Consultation response

**Mid Term Review of the European Commission 2011 White Paper on Transport**

European Commission

**June 2015**
1. Introduction

1.1. pteg (Passenger Transport Executive Group) brings together and promotes the interests of the six strategic transport bodies serving over 11 million people in the largest city regions outside London. We are also a wider professional network for Britain's largest urban transport authorities.

1.2. Our main tasks are to:
   - Promote efficiencies and exchange of knowledge within the pteg network.
   - Raise awareness of the key transport challenges facing the city regions and the solutions our members are implementing.

2. Key points

   - To address major transport issues, cities have to not only be recognised as key players, but also need to be more directly involved in decision and policy making.
   - Greening the private car is laudable. More important in the long term will be addressing congestion and this can only be done through multi-modal transport solutions pushing modal shift.
   - It is important to get the balance right between guidance and allowing appropriate transport authorities flexibility to meet their own local needs - not an imposed solution but a framework to work within.
   - Design and implementation of TEN-T projects - cities need to be meaningfully involved in Corridor Forums and member states need to ensure that their cities are brought to the table.
   - We welcome the possibility of funding some sustainable urban mobility under the Low Carbon theme of ESIF strategies, but note that this funding is limited and that the messages coming from government about the use of this funding is confused.
   - Improving mobility has to be the main focus of EU level transport policy and finding innovative ways connecting people, places and goods across all transport modes.
   - Unlocking the potential of private finances through the Junker Plan is welcomed although it is vital that in finding new funding streams, transport funding programmes are not affected.

3. Response

3.1. As a group we support the actions laid down within the White Paper, particularly the reduction in the use of oil and the recognition of the need for increased mobility, particularly in urban areas. We welcome the progress made in delivering these over the last four years and feel that significant progress has been made in a relatively short period of time.

3.2. The White Paper is important in its recognition of the importance of local, regional and urban transport and its potential impact on the quality of life of our citizens and businesses. That the White Paper ran alongside the revision of TEN-T and the creation of the Connecting Europe Facility which recognises cities as a key part of the overall transportation system in the European Union is also significant. The importance attached to urban transport issues has also been reflected in the Urban Mobility Package from 2013, as well as in the current strategy toward Smart Cities and the promotion of alternative fuels and infrastructures.
3.3. We very much welcome the recognition that sustainable mobility in urban areas and connectivity between our major urban centres are integral to the achievement of EU targets for more sustainable mobility and reducing CO2 emissions. These elements are also key to ensuring accessibility, inclusion and economic development.

3.4. We are concerned however at the lack of certain aspects of inter-urban mobility, particularly in the TEN-T network. The current corridors provide an excellent network north-south for the UK, but neglect the important east-west connections, which through current UK policy initiatives (in particular the drive towards a "Northern Powerhouse" and the Northern Transport Strategy\(^1\)) are becoming increasingly important. A greater focus on east-west links would allow better connectivity between the Republic of Ireland, the UK and northern Europe (and so on to the rest of Europe) and allow for better use of the motorways of the sea. In the context of freight routes developing through the expanded Panama Canal and the creation of a deep water port at Liverpool this should be re-examined as matter of urgency.

3.5. A truly integrated TEN-T network will depend on the meaningful involvement of cities in the current planning phase, and later in the implementation phase, of a new strategy. An efficient and optimal TEN-T network can only be achieved in close partnership with cities.

3.6. Cities have been recognised as key partners in the TEN-T legislative framework, as they should be. The TEN-T Regulation clearly proposes the involvement of cities in the Corridor Forums. In practice however, we have found that cities have only been consulted at a later stage, by which time critical planning decisions have already taken place. It also remains to be seen to what extent Member States will actually bring their cities around the table in the future. City involvement here could be usefully facilitated by the Commission.

3.7. This will mean involving cities meaningfully in the Corridor Forums in the future and ensuring that Member States respect this commitment. This will improve the coordination and the development of TEN-T projects and contribute to the common objective of cohesion, interconnection and interoperability. A return on investment for CEF projects will only be maximised if cities are adequately involved.

3.8. Related to this, the role of freight in cities has traditionally not been well researched or understood and therefore policy responses have not been well developed. The freight sector, which includes a large number of small firms, can be difficult to reach. We know that freight logistics make an important contribution to the urban economy and addressing the impact of this on the environment and on road safety is becoming more and more important.

3.9. We would welcome recognition of this in future iterations of EU policy along with funding for research into this area and funding for solutions to issues identified. EU support could help ensure better monitoring and management of urban freight flows, and to stimulate companies to implement efficient urban logistics in partnership with relevant local transport authorities.

3.10. EU actions should continue to support and enable efforts at the local level, rather than impose one size-fits-all or top-down solutions.

3.11. Cities face the double challenge of improving mobility while making urban transport more sustainable. To meet these objectives in a context that varies from place to place, cities need to be able to develop and deliver flexible transport plans which are responsive to local needs.

\(^1\) See [https://www.gov.uk/government/publications/northern-transport-strategy](https://www.gov.uk/government/publications/northern-transport-strategy) for more information
3.12. Our members continue their work on modal shift towards more sustainable means of transport, including public transport, cycling and walking. EU strategies such as the Transport White Paper need to include a stronger focus on this modal shift in urban areas. New technologies are necessary to tackle climate change and reduce greenhouse gas emissions but, in cities, the most energy-efficient solutions will be more sustainable modes of transport such as public transport, cycling, walking and car-sharing. Traffic remains a challenge for cities in terms of congestion, liveability, road safety and parking space, which less polluting technologies, although important, will do nothing to address.

3.13. To help to address this we would appreciate more EU support to help better connect cycling and public transport schemes, for a better modal shift away from the car. The EU can help in a number of ways, for instance with data collection and production, e.g. providing statistics, which would facilitate the development of inter- and multi-modal schemes and make them as successful as possible, and providing an alternative to the private car. Financing more data collection on active travel and cycling and public transport interchanges could aid mobility as much as a focus on ITS and clean fuels.

3.14. Where there is a focus on alternative fuels this should be to look at the use of alternative fuels that best fit local strategies - technology neutrality, rather than a top down imposition of technology will be key to success.

3.15. In addressing innovation, technology neutrality is an important issue. We welcome the fact that the White Paper refers to innovation, but not that this refers almost exclusively to technological innovation. This overlooks essential aspects of sustainable mobility policies, which may be innovative but not technological (e.g. innovative integrated planning approaches, new governance models, coordination and stakeholder involvement strategies, innovative awareness raising initiatives).

3.16. A wider definition of innovation should be used. Any innovative approach must be assessed with regard to its ability to help reach local transport policy objectives and thus should be focused on the solution rather than solely focused on technological development. Cities need to retain the flexibility to choose the most appropriate technology that suits their local circumstances, alongside local policies.

3.17. Getting it right in the cities will be decisive; this is where the majority of the population is. There is a high potential for deploying alternative fuels in cities, but traffic remains a far bigger challenge in terms of congestion, liveability, road safety, noise, health issues and parking space.

3.18. We would welcome a clear acknowledgment of Intelligent Mobility as a new way of thinking about how to connect people, places and goods across all transport modes. Intelligent Mobility combines a strong focus on putting the citizen at the heart of the service. The emergence of the sharing economy, access over ownership, mobility services on demand, the blurring of the boundaries between public and private transport will challenge the market and regulators to respond positively to new ways of working. Intelligent Mobility provides the opportunity to better manage the process of developing new innovative services by involving citizens in partnership with EU institutions and governments.

3.19. In the future, we would welcome more focused funding for public transport, cycling and walking strategies in cities, alongside that on clean cars. This will help to relieve congestion in our member cities, where more financial support could provide a real alternative to the car.
A traffic jam of low polluting cars is still a barrier to mobility. A focus on financing soft modes and public transport should be reflected in future Horizon 2020 calls.

3.20. We would also welcome a clearer read-through with the emerging EU urban agenda. We support this agenda as part of an essential process of rebalancing the focus of the EU more toward cities and understanding how the EU can support cross-sectoral work in cities. This would allow for more of a greater focus than previously on how effective urban transport can support cities' role as motors of the EU economy.

3.21. We welcome EU support for the development of Smart Cities. It is right that the EU is supporting this agenda and helping to lead debate. The EU’s work on networking European actors, and its recent attempts to reinvigorate this process through calls for commitments and clustering of actors and their respective commitments into action clusters is interesting and may well prove effective. However, the EU needs to broaden its focus and look at, for instance, social and health aspects of Smart Cities. It also needs to provide more flexible Smart Cities funding under Horizon 2020, as the available instrument (the 'Lighthouse Projects') is too large scale for many cities to engage with.

European Fund for Strategic Investment

3.22. We welcome the development of the European Fund for Strategic Investments ("Junker plan") but are concerned at the top-slicing of funding from TEN-T and Horizon 2020 and the potential impacts that this might have, and would expect a review of the white paper to clarify the use of the European Investment Plan and to ensure that CEF funding which has been repurposed remains available for use to support transport infrastructure and won't be used for different activities.