Consultation response

To: European Commission Green Paper – towards a new culture for urban mobility

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Contact point:

Jonathan Bray
pteg Support Unit
Wellington House
40-50 Wellington Street
Leeds
LS1 2DE
0113 251 7445
info@pteg.net

Introduction

pteg represents the six Passenger Transport Executives of England and Scotland which between them serve eleven million people in the conurbations of Tyne and Wear ('Nexus'), West Yorkshire ('Metro'), South Yorkshire, Greater Manchester, Merseyside ('Merseytravel') and the West Midlands ('Centro'). Transport for London and Strathclyde Partnership for Transport (SPT) are associated members. Transport for London and SPT will submit separate evidence.

Overview

- We agree that the EU has a role to play in promoting sustainable urban mobility. Developing an urban transport policy should also help address the problem of different EU policies with significant implications for urban transport being produced independently from each other. Examples include regional, energy, internal market, social inclusion and environmental policies. However, there is a need to further develop 'joined up thinking' on EU policies which have a significant urban transport dimension. For example there is very little read-across between EU policy on social inclusion and transport – although lack of access to affordable transport can be a major barrier to inclusion.

- Most of Europe lives in urban areas and there can be no sustainable Europe without sustainable cities and city regions. Additional resources should be made available to support sustainable urban transport initiatives. There is a strong case for re-focusing EU transport investment from major, inter-regional, road building schemes (which can promote unsustainable sprawl and travel patterns) and towards public transport improvements which will improve the sustainability of cities and city regions.

- Locally accountable transport authorities have a central role to play in the implementation of sustainable urban transport strategies. Cities and city regions across Europe work within very different legal, organizational and financial constraints. They also serve areas with major differences in their socio-economic and physical characteristics. Empowering and resourcing those cities and city regions to devise and deliver workable transport policies will be the most effective course of action – which is why the principles of subsidiarity should be a key pillar on EU urban transport policy. The EU can further support this approach by promoting the right of local self-government to member states, in line with the Council of Europe's Charter on Local Self-Government. It is also why EU policy should not impose unnecessary restrictions or burdens on cities and city regions which might hamper the development of innovative responses to the distinctive transport challenges that they face. In addition it needs to be recognized that much of the detail of urban transport policy delivery is essentially local in nature (bus lanes, pedestrianisation etc) and other than for the dissemination and promotion of best practice, and for funding, the EU should have a very limited role.

- There should be more focus within the Paper on introducing stricter standards on car manufacturers and on ratcheting up environmental specifications for new cars and light commercial vehicles. Whilst it is right that demanding standards are set for the environmental performance of public transport vehicles and systems, it should be remembered that a well-utilised urban public transport network will have a significantly better environmental performance than private cars. Increasing the cost-base of public transport

(which could be passed on in higher fares) through higher environmental specifications could have the unintended consequence of switching users to private cars, unless there are complementary policies for private cars.

- We support moves to ensure that the external costs of transport are recognized in decision-making processes and in EU policy. We would support policy which ensures that the principle that external costs must be evaluated in transport decision making is upheld, and that non-statutory EU guidance on the issue would be helpful. However, given the complexities of the issue, and the multiplicity of local circumstances and established appraisal processes, we do not think that a single European-wide transport appraisal system for urban transport authorities is a viable proposition.

- Environmental standards for public transport vehicles and systems should be technologically neutral and linked to economic incentives. The aim should be to promote the renewal of bus fleets through the adoption of the cleanest technologies, but in a way that does not lead to the unintended consequences that could follow if this leads to a significantly higher costs for local transport authorities and public transport operators

- We 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 Commission should examine the scope for improved dissemination – perhaps through a single web hub. The urban observatory could have a role to play – but we would be more sceptical if it adds a further layer to the confusing array of research projects and hubs that already exist.

- The EU has a role to play in promoting compatibility of technological innovations (such as road user charging schemes and smartcard ticketing) in urban transport between cities. However, a balance needs to be struck between securing compatibility and in allowing cities to devise innovative solutions that are most appropriate for their areas.

- The EU has a key role to play in cross-border enforcement of charging, parking and environmental zones. Such schemes can only be fully successful if they are enforceable and action is needed at a European level to ensure compliance.

- The EU should provide a general regulatory and fiscal framework but it should not force national, regional and local authorities to liberalise or privatise.

Q1. Should a "labeling'" scheme be envisaged to recognise the efforts of pioneering cities to combat congestion and improve living conditions?

There is merit to the concept of establishing a network of 'exemplar' or 'demonstration' cities – which have pioneered radical and effective measures to combat traffic congestion and improved the urban environment. The purpose of any labeling scheme should be the promotion of best practice linked to EU research and dissemination programmes.

Any 'labelling' system should be 'light touch' and modest in scope, to prevent creating unnecessary layers of additional bureaucracy.

We would not support 'league tables' of cities (as different cities have different socio-economic make-ups as well as different levels of autonomy). We would not support linking the labeling system to EU funding priorities – as this could distort funding programmes towards the more economically robust cities which are often better able to pioneer radical measures on congestion and the urban environment.

Q2. What measures could be taken to promote walking and cycling as real alternatives to car?

Walking and cycling have significant environmental and health benefits. There is a great potential in the UK and other EU countries for more journeys to be made on foot and by bike – and to follow the lead of countries like the Netherlands and Denmark.

Walking and cycling policies and provision are essentially a local decision and the EU will have a limited role however the EU should actively promote best practice.

There is also a need for better 'read across' to other EU policies such as those outlined in the Commission White Paper on Sport COM(2007)0391 and the Commission White Paper on Obesity COM (2007) 0279.

Q3. What could be done to promote a modal shift towards sustainable transport modes in cities?

The package of measures suitable for each urban area should be determined locally. The EU can assist by providing a supportive policy backdrop, appropriate funding measures and the dissemination of best practice.

We deal in more detail with the implications of this in the overview section of this response, and in our response to the more specific questions elsewhere in the consultation.

We also suggest that the EC could improve its own credibility in this regard – and show leadership – by having a sustainable travel plan for its own staff, organisation and functions.

Section 2.2. Towards greener towns and cities

Q4. How could the use of clean and energy efficient technologies in urban transport be further increased?

The generally environmentally superior performance of urban public transport compared with private cars should be reflected in the fiscal and environmental standards regime. The EU should be ensuring that wherever possible the need to internalise the external costs of private cars should be reflected in its policy instruments. For cars and light commercial vehicles this means that there should be a 'twin track' strategy of tough Euro standards and challenging mandatory targets to reduce CO_2.

For public transport 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 have significant freedoms to adopt the solutions most appropriate to local need and circumstances).

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.

Preference should be given to early application of the latest Euro standards.

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.

Q5. How could joint green procurement be promoted?

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).

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.

Procurement of vehicles for public transport services should give preference to clean vehicles; award criteria should be able to include lifetime costs for pollutants, CO_2 emissions and fuel consumptions. The framework for any green procurement strategy should be technological neutral and should also dovetail with existing environmental frameworks – particularly Euro standards.

Q6. 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?

The Commission should provide greater clarity on what it means by 'green zones'. On the face of it 'green zones' could include pedestrianised areas (over which it's difficult to see what role the EU could play – other than on best practice dissemination). If the definition of 'green zones' also encompass low emission zones or road user charging areas then there is a potential EU role which goes beyond best practice dissemination. This could include common standards for low emission zones, cross-border enforcement of transgressions and interoperable tariff payment systems (for example one vehicle permit could be used within green zones within a number of cities). However, beyond cross-border enforcement, there will be a need to balance the advantages of interoperable tariff payment systems and common standards for low emission zones - against the freedoms that individual localities will need to devise forms of 'green zones' that are locally acceptable and which reflect local circumstances, needs and aspirations - with the latter should take precedence.

On cross-border enforcement *pteg* would support a Directive on the cross-border enforcement of all traffic offences (criminal and non-criminal). This could be done by extending the scope of the existing proposal for cross border enforcement of criminal offences as they relate to road safety.

Q7. How could eco-driving be further promoted?

No comment

Section 2.3. Towards smarter urban transport

Q8. Should better information services for travelers be developed and promoted?

People need good quality information at all stages of a journey, or potential journey. These information sources range from traditional formats (like printed timetables) to the use of emerging IT like real time information by mobile phone.

How and what information is provided by travelers is best determined locally. However, there is a role for the EU in dissemination and exchange of best practice.

Q9. 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?

ITS is developing rapidly and is playing an increasingly major role in the delivery of effective sustainable urban transport systems. Interoperability of systems has clear advantages – however sensitivity is need to ensure that localities are still able to develop locally appropriate solutions without undue restriction.

With the introduction of smartcard and mobile phone ticketing there is the prospect of greater cohesion between ticketing systems and structures – making the use of public transport in different city regions easier and more attractive. However, at the same time each city region has developed, and invested in ticketing structures and technologies that reflect local political priorities and financial constraints.

A first step could be to support the development of a common European standard by which any city's ticketing software could be delivered 'over the air' as a software application to visitors' contact less mobile phone handsets. With a standard agreed and in place, it would be for cities to package their own ticketing software in an appropriate way and make it available for download by visitors on the internet or at kiosks at convenient places both before and during their visit.

Q10. Regarding ITS, how could the exchange of information and best practices between all involved parties be improved?

There is a role for dissemination of best practice – however this is a fast moving area and any good practice work in this area should recognize this.

Section 2.4. Towards accessible urban transport

Q11. How can the quality of collective transport in European towns and cities be increased?

pteg sees the key barrier as lack of sufficient powers and funding for sub-national public sector transport authorities. We recognise that the situation in England, outside London, is unusual 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.

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

Q12. Should the development of dedicated lanes for collective transport be encouraged?

Bus priority measures are effective tools for improving the reliability and attractiveness of bus services. However, their implementation at a local level is a matter of local determination where the EU has no role – other than the dissemination and promotion of best practice.

Q13. Is there a need to introduce a European Charter on rights and obligations for passengers using collective transport?

We do not think that there is a compelling case for extending passenger charter rights (defined by the EU) to urban transit networks.

This is because:

- urban transit networks are characterized by short, open access journeys based on an appropriately low fare (when compared with long distance rail or air travel). Administering a system of refunds (if that was a feature of the Charter) could therefore be complex, costly and disproportionate to the likely level of refund payments
- some urban transit systems already offer their own Charters (with or without refund systems). These Charters have been devised to take into account local circumstances (including fare structures and levels, the nature of the network and financial constraints). An EU Charter is unlikely to be as fine-tuned to local circumstance as a local Charter. It would run the risk of being either a reduction in standards compared with the local Charter, or imposing higher standard which could be locally inappropriate or unaffordable to the operator or local transport authority
- the nature, age and condition of urban transit systems varies and so do the passenger service standards that can reasonably be expected. An EU charter is unlikely to be sophisticated enough to reflect that. There is also a danger that where a transit system is being overhauled (with consequent implications

for disruption of services) that it is penalised through an increase in Charter refund claims

Q14. What measures could be undertaken to better integrate passenger and freight transport in research and in urban mobility planning?

No comment (PTEs currently have no direct responsible for freight)

Q15. How can better coordination between urban and interurban transport and land use planning be achieved? What type of organisational structure could be appropriate?

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. EU urban transport policy 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.

This is a further reason why there should be a shift in EU investment priorities away from major inter-regional infrastructure like new motorways (which promote unsustainable urban sprawl) and towards investment in urban public transport networks (which promote agglomeration economies).

Beyond this the EU can only have a very limited role in how land-use and transport planning is carried out at a city level – other than the promotion of the principle as a policy goal, and the dissemination of good practice.

Section 2.5. Towards safe and secure urban transport

Q16. What further actions should be undertaken to help cities and towns meet their road safety and personal security challenges in urban transport?

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.

Q17. How can operators and citizens be better informed on the potential of advanced infrastructure management and vehicle technologies for safety?

No comment

Q18. Should automatic radar devices adapted to the urban environment be developed and should their use be promoted?

No comment

Q19. Is video surveillance a good tool for safety and security in urban transport?

CCTV systems can play a valuable role in maintaining safe and secure public transport networks. However, they need to be part of wider strategies for tackling crime and antisocial behaviour which includes an adequate staff presence, good maintenance standards, outreach work with communities (particularly young people) and 'designing out crime' in public transport vehicles, interchanges and facilities.

The use of video surveillance on urban public transport networks is a matter for local determination and other than the dissemination of good practice it is not a matter for the EU.

Section 3. Creating a new urban mobility culture

Q20. 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?

The Commission needs to define the nature of the European Observatory before we could take a view.

We 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 little practical value to those practitioners who are not directly involved in them. The urban observatory could have a role to play – but we would be more sceptical if it adds a further layer to the confusing array of research projects and hubs that already exist - many of which do not appear to place a high priority on effective dissemination.

Possible key roles for an Observatory would be:

- developing a set of comparable datasets and indicators on urban transport for the cities of Europe
- a single web-portal for EU research projects, funding streams and relevant policy initiatives and legislation

Section 4. Financial resources

Q21. 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?

Additional resources should be made available to support sustainable urban transport initiatives. There is a strong case for re-focusing EU transport investment from major, inter-regional, road building schemes (which can promote unsustainable sprawl and travel patterns) and towards public transport improvements which will improve the sustainability of cities and city regions.

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

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. 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.

Whilst much lip service has been paid to the importance of transport to regeneration, its importance has not been fully understood. This is at least in part to do with the belief that this would mean limited funds in Competitiveness regions being swallowed up by large infrastructure projects. However, as demonstrated by the priority below smaller resources can be used to make a significant contribution to economic development.

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, however we feel that these have not been given the prominence they deserve in the new operational programmes :

'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.'

Q22. How could economic instruments, in particular market-based instruments, support clean and energy efficient urban transport?

There should be more focus within the Paper on introducing stricter standards on car manufacturers and on ratcheting up environmental specifications for new cars. Whilst it is right that demanding standards are set for the environmental performance of public transport vehicles and systems, it should be remembered that a well-utilised urban public transport network will have a significantly better environmental performance than private cars. Increasing the cost-base of public transport (which could be passed on in higher fares) through higher environmental specifications could have the unintended consequence of switching users to private cars, unless there are complementary policies for private cars.

EU competition policy can play an important role in ensuring that competition is controlled and properly regulated. Experience of uncontrolled competition for bus services outside London has largely been a disaster for urban public transport – with bus use in our areas declining by half in the twenty years since the policy was introduced, whilst fares have doubled in real terms. This contrasts with the experience of controlled competition in the London bus market which has contributed to the current record levels of growth.

We therefore support the sectorial approach to EC competition legislation as reflected in the recently agreed regulation on passenger transport.

Q23. How could targeted research activities help more in integrating urban constraints and urban traffic development?

Notwithstanding the new emphasis on demonstration projects, the EU should orientate future calls under Framework Programme7 (FP7) towards urban mobility issues.

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.

Q24. 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?

Innovative demand management is the right approach for cities, and the EU can help with this by removing national-level barriers to these solutions and promoting interoperability of technology whilst ensuring that Europe's cities and regions 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.

We support moves to ensure that the external costs of transport are recognized in decision-making processes and in EU policy. We would support policy which ensures that the principle that external costs must be evaluated in transport decision making is upheld, and that non-statutory EU guidance on the issue would be helpful. However, given the complexities of the issue, and the multiplicity of local circumstances and established appraisal processes, we do not think that a single European-wide transport appraisal system for urban transport authorities is a viable proposition.

Q25. What added value could, in the longer term, targeted European support for financing clean and energy efficient urban transport, bring?

The current EU funding opportunities for transport do not adequately support passenger transport authorities' objectives for trans-national co-operation. It would be useful to have a general EU (urban) transport fund - just as LIFE+ is the dedicated trans-national fund for the environment – with annually recurring calls and thematic priorities broad enough to allow local and regional actors to run projects adapted to their own specific needs.

There is a review of EU funding taking place in 2008-09, so it is timely to be making this point. Currently, EU transnational transport funding focuses on the energy aspects of transport, modal shift for freight and the Trans-European Networks. FP7 funding for transport research and demonstration (aside from CIVITAS) is very prescriptive in terms of the themes it will support and is structurally very complex – as such, passenger transport find direct participation difficult. Broader urban transport funding opportunities are afforded by CIVITAS, but the calls do not recur annually, there are strict criteria on the size of urban area that can participate and you have to implement a wide variety of measures if you want to take part. There is currently no EU fund for, say, sharing good practice or doing joint projects with other EU regions around a specific aspect of urban transport, such as integrated ticketing, vehicle procurement or passenger transport tendering. This freedom does exist in other areas, such as environment and JHA funding, but not transport funding.