



Polis Position Paper on European Commission's White Paper on Transport¹

October 2011

Introduction

Polis is a network of European cities and regions supporting innovation on local and urban level to achieve sustainable mobility. Our member cities and regions are convinced that the **reduction of dependency on the private car, a modal shift towards more sustainable modes of transport such as public transport, cycling and walking, as well as the development of clean and energy efficient transport should be the main objectives of policies influencing urban and regional mobility**. Aspects of the European Commission's vision including to phase out 'conventionally fuelled' cars in urban transport in cities by 2050; to achieve essentially CO₂-free city logistics in major urban centres by 2030; and to have multimodal transport information, management and payment system by 2020 are compatible with Polis members' main policy objectives.

Polis welcomes the fact that the White Paper recognises the importance of local, regional and urban transport and that the European Parliament proposes to further emphasise it²³, and supports the progressive definition of a European policy for urban and regional transport. Polis looks forward to a fruitful dialogue with the European institutions on the first steps towards the implementation of the White paper and on the review of the European Action Plan on Urban Mobility expected for 2012⁴.

We especially welcome the ambition of having a "higher share of travel by collective transport", the recognition of the role of demand management and of soft modes. We regret however that there is little more than a declaration of principle in favour of walking and cycling in the White Paper. It is for instance important to stress that the final mile of a journey (and more) can be done with these modes, while the White Paper refers only to clean vehicles. Polis would welcome stronger support to non-motorised modes of

¹ Full title: Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system. March 2011

² [Draft Report on the 'Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system'. Mathieu Grosch, Rapporteur, TRAN Committee, European Parliament, 23 August 2011.](#)

³ But strongly disagree with the proposed [Amendment 182 to the EP's proposed report](#) that urban mobility is not the competence of the EU.

⁴ And thus support proposed [Amendment 187 \(to the EP's proposed report\)](#) of MEP Ticau that European action for urban mobility should be elaborated together with local authorities.



transport at the European level⁵. Additionally, while we appreciate the recognition of demand management measures such as access restrictions or road pricing, Polis would like to stress the importance for cities to remain free to design and implement their own schemes to best fit local conditions and policies. The European Commission's vision looks to move towards full application of 'user pays' and 'polluter pays' principles: Polis warns that this should be applied with care, and within the framework of existing local policies.

Polis also stresses that **innovative policies are required to trigger new practices and behaviours and the deployment of new technologies to achieve a new mobility culture**. Polis therefore welcomes the fact that the White Paper refers to innovation, but not that this refers almost exclusively to technological innovation; this overlooks essential aspects of sustainable mobility policies, and a wider definition of innovation is required⁶. Any innovative policies must be assessed in regard to their ability to support local transport policy objectives and thus should be application / solution focussed rather than simply concentrated on developing technology.

Polis members stress that although mobility is an important element in creating functioning competitive cities, it is not an end in itself. Consideration should be given to the balance between accessibility, mobility and competitiveness of cities and the importance of dealing with these objectives as part of an integrated process that also includes urban planning; in this context, the notion that "Curbing Mobility is not an option" should be reviewed.

For further information on Polis' positions on other topics in urban mobility including on the [Green Paper on Urban Mobility](#); the [ITS Action Plan](#), the [Strategic Transport Technology Plan \(STTP\)](#), and the [Clean Transport Systems Consultation](#) visit www.polisnetwork.eu/eu-policy/position-papers.

⁵ Polis would be happy to see – as suggested in the proposed MEP Grosch's draft report from the European Parliament – a proposal to support the development of infrastructure for cycling and walking in urban areas. We also support Amendment 20 from MEP El Khadraoui recognising the importance of a modal shift in urban areas to deliver benefits in terms of reduced congestion and pollution.

⁶ For example, as defined by DG Regio in the 6th Progress Report on Economic and Social Cohesion: "innovation is 'putting a new and useful idea into practice' and new and useful was defined as 'new and useful to the region'."

Overview

This paper is divided into several parts to give specific opinions on different topics within the White Paper. These topics are:

1. Sustainable Urban Mobility Plans
2. European programmes & TEN-Ts
3. Decarbonisation, Cleaner Vehicles and Electromobility
4. Pricing & Access Restrictions
5. Moving People & Goods
6. Intelligent Transport Systems
7. Safety & Security

1. Sustainable Urban Mobility Plans (SUMP)

A Sustainable Urban Mobility Plan is a way of tackling transport-related problems in urban areas more efficiently. Building on existing practices and regulatory frameworks in the Member States, its basic characteristics are:

- A participatory approach: involving citizens and stakeholders throughout the planning process;
- A pledge for sustainability;
- An integrated approach: of practices and policies between policy sectors, between authority levels, and between neighbouring authorities (inter-municipal, inter-regional, trans-national, etc.);
- A focus on achieving measurable targets derived from short term objectives, aligned with a vision for transport;
- A review of transport costs and benefits, taking into account external costs and benefits across policy sectors;
- A method comprising the following tasks: 1) status analysis and baseline scenario; 2) definition of a vision, objectives and targets; 3) selection of policies and measures; 4) assignment of responsibilities and resources; 5) arrangements for monitoring and evaluation.

Source: Adapted from ELTIS-SUMP and from the PILOT project.: *Sustainable Urban Transport Plans –SUTP Manual, Guidance for Stakeholders* (2007)

Polis has, and continues to work on supporting the exchange of practices and methodologies on sustainable urban mobility plans and on the definition of tools to support cities developing and implementing these plans. We therefore welcome the recognition of their key role for a more sustainable mobility across Europe. Within this context, we would also like to stress the important impact of land use on mobility and the potential of integrated land use planning to achieve policy objectives on the long term.

However, **Polis disagrees with a mandatory approach for SUMP at the European level which would be extremely difficult to define properly, to implement and to monitor.** We rather encourage at the European level a framework which supports cities in developing, implementing and evaluating SUMP, proposing a



voluntary approach encouraged by significant European incentives, including incentives related to the allocation of European funds⁷.

In order to disseminate planning methodologies and approaches for sustainable urban mobility plans, and to support the rapid and wider adoption of these plans, European funding for sustainable urban mobility planning processes can play a key role. Therefore Polis strongly encourages a *“European support framework for a progressive implementation of Urban Mobility Plans in European cities & metropolitan areas.”*

2. European Programmes & TEN-Ts

Polis supports the extension of the **CIVITAS programme** beyond FP7. Large scale demonstration of innovative sustainable urban mobility solutions and technologies can bring great benefit to urban local authorities even beyond those directly involved in the demonstrations. Future schemes should look to how European efforts (including funding) can best build on CIVITAS to address the challenges of large as well as medium-sized European cities and metropolitan areas, from all regions of the European Union.

Large scale demonstration projects should be held in which cities cooperate for the deployment of a technological solution: exchange on expectations, deployment scenario and exchange of data (and not only practices). In this way, cities take part in activities to accelerate the learning process and therefore the deployment of the technology. Integrated urban mobility is key to the development of cities and a low carbon future.

It is also important that some large scale demonstration projects enable further integration of transport with other services and sectors for a more sustainable urban environment. We therefore support a **Smart Cities Innovation Partnership** which would include mobility as one of its components

Polis strongly supports the inclusion of the main nodes (cities) in the TEN-T network. This is absolutely necessary to ensure the efficient functioning of the European transport system. This should ensure:

- A better integration between the networks: between the long distance, regional and urban networks, with efficient interchanges (stations and logistics platform) and interfaces for the exchange of information.
- A better integration between the modes, as the continuity of the long distance transport network until the last mile (for people and goods) requires in all cases a transition between modes of transport.

This integration is also necessary for the various information systems, which means that the urban dimension must be taken into account when ITS is deployed on the TEN-T. This, in turn, requires the inclusion of cities in future projects for Europe-wide ITS deployment.

⁷ In this context, we consider that the proposal from MEP Grosch in his draft report from the European Parliament that “support for projects is made conditional upon the submission of urban mobility plans” goes in the right direction.



The integration of EU capitals and major cities in the TEN-T network should also ensure the eligibility of urban projects to TEN-T funding. Local and regional governments should also be involved in the identification of TEN-T projects, which should take into account feeder routes and secondary nodes.

With regard to certain specific proposals in the White Paper:

- Polis welcomes the possibility to consider new transport financing instruments such as project bonds.

3. Decarbonisation, Cleaner Vehicles and Electromobility

Polis welcome the targets set by the White Paper on decarbonisation and oil independence. However, there is a lack of more detailed and intermediate targets to define more clearly steps on the path to achieving decarbonisation.

Clean fuels and vehicles must not just be part of a policy in reducing CO₂ emissions, but part of a sustainable mobility strategy to efficiently contribute to all sustainability objectives (environmental, social and economic). European transport policy should not only insist on cleaner technologies but on integrated mobility strategies to achieve its objectives. This will require careful monitoring and evaluation, and the **transport effects on the environment and health should be systematically taken into account in any analysis of new policy or technology**: for example contribution to noise, air pollution and health as well as GHG emissions. For vehicles and fuels, this includes a proper evaluation of the environmental well to wheel analysis⁸. Polis supports a proper and systematic consideration of energy efficiency needs and climate change challenges (climate resilience of the overall infrastructure, refuelling/recharging stations for clean vehicles, choice of construction materials...) in the allocation of EU funds for transport infrastructure.

Polis supports European funded demonstration projects for electromobility as proposed in the White Paper. Such large scale demonstration projects should not just focus on electric vehicles, but also demonstrate the use of other types of cleaner vehicles. In fact, EU funding for large scale clean vehicle projects is essential to the future widespread take-up of these vehicles and the ultimate goal of removing conventionally-powered vehicles from cities. For the deployment of electromobility, data exchange standards for exchange between the grid (energy network) and the vehicle (for example, for payment) are also required.

Demonstration projects should also enable the integration of clean vehicles in a sustainable urban and regional transport policy, and **demonstrate how the transition towards a new technology can trigger a transition towards a new more sustainable mobility culture**.

It is true that sometimes it will be appropriate for clean vehicles to make the final mile of the journey, but this can also be performed by foot and by bike, not just clean vehicles. This requires appropriate networks for cycling and walking as well as parking facilities at interchanges which should also be taken into account.

With regard to certain specific proposals in the White Paper:

⁸ We agree with MEP Grosch's proposed draft European Parliament Report that all forms of transport should increase their sustainability as measured by their entire 'footprint'.

- Polis strongly supports the labelling of vehicles *and the harmonisation of the label and vehicles fuel efficiency classes throughout the Member States.*
- Polis supports appropriate standards for CO₂ emissions of vehicles in all modes
- Polis supports that eco-driving be included in any future revisions of the driving licence.

4. Pricing & Access Restrictions

Polis members would like to warn about the risks of some of the principles and policies envisaged in the White Paper on the economic framework of transport and in particular pricing.

The concepts of user pays and polluter pays should be applied with care, and in the framework of existing policy. This for example means that such a principle should not be applied to public transport fare policy as this would be contrary to other policies (e.g. reduction of congestion, reduction of emissions, etc.)⁹.

The move towards the internalisation of externalities would be a positive step, but the principle of internalisation of external costs and charging for infrastructure should be left open: for instance a maximum charge rate should not be applied. Existing congestion pricing schemes exist within a wider policy, and act rather as a price signal to encourage behavioural change.

It is fundamental for European local authorities to keep the freedom to set charges to control access to some areas at the level of their choice. **Cities and urban agglomeration should remain free to decide whether they want to implement access restriction and charging schemes or not. If they chose to do so, they should be able to design the schemes as they see fit, and have the choice to set the level of any charge.**

One should note that parking is an important tool for demand management, which can also be used for internalising external costs. Parking policies can also enable intermodality and they can be funding tools for transport projects.

In terms of buying power of local and regional authorities, public procurement can play an important role. In bringing about **joint public procurement**, the most important is *not* in 'promoting' it, but in *making it easier* for local and regional authorities to go about joint public procurement (by looking at the organisational and legal structures which are barriers to it going ahead).

With regard to certain specific proposals in the White Paper:

- Polis agrees with the need to *reassess transport taxation where necessary, namely by linking vehicle taxation to environmental performance, reflecting on possible way forward to review the current VAT system concerning passenger transport, and revising company car taxation to eliminate distortions*

⁹ We agree on the proposed [Amendment 48 \(to the EP's draft report\)](#) internalisation of external costs should provide for investments for the benefit of more sustainable transport modes.

and favour the deployment of clean vehicles. The current situation in which kerosene is free of VAT is a barrier to providing a level playing field across modes.

- Polis supports the revision of *motor fuel taxation with clear identification of the energy and CO₂ component.*
- Polis welcomes the possibility to consider new transport financing instruments such as project bonds.

5. Moving People and Goods

Polis would like to stress that for transport to work for the city, the focus needs to be on efficiently moving people and goods and not just vehicles.

Increasingly, urban and regional transport policy are aiming at providing accessibility to jobs and services. In this respect, mobility is a means to an end, in accessing services and locations, and is an important part in ensuring competitiveness of cities. Polis believes within this context that the principle in the white paper that “*Curbing mobility is not an option*” should be reviewed and better consideration should be given to the relation between mobility, accessibility and the competitiveness of a territory.

For a better management of the movement of people, it is recognised that the private car is often not the most efficient way to move large numbers of people through urban areas. A modal shift to cycling, walking and public transport is required to improve the flow of people within urban networks. In fact, a modal shift to **cycling and walking would deliver on many of the policy objectives within the White Paper: de-carbonisation, energy security, less congestion, fewer local emissions and noise, as well as those that are not mentioned (such as improving health).** These modes should be highlighted more, and given a more prominent place in European transport policy¹⁰.

Polis would additionally encourage the European Commission transport policy to give a stronger consideration to mobility impaired persons to create barrier free cities for all.

The definition of further legislation on passenger rights at the European level should not have adverse effects on attempts to facilitate a modal shift towards more sustainable modes of transport, for example by increasing the cost of public transport.

For a better management of goods, the extension of e-freight to urban areas should be considered. Polis strongly agrees with the fact that *the interface between long distance and last-mile freight transport should be organised more efficiently.*

For cities to learn from each other, it is important to rely on networks such as Polis and their experience in sharing good practice. Polis has contributed to several databases of good practice for freight (see SUGAR,

¹⁰ Following the MEP Grosch’s proposed draft report, we support European action to improve the infrastructure for cyclists and pedestrians, and increase the modal share of public transport.



BESTUFS, BESTFACT), convinced by the importance of significantly improving urban freight delivery in the local and urban environment for a more efficient mobility system. Polis therefore supports the definition of a strategy for moving towards 'zero-emission urban logistics', bringing together aspects of land planning, rail and river access, business practices and information, charging and vehicle technology standards.

6. Intelligent Transport Systems

ITS is an important supporting tool to help reach policy objectives including moving goods and people efficiently through cities, but **implementation of ITS should not be seen as an end in itself**. Along with the implementation of ITS systems and services, consistent assessment should also be made in order to understand the performance of ITS with respect to policy objectives. Polis members have been involved in activities to define tools for the evaluation of ITS (see, for example, the CONDUITS project).

Polis is actively involved in the implementation of the ITS Action plan, and further information on Polis' position with regards ITS can be found in the Polis position paper on the ITS Action Plan¹¹. The association has 5 members on the ITS urban expert group and has applied to be a member of the ITS advisory group with 2 representatives (North Brabant and Toulouse). Polis has also recently developed a comprehensive answer to the consultation on the Strategic Transport Technology Plan¹².

It is important that European cities and regions are involved in decisions regarding ITS. The provision of public data to private service providers provides a case in point where European cities face different legal, administrative and financial competences with regard to sharing of data.

There is a need for the certification of data/data quality and standards to allow for better integration between modes, and ultimately a better management of the movement of people and goods, and not solely of vehicles. There is a need for standards for smart charging and payment, although again it is important to consider the input of various actors, and to consider that in some cases national or local solutions may be best. With regard to integration of ITS systems, Polis considers that there is a more pressing need for the integration of local information and payment systems rather than the need for pan-European integration of such systems.

7. Road Safety & Security

Polis supports the 'zero-vision' on road safety set out in the European action plan on road safety¹³. Our member cities and regions stress that efforts should not be geared solely to technological solutions.

¹¹ Available here: http://www.polisnetwork.eu/uploads/Modules/PublicDocuments/answer_POLIS_ITS_Action_Plan-2.pdf

¹² Available here:
http://www.polisnetwork.eu/uploads/Modules/PublicDocuments/sttp_questionnaire_response_polis_final.PDF

¹³ Polis appreciates MEP Grosch's strong stance on road safety, as highlighted in the proposed draft report on the white paper, and the coherence highlighted therein to the European Road Safety Policy 2011-2020.



Infrastructure measures as well as training and education, with a specific attention to vulnerable road users should be prioritised over solely technological solutions.

We also encourage the European Union to consider in its road safety policy the differences between the various transport networks: long distance, regional and urban.

In terms of transport security, there is a large difference between security measures to be implemented in urban and inter-urban areas. Polis agrees broadly on the *“need to find an appropriate European approach to land transport security in those areas where EU action has an added value”*, provided that these differences are taken into account.



Polis is a network of European cities and regions which promotes, supports and advocates innovation in transport.