

Dear Mrs Genoux-Stawiarski,

due to technical reasons, it was not possible for us to answer earlier to the invitation for comments on the TEN-T revision. However, the extension of the period of consultation until today makes us optimistic that our arguments can be taken into due consideration, and it shows that other stakeholders also had difficulties with the tight timetable.

To make it short, the Spatial Planning Department in the Ministry of Labour and Building Mecklenburg-Vorpommern wants to recommend the following.

1) Use the knowledge and experience of Spatial Planning

The Van Miert Report calls for an adaptation of assessment methods (chapter 6.6.4) and states inter alia: "It rests with the infrastructure promoters and with the political decision-makers to anticipate these long development deadlines and to start the studies of projects upstream." (para 72)
This is what happens in the Territorial Impact Assessment procedures which are carried out in several EU member states, on programme level as well as on project level. Therefore we recommend to start a dialogue between sectoral transport planning and cross-sectoral spatial planning, and we offer to contribute to this undertaking.

To name just two examples:

- The method to evaluate transport infrastructure investments on programme level as part of the Federal Transport Infrastructure Plan - FTIP has recently been upgraded to take spatial development arguments into account. The methodology paper can be downloaded at <http://www.bmwbw.de/English-Content-.454.13237/Federal-Transport-Infrastructure-Plan-2003-Basic...htm> => <http://www.bmwbw.de/Anlage13389/Federal-Transport-Infrastructure-Plan-2003-Basic-features-of-macroeconomic-evaluation-methodology.pdf> (2.9 MB). Information about the FTIP is available at <http://www.bmwbw.de/English-Content-.454.17080/Federal-Transport-Infrastructure-Plan-2003.htm>

- Decades of experience with formal TIA on project level in Germany have shown that an assessment procedure which is conducted upstream and governed by the Spatial Planning authorities can contribute to a higher efficiency in the planning process. It integrates the different sectors of planning, helps finding the optimum solution as regards technical details or the location / routing and thus can save time and money.

Compare

<http://www.bmwbw.de/English-Content-.454.2222/Federal-Regional-Planning-Act.htm> => Section 15 which makes TIA procedures on project level compulsory for most large-scale infrastructure investments. A list of these projects is laid down in the Federal Regional Planning Ordinance (cf. section 17 (2) of the Act).

2) Use INTERREG IIIB projects as a basis for discussion

There are several INTERREG IIIB projects working at trans-national transport issues. We would like to draw your attention especially to the projects Baltic Gateway (<http://www.balticgateway.se>) and South Baltic Arc (<http://www.south-baltic-arc.org>). The former supports the "Motorway of the Baltic" approach for the Southern Baltic Sea region [cf. Van Miert report chapter 6.1.2 para 23 (3)], whereas the latter is inter alia working at a trans-national method for TIA on programme level which is based primarily on the German and Polish experience (part of WP 2 "Via Hanseatica").

3) Motorways of the Baltic: Have a look at longitudinal and lateral connections likewise

The fact that the average speed of ships is only one factor which makes these connections attractive is obvious: The longer the distance over sea, the more important becomes the speed of ships. We therefore recommend to take longitudinal connections in the Baltic (~20 - 24h of travel, e.g.

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Rostock - Helsinki) and lateral connections (~2 - 7h of travel, e.g. Rostock - Gedser / DK) into equivalent consideration since the technical and logistic implications are quite different.

If you have further questions, please do not hesitate to ask us. We are open for discussion any time.

Best regards

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