



## **Polis answer to the European Commission Consultation on the Green Paper: “Towards a new culture for urban mobility”**

Polis is a network of European cities and regions supporting innovation in local and urban mobility. As stated in a letter co-signed by six European associations and networks representative of European cities and regions and their transport authorities and operators, last 1<sup>st</sup> of June 2007, Polis members are in favour of a strong European initiative on urban mobility and therefore welcome the publication of the Green paper by the European Commission.

They support a strong European initiative on urban mobility mainly for three reasons:

- the improvement of urban mobility is critical for the achievement of several objectives of the European Union, for instance on climate change and on the competitiveness of our economies, and keep a very high relevance after the recent proposal of an economic recovery plan and the European agreement on the climate change and energy;
- there are already European legislation and programmes which directly affect urban mobility and mobility policies but which do not provide them the tools to comply with the legislation in the most efficient way;
- there is the possibility to identify important European initiatives on urban mobility without restricting the freedom of administration of the cities and local authorities, in the full respect of the principle of subsidiarity.

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, like public transport, cycling and walking, as well as the development of clean and energy efficient urban transport, should be the main objectives of this policy on urban mobility. They stress the impact of land use on mobility and the potential of integrated land use planning to achieve these objectives on the long term. They also stress that **innovative policies, are required to trigger new practices and behaviours and the development of new technologies to achieve a new urban mobility culture.**





## What role for the European Union?

Four types of activities could be considered and would provide efficient support to achieve the required urban mobility culture:

- encourage a strong coordination of all European initiatives which are of relevance to urban mobility and likely to have an influence on it (I);
- create or encourage the development of tools, often legal and technical, which can facilitate and support the implementation of the most efficient measures and policies at the local level (II);
- develop the tools for an efficient benchmarking between cities and encourage the dissemination of best practices, beyond the simple exchange of information (III);
- Review the allocation of European funds to better support urban mobility projects (IV).

### **I - Encourage a strong coordination of all European initiatives which are of relevance to urban mobility and likely to have an influence on it**

Several European legislative measures affect directly or indirectly urban mobility and urban mobility policies. However many of these measures do not result from the European transport policy, and this is may be one of the strongest challenges for the issue we are addressing. The most obvious example is the legislation on air quality. To achieve the objectives of this legislation, which sets limit values, target values and/or alert thresholds on a whole range of air pollutants, cities have to adjust their urban mobility policy with measures such as access restrictions, green zones and also less constraining measures such as communication strategies.

It is therefore essential that European legislation and initiatives take full account of the actions that cities may have to take for their effective implementation. This requires a much more systematic approach in the European institutions to assess the impact of certain legislative proposals on cities and on urban mobility.

### **II - Create or encourage the development of tools, often legal and technical, which can facilitate and support the implementation of the most efficient measures and policies at the local level**

A second set of European initiatives, possibly the most important one, would consist in creating or supporting the development of legal and technical tools for the efficient implementation of the mobility policies and measures chosen at the local level.

In its answer to the questions of the consultation, Polis lists and describes initiatives which can be taken at the European level to develop these legal and technical tools.





They consist mainly in:

- removing barriers for the implementation of the policy tools of their choices by cities;
- promoting and adopting legal and technical standards and norms of interoperability and in some cases publishing guidelines and encouraging harmonisation;
- supporting research to achieve policy objectives and the creation of a new urban mobility culture.

It is important that the European Union act as enabler, supporting the efficient and integrated implementation of policy tools at the local level and contributing to increase the effectiveness of policies and instruments and supporting the development of new solutions. Local authorities would remain free to use the instruments and policies of their choice to manage their transport systems and achieve local, national and European objectives and targets.

Among the instruments, appropriate infrastructure for soft modes and public transport, information to users, integration between policies, networks and services, support to the development of new solutions for collective transport, are of primary importance.

The European Union should guarantee that cities can use the tools of their choice, without imposing them but ensuring the reality of this choice. This is particularly important for demand management tools<sup>1</sup> which can prove in certain circumstances very efficient to support modal shift. Any barriers preventing cities to adopt the instrument of their choice should be removed.

### **III - Develop the tools for an efficient benchmarking between cities and encourage the dissemination of best practices, beyond the simple exchange of information**

The third type of initiative that would be most welcome by European cities is the development of tools to better identify best practices, encourage their dissemination and further support benchmarking activities.

This should go beyond the simple exchange of best practices which already exists and is already supported by European programmes and several organizations. It should consist in concrete incentives for the adoption of best practices.

But important steps can be taken at the European level to better know the situation of mobility in cities to better measure their performance. Common indicators on the situation of mobility for instance would be helpful, for measuring traffic volumes, time and travels, for benchmarking the impact on road safety of some measures as well. The definition of common indicators, the scientific and independent definition of a methodology to identify best practices is today asked for by many cities across Europe.

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<sup>1</sup> Demand management tools includes parking policies, all forms of access restrictions, including Environmental Zones and congestion charging schemes, and the allocation of road space and road infrastructure to the different modes.





The promotion of best practices should also address the process of transport planning. When it comes to benchmarking the differences between cities, their size, national and geographical environment, etc. differs so much that it is probably not possible that there is one measure or one policy suitable for all cities. However we know, through the experience of cities and countries, and as identified by work done at the European level with the support of the European Commission, that there are process leading to the choice and the implementation of mobility plans which are more likely than others to lead to the optimal policy mix. This process has been identified as Sustainable Urban Transport Planning. The European Union could encourage cities across European to start this process where they have not done so already, using funding as a tool to do so.

#### **IV - Review the allocation of European funds to better support urban mobility projects**

Finally, Polis members call upon the European Commission to better support urban mobility projects through European funding. This would require to target more resources from cohesion and social funds to urban mobility projects, and also to consider the possibility to fund a major demonstration programme on urban mobility outside the European research framework programme.

It also implies a better use of European funds to guarantee that they are spent in accordance with the objectives of the European Union. In particular funding of transport infrastructure should be allocated only to projects consistent with a sustainable transport policy.

#### **V. A European policy on urban mobility consistent with and supportive of the objectives of the European Economic Recovery Plan and of the European objectives on Climate Change**

The development of clean car technologies as foreseen in the European recovery plan should be considered as one element of a future sustainable transport system. The deployment of new technologies should be used as a **catalyst for a transition towards the new urban mobility culture called upon by the European Commission** in its Green paper on urban mobility. This would consist in using the deployment of new technologies, for instance electric vehicles, to accelerate the modal shift towards public transport, and alternative modes of transport with the deployment of new mobility services using the various types of vehicles. This should result in more sustainable mobility patterns for travellers in European cities, more efficient and sustainable urban delivery systems, and the faster deployment of new vehicles technologies.

As a consequence, Polis welcomes the announcement, as part of the European Economic Recovery Plan, that the Commission will support the development of a procurement network of regional and local authorities to pool demand for clean buses and other vehicles





Other measures in addition to lowering the emissions from the private vehicles will be required to achieve the objectives of reduction of CO2 emissions agreed recently by the European Union. An efficient European policy on urban mobility can contribute significantly to lowering the emissions from the transport sector, and at the same time help to improve traffic efficiency by reducing congestion. These measures should support a modal shift towards more sustainable modes of transport: public transport, cycling and walking, and new mobility services, as well as improved traffic management through the use of intelligent transport systems.

Finally, to further contain CO2 emissions, accelerate this modal shift and preserve the local environment, stimuli to infrastructure investment, as planned in the European economic recovery plan, should give priority to public transport infrastructure and infrastructures for soft modes. Infrastructure investments should respect sustainable urban transport plans or represent an opportunity to develop them. Priority must be given to infrastructures which can contribute to achieve the objectives of the European Union to fight climate change.

Polis would welcome a clear agenda for the implementation of the action plan which should detail the steps which will be taken at the European level towards the achievement of a new urban mobility culture.

This would allow Member States, regions and cities to subscribe to this agenda and share the commitment of achieving the new urban mobility culture. It could be a reference for the adoption of similar agendas at city level.





**1. Should a "labeling" scheme be envisaged to recognize the efforts of pioneering cities to combat congestion and improve living conditions?**

The EU should set the framework for the permanent monitoring of urban mobility and of its impact on the environment and health. This would allow efficient benchmarking. A labeling scheme would be welcomed in a second stage in the framework of a broader European initiative to support benchmarking.

However it can only be developed following the definition of a transparent scientific methodology to monitor the performances of urban mobility networks. This methodology would first require the **identification and definition of common European indicators to monitor urban mobility**. It should **also define standards for data quality**.

The definitions of indicators and standards for data quality should cover for instance urban road safety (number of people injured and killed, etc.), traffic volumes for all modes of transport, modal shares, etc.

These indicators would be used for urban mobility data collection and to create a database. They should also contribute to the definition of a common terminology.

**A European methodology should be proposed to evaluate performance and policies**, integrating the various urban profiles and taking into account the diversity between cities across Europe, in terms of size, density, socio-economic profile, demography, urban mobility situation, etc.

On the base of this, **sound benchmarking activities can be developed, among which the definition and allocation of a label for sustainable mobility in cities**. This label should have the sole purpose of encouraging more sustainable urban solutions across Europe. It should therefore be designed in such a way that it would allow the identification of sustainable urban transport policies and solutions.

Any benchmarking initiative, or labelling scheme, should recognize that the constitutive elements of sustainable urban transport planning are necessary for achieving a sustainable urban mobility policy.

The UK scheme of beacon status could be a useful reference when designing a possible European labeling scheme.

The label would contribute to raising awareness of the importance of sustainable transport through the whole community – elected members, administrative officers, business community, service providers, residents and visitors.

This question is strongly linked to question 20, which also requires referring strongly to the need for a definition of common indicators to monitor urban mobility. This could be done, for instance, through the support to a European project consisting in setting up a European Observatory for Urban Mobility or any structure / platform of this kind.





## 2. What measures could be taken to promote walking and cycling as real alternatives to car?

The increase of walking and cycling is key to achieve an urban mobility culture. Most trips from home start with cycling or walking. They must therefore be considered as mainstream transport modes in urban areas and should be treated as such by the EU.

The potential contribution of walking and cycling to a new urban mobility culture is very significant, considering that a majority of trips in urban areas are less than 5 km long. These transport modes have also a significant contribution to make towards a fitter and healthier population.

Cycling and walking should be promoted through safe and attractive traffic environments, effective networks with appropriate infrastructures and supporting mobility measures.

### *Attractive networks and friendly infrastructures for walkers and cyclists*

The efforts made by cities to combat congestion should be implemented with complementary measures to 'lock in' the benefits from reducing congestion. These measures aim to reallocate road space to non motorized transport.

They include making access by walking and cycling simpler, more convenient and less time consuming than access by car; reducing traffic speeds; introducing priority lanes for cyclists and public transport; intersection treatments to improve safety for cyclists; parking restrictions; pavement widening; raised crossings; and re-phasing of light – controlled crossings in favor of pedestrians.

The decrease of parking space for private cars and the increase of parking facilities for bicycle should be encouraged and seen as a tool to promote cycling.

Cycling and walking should be supported by attractive interfaces and intermodal interchanges for walkers and cyclists.

Cities and transport authorities should as much as possible allocate dedicated space to more sustainable modes of transport, in particular cycling, in order to give them an advantage in terms of speed, distance and convenience.

It is necessary to provide for the full integration of cycling and walking in the mobility network using new technologies when they can prove useful. Research on ITS for walking and cycling should be supported at the European level. It should aim among other things at providing real time personalized and geo-localised information to cyclists and walkers on accessibility, walking paths and bicycle lanes, and the situation of the urban mobility network. They should benefit from the same level of satellite navigation services as the car users. Such schemes should provide real-time audio directional instructions for new walkers, residents as well as tourists visiting a city for the first time. Such information must be integrated with other local area audio information.

More generally, cycling and walking should receive the same level of support and research than the motorized modes receive. One should bear in mind that a significant investment per capita in cycling policies and infrastructure is necessary at the local level







to achieve a serious modal shift and reach modal shares for cycling approaching the level reached in some successful cities of Switzerland or northern Europe.

The development of European guidelines on the design of bicycle lanes and sidewalks in Europe, and of harmonised signing for cyclists, would be welcome to support cities promoting cycling.

### *Safe environment*

Walking and cycling should be better integrated in local and European policies on road safety.

Cycling and walking would be efficiently supported by an increase in the knowledge of the exposition of vulnerable road users to accidents. More efforts should target the protection of these vulnerable road users.

### *Supportive policy framework*

Travel behaviour change programmes can efficiently support soft modes. Individualised travel marketing, companies and school travel plans, also contribute to more cycling and walking.

Walking and cycling should be integrated in mobility planning and policies. A strategy for cycling and walking should be included in any sustainable urban transport plan and mobility policy. An integrated approach to urban mobility through the sustainable urban transport planning exercise would also allow reinforcing the integration between land use and walking and cycling possibilities for urban citizens.

Thus for instance it could require considering accessibility of new urban development for walkers and cyclists.

An analysis of the impact of any urban project on cycling and walking and of alternative possibilities strengthening cycling and walking should be required.

Funding of urban mobility projects at the European level should be conditional on the existence of such an analysis, if it is to depend on sound sustainable urban transport planning.

The integration of walking and cycling in the planning and provision of public transport services should be encouraged whenever possible, since this has proved very effective to influence modal share.

Locally and at the European level, campaigns to raise awareness about the potential benefits of cycling and walking for the mobility network and on public health should be encouraged and promoted.

All European transport-related demonstration, research and funding programs should support projects to increase walking and cycling.







The European Union should also integrate the promotion of cycling and walking in its health and environment policies.

Targeted activities and campaigns to widen awareness among decision-makers and local partners achieve a stronger perception and encouragement for these forms of mobility would support cycling and walking.

### **3. What could be done to promote a modal shift towards sustainable transport modes in cities?**

Modal shift is the result of changed behaviour and ultimately of the change of the urban mobility culture called for by the Green Paper. It can only be achieved when sustainable transport choices become recognised as smarter choices than private motorised transport.

Modal shift is the key objective for cities and is an essential part of the fight against climate change. An integrated approach across all urban policies (planning, transport, environment etc.) is required to achieve this goal.

It is therefore recommended that the European Union encourages cities across Europe to adopt a **sustainable urban transport planning (SUTP)** approach. This would reinforce the integration of urban policies with the urban mobility policy, and guarantee that modal shift and sustainable urban mobility are the goal of any urban transport policy. It would also significantly increase the chances of success of this policy.

Supporting SUTPs is also an element allowing to approach urban transport as an intermodal and multi-modal system, which is very important to be able to promote modal shift.

To encourage sustainable urban transport planning, the European Commission could pursue the work started on this issue and support further the dissemination of best practices in this area.

Polis would also welcome a European initiative to fund sustainable urban transport planning in some cities to demonstrate further their contribution to sustainable urban mobility. This kind of initiative would provide a high return in response to a reasonable level of European funding. Indeed, while it requires less financial resources than investments in many transport infrastructure, funding sustainable urban transport planning can bring very significant results in terms of improvement of urban mobility.

Finally, an important initiative to support sustainable urban transport planning and ultimately modal shift would be to systematically impose the commitment to start the process of sustainable urban transport planning when an urban transport project is financed by the European level, in cities which have not yet adopted this planning practice.





By Sustainable Urban Transport Planning, it is understood urban transport planning processes which include the following key components:

- an analysis of the current situation of the mobility in the city;
- the definition of possible scenarios for the future;
- the definition of a vision, objectives and targets for the future of urban mobility;
- the definition of an action and budget plan for the planning process;
- the definition of a timeframe for the planning process;
- a strategy for the coordination of the process and the management of the relations between the main actors;
- the participation of the citizen to the planning process;
- the involvement of the stakeholders in the planning process
- the integration of the sustainable urban transport plan with the other urban policies;
- a framework and a campaign of information and public relations
- a framework for skill management

Supporting modal shift of course requires the provision of appropriate infrastructures, services and information to encourage and facilitate the use of public transport, as well as cycling and walking and therefore establish the seamless journey. The various initiatives that the European Union could take in this respect are detailed in the answers to other questions of this consultation process and in the general answer of Polis to this consultation process.

Achieving modal shift and the new urban mobility culture require a re-thinking of mobility at all levels down to the level of the individuals and of the companies. Any European initiative which would therefore encourage as strongly as possible all organizations and companies to adopt sustainable travel plans and freight delivery plan would be very useful and would have the potential to achieve significant results.

Finally, innovation can play an important role in supporting modal shift. It is therefore necessary that the European Union supports research for innovative solutions and technologies on urban mobility. Intelligent Transport Systems for instance can help to move away from a modal towards a systemic approach to urban transport which is necessary to ease the transition towards more sustainable modes of transport. This would also mean moving away from a mode-specific to a systematic person/good-journey approach of transport planning and management.

The contribution of the Green paper of the European urban mobility research cluster led by Polis with the support of the European Rail Research Advisory Council (ERRAC) and the European Road Transport Research Advisory Council (ERTRAC) detail the research priorities to be supported at the European level.

To support innovation and encourage the dissemination of best practices to achieve a new urban mobility culture, Polis encourages the European Commission to support a major demonstration programme in which some selected cities would be recognized at the European level as showcase for sustainable urban mobility, possibly with a major theme associated with one city. This would be that one city would receive significant





financial support to rapidly become the intelligent mobility city, the European cycling city, the clean city (fleet of clean vehicles), etc...

This could be part of the future CIVITAS programme but could also be financed outside the research framework programmes. It could consist in a very small number of identified and recognized flagship cities while the CIVITAS programme would be extended and allow every year new CIVITAS cities to receive funding and join the programme.

This would need to amend the programme, and transfer even more its focus towards demonstration activities and deployment of advanced clean and sustainable solutions, which would probably require to support the programme outside the research framework programme.

It would be opportune for the European Commission to keep in any case the CIVITAS label for this programme, since it can rely on a well-known and recognized brand identified across Europe with clean urban mobility and sustainable urban transport.

#### **4. How could the use of clean and energy efficient technologies in urban transport be further increased?**

The European Commission should focus on a twin strategy of tough Euro standards and challenging mandatory targets to reduce CO<sub>2</sub> from cars and commercial vehicles, including light vehicles.

Euro emission standards need to be as stringent as possible to deliver real benefits in urban environments. Polis therefore regrets that the recent European agreement on CO<sub>2</sub> emissions from private cars is less stringent than the initial proposal of the European Commission but acknowledges the progresses made and encourages the European Commission to ensure that the new directive will be duly respected.

The improvement of the existing fleet is the first priority taking into account the slow renewal of the vehicle fleet, the long phase of introduction of new exhaust regulations and the high concentrations of noxious pollutants in urban air. Therefore it is necessary that the European Union harmonizes the certification of retrofitting systems to reduce particulate and NO<sub>x</sub>-emissions of diesel vehicles with ambitious standards and quality (e.g. reduction rates and durability). This would stimulate the development of an European market of effective retrofitting devices, lower cost and increase acceptance. Preferably, the certification should be formed in such a way that vehicles equipped with retrofitting devices easily can be categorised according to Euro-vehicle classes, thus facilitating procurement procedures and the use in low emission zones. An increased use of effective, retrofitted exhaust treatment could cost-efficiently reduce emissions from existing heavy vehicles.

Polis members would welcome a European initiative to stimulate member countries to introduce schemes to speed up the replacement of the most polluting vehicles on a national level, or support similar schemes on city levels. Potential tools are vehicle taxes that are at least partly related to the vehicles emission levels or subsidies for scrapping





the most polluting vehicles. State aid for owners of high emitters replacing their vehicle by a new vehicle complying with ambitious emission standards should be allowed.

Polis members believe that there should be no preferential treatment of light duty vehicles concerning emission standards. Light duty vehicles account for an increasing part of traffic and emissions in cities but are currently allowed higher levels of regulated emissions as passenger cars, despite similar vehicle characteristics. Polis asks for the introduction of the same emission standards for light duty vehicles as for passenger cars in the same weight category, including limits and standardised test cycles for CO<sub>2</sub>-emissions.

Polis calls upon the European Union to explore the possibility to establish effective periodical inspection and maintenance regulations for vehicles.

The possibility of earlier introduction of forthcoming exhaust and noise regulations for the group of “dedicated vehicles” in use in urban transport (taxis, city buses, delivery vans, waste collection lorries or more ambitious standards for this group would result in high cost efficiency and should also be explored.

Polis would also welcome European initiatives harmonized regulations for the measurement of energy efficiency and noise emissions of tramways, metros and regional railways. There should also be harmonized regulations for efficiency and noise emissions of new tramways, metros and regional railways.

### *Research*

Efforts at the European level should support intensely research on the development and market deployment of the so-called second generation of biofuels (biomass-to-liquid) which are the most likely in the near future to achieve a better efficiency and a higher potential of reduction of both greenhouse gases and PM and NO<sub>x</sub> emissions.

Research on hydrogen and the use of **fuel cell** technology, generation sites and distribution networks should be pursued.

The European Union should support programs for research and demonstration of retrofitting/modernization of tramways, metros and regional railways in terms of energy efficiency and noise emissions, including programs for financing,





## Noise

The European Commission should develop and promote 'quiet vehicle' standards. The initial priority is to adopt new, tighter noise standards for all vehicles and tyres.

At the European level, Polis also calls for:

- the integration of noise in a European labelling scheme (comparable to existing noise labelling for heavy duty trucks), (see question no. 6),
- ambitious standards for noise emissions of motorized two-wheelers,
- ambitious standards for noise emissions of light and heavy duty vehicles (e.g. reduction of noise limit for city buses from 80 dB(A) to 75 dB(A), since such buses are available on the European market since 5 years and more),

## **5. How could joint green procurement be promoted?**

Joint procurement of clean and energy efficient vehicles contributes to promote market development and should be supported at the EU level. There are four steps in the promotion of joint green procurement:

1. The EU should take away all remaining questions about the legality of joint procurement.
2. The EU should support these parties who want to investigate the possibilities of joint procurement through funding and exchange of information.
3. The EU could promote clean leasing opportunities for those local authorities and public transport operators who have chosen not to procure their own rolling stock and vehicles.
4. The EU could support these initiatives with data exchange tools such as a clean vehicles database (e.g. CleanCities USA) and for instance by setting up a virtual market place for clean vehicles.

### *Clarity on the legality of joint procurement*

The legal framework has to be clear and transparent, in such a way that all EU public procurement legislation is carefully applied. Polis has received mixed messages whether the current legal framework is sufficient to allow joint procurement for clean vehicles. If so, the EU should give a clear message that existing legislation enables joint green procurement. If not, barriers should be overcome by new legal initiatives. In the field of clean vehicles there may be national laws that are obstacles for market developments, e.g. safety regulations on refuelling various fuels.

It is important that any proposal regarding future green vehicle procurement is technology-neutral. It should also fit seamlessly with existing environmental frameworks, particularly Euro standards. Given that the challenges, whether funding, technological or spatial, vary enormously between Europe's cities, local authorities must have flexibility in their choice of green procurement strategies.





### *Support to procurement consortia*

What is clear from past and ongoing projects on joint procurement, is that this topic needs further experience and applied research. In order to foster the independent establishment of joint procurement consortia, Polis calls upon the EU to continue and expand the support to these local and regional authorities that want to take action in this field. This can, for example, take the form of funding projects that aim at facilitating large-scale procurements of clean vehicles with participation of different European partners (as for example the PROCURA project).

### *Do not forget the leasing sector*

It has to be investigated how joint procurement would clean up the fleet of lease vehicles. One could imagine a policy that would favor leasing of cleaner vehicles, more in particularly special purpose vehicles such as public transport rolling stock. The business model of establishing holding organizations who lease out clean vehicles cities, regions and (their) public transport operators could be investigated on a European level.

For some clean vehicles (e.g. hydrogen), it is so that not only the vehicle is acquired, but a system (including fuelling station(s) and maintenance). This kind of service-to-system procurement might easier be fit to leasing format of contracts than to real purchase contracts.

### *From Virtual Showroom to virtual market place*

CleanCities USA has provided the EU with a good example on how a central government can gather detailed information on clean vehicles. This model could be adapted to EU legislation and objectives. The “virtual showroom” could even be further developed into a virtual market place for clean vehicles. This would be a European virtual platform for building up consortia of buyers and for contacting potential suppliers. On this platform, buyers could express their needs and find other buyers with similar needs to launch joint procurements.

**As a consequence, Polis welcomes the announcement, as part of the European Economic Recovery Plan, that the Commission will support the development of a procurement network of regional and local authorities to pool demand for clean buses and other vehicles.**

Beyond the scope of this question, Polis would support European initiative which would encourage and ease the use of public procurement to trigger the deployment of cleaner and more advanced solutions, as well as to trigger changes in behaviors. In this regard, it is also interesting to link this to the investigation that the Commission is currently carrying out in the field of pre-commercial procurement for ITS deployment.





**6. Should criteria or guidance be set out for the definition of Green Zones and their restriction measures? What is the best way to ensure their compatibility with free circulation? Is there an issue of cross border enforcement of local rules governing Green Zones?**

Green Zones (pedestrianised areas, restricted access schemes including low environmental zones and congestion charging schemes, quiet zones, low speed areas, etc.) are tools for cities and urban areas to improve urban mobility by reducing congestion and containing the negative impact of mobility on the environment.

Low Emission Zones in particular are tools for cities to respect the limit values on air quality set by the European directives.

Cities should retain the freedom to chose or not to implement Green Zones and to design these schemes according to their local needs and circumstances.

However, some European guidelines and recommendations would be welcome to ensure the efficient implementation of these tools and to guarantee that they do not create unnecessary barriers to the freedom of movement across the European Union.

Therefore, the European Commission should encourage restricted access schemes to base their parameters on agreed European norms.

Some proposals made in the previous answers to this consultation are also important for the efficient implementation of Green Zones at the local level. As already mentioned, there is for instance a need for an EU-wide system of certification for pollution abatement devices, to guarantee that a device fitted in any Member States would meet the requirements it claims to. As there is not certification everywhere, information sharing is not enough.

Encouraging cooperation and information sharing between licensing, certification and accreditation bodies across the EU for vehicles fitted with pollution abatement equipment would **facilitate the implementation of Low Emissions Zones**.

Low Emission Zones are access restrictions schemes for high polluting vehicles emitting noxious concentrations that exceed air quality standards. Several member states have defined labels using their own criteria and traffic signs for low emission zones. That has become an obstacle leading to high costs for industry and car owners due to small series, a confusion of car owners and drivers, low acceptance.

In order to bring lower costs and higher acceptance, the EU should define harmonized traffic signs for low emission zones

Integration of noise levels in a European labelling scheme (comparable to existing noise labelling for heavy duty lorries (see question 4).







The European Union should support the creation of a European information platform where freight operators and public transport authorities could exchange and upload information on traffic rules, restrictions and conditions in European cities. A European platform would provide the framework for a standardised format for exchanging information and therefore make it significantly more efficient and attractive.

### *Cross-border enforcement*

There is a need for action at EU level to enable cross-border enforcement. Cross-border enforcement of traffic penalties is key for an efficient implementation of access restriction schemes, as well as of course the efficient implementation of road safety policies relying on speed limitations. Effective enforcement and compliance for such schemes is essential if they are to be accepted by citizens. With a growing trend towards decriminalising such offences, the problem of cross-border enforcement will therefore come more sharply into focus. Local transport authorities not only have problems in tracing foreign registered vehicle owners (and keepers) but also enforcing penalties when they are identified.

Several European initiatives are necessary for this purpose.

It is first necessary to make possible at the European level the exchange of existing data (i.e. of the detail of existing data s of the owner (registered keeper)) of a vehicle. This would have to be done by EU legislation as at the moment national rules in some Member States prohibit such data sharing.

Although Member States could develop a series of bilateral agreements on data sharing and enforcement, this is resource-intensive, time consuming and could result in a patchwork of different agreements preventing effective and consistent enforcement. Action at European level is needed. Polis urges the Commission to come forward with a Directive on the cross-border enforcement of all traffic offences, criminal and non-criminal. This would be best achieved by extending the scope of the expected proposal for the cross-border enforcement of offences relating to road safety.

The Eurosparks European funded project has examined existing legislation and developed recommendations for adapting or changing EU law so that local authorities can enforce civil/administrative penalties against foreign-registered vehicles. Its findings should be used as a reference for any future European initiative on this topic.





## **7. How could eco-driving be further promoted?**

Eco-driving refers to more than the private drivers' behaviour. It is an issue of relevance for professional drivers (drivers of buses, heavy and light duty vehicles, taxis) and private drivers of private cars.

The tools to promote eco-driving include technological solutions and information and engagement schemes targeted professional and private drivers.

### *Technology*

The EU could efficiently support technology development and requirement to support eco-driving. Requirements to include some in-vehicles device in all vehicles sold in Europe would contribute to this objective. These devices would systematically inform the driver about its average fuel consumption. Support to vehicle and infrastructure technology that discourages rapid braking and acceleration, and more generally (advanced) driver assistance, can also contribute to encourage more fuel-efficient driving techniques. EU funding for Intelligent Transport Systems (ITS) could also be aimed at eco-driving in the context of improvements to in-vehicle technologies.

At the European level, eco-driving could be used in a European scheme to engage the vehicle manufacturers and oil producers in a corporate social responsibility scheme.

### *Private drivers*

For private car owners, eco-driving starts with the choice of vehicle and fuel type (e.g. vehicle type, engine size, accessories)

Eco-driving should be promoted through campaigns showing the actual financial impact for the user of his driving behavior.

Eco-driving should also be promoted through the driving licence training and tests across Europe, European requirements in this matter would be welcome.

Regarding company vehicles used by private drivers, leasing companies should have the obligation to provide eco-driving training with the vehicles.

Encourage the inclusion of eco-driving in driver's training, and research the potential impact if having eco-driving as a major requirement to obtain a driving licence;





### *Professional drivers*

The reference to eco-driving in directive 2003/59 on the training of drivers of goods and passengers vehicles should be reinforced. A revised version of the directive should set in its annex as an objective to raise the awareness of drivers not only about fuel consumption but about the impact of driving habits on the environment, in particular in urban areas.

Requirements for professional drivers training should also address taxi drivers training and licenses.

At the European level, support should be given to the use of local freight partnerships between public authorities and freight operators whereby the public authorities create incentives to encourage eco-driving towards the freight operator.

Public procurement could be used to encourage eco-driving. One criterion for selecting a company or a freight operator as supplier to a public authority should be its commitment to support eco-driving, through for instance the regular provision of eco-driving training to the drivers.

Eco-driving in public transport (rail and road) should aim to combine the reduction of energy consumption with increased comfort for passengers increasing.

## **8. Should better information services for travelers be developed and promoted?**

Yes, integrated information services for travelers are fundamental to create a seamless and integrated urban mobility systems. They would allow travelers to make better informed choices. They would also allow a dynamic management of the network, through the use of information to influence behavior.

### *Who should receive the information?*

It should target all groups of travelers according to their specific need and their condition in a given moment, drivers (which are potential Public Transport customers), Public Transport customers, walkers, cyclists, tourists, mobility impaired persons, etc.

### *What type of information ?*

This information should integrate data on the traffic, soft modes, public transport, cost of travel, the environmental situation and the environmental impact of the travel. It should be provided as much as possible in real time, it should be individualized and geolocalised, to maximize its impact on travel behaviors.

The objective is to be able to give any traveler at any time and in any place of the city the best possible information about his mobility choices to reach its destination, informing him about the possible options: the cheapest, safest, cleanest or fastest way to reach his destination. This information must be simple, easily accessible and reliable. Obviously it should reflect the fact that most journeys are multimodal.





It is important that the European Union would continue and intensify its efforts to support research to achieve this objective. In relation to this, it should encourage the development of interoperability in such systems enabling information to be fed directly into all satellite navigation systems.

The quality of the information, its accessibility and usefulness for all category of users could be efficiently supported by European initiatives.

Indeed, common standards for the display of the information to the general public would allow to easily informing foreign citizens about their mobility choices.

Common standards for information portal, and common rules for download information about mobility solutions across Europe would greatly accelerate the provision of the most advanced information and the development of advanced information systems.

While taking into account local specificities, and the need to accommodate current practices and local signing codes, the European Union could encourage a move towards the harmonization of pictogrammes and some signing standards, at least on web and virtual information portals. They would be useful to provide information about the mobility network (bus stops, accessibility), but also about the process of searching for itineraries.

The European Union should also fund demonstration projects to accelerate the deployment of more advanced information services. If it chose to fund a major demonstration programme with leading European cities, a European smart city should be able to provide all the travelers on its territory the kind of integrated comprehensive information described above.

#### *More specifically on public transport*

Information must make easier access to the public transport network. It should make the trip as convenient and least stressful as possible, reducing as much as possible uncertainty. It should make public transport more attractive.

For most of the customers (current and potential), real time information and in case of accidents or service disruptions are fundamental.

The European Commission could create a framework encouraging organizers of any public event of more than 20 persons to provide information on how to reach the event by public transport.

It is worth stressing here that better information services on mobility for business and freight operators are as important as information services for travelers. It needs to be recognized, however, that they will need different types of services – for example the routes taken by HGVs and private cars will not necessarily be the same. This will require closer collaboration between service providers, regulatory authorities and others whose actions affect the transport network (e.g. to receive continuous updates on access restrictions such as Green Zones, engineering works on public transport networks, or roadworks being carried out by utility companies).





Polis welcomes the initiatives of the European ITS Action Plan announcing the definition of procedures for the provision of EU-wide real time traffic and travel information services and identifying the optimization and collection of data as a priority.

**9. Are further actions needed to ensure standardisation of interfaces and interoperability of ITS applications in towns and cities? Which applications should take priority when action is taken?**

Intelligent Transport Systems can efficiently contribute to the creation of an integrated mobility network, which is necessary to support modal shift and a new urban mobility culture.

To achieve an integrated mobility network with the support of Intelligent Transport Systems, the various ITS tools must be compatible and it should be possible to integrate them with each other.

To achieve an integrated mobility network, there should be tools for integrated network management, integrated exchange and provision of information and integrated payment tools for the use of mobility services and transport infrastructure.

The full integration of these tools is prevented by technical barriers. Several of them could be removed in the future with future systems if standards and interoperability norms are adopted at the European level.

Standards and norms for interoperability can accelerate the deployment of new solutions for this integration and bring down prices, therefore also accelerating market deployment for new systems.

Initiatives to promote interoperability norms and standards are necessary but should take into account the cost of their implementation for cities which have already made considerable investments in ITS systems.

These cities should be given time to reap the benefits foreseen in the business cases for their original investments.

***Integrated network management***

Intelligent Transport Systems must allow to move towards an integrated network management focusing on the movement of people and goods and not only on the movement of vehicles as it is often the case.

For this purpose, it is necessary to develop the standards and norms of interoperability to integrated network management tools and in particular the interchange of data between Public transport passenger transport real time scheme, UTMC, and electronic parking management.





Standards and norms of interoperability should allow to move towards this integrated network management with the deployment of cooperative systems, and of applications for nomadic devices.

The interoperability of the various components of a complex ITS system at the European level, including the interoperability of the components of traffic management systems, is essential for the rapid deployment of the technologies.

It would also be necessary to take initiatives at the European level to accelerate the certification process of material which is in used in other countries. This would again contribute to remove barriers to the efficient implementation by local authorities of the instruments of their choice to encourage a new urban mobility culture.

### ***Integrated payment***

Standardisation of interfaces and interoperability of ITS applications is a key element to improve Co-Modality (inter-, multi-modality) of collective and individual public modes by establishing a common information technology surface, which would integrate good information, easy access and simple payment (for one-way trips, pay-as-you-go).

Payment modes should be as simple as possible for the user. There should be a move towards common payment tools for various mobility services (public transport, parking, congestion and infrastructure charging when applicable, ...).

The ticketing policies and systems used in individual cities within Europe have over many decades evolved to form a highly diverse mix. Cities differ from each other in the technology they use, in the prices they charge and in the products they offer for urban travel.

Any initiative in this area should take into account the interoperable standards provided by the payment industry and the new solutions offered by mobile payment.

Several paths should be explored, interoperability of payment systems, the use of various technologies, or moves towards a fare collection system based on payment industry standards. The potential of each of these approaches in terms attractiveness for customers, technical and economic efficiency, should be thoroughly evaluated.

At the European level, harmonised technical standards for electronic public transport ticketing (integrating all modes, local and interurban), harmonised technical standards for interfaces and interoperability of systems for congestion charging and road pricing, and harmonised technical standards of interfaces and interoperability for cash-free payment of fees e.g. by mobile phone and credit-/debit-card would be welcome by Polis members.

Polis believes the European Commission should also consider the development of a European standard by which any city's ITS software, in particular ticketing softwares, could be delivered "over the air" as a software application to suitable contactless mobile phone handsets. With a standard agreed and in place, it would be for cities to package their own ITS application in the appropriate way and make it available through national mobile network operators for download by visitors on the internet or at kiosks at convenient places both before and during their visit. The European Commission is





ideally placed to engage with the mobile operators on a pan-European basis on this concept.

The use of mobile phone for mobile payments of transport services such as parking or public transport should be facilitated by harmonization of national legislation on the integration of these services in phone bills

### ***Integrated mobility information***

The answer to the previous question details the need for integrated information for passengers. Standards and/or norms of interoperability to integrated information systems on public transport, traffic and soft modes mobility solutions need to be developed to provide on the short term the integrated information needed for travelers.

For freight urban delivery, integrated information systems are also necessary, but they should focus on the exchange of information between businesses and public authorities/ infrastructure managers, which will require an harmonized European platform, as explained in the question on Green Zones of this consultation process.

Polis contribution to the upcoming ITS action plan and Polis answers to the consultation on the action plan will detail further what actions can and should be taken at the European level in this area.

The recent proposal of a European Commission for a directive laying down the framework for the deployment of intelligent transport Systems in the field of road transport and for interfaces with other transport modes includes essential tools for the standardization of interfaces and the interoperability of ITS application.

### **10. Regarding ITS, how could the exchange of information and best practices between all involved parties be improved?**

Polis members call upon the European Union to support **an ITS platform for European cities** to exchange and benchmark their policies with the goal of raising the level of awareness on Intelligent Transport Systems and to facilitate the deployment of ITS solutions. The platform would encourage dialogue between towns and cities and allow for instance to set references and indicators to better quantify the potential of ITS for sustainable urban transport planning.

Such a programme should be encouraged by the EU to lead to the definition of a **reference framework for European cities for the deployment of ITS solutions**, which would consist in a methodology and would help decision-makers to choose and implement the ITS tools best suited to the local challenges and needs.

An ITS city platform, led by local authorities and for local authorities, would also be a useful tool to structure the dialogue on the **interoperability and standardization** of new technologies to ease their deployment on the market.







The platform would be a technology watcher. As such, it could be a reference for cities and local authorities to develop **pre-commercial procurement strategies** with the same goal of accelerating the market deployment of new technologies.

The platform, and more generally European dissemination efforts regarding ITS should define target groups and customized dissemination activities depending on the target groups. One necessary initiative consist in supporting at the European level a dissemination activities stressing the functional and economical benefits of ITS solutions, both for the user (professional and general public) and for the politicians and decision-makers.

Therefore attention should not be given only to the dissemination of technical solutions but also to non-technical issues. Dissemination messages should answer the following questions:

How to implement ITS developments?

Which market models are available?

How to handle ownership of the ITS-hardware, what is a suitable contract form?

Polis welcomes the proposed creation of a European ITS cooperation and coordination platform by the European Action Plan on Intelligent Transport Systems. This platform should be designed to ensure an efficient exchange of information and the dissemination of best available knowledge on ITS.

### **11. How can the quality of collective transport in European towns and cities be increased?**

The increase of the quality of collective transport must be a continuous effort. It essentially depends on local initiatives and the quality of collective transport is largely an area for local governance. Any approach at a European level must be flexible enough to take into account local circumstances.

Improved quality can only be achieved by cities and urban areas taking a broad strategic approach and by establishing an integrated, sustainable transport policy. It has to be part of a strategy which has as its ultimate aim the achievement of modal shift from private to public and sustainable transport. To achieve a new urban mobility culture and a move away from the car, public transport should be attractive, reliable and reasonably priced.

The quality of collective transport partly depends also on the integration between collective transport and other transport modes. It is therefore important to provide European support for the continuous improvement of transport and travel interchanges, with functioning and efficient park & ride sites, and advanced interchanges with better physical links between modes/services at railway stations, bus stations, transport nodes, taking as well into account the integration with soft modes such as walking and cycling.

It would be useful at the European level to develop tools to monitor the quality of collective transport services at the local level. European initiative encouraging further certification of services would be welcome. Initiatives mentioned in other answers of this





consultation process, aiming at improving the quality of data collected on the situation of the mobility networks, and in particular on collective transport, the definition of indicators to monitor this quality, are examples of initiatives which can usefully be taken at the European level. Transparency, monitoring and evaluation of service quality is indeed a precondition for improvement.

Polis would encourage at the European level a debate on a future agenda of collective transport in the post-industrialized, modern societies of the 21<sup>st</sup> century. European support to new innovative collective transport services would be welcomed to contribute to make them mainstream mobility options for European citizens.

With the traditional public (rail) transport as a backbone, flexible and individual modes should become obligatory elements of urban transport fitting with the demands of modern society. Innovative solutions such as 24/7 door-to-door service depending on customers' demand, the integration of individual services (e.g. taxis, demand-related flexible transport solutions, car-sharing, bicycle-sharing) with traditional collective transport, should be supported.

As mentioned in other answers to the consultation process, there should be a move, supported by the European Commission, towards offering all customer services on one common surface (information, reservation, access, payment). Answers to question on modal shift, information to travellers and the needs for ITS standards and interoperability norms, dedicated lanes for collective transport, all provide elements of answer to this question on collective transport.

Improving the quality of collective transport requires the improvement of the quality of bus services, with more comfortable vehicles and better passenger infrastructure, bus priority measures – shorter journey times and more reliable services, increased modal shift – reduced congestion and reduced delays, more passengers – cheaper fares and more frequent services.

It also requires to improve the supply of collective transport solutions, including through the building of new rail transport structures and bus rapid transit infrastructures.

This is only possible if adequate funding is made available for collective transport projects. In many countries, local finances are not sufficient to finance these projects. The national sources of funding have progressively diminished to levels inadequate to achieve the required increase in collective transport quality to achieve modal shift and a new urban mobility culture.

Since the challenge of a sustainable urban mobility is a European challenge, this issue of funding of collective transport projects should also be addressed at the European level.

It should be tackled through an initiative to coordinate actions at the European and national level regarding funding of collective transport infrastructure and projects. European initiatives should also support research on new forms of financing for collective transport initiatives.

Finally, investment in collective transport should be given a stronger priority when it comes to allocating European structural and cohesion funds.





## **12. Should the development of dedicated lanes for collective transport be encouraged?**

Dedicated lanes for collective transport can be effective instruments to accelerate public transport. The installation of these lanes depends on the local situation. The European Union can encourage the exchange of data and best practices. It can also set guidelines on how to efficiently isolate collective transport from private traffic in certain circumstances. This is particularly interesting for urban areas where demand for road space outstrip supply. The use of these lanes not only by buses, but also taxis and HGV should also be a topic for more European research and possibly guidelines.

From a general perspective, support through exchange of best practices and funding to measures allowing to improve commercial speed and reliability of public transport are necessary. Public transport has to offer competitive travel times against the private car to increase its attractiveness. This is necessary to achieve a modal shift.

The management of public transport services, and in particular bus lines, in situation of congestion leads to a lack of economic competitiveness.

Dedicated lanes for collective transport are one of the tried and tested methods for making collective transport more attractive and reliable than private motorised transport. It is an example of how urban transport measures can 'lock-in' the benefits of changing travel behaviour, which will increase the likelihood that collective and sustainable transport will become the natural, preferred choice.

## **13. Is there a need to introduce a European Charter on rights and obligations for passengers using collective transport?**

Polis members would encourage work to support greater accessibility of collective transport for mobility impaired persons and would be willing to contribute to this work. The first step at EU level should be to evaluate in a transparent way the different passenger charters in place and, based on this assessment and responses from stakeholders, consider then whether further work is required.

Any work on such a charter should not lose the focus of the great challenge at stake for urban mobility in the future in Europe which is the reduction of CO2 emission coming from urban transport and the containment of the impact of urban mobility on climate change.

Considering that many transport operators already have passenger charters, and that there are substantial differences between cities and public transport modes, Polis members would support the voluntary approach proposed by the International Association of Public Transport (UITP). UITP's Charter of Passenger Rights sets out minimum standards that its members endeavour to observe. It is an important benchmark for collective transport and a useful tool for developing good practices.

Polis will develop an answer to the proposed directive on the rights of passengers for bus and maritime transport based on principles stated in this answer.





#### **14. What measures could be undertaken to better integrate passenger and freight transport in research and in urban mobility planning?**

Sustainable Urban Transport Planning can efficiently help to better integrate passenger and freight transport. SUTP should address freight as much as passenger transport. Polis members encourage the European Union to address the issue of urban freight delivery through specific programmes.

European research should support further the integration of logistic and vehicle technology (flexible vehicle for dual use (switched or combined/shared mode). Interface between public transport and freight traffic).

It should also contribute to the development of a European platform for the exchange of experience between infrastructure managers and public authorities on one hand and freight operators and businesses on the other hand. This should lead to the identification of common indicators to monitor urban freight delivery and provide more reliable information on this, a key gap currently obstructing more significant developments.

The cooperation between freight operators and businesses and public authorities is key to better integrated passenger and freight transport. The use of public procurement, freight operator recognition schemes and freight quality partnerships should be encouraged. Research on this should be supported.

Any efforts towards the full integration of the urban mobility network would contribute to better integrated passenger and freight transport at the urban level.

Polis supports the intention to strengthen the freight aspects of the CIVITAS programme with projects to promote the integration of long-distance and urban freight logistics.

European initiatives promoting the integration of freight delivery plans with travel plans for companies across Europe would be welcome. Research should investigate the potential gains of spreading the practice of adopting freight delivery plans for European companies, for buildings and for new urban developments.

Finally, research should investigate business cases to identify sustainable models for establishing urban freight distribution centres in cities which wish to do so.

#### **15. How can better coordination between urban and interurban transport and land use planning be achieved? What type of organisational structure could be appropriate?**

Polis members invite the European Union to support further an integrated approach to urban policy and in particular integrated sustainable urban transport planning. This should be done through the promotion of sustainable urban transport plans, which are useful tools to integrate urban and interurban transport, through the necessary definition of mechanisms and structure to address this challenge at this local level. They are also





efficient tools to support the integration of the urban mobility policy with land-use planning.

Sustainable Urban Transport Planning is also a useful tool to integrate better transport planning and transport investments with **economic development**.

#### *Towards a stronger coordination between urban and interurban transport*

In the definition of its European urban transport policy, the European Union should recognize the relevance of **regional approaches** to urban transport problems and therefore recognize the role of local and regional partners, for instance in its research and demonstration programmes.

The development of platform and interfaces for the exchange of information between urban and interurban traffic managers would contribute to improve the management of the traffic on both networks. This exchange of information remains far too rare in cities and regions across Europe.

The administrative and institutional organization of each territory is an issue that does not fall under the competency of the European Union. It is however important to take actions at the European level to encourage any administrative organization allowing for the efficient coordination of the management of mobility at the various levels, urban and interurban.

The European Union should better take into account the connection between the TransEuropean networks and urban centres when financing the TENs.

With the development of low-cost airlines and regional airports, a stronger coordination between urban transport and airports development is required. The European Union should support research on the traffic generated by the development of regional airports and the impact of the traffic increase on the environment. It should encourage the development of collective transport link to airports and study how this can in return support the further development of public transport locally. It should finally explore the possibility and the impact of requirements to manage the extra traffic induced by the increase of air traffic when new airport infrastructures and new lines are opened.

The European Commission finally should address comprehensively the various forms of interurban transport. It should consider taking an initiative for a more sustainable rural transport for instance.

#### *Towards a stronger integration between urban and interurban transport and land use planning*

It is critical that urban transport is effectively linked to **land use policy** and urban design to ensure sustainability, to reduce the need to travel, and ensure the optimal sustainable mix of transport. This linkage of land-use and urban transport must be adequately addressed. Also urban transport should be taken into account in the early phases of spatial planning in order to prevent problems instead of repairing problems.





The efficient integration between transport and land-use should focus on the accessibility of services for the population and the goods. IT should aim at a model of city development which reduces the demand for mobility by guaranteeing the accessibility by soft modes first, and then public transport, to services.

It should be noted that public transport infrastructure could be used as a backbone for city developments to provide this necessary accessibility. Guidelines for minimum levels of accessibility to services and jobs for new urban developments could be developed at the European level.

Urban mobility policy should integrate anticipated demographic changes and their impact on land use and economic development for sound future sustainable urban mobility solutions.

The European Union should support funding research on the effects of different organisational structures of transport and land use planning,

European research efforts could lead to the definition of a manual for green transport land use planning. The mobility scan that is now developed in the Netherlands provides a useful reference for this process. It assesses the accessibility of new developments and also the negative effects on neighbouring locations in terms of mobility (accessibility, traffic flow, safety, noise and air quality). The proposed manual should give a step-by-step approach for solutions and design options for green transport towns.

The European Commission should also encourage greater coordination between spatial and transport planning, highlighting opportunities cities provide for businesses and customers to work in close proximity. This spatial concentration, or agglomeration, is increasingly being seen as providing significant benefits in terms of productivity and innovation. The European Commission should promote research and demonstration on the link between transport investment and economic development: traditional models used to evaluate transport projects have tended to miss the benefits of agglomeration.

There is merit in discussion at a European level on using **land value capture** as a method of funding transport investment. Such a development would help supporting development by owners of under-used or idle urban sites, encourage higher density housing and thus enabling towns and cities to operate more efficiently. Lower land prices would make business premises and homes more affordable and contribute to economic growth.







## **16. What further actions should be undertaken to help cities and towns meet their road safety and personal security challenges in urban transport ?**

Polis members call for **EU initiatives for benchmarking road safety policies. This should be supported by the development of a European urban road safety database.**

It would be helpful if the CARE database (Community database on Accidents on the Roads in Europe) permitted valid comparisons of casualty and collision data between metropolitan areas. It could be a powerful tool for exchanging information and expertise among transport professionals.

Benchmarking and exchange of best practices are essential, in particular in this area. Indeed, increasing road safety record for some cities and countries is a challenge since it consists in tackling new road safety risks or residual ones. there are on the other hand many best practice known which can be transferred and implemented in other cities and countries and have proven to provide efficient tools to drastically improve road safety records. Incentives for the exchange and implementation of best practices are therefore particularly important.

Polis members support European initiatives imposing the **enforcement of cross-border penalties for traffic infractions and all transport related infractions** (failure to pay toll, urban congestion charges, parking, low environmental zones). The cross-border enforcement of penalties is hampered because of the patchwork nature of the local data protection rules in place. Harmonisation of these rules would facilitate cross-border enforcement of penalties.

Polis members support European initiatives for the development of ITS and cooperative systems applications improving road safety. They stress the potential for these applications to be used as well to achieve other objectives of the urban transport policy such as modal shift, efficient network management and the containment of the negative effects of transport on the environment.

The European Union could take some further actions to help cities improve road safety. It should extend pedestrian testing of NCAP-test by bikers and bicyclist testing.

Efforts should be put into using the future possibilities provided by Galileo to support further road safety applications. This could for instance lead to the development and introduction of an electronic data recording (e.g. vehicle speed) for all motorised vehicle (extension of the existing regulation for heavy duty vehicle).

The European research framework programme should support demonstration projects with electronic speed management including intensive monitoring and evaluation.

It could also support identifying and promoting standards of in-vehicle information system design and installation which contribute to road safety. A clear commitment to encouraging manufacturers to develop systems which are not distracting could help ensure that this type of technology plays an important part in road safety in the future.







It should also explore fully the potential of Intelligent Speed Adaptation and support its deployment across European cities.

For this purpose, and more generally to mitigate the potential negative effects of navigation systems on road safety, there is a need for a rapid and major European initiative to ensure that navigation systems will provide information about traffic rules and regulation and update them in real time through signs which can be understood by all drivers, including foreign drivers.

This is necessary to avoid the traffic problems, and sometime tragic accidents, due to the absence of information on traffic rules or the lack of update of navigation systems, which has led foreign drivers to use the shortest indicated path, even though that led them to break traffic rules, sometimes with tragic consequences.

Improving vehicle design outside of the driver's cabin also presents an important opportunity to meet road safety challenges. In this respect, the Commission's proposal for the Regulation on Pedestrian Protection is inadequate and needs strengthening in several respects<sup>2</sup>.

The European Union should remove (national) barriers to the implementation of efficient local road safety policies. Local authorities should have the possibility to decide speed limits on their territory and to enforce these speed limits with all tools available and used across Europe.

### **17. How can operators and citizens be better informed on the potential of advanced infrastructure management and vehicle technologies for safety?**

To better inform operators and citizens, training and education programme targeted at specific groups would be helpful.

Any strategy aiming at promoting vehicles technologies for safety should be developed in partnership with the road safety institutes, retailers and vehicle manufacturers which should agree to a framework action. This should be part of their corporate social responsibility strategy. Mandatory labeling in show rooms could also be a step in the right direction.

The ITS platform of cities mentioned earlier could also help to reach the operators on the potential of advanced infrastructure management. It would help to exchange knowledge and expertise through ITS Platform for Cities, but also between road safety practitioners working in different areas, such as police, highway engineers, policy makers, vehicle manufacturers and health practitioners, who often do not have the opportunity to work together.

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<sup>2</sup> <http://www.etsc.be/documents/ETSC%202008%20Position%20Paper.pdf>





### **18. Should automatic radar devices adapted to the urban environment be developed and should their use be promoted?**

The development of radar devices for detection, monitoring and enforcement purposes should be actively considered in the urban environment. They are well established as an efficient detection facility for traffic signal installations.

Automatic radar devices (in combination with electronic vehicle data recording) are an effective approach of (urban) speed management. Harmonised technical standards at the European level would bring down costs and would therefore be welcomed .

Polis would welcome a European initiative to remove national barriers in order to ensure that cities can decide to install automatic speed radar on their road network.

The exchange of best practices on the use of automatic speed radar would also be useful.

### **19. Is video surveillance a good tool for safety and security in urban transport?**

Video surveillance can be effective in improving security and safety, as part of a package of measures.

The European Union can highlight best practices in overall security techniques and can play a role in funding and supporting the development of sophisticated hardware and software technologies for use in complex environments.

Decisions on the use of video surveillance must be left to individual member states and their local transport authorities.

Video surveillance can be used efficiently for better public safety and security. Video surveillance has proved efficient in fighting vandalism. When it comes to fighting violent criminality, its main interest consists in allowing a rapid and coordinated reaction to incidents to avoid a possible escalation.

Video surveillance is used for managing road traffic for two main purposes. The first one is similar to the use of video surveillance for monitoring persons and goods but it aims at monitoring road traffic instead of persons. Software for image analysis are used in this case to identify critical situations (automatic accidents detection). The second purpose is the continuous monitoring of traffic, including in “normal” periods. This is for instance the case of the system of automatic licence plate recognition which allows to know the exact travel time between two points. These two applications are relevant for safety and security of urban transport and for Intelligent Transport Systems as referred to in questions 8 to 10.

The usefulness of video surveillance to enforce safety and security of people and goods in public places is certain.

The European Union could support the development of more efficient softwares in this area by financing targeted research in terms of security automatic control in public





transport. There is a real need for more efficient products for the analysis in real time of video images in sensible areas such as metro stations for instance.

The second constraint comes from the high cost of efficient systems of video surveillance. Indeed, for such systems there should be a large number of video cameras, each of them posted in accordance with its environment (urban design, protection against vandalism and corrosion, etc.). To be efficient, these cameras must be commanded by sophisticated systems (web server, FTP client, mail client, contact relay input and output, movement detection, 360° rotations, positioning memory, audio and video streaming, audio transmission full duplex...). Images are analyzed on the spot by monitoring and alert softwares. They are then sent to a control center. The information flow is very important and requires advanced systems (fiber optics, etc.). The images are seen on special screens (ergonomic requirements), by control squads which must often be available 24hours a day.

Some research efforts could help to decrease the cost of the system at the European level. But they would only make sense, if there is a European harmonization of all national regulations on privacy in relation to video surveillance. This is a necessary condition for the creation of a market large enough to bring costs down and justify the investment in research.

This issue could be tackle by the European Union in the forthcoming communication of the European Commission.

**Public administrations would very much welcome a European initiative aiming at harmonising at the European level the message or the sign warning citizens that they enter a zone of video surveillance.**

Where such signing is a mandatory requirement, it can raise very concrete problems. According to the European directive on tunnels, for instance, at the entrance of each tunnel, drivers should be informed that they are entering an area of video surveillance, with the name of the administration watching the images and a phone number for information. The display of this information is not advisable for road safety reasons in areas such as the entrance to tunnels, which have already been identified as a risk for road traffic safety. The problem is even more acute in urban areas where there are numerous messages sent to the drivers at the same time. A common European logo, possibly recognized by the Vienna convention, to be used when required by European, national or local regulation, would solve many problems in this respect.

Regarding road safety, the European Union could support research in using video surveillance for automatic control of safety in certain specific places of the network (black spots, accidents prone areas, crossroads, tunnel entrance, entrance and exit of speed lane) or for in vehicles cameras.





The European Union should also support research on the automatic control of the safety and security of walkers and cyclists, with cameras located in specific points of the network (black spots, crossroads, pedestrian crossings?, schools, ...).

Looking at the statistics on urban road safety and the number of accidents involving walkers and cyclists, it is time that these vulnerable users can benefit from technological innovations as much as motorized transport has benefited over the past years.

**20. Should all stakeholders work together in developing a new mobility culture in Europe? Based on the model of the European Road Safety Observatory, could a European Observatory on Urban Mobility be a useful initiative to support this cooperation?**

*On stakeholders cooperation*

The cooperation between stakeholders to develop a new urban mobility culture is essential. Sustainable urban transport planning exercises are an efficient method to organize stakeholders' consultation and participation to urban mobility choices.

Stakeholders are key for the success of innovative urban mobility policies, to reinforce their acceptability and support their efficient implementation.

Stakeholders consultation can often prove itself a source of innovative efficient ideas for urban mobility. The public authorities, the citizens, but also businesses, retailers, NGO's, freight operators, all stakeholders must be engaged in the challenge of creating a new urban mobility culture.

At the European level, any European initiative should equally bring all stakeholders around the table, representative of public authorities, cities, infrastructure managers, public transport operators, transport authorities, vehicle manufacturers, industry federations, NGOs, representative of businesses, and operators, etc. While consensus on any given measure might be difficult to obtain, consultation of everybody is worthwhile and structure to maintain the dialogue between all stakeholders is key for the identification of the most efficient European initiatives.

*On a European Observatory on Urban Mobility*

The main objective of the European Road Safety Observatory is to work on road safety data and indicators.

As explained above (see question1), there is a real need for the definition of common indicators at the European level to be able to monitor efficiently urban mobility. There is a need for a scientific and independent definition of indicators and methodology for assessing and evaluating best practices in urban transport. This is necessary to then support benchmarking activities.





There is also a real need for improving data collection practices and the quality of the data on urban mobility. Here again European initiatives defining standards for data collection and quality would be of much use.

The regular collection of data on urban mobility in all cities is necessary for the efficient identification of best practices and for efficient benchmarking activities across Europe.

All these activities could be the responsibility of a European Observatory on Urban Mobility or could be carried on in another programme. More than the structure or project which supports them, what matters is that they are developed, as rapidly as possible.

In addition, a **framework for the exchange of transport experts** should be created, perhaps using established networks like UITP and POLIS.

### **21. How could existing financial instruments such as structural and cohesion funds be better used in a coherent way to support integrated and sustainable urban transport?**

**Polis members call upon the European Union to launch an ambitious European initiative for the financing of urban transport systems and infrastructure.**

This issue has been addressed in several answers to the question of this consultation process.

There is a need to support urban transport projects with significant EU funding, providing that these projects would demonstrably lead to a modal shift away from the private car and would contribute to minimizing the impact of transport on the environment.

As suggested above, European funding should be used to spread the practice of sustainable urban transport planning, by funding SUTP in some cities, or committing cities receiving funding for urban transport project to embark in the SUTP process.

Polis members feel that **urban transport should be a priority of the European regional policy**. Urban transport projects should be a priority for the allocation of structural funds and the European Commission should guarantee that this priority is respected by the Member States. The specific need for investments in urban transport in New Member States should be taken into account.

Structural and cohesion funds should also be used intensively for the deployment and introduction of new technologies and services, including intelligent transport systems.

The European Union institutions and agencies should assess potential investment proposals more explicitly in terms of their contribution towards delivery agreed policy objectives. This will allow the relative merits of different types of proposals to be assessed on a consistent basis using a process that is transparent and robust. In particular, investments should justify how the possibility to reinforce soft modes (cycling and walking) and public transport have been taken into account.





Other and / or new sources of financing for urban transport projects should be explored at the urban level. The creation of a dedicated fund for urban transport would be justified by the importance of this sector for the achievement of the European objectives in terms of climate change and competitiveness. A new fund could be limited in time to focus on the achievement of a new urban mobility culture through the development of public transport infrastructure, infrastructures for soft modes and the deployment of necessary technological solutions.

It could support the financing of an extended and continuous CIVITAS programme, as well as major showcase demonstrations in a few European cities, as described above in the answer to the question on modal shift.

The European Commission should also create a mechanism to allow the reimbursement of the cost associated with the preparation of the application for all EU funds and programs, as it is already possible in some cases. The costs and uncertainty of this application process are barriers for the applications from cities from some regions which have the strongest need of these funds.

The principles stated in this answer should be applied in the framework of the European economic recovery plan according to which the European Commission will stimulate the use of these funds for investments in transport infrastructures.

## **22. How could economic instruments, in particular market-based instruments, support clean and energy efficient urban transport?**

Polis supports the work being done towards the internalization of external cost in transport across Europe. It however stresses the importance of moving in this direction while preserving the freedom of cities to adopt their own pricing systems to fight congestion or achieve other policy objectives. Any European initiative on the internalization of external costs should not create obstacles to the implementation of the charging scheme of its choice for a city.

It should also be complemented by initiatives exploring the possibility to have a convergence of fuel taxes and tax incentives on all goods and services relevant to urban mobility (fuel, vehicles, etc.).

Cities must have the possibility to allocate revenues from economic instruments used to implement urban mobility solutions to further improvement of their mobility system, and they should have the possibility to make this allocation of revenues systematic.

The use of procurement to support clean and energy efficient urban transport should be further encouraged and researched.

European research and debate should also address the possibility to use land-value capture to improve the financing of collective transport project in order to improve the supply of public transport thus providing cleaner and more efficient urban transport solutions.





Polis members also believe that the extension of the emission trading schemes could be of great benefit for urban mobility.

The European Commission should generally support the development of market-based instruments part of a wider urban mobility strategy. This should take into account the experiences of cities (like London, Stockholm and others) which have used such instruments. A database of best practice could be established drawing on these experiences.

### **23. How could targeted research activities help more in integrating urban constraints and urban traffic development?**

Research on the integration between urban and regional development of transport planning will be useful to better guide cities on the integration of their land-use and mobility policies and on their economic and spatial development.

Research on the transferability of practices and policies between cities across Europe is strongly needed in order to assess the best use that can be done of the exchange of best practices and benchmarking exercises.

Research on the impact of technology should also be supported at the European level.

### **24. Should towns and cities be encouraged to use urban charging? Is there a need for a general framework and/or guidance for urban charging? Should the revenues be earmarked to improve collective urban transport? Should external costs be internalised?**

The decision to implement urban charging belongs exclusively to the local authorities and cities responsible for the management of their urban mobility system.

It is however important that the European Union takes the necessary initiative to ensure that cities which want to implement this tools can do it in the most efficient way. Barriers, in particular at the national level, preventing the efficient implementation of urban charging, should be removed.

The European Union could also promote harmonised technical standards for urban congestion charging and road pricing in order to reduce costs of infrastructure investment and operation, for vehicle owners and improve acceptance by higher interoperability.

More generally, and as detailed above, local authorities should be encouraged to use demand management tools. These should be part of an integrated strategy, ideally supported by a sustainable urban transport plan. Demand management tools, including urban charging, should be part of a package of measures and policies aiming at modal shift and sustainable urban mobility. It should for instance be complemented by the provision of extra public transport capacity. This package of measures should be tailored to the unique local conditions.







The local implementation of demand management tools should be implemented following a period of consultation of the stakeholders.

Also as detailed above, the European Commission can support efficiently urban charging scheme with the development and maintenance of vehicle emissions standards (which local authorities may refer to in their own schemes). This should include standards for retrofit equipment and supporting the inter-operability of systems.

Another useful initiative of the European Union would support cross-border enforcement and data sharing between member state licensing authorities.

Considering however that the choice of the tools is a competency of the local and transport public authorities, there is no need for developing a European framework on urban charging.

Revenues from charging schemes should preferably be earmarked for investments supporting the improvement of urban mobility. However it is up to actors at the local level to decide whether they want to earmark the revenues or not.

The issue of the internalization of external costs has been addressed in an answer to a previous question.

### **25. What added value could, in the longer term, targeted European support for financing clean and energy efficient urban transport, bring?**

As explained in the general answer of Polis to the consultation on the Green Paper on urban mobility, support for financing clean and energy efficient transport can contribute to achieve the long terms objectives of the European Union.

Most obviously, it will contribute to achieve environmental objectives, in terms of air quality and noise emissions, and it will also contribute to achieve the long term European objectives of fighting climate change.

Investment in this sector will help to contain the negative impact of urban mobility on the climate.

The long term improvement of air quality and noise emissions related to transport in European cities will, together with the development of soft modes, bring significant health benefits. This will have a long term impact on the cost of heath benefits for an ageing population at the European level.

The demographic evolution in European countries will be better managed if there are sound investments made in transport infrastructures and services taking into account these demographic changes.

The improvement of urban mobility, with the related improvement of the quality of life, will increase the competitiveness and attractiveness of European territories.

Investments in financing clean and energy efficient urban transport should also be made with the objective of developing a European leadership in this area. This should boost





European companies and support them to consolidate and develop further their position on the markets of clean energy, efficient vehicles and intelligent transport systems, in the future.

Investment in this sector is key for the future competitiveness of the European economy and for achieving the objectives of the Lisbon strategy.



**economic  
& social aspects**



**environment  
& health**



**mobility  
& traffic efficiency**



**safety  
& security**