European Commission Consultation on the Green Paper on Urban Transport

Response of the Passenger Transport Executive Group

GENERAL INFORMATION

You	ır profile (compulsory)							
0	I'm a citizen		I'm ar	n org	ganisation			
Jo	onathan							
В	ray							
Reg	jion (compulsory)							
0	European Union	Euro	ope outside Eu	urop	ean Union			OTHER
	Austria	0	Germany		•	Ne	therla	nds
0	Belgium	0	Greece			Ро	land	
\bigcirc	Bulgaria	0	Hungary			Ро	rtugal	
0	Cyprus	0	Ireland		0	Ro	mania	
\bigcirc	Czech Republic	0	Italy		Ō	Slo	ovakia	
\bigcirc	Denmark	0	Latvia		Ō	Slo	ovenia	
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\bigcirc	Finland	0	Luxembourg		Ô	Sw	veden	
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0	Croatia			0	Norway			
0	Former Yugoslav Republic of M	laced	lonia	0	Russia			
P	assenger Transport Executive Group						-	

C orga	Associations/non-governmental anisations	0	Chamber of commerce	0	Consultancy/Lobbying
0	Educational establishment	0	Employers' organisation	D boo	European institution or dy
\bigcirc	Government, Ministry	0	Industry, business	0	International organisation
\bigcirc	Library	0	Local government	0	National government
\bigcirc	Not-for-profit association	0	Parliament	0	Press
\bigcirc	Private company	0	Public sector body	0	Publishing
0	Regional government	C inst	Scientific/research itute	0	Trade union
0	University	0	OTHER		
\bigcirc	Freight transport services	Poli	cy and legislation		Transport equipment
\bigcirc	Fuels	Publ	ic transport services		Users associations
\bigcirc	Infrastructure	Тахі	services	0	OTHER

1. YOUR DAILY MOBILITY

	What was the mode of transitive of transitive (optional)	nspor	t that you used	mos	st often yesterday f	or your daily
0	Car Public transport		Walking Cycling		Motorbike Taxi	OTHER

pteg represents the publicly accountable public transport authorities in UK conurbations

2. THE SCOPE OF THE GREEN PAPER

Citizens and businesses expect good access and increased mobility in urban areas. Effective and efficient transport and mobility solutions are essential for the economic, environmental and social well-being of people in our urban areas. More than anyone else, city dwellers experience the negative effects of their own mobility.

2.1.	. What are the main problems and issues at sta	ke ir	n urban transport? (optional)
•	Congestion	•	Financing
	Safety	✓	Price of public transport
	Security		Job security of workers
~	Pollution		Citizens and travellers' rights
	Noise	✓	Difficulties to change people's behaviour

Climate Change	New technological opportunities
Impacts of transport on health	Ageing of society
Consumption of energy and fossil fuels	Impact of lifestyle changes
Pressure on urban space	Lack of co-operation, coordination and planning
Accessibility of public transport vehicles and infrastructure	OTHER

Quality of public transport

2.1

We would like to add 'access for socially excluded' and 'linkage with promotion of sustainable economic growth' to the above list of problems and issues.

What problem(s) or issue(s) should be addressed with priority, and how?

2.2

There should be a strong focus on the role of transport in promoting the economic vitality of urban areas in a sustainable and equitable way. This includes both underpinning successful urban areas and promoting the sustainable regeneration of urban areas in transition. It also means ensuring that transport policy enables access to opportunity for social excluded groups and localities.

Urban transport's role in tackling climate change should also be a major priority. As part of this the Green Paper should be seeking modal shift from the car to the more sustainable modes. This should be done through the analysis of best practice and the identification and promotion of successful policy tools.

3. CATEGORIES OF MEASURES

Local authorities normally take the lead on urban mobility policies. They are often implementing integrated packages of measures to alleviate problems and improve transport and mobility in urban areas. Different categories of measures and tools are part of such an integrated approach.

3.1. Which of the following categories of measures and tools do you consider the most important? Measures and tools that contribute to: (optional)

Increasing the use of alternative fuels like natural gas or biofuels and of clean and energy efficient vehicles;

Technological planning and infrastructure measures to improve air quality and reduce noise aiming at a better and more healthy environment;

Stimulating the use of collective passenger transport, for example through the intermodal integration with other transport modes such as walking, cycling and park and ride, high safety and

security and affordable and accessible services;

Better demand management strategies based upon economic (dis)incentives or regulatory measures including zones with regulated/restricted access, road pricing and spatial planning, teleservices;

Influencing travel behaviour and modal choice through mobility management plans, marketing, communication, education and information campaigns;

Developing safer road-infrastructure and safer and secure means of travel for all users, and educating users towards a safer behaviour;

Promoting new forms of vehicle use and/or ownership and a less car-dependent lifestyle (e.g. car-sharing);

Promoting efficient freight logistics services and new concepts for goods distribution;

Enhancing the use of innovative transport telematics systems for traffic management and traveller support, including solutions based upon satellite applications/GALILEO;

Re-designing transport infrastructure and services, re-allocating urban space and addressing social exclusion so that city-areas become more pleasant places to live and to be in;

OTHER

3.1 Land use planning and agglomeration: Cities can act as the wider economic drivers for their regions. The agglomeration of high-value 'knowledge economies' within cities requires supportive land-use and transport policies. This includes land-use policies that underpin the 'clustering' of high value economic sectors (like financial and business services) supported by transport networks which provide both effective commuter networks and 'connectivity' with other major centres. The Green Paper should recognise the importance of urban agglomeration economies and the key role that allied transport and land use policies can play in promoting and sustaining them.

3.2. What are the main barriers at the local level to improving transport and mobility in urban areas? (optional)

- Insufficient funding
- Insufficient human resources
- Insufficient political support and leadership
- Insufficient public involvement and support
- Insufficient strategy and policy
- Insufficient appropriate structures at local level

Lack of appropriate structures and allocation of responsibilities between local, regional and national level

Cultural problems

Technological problems

- Insufficient knowledge and understanding
- Insufficient technical interoperability
- Insufficient inter-connections between transport networks and services
- Insufficient coordination with neighbouring cities
- OTHER

3.2 *pteg* sees the key barrier as lack of sufficient powers and funding for subnational public sector transport authorities. We recognise that the situation in England, outside London, is fairly unique in Europe in that as public sector sub-regional public transport authorities we have few powers over the main public transport mode (the bus). A key priority of the Green Paper should be to enshrine both the principle, and the legal framework, whereby the public sector is able to plan, specify and regulate the public transport network in support of wider city region environmental, economic and social inclusion objectives. Linked to greater powers over public transport networks is the need for sub-regional public authorities to have greater scope to raise additional funding for transport through locally appropriate taxation mechanisms.

We also believe that there is greater scope for knowledge sharing on best practice across Europe's cities. At present there are a multiplicity of limited and low profile European best practice sources and projects which are of limited practical value to those practitioners who are not directly involved in them. The Green Paper should examine the scope for improved dissemination – perhaps through a single web hub.

3.3. Is	there a	need f	or the	EU to	take	action	in	order	to	break	these	barriers	and	to ac	ld
value?	(optional))													

O Yes	
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No No

No opinion

3.3 See response to 3.2.

4. THE ROLE OF THE EU

Besides considering urban transport as an integral element of European transport policy, the EU also contributes to improving transport and mobility in urban areas by integrating urban transport concerns into other EU policies, such as environment or energy policy, and by removing obstacles to effective urban transport policies that might exist at the EU level.

4.1	. Is the	integration	of urban	transport	in El	J sectorial	policies	effective?	(optional)

igodol	Yes	No	No opinion	
	Environment policy		Research policy	Internal market policy
	Energy policy		State aid, financing, loans	OTHER
	Health policy		Social policy	

Regional development policy

4.1 The integration of urban transport policy into other policy areas varies between sector. For example EU social and health policy makers display a relatively low level of consideration for transport's importance to the achievement of their wider objectives. Regional development has a variable record. Under the Cohesion Fund transport accounts for 50% of investment – however transport is not given enough weight outside this fund.

4.2. Do existing European policies/legislation create obstacles to prevent effective urban transport policies at local level? (optional)

Yes No No opinion

5. PRIORITY AREAS FOR ACTION

The EU supports innovative projects and initiatives for local, regional and national authorities to establish, disseminate and exchange best practice in urban transport.

- 5.1. What should be the priority areas for action? (optional)
- Preparing guidance material
- Facilitating networking, exchange visits and twinning
- Launching public awareness and education campaigns
- Providing information tools for decision makers
- Education and training of local actors
- Promoting intelligent transport systems/ Galileo
- Supporting urban mobility research
- Supporting demonstration programmes
- Setting up knowledge and training centres
- Developing specifications for joint solutions
- ✓ OTHER

5.1 We would like to add: 'resources for demonstration projects and urban mobility research.'

pteg believes that creating a single hub for good practice - preferably web based, should be a priority area for action. Notwithstanding the new emphasis on demonstration projects, the EU should orientate future calls under Framework Programme7 (FP7) towards urban mobility issues.

5.2. Do you believe that the EU should do more than facilitating the exchange of best practice? (optional)

5.2 Best practice exchange alone is not sufficient. The EU should be seeking to ensure an effective legal and policy framework whereby urban transport policy supports the equitable and sustainable development of major urban areas. The instrument for achieving this should be accountable public authorities able to plan, finance, procure and regulate locally appropriate transport networks in ways which best suit local circumstances.

Legislation might be required, for example to facilitate the enforcement of cross-border traffic offences, improve vehicle design to protect vulnerable road users, or tighten air quality and emissions standards. In other policy areas, such as on road pricing (following up the Eurovignette directive) or on environmental zones, it is essential that any action at EU level does not limit the flexibility of cities to react rapidly to local and constantly evolving problems.



OTHER

Through regular monitoring

By providing training

5.3 Whilst we agree that 'sustainable mobility plans' are important, we do not think this is a valuable use of the Commission's limited resources. In the UK and elsewhere, integrated transport plans are already in place. We believe that where such plans do not exist they should be encouraged. However, we would be opposed to additional mandatory plans that would almost certainly duplicate much of the information in existing plans and which might not recognise local, regional or national circumstances.

6. FINANCING URBAN TRANSPORT IMPROVEMENTS

The issue of financing for urban transport improvements needs particular attention (e.g. for infrastructure investment, rolling stock, etc). New technologies, innovative and intelligent transport solutions can be relevant to resolve urban transport problems and improve safety, increase efficiency, protect the environment and offer new customeroriented services to citizens.

6.1. All relevant financial instruments should be used, including structural funds, cohesion fund, EIB loans and public/private partnerships. Are local and regional authorities aware and capable of using EU funds in the best way? (optional)

Yes No No opinion

6.1 Greater clarity on the range of available funding sources, tools and mechanisms available to local and regional authorities would be helpful.

6.2. Public/private partnerships in urban transport might be able to provide the necessary funds for urban transport improvements. Do you believe that the EU should take the lead in promoting public/private partnerships? (optional)

Yes	🖸 _{No}	No opinion

6.3. Is there a need for EU action to increase the market acceptance of new technologies, innovative and intelligent transport solutions? (optional)

Yes No No opinion

6.3 The EU has a role to play in supporting trials, disseminating the benefits and experience of the application of new technological solutions, and in encouraging compatibility between systems (although ultimately localities should be free to adopt the solutions most appropriate to local need and circumstances).

7. POSSIBLE ACTIONS AT EU LEVEL

Urban transport is a domain where the expectations from the EU are high but so far no comprehensive vision has been developed. The EU could contribute to improving transport and mobility in urban areas by means of different non-legislative and legislative tools.

7.1. What action at EU level could generate most added value? (optional)

- Playing the role of catalyst
- Setting standards and ensuring interoperability
- Promoting research and the spread of best practice across borders
- Integrating urban transport concerns into and removing barriers from sectorial EU policies
- Providing legal and financial frameworks, as appropriate, to encourage decision-makers
- Providing platforms for stakeholders to meet and discuss
- ✓ OTHER

7.1 The added value of action at an EU level will depend on the issue concerned. In principle the role for the European Commission is to share best practice, facilitate discussion and, where appropriate, establish targets for example over emission targets.

7.2. The EU could contribute to improving transport and mobility in urban areas by helping to develop and implement solutions of European interest for policy domains where there is a consensus to work together. These joint solutions could be based upon measures that have been successfully tested by Europe's most ambitious cities. Is there a need for EU action to help develop and implement joint solutions of European interest? (optional)

O Yes No. No opinion

7.2 The EU can play a vital role in helping develop innovative solutions being adopted by various European cities. Implementation is largely for cities themselves, though could be assisted by exchange of best practice and funding.

8. ALLOCATION OF RESPONSIBILITIES

For efficient urban transport, a clear division of responsibilities is important. Initiatives taken at the EU level in the field of urban transport have to pass the subsidiarity test. The Green Paper will need to address the question of allocation of responsibilities. At Member State level, the division of responsibilities for urban transport varies per Member State.

8.1.	Are there g	overnance-r	elated problems	relat	ed to urban	transport in	Europe? (optional)
0	Yes		No	۲	No opinion		

Institutional, such as unclear division of responsibilities

•	Lack	of	nolicy	/ cohei	ence
	Lack	UI	punc)		CHCC

- Financial, such as decentralisation without providing the appropriate financial frameworks
- ✓ OTHER

8.1 We would like to add 'inadequate powers for sub-national authorities to plan and procure transport services'.

There are significant governance issues in England outside London. City region transport authorities do not have the levers they need to promote and provide integrated, high quality and environmentally sustainable public transport networks. In particular, they have insufficient powers over the majority public transport mode – the local bus network (which is largely deregulated). They are also largely dependent on UK government for funding and approval for major projects. *pteg* believes that locally accountable transport authorities are best placed to determine the provision of urban transport networks – and that they should have the powers they need to plan, promote, procure and provide those networks. They should also have greater autonomy in securing new local funding streams to finance the development of those networks.

8.2.	Should	action	be taken	at the	EU le	evel t	o add	value i	in this	area?	(optional)
0	Yes			No				No opir	nion		

8.2 The EU can help with this approach by promoting the right of local selfgovernment to Member States, in line with the Council of Europe's Charter on Local Self Governance, and the draft EU Constitutional Treaty.

8.3. Are private sector partners doing enough to demonstrate co-responsibility for
implementing local actions that promote sustainable mobility and improve access to their
business-location, such as introducing company travel plans, parking management
measures, etc? (optional)

O Yes O No	No opinion
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8.3 This is an area where DG Enterprise's work in the field of Corporate Social Responsibility. Incentives to encourage the use of public transport, especially by large employers, could make a significant impact on congestion.

9. IMPROVING TRANSPORT SYSTEMS AND SERVICES

High quality, affordable and easily-accessible public transport can play a role in facilitating urban mobility and encouraging modal shift. The EU is currently updating its legislation on public transport services to ensure a clear and stable legal framework for quality investment in clean and efficient public transport.

9.1. Are local authorities and public transport operators doing enough to improve their urban public transport systems? (optional)

Ves No No opinion

9.1 PTEs are doing everything within their power to improve urban public transport networks. However, there are serious limitations on their powers and resources. In the UK public transport operators are not necessarily incentivised to provide improved services as deregulation has allowed bus operators to make above average returns from overseeing a declining market, with rising fares and patchy service quality

9.2.	Once	the new	EU	public	transport	legislatio	o <mark>n i</mark> s ir	n place,	are	there	any	follow	- up
initi	atives	needed	to s	uccessf	fully imple	ement it?	(option	nal)					

Ves No	Ô	No opinion
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9.3. Should financing for public transport be considered as a priority in the context of the regional development policy? (optional)

Yes
No
No opinion

Transport is a driver of economic activity and vibrant, economically successful cities are essential if the EU is to meet its Lisbon goals. Given the overriding priority of tackling climate change, it is important to prioritise public transport.

By ensuring a strong urban dimension in the use of Structural Funds, is one way to ensure public transport issues are addressed. We fully endorse the *indicative* list of actions outlined in the Commission's Communication on Cohesion Policy and Cities :

'3.1. Accessibility and mobility Guidelines for action include:

 Sustainable urban mobility means making the best use of all the transport infrastructure, co-ordination between the various transport modes and the promotion of the least polluting modes.

– Cities in peripheral locations need good links to major airports and to the major axes of the Trans-European Transport Networks (TENs). For example, air accessibility is a particular issue in many new Member State capitals.

 Successful management of urban transport often requires the city and its surrounding region to coordinate transport planning, construction and land-use. New projects should form part of an integrated transport strategy for the urban area.
 Issues considered should include road safety and other public health concerns, including noise reduction and air quality.

- It is important to improve the affordability, efficiency and effectiveness of public transport, as well as linking the different transport modes. An issue for public transport in many cities is the need to reduce criminal behavior and improve the safety of employees and users.

– Cities should, as part of an integrated approach and where possible, promote the use of cycling, walking and other alternative and "soft" forms of transport. This includes: demand management, regulated access to or even the pedestrianisation of the city's sensitive zones; the construction of cycle and pedestrian paths; encouragement of energy efficient vehicles and alternative transport fuels, such as biofuels.

– Transport planning should take account of those without cars or those unable to drive (e.g. older people, young people and those with mobility impairments). The goal is to ensure access to jobs and services (healthcare, shopping) and to facilitate personal autonomy without reliance on the private car.'

9.4. Should traveller security be improved? (optional)



9.4 Crime and the fear of crime is a major disincentive to public transport use – particularly in socially excluded areas, and for socially excluded groups. PTEs invest heavily in policies and programmes to tackle crime and fear of crime. However, there is always more that could be done and there is the potential for better knowledge sharing across the EU in this area.

9.5. Do public transport operators and authorities pay sufficient attention to the working conditions of public transport workers? (optional)

Yes No No opinion

9.5 The main area of concern is bus operation where in the deregulated market there is high turnover and considerable evidence of staff dissatisfaction. Good customer service is necessary if modal shift is to be achieved. This requires a well-motivated and properly trained and supported public transport workforce.

9.6. Is the security of personnel working in public transport taken sufficiently into consideration? (optional)

Ves No No opinion

9.6 PTEs do not directly employ many public transport personnel but the programmes and policies they institute and fund on safety and security do bring about benefits for staff. However, there is always more that could be done and there is the potential for better knowledge sharing across the EU in this area.

10. MARKET DEVELOPMENT OF CLEAN AND ENERGY EFFICIENT VEHICLES

The market development of clean and energy efficient vehicles could be strongly supported by appropriate award criteria in public procurement. As a result, cleaner and more efficient vehicles in urban areas could make an important contribution to improvements in air quality.

10.1. What actions should be taken, at EU level, in order to promote the market use of clean and energy efficient vehicles? (optional)

10.1 We believe that flexibility and technology-neutral proposals are the key to successful initiatives at European level. Any proposal must follow these principles. The starting point for this could be an assessment by the Commission of the current make-up of public sector vehicle fleets so that cities and other public authorities can compare their performance. However, it must be emphasised that one of the main barriers to rapid progress in achieving a clean(er) vehicle fleet is funding. Extra funding must either come from taxation or from transport-related charges (fares, congestion charging or other charging schemes) on citizens. In taking forward future work, the Commission should consider how best to provide incentives for public authorities – particularly those currently with less environmentally friendly fleets - to purchase cleaner vehicles.

PTEs have also benefited from the various EU-supported research and trial projects for new types of no or low emission public transport vehicles. We believe that this is a very useful role for the EU to play.

10.2. Should preference for clean and energy efficient vehicles be mandated or left as an option for public authorities? (optional)

We recognise that publicly accountable sub-regional transport authorities have a role to play in improving the environmental performance of public transport fleets but the way in which EU regulation is applied needs to be sensitive to local circumstances. If EU legislation required a rapid improvement to the emission and energy standards of publicly procured bus services in the PTE areas then this would result in fewer services being procured – with serious consequences for social inclusion and social cohesion. Any legislation also needs to recognise the unique circumstances that apply to bus provision in Great Britain outside London. Which is that bus services are deregulated with public authorities only able to fill gaps in the network (in our areas only 15% of bus services are publicly procured).

10.3. Do you think proc preference to clean and		or public transport services should give cles? (optional)
• Yes	No No	No opinion
10.3 See 10.1 and	10.2	
		rocurement, of clean and energy efficient (optional)
Yes	O No	No opinion
		or pollutants, CO2 emissions and fuel Fective approach? (optional)
• Yes	No	No opinion
		application of the latest Euro standards ate of general application? (optional)
• Yes	No	No opinion
	he development of saf	ND CYCLING Te infrastructure for walking and cycling can and encouraging modal shift.
11.1. Are local authorit mobility? (optional)	ies doing enough to inc	crease the role of walking and cycling in urban
Yes	No	No opinion
for cars over pedest	rians and cyclists.	public authorities to prioritise provision PTEs currently have no highway tion to directly influence prioritisation of
11.2. Should the EU tak mobility? (optional)	e more action to prom	note walking and cycling in urban

O Yes

🖸 _{No}

No opinion

11.2 The EU should actively promote best practice in the areas of walking and cycling. We would welcome a simple, accessible system for accessing such information and learn from innovative and successful projects across the EU in this area.

12. URBAN FREIGHT, LOGISTICS AND DELIVERY SERVICES

Urban freight, logistics and delivery services in urban areas are often forgotten in debates and policy development for urban transport.

12.1. Are local authorities doing enough to improve the efficiency of urban freight, logistics and delivery services? (optional)

Yes No No opinion

12.1 PTEs have no direct responsibilities for freight.

12.2. Should the EU take action to improve the efficiency of urban freight, logistics and delivery services? (optional)

Yes No No opinion

13. INNOVATIVE DEMAND MANAGEMENT

Some European cities are implementing, as part of an integrated approach, innovative demand management tools such as pedestrianisation projects, zones which only allow access to certain types of vehicles, speed limitations, regulated or restricted parking schemes, consolidated freight delivery schemes, or road user charging.

13.	 Do you think that 	this	is the right ap	proac	ch? (optional)			
0	Yes		No		No opinion			
13.2	2. Is there a need for	or the	e EU to take ad	ction?	(optional)			
0	Yes		No		No opinion			
barı solu	Removing possible riers against these tions that might t at national levels;	appro appli	Ensuring such baches are ed consistently s the EU;	appro applie	Ensuring such baches are ed without unfair imination;	Promoting interoperability of technology;	•	OTHER

13. 1 Europe's cities and regions must have the freedom to adopt the demand management policies that are appropriate to local circumstances. The EU can help support these decisions through disseminating best practice and information on the technological and policy solutions. It can also help promote a debate on the future of cities and congestion which will help create a climate of public acceptability for such schemes.

14. STENGTHENING MARKETS FOR INDUSTRY

In a number of areas the European industry is a global leader in the development of clean urban transport technologies; particularly of clean vehicles, alternative fuels and intelligent transport systems. European cities, researchers and consultants have knowledge and experiences that are valuable for industrialised countries and developing countries in other continents. 14.1. Should the EU help to strengthen the European market for clean urban transport industry? (optional)

Ves No No opinion

14.1 A continued focus on demonstration projects under Framework Programme 7 (FP7) would be a good way for the EU to strengthen the European market for cleaner vehicles.

14.2. Should the EU facilitate the export of clean urban transport technologies outside the EU and better exploit its knowledge-base? (optional)

Yes No No opinion