

EAST OF ENGLAND REGIONAL TRANSPORT FORUM

TEN-T Consultation
Directorate-General for Mobility and Transport
European Commission
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Brussels
Belgium

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To Whom it May concern,

East of England Regional Transport Forum Response to the European Commission 'Consultation on the Future Trans-European Transport Network Policy (TEN-T)'

The Regional Transport Forum, which was initially established in 2005, comprises Portfolio Holder representatives from each of the eleven Transport Authorities in the East of England Region. Attendance at Forum meetings also includes representatives from the East of England Development Agency, the Government Office for the East of England, and the Highways Agency. Representatives from DfT (Rail), Network Rail and other organisations are invited and attend as appropriate. The Forum meets four to five times a year to discuss transport matters of regional interest, to exchange information on best practice and to provide advice on transport issues to the Regional Planning Panel. During the RTF meeting on 10th September the Forum endorsed a regional response to the consultation, please see below.



RTF's Formal Response

The East of England is the second largest geographical area in England in the United Kingdom covering 19,120 square kilometres with a population of 5,541,600 (ONS mid year population estimate) for 2005. There are around a dozen medium-sized towns and cities, although there is no major city acting as a regional focus. The five counties of Cambridgeshire, Essex, Hertfordshire, Norfolk and Suffolk and six Unitary Authorities of Bedford, Central Bedfordshire, Luton, Peterborough, Southend-on-Sea and Thurrock make up the East of England. There are 41 District or Borough Councils¹.

The area is diverse, stretching from the edge of London in the south to remote coastal and rural areas in the north and east. It is an area facing challenges from the risk of flooding from sea level rise, an ageing demographic profile and yet significant population increases accompanied by high housing growth targets and thus considerable current and future pressure on its infrastructure.

As a result of its proximity to both London and Continental Europe and as the location of the UK's key deep-sea ports, the East of England region serves as a vital conduit between the rest of the UK and other parts of Europe leading to the region accommodating significant passenger and freight flows. Indeed, over 400,000 containers were transported from/to the Port of Felixstowe by rail in 2008, making it the UK's largest intermodal rail hub.

Multiple studies and reports have underlined the need for better quality transport infrastructure and services to support future development and growth in the area and also to make best use of the existing networks. The UK Highways Agency estimates an increase in road traffic on the strategic highway network in the East of England of 44% between 2001 and 2021.

Connectivity in the East of England poses a major challenge. Public transport use is relatively low and the East of England has by far the highest personal car usage levels for the whole of the UK (19% higher than the UK average). There is significant congestion on the strategic highway network at present and this is expected to worsen in the future. There is widespread rail overcrowding on nearly all rail routes into London, which constrains opportunities for further passenger growth in the absence of capacity improvements and this is coupled with underinvestment in east-west rail links in many areas.

A recent survey on barriers to small and medium sized enterprises (SMEs) in the UK found that the East of England suffered more from traffic congestion as a whole and 54% of respondents were 'very dissatisfied' with local roads and 43% with motorways and trunk roads. The congestion and limited transport networks inhibit economic growth and challenge the region's low carbon ambitions.

As a result of these challenges, the East of England has set itself ambitious low carbon economic growth targets, and has given its Regional Competitiveness (European Regional Development Fund) Programme a low carbon economic growth theme.

The policy review of the Trans-European Transport Network (TEN-T) is therefore of great importance to the East of England and provides an opportunity for us to share our expertise on the issues raised and, at the same time, to provide a means of tackling some of its most pressing concerns.

¹ For an explanation of the local government structure in England please see www.lga.gov.uk. Essentially, unitary authorities provide all local government services in their area while in a two-tier structure (counties and districts/boroughs) responsibility for services is divided.

The following routes within the East of England are currently incorporated in the TEN-T network:

Priority Project 13: United Kingdom/Ireland/ Benelux Road Axis

Covering the A14 and parts of the A12, A120 and M11

Priority Project 14: West Coast Mainline

A small part of the WCML passes through Hertfordshire and Bedfordshire (Watford Junction being the relevant station).

Priority Project 26: Railway/Road Axis Ireland/United Kingdom/Continental Europe

Covering the Felixstowe to Nuneaton Rail Line.

Priority Project 21: Motorways of the Sea

Covering: Harwich, Felixstowe, Ipswich, Great Yarmouth and Tilbury.

In addition, a number of routes run through the East of England which are not 'priority' routes but still part of the 'comprehensive' TEN-T network. These are:

Road:	the A47, parts of the A1, A1(M), A12, A14, A120, M1, M11 and the M25
Rail:	Great Yarmouth–Peterborough, Kings Lynn–London (Via Cambridge), Felixstowe–Norwich, Harwich–London, East Coast Mainline, Midland Mainline and Southend–London
Ports:	Felixstowe, Harwich, Ipswich and Great Yarmouth
Airports:	Norwich, Luton, Stansted and Southend

Introduction

The East of England Regional Transport Forum (RTF) welcomes the opportunity to contribute to the European Commission's Future Trans-European Transport Network policy consultation in light of the significant issues in terms of transport facing many of Europe's regions and cities, not least the East of England.

The East of England RTF takes its responsibilities in terms of contributing to the debate on the development of European policy very seriously and has in recent times contributed to major EU debates on territorial cohesion, EU2020, maritime policy, urban transport and climate change. In addition, it is vital that any revision of the TEN-T guidelines is complementary to the forthcoming European Transport White Paper.

The East of England Regional Transport Forum calls for:

- An increase in the TEN-T budget to more adequately reflect what the programme is seeking to achieve
- The maintaining of both the current priority projects and comprehensive network within the East of England. We believe it would be damaging and short sighted to remove the potential for future TEN-T investment post-2013 in the currently uncompleted priority network, as this would not allow existing investments and works to be fully realised and reach their full potential
- Consistency with other European policies for example the developing Transport Policy, the emerging concept of Territorial Cohesion and consideration within the developing EU budget

- A longer timeframe for project funding, beyond the current 7 year period, to reflect the scale of the projects under consideration – possibly 14 or 21 years
- A stronger focus on European objectives, based on the EU2020 strategy and the EUs 20/20/20 climate change goals, supported by consistency with national and regional objectives
- A consistent approach to project assessment in terms of maturity, quality and cost-benefit analysis
- Continued support for and completion of the currently defined priority projects, given the recognised European, national and regional benefits these will bring and the disadvantages inherent in not completing these projects
- Expansion of the list of priority projects to incorporate key elements of the European transport network, including major international gateways such as ports and airports because of the enormous economic benefits these bring, and their hinterland connections, particularly where these use sustainable transport modes
- A clearly defined conceptual pillar, where this supports projects of common interest, e.g. in relation to congestion, capacity management, safety and security issues, both in response to market needs and to exploit new technological approaches
- Future-proofing of the programme to ensure projects can be supported which relate to future needs not just what is already required
- Increased co-ordination of funding streams, particularly where this leads to more innovative solutions to identified problems
- A broader definition of “cross border projects” under the TEN-T programme more in keeping with that used under the Territorial Co-operation programme, which includes maritime borders
- Continued support for both annual and multi-annual calls for proposals to ensure both large scale and smaller projects can be covered by the TEN-T programme

1. Core Network and Nodes

The idea of a core network composed of nodes and links is a positive development, but only if it is able to escape the financial difficulties associated with the current priority route network where the available funds are far from being sufficient to support the identified network. It is encouraging to see that the Commission does not propose to initiate an entirely new infrastructure programme and will give suitable attention to key bottlenecks. We believe that whilst an enhanced core network (better covering new and old Member States) is welcome it is important to continue to provide resources to the many uncompleted priority routes. It would be an inefficient use of limited resources to reduce in stature many of the current priority routes to that of a wider comprehensive network.

In addition, we would argue that the concept of nodes is a good one as it would allow other key elements of a European transport network including international gateways such as airports and ports (both existing facilities and those in the latter stages of development) to be included in future programmes. In terms of the East of England this would include the Haven Ports of Felixstowe and Harwich, London Gateway, London Southend Airport, London Stansted Airport, London Luton Airport and Norwich International Airport. Furthermore, the development of hinterland connections which enable the EU to maximise the benefit of these nodes and in some cases to combat congestion problems, need to be included and prioritised in future programmes, particularly where there are environmental gains to be made e.g. by supporting the development of rail projects.

We would strongly argue for the retention of all existing TEN-T rail links in Norfolk (Great Yarmouth-Norwich-London Liverpool Street, London Liverpool Street-Harlow-Cambridge-Ely-King's Lynn, and Norwich-Ely-Cambridge). We would also support the addition of Hitchin to Cambridge since this connects TEN-T routes and is used as a route by a number of existing services on the current TEN-T network.

In relation to airports, the RTF believes that the criteria for eligibility of airports should not be raised to 1.5m passengers as suggested. Smaller airports have an important function, not least in terms of their role in boosting the economy. Evidence shows that 28% of the UK's national income is generated through international trade, and that GVA per employee is higher in transport gateway sectors than the regional average. Additionally, many high-value businesses would not be located in an area if it were not for the presence of an airport offering international links. The proposal to simply raise the passenger threshold takes no account of the importance of an airport. Even smaller airports such as Southend and Norwich can serve an important economic role, which is not recognised by total passenger numbers only.

It is suggested that consideration should be given to the inclusion of the Port of Tilbury in its own right (i.e. separate from London). Whilst still under construction, it is suggested that consideration should also be given to the inclusion of the new London Gateway Port, the first phase of which will become operational in the near future.

As is the case with the TEN-T routes crossing the East of England, it is important to ensure there is a consistent European, national and local framework which can be used to determine whether projects are eligible for funding.

In terms of Article 23 of the Community Guidelines, which outlines a definition of "Priority projects", the East of England believes this is largely an appropriate definition and provides a strong basis upon which to build a Core Network. However, the East of England believes that Member States should be expected to have already undertaken studies and (consistent) evaluation procedures to ensure that projects have sufficient maturity and a clear cost-benefit analysis in support of them prior to submission for funding rather than only to "demonstrate commitment" to undertaking this work.

2. Comprehensive Network

There is a strong sense that the existing Comprehensive Network has emerged as a means of benefiting each individual Member State rather than as a strategic attempt to provide a transport network which can benefit the EU as a whole. This clearly has implications in terms of the financial effectiveness of the programme and ultimately its credibility. The East of England would argue that the European Commission should refocus TEN-T on common European objectives, based on EU2020 and the fight against climate change, which can be supported by the funding available. This will give the network coherence and strategic importance. By virtue of it being achievable, the credibility of the programme will also be enhanced.

As such, the East of England RTF believes that TEN-T should continue to support the completion of the "priority projects" as having substantial recognised benefits at a European, national and regional level; this is particularly true of the priority projects which cross the East of England region. At the same time it is important to realise that there are significant disadvantages inherent in not completing these projects.

3. Innovative Infrastructure Measures

Intelligent Transport Systems (ITS) have a crucial role to play in enhancing the functioning of the transport system and in helping to meet the EU2020 targets on technological innovation

and knowledge, and contributing towards the EU's Innovation Agenda. ITS can be used to provide data to governments in terms of infrastructure usage and current and future requirements, to provide information and advice to infrastructure users in terms of congestion and alternative routes, to provide information to emergency services for the more efficient and effective delivery of their services. Data on freight movements can be used to make more informed decisions on the most effective modes of transport in particular situations and places, facilitating increased modal shift. Logistics companies and customers can be better informed of the whereabouts of items of freight.

In terms of using the TEN-T network for the deployment of innovative approaches, for example in transport pricing, it is important not to disadvantage the TEN-T network in relation to other possible networks, thus possibly displacing traffic to the detriment of other networks, with all the attendant consequences for European competitiveness, as well as the social and environmental impacts on these alternative routes. A consistent approach must be taken across the entire European network if a fair system is to be available to all infrastructure users.

A key consideration, however, is to ensure that there is sufficient harmonisation of information, data collection and systems across the EU to ensure fair access to the benefits ITS can bring. It is also essential that where ITS is deployed, it is future-oriented and adaptable to the changing needs and pressures on the transport network. It should be emphasised that TEN-T is an infrastructure programme and ITS should be complimentary to this, and not compete for TEN-T investment.

4. Funding

The East of England RTF fully supports the TEN-T programme and would argue that its budget should be substantially increased to enable it to more closely reflect the needs it is trying to address.

The East of England RTF believes that the current focus on a seven year funding framework is inappropriate to the scale of many projects necessary to provide a trans-European transport network. Aligning TEN-T funding to two or even three framework periods (i.e. 14 or 21 years) would be more relevant and would fit more effectively with the planning timeframe.

We believe it is important that the TEN-T programme applies more rigorous tests in terms of evidence of European value, cost-benefit analysis and project maturity to the projects put forward. This would give a more accurate picture of the cost of projects, would facilitate more effective monitoring and would ensure the relevance of projects to the needs of the EU.

It is important that a range of sources are used to fund TEN-T projects and we fully support the EU2020 strategy *"to mobilise EU financial instruments (e.g. rural development, structural funds, R&D framework programme, TENs, EIB) as part of a consistent funding strategy, that pulls together EU and national public and private funding"*. Community funding is crucial to ensure projects of genuine European benefit take place but the scale of projects in question could not be funded solely by European sources. Indeed, a project partner contributing an element to a funding package for a project ensures a level of commitment to the timely delivery of projects to acceptable quality standards. It is unnecessary, however, to restrict or define the component sources of the funding package. Individual projects and situations will require and have available to them different funding sources and it is important that they are able to use any opportunities presented to them. The Commission's intention should be to facilitate the development of funding packages, not to provide a strait-jacket which limits the range of funding which can be used.



The East of England RTF would agree with the current situation whereby increased funding is available to cross border projects but would argue that the definition of cross border is too restricted and that it should be extended to include maritime borders, e.g. in the case of the route from Nuneaton-Felixstowe and beyond. This would be consistent with the 2007-13 Territorial Cooperation programmes where new maritime cross border programmes are being supported.

We would also argue that support for multi-modal nodes and sustainable modes of transport, e.g. rail, should be prioritised over modes such as road or air.

The East of England RTF would urge the European Commission to ensure above all else that there is a consistent and fair approach across Europe to the support given to projects which are deemed to be in the European interest and of sufficient maturity to proceed. This applies to ensuring that only those projects which meet a defined set of criteria are funded and also to the introduction of fair charging schemes for commercial and private infrastructure users.

Furthermore, it is important that equal priority should be given to those projects funded by the private sector as is accorded to public sector projects. There is concern currently that public sector projects are being prioritised over those supported by the private sector.

5. Conclusion

The East of England RTF supports the concept of nodes and links with an additional focus on key interchanges such as ports and airports, along with their hinterland connections. In addition, we support a stronger focus on projects where sustainable transport modes are used and where there is a clearly recognised European as well as national and regional value to the project. It is also important to have a consistent approach to the assessment of projects and a satisfactory cost-benefit analysis.

The East of England would also support the notion of the comprehensive network being the “basic TEN-T layer” upon which crucial nodes and links are added. However, it is important that such a “layer” does not distract and divert much needed resources away from the critically important transport interchanges and routes of strategic and economic importance.

Yours sincerely,

Mark Flewitt

Chair of the East of England Regional Transport Forum