consultation:

- The local plans of the nation and regions are the reference for land use planning.
- It would seem appropriate to use the standards of the country of the transport network for technical and legal requirements on interoperability and safety
- The development of the network should also reflect capacity bottlenecks where diminishing rates of return of transport investment (e.g. A55 Holyhead to Dublin route) mean that priority is better given to under utilised sections of the TEN_T Network (e.g. M4/A40/A477 Fishguard/Pembroke Dock corridor).
- The focus in TEN_T should be on reducing peripherality with rail and maritime networks increasingly important as the distances become longer.
- A principal focus of TEN_T should be to reduce transport costs within the EU and thereby reduce the impedance to trade.
- Multimodality, including intermodal links and facilities for co-modal and/or combined transport, is particularly relevant at ports where maritime, rail and road modes often coalesce. Note the comments on the four elements below:

- Interconnectivity and network optimisation: there needs to be a refocus from very large projects to localised improvements where connecting missing links in the network would provide better value for money (e.g. connecting the port of Pembroke to the rail and Trunk Road network which both stop short of the port).
- Interoperability and improved efficiency of all modes of transport: increase focus on utilising existing capacity rather than building new infrastructure will often be more cost effective.
- Minimisation of investment, maintenance and operational costs, while nevertheless meeting the relevant policy objectives and the criteria below in a balanced way: This implies there should be a focus on small schemes to tackle localised gaps or bottlenecks in the network
- Gateway ports, intercontinental hub ports and airports, connecting the EU with the outside world, and the most important inland ports and freight terminals: Connections to Port of Pembroke, Fishguard and Milford Haven are key. The 3 ports share common TEN-T and Trunk Road access corridor M4/A48/A40(A477)