



**COUNCIL OF EUROPEAN MUNICIPALITIES AND REGIONS
CONSEIL DES COMMUNES ET REGIONS D'EUROPE**

**CEMR response
to the consultation on the
Green Paper on Urban Mobility**

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1. The Council of European Municipalities and Regions (CEMR) is the umbrella organisation gathering 49 national associations representing local and regional government in 36 countries. CEMR's members represent local and regional authorities in both urban and rural areas.
2. CEMR has an active working group on transport, which has been working on the issue of sustainable mobility for a long time. In October 2004, CEMR published a "Manifesto on sustainable mobility for Europe's regions, towns and municipalities"¹. As well, CEMR has actively contributed to the making of the Aalborg Commitments and to their promotion, in particular through the Sustainable Cities and Towns Campaign. It was also a partner in the NICHES project, of which objectives were to identify and disseminate excellent, transferable examples of innovative urban transport concepts. CEMR is currently involved in the ELTIS project whose aim is to provide information and support a practical transfer of knowledge and exchange of experience in the field of urban and regional transport in Europe.
3. CEMR calls for EU sustainable mobility policies to be placed at the core of European, national, regional and local actions. Sustainable mobility implies a modal shift towards more sustainable modes of transport, including public transport, cycling and walking, as well as the development of clean and energy efficient urban transport.
4. For environmental and health reasons, the decoupling of road transport growth from economic growth should remain a priority of EU transport policies in the future.
5. CEMR believes the EU can bring some added value in policy areas and challenges that are common to EU cities. However, urban transport policies are local by their very nature. A strong level of Subsidiarity must therefore be respected. Local decision-makers know best the local conditions and needs, and what suits their citizens.
6. At their meeting on 4 and 5 December 2007, the members of CEMR's Policy Committee engaged in a debate on urban transport and adopted the "Stuttgart Declaration on urban mobility". Mayors and elected representatives emphasised the essential role of European local and regions governments to address sustainable mobility challenges².

"Towards a new culture for urban mobility"

7. CEMR welcomes the aim of the Commission's Green Paper on urban mobility: to debate with citizens and all relevant stakeholders at local, regional, national and European level what a European policy on urban mobility should look like.
8. CEMR welcomes the procedure chosen with a consultation phase, in which it participated actively, leading to a Green Paper, which again

¹ CEMR Manifesto on urban mobility (2004): http://www.ccre.org/bases/T_599_21_3524.pdf

² CEMR Stuttgart Declaration (2007): http://www.ccre.org/docs/stuttgart_urban_mobility_en.pdf

opened this second consultation phase to identify actions that will be included in an Action Plan on Urban Mobility.

9. We are pleased to find many of our answers to the first consultation in the Green Paper and would welcome further exchange of views with the European Commission.
10. CEMR is pleased that the Action Plan on Urban Mobility will propose concrete actions at all levels, including citizens and economy, with clear responsibilities and tasks and a timetable for action. However, it is crucial that the Action Plan respects the principle of Subsidiarity, thus supporting local and regional authorities in their transport policies, but not imposing solutions on them. The Action Plan should not lead to further EU regulations implying obligations and financial burden for local and regional authorities. European cities, regions, transport authorities and operators should be closely involved in the drawing of the Action Plan.
11. CEMR believes the EU, when considering further actions related to urban mobility, should take into account the link with existing legislation having a direct or indirect impact on local transport policies (for instance legislation setting technical standards, on air quality, noise pollution, etc.).
12. CEMR welcomes the integrated policy approach promoted by the Green Paper. We are pleased that the problem of urban conglomerations, the urban-rural interface and the trends towards urban sprawl and suburbanisation are addressed, as well as the demand for coordination between authorities and the integration of different policy sectors such as urban planning, transport, economic and social affairs. Comprehensive mobility strategies must not only address transport, but also take into consideration the cultural, economic, social and territorial dimension. In this sense, we believe there are also opportunities to better integrate European transport policies into other community policies.
13. CEMR supports the creation of a new culture for urban mobility, both amongst citizens and decision makers. Education and awareness raising are key to this and actions at EU level can have an important impact.
14. CEMR considers that the role of employers should not be omitted in the Action Plan. The EU and public authorities at all levels have a role to play to support employers in launching initiatives to help their employees to move in a sustainable way.
15. CEMR observes that the Green Paper does not refer to air, maritime and fluvial transport. Even if specific EU policies address these issues, they also have to be considered in light of inter-urban transport of goods and passengers.
16. CEMR is disappointed by the low profile given to modal shift in the Green Paper. We are convinced that it needs strong measures to achieve a significant change, and the appropriate level to impose rules on this matter must be the EU.

Subsidiarity in urban transport policies

17. There is a need for a real EU policy on urban transport, not just benchmarking and exchange of best practices. The European Union has a major role to play in favour of sustainable urban mobility, empowering cities while fully respecting the principles of Subsidiarity and Local Self-Government, in line with the Council of Europe's Charter on Local Self-Government.
18. CEMR welcomes that the Green Paper honours the Subsidiarity principle and the clear statement that local authorities are in the lead in defining and implementing urban mobility policies, but that the EU can support them, without imposing solutions.
19. However, since the aim of the Green Paper is to offer options for local decision makers and not to present solutions, much will depend on the follow-up and the announced Action Plan. The latter must take into account the diversity of competence levels and administrative organisation in the Member States. In view of the diversity of local situations throughout Europe, there cannot be "one for all" solutions. Targets should thus, in general, not be mandatory and binding, but indicative.
20. CEMR broadly agrees with the identified obstacles to successful urban mobility and the key issues and main challenges highlighted in the Green Paper. In CEMR's opinion, the main barriers at local level to improving urban transport and mobility are insufficient funding; insufficient public involvement and support; lack of appropriate structures and allocation of responsibilities between local, regional and national level; insufficient interconnection between transport networks and services; insufficient coordination between neighbouring cities, and insufficient coordination between transport services and the individual and varying transport needs of customers. Public transport must adapt to the new customer needs.
21. The EU can add value by, for instance :
 - providing clear legal frameworks that set common principles while respecting Subsidiarity and Local Self-government
 - setting technical standards (e.g. vehicles, equipment, fuels etc.) and ensuring interoperability
 - promoting research and the exchange of data and good practice
 - support actions aiming at changing mobility behaviour: launching campaigns to raise awareness and promote the implementation of the Aalborg commitments
 - integrating urban transport issues into sectoral EU policies and integration within different levels of government
 - providing guidance of a non-binding nature to cities on how to develop sustainable urban transport plans and how to implement EU legislation that closely relates to urban transport, such as air quality directive
 - providing help in transport demand management

- ensuring strong financial frameworks for urban transport (structural funds, EIB loans, dedicated fund, etc.), with priority given to public transport and sustainable modes of transport
- supporting clean vehicles through legislative measures targeted at manufacturers and financial incentives for public bodies.

On this last point, CEMR takes note of the recent Commission's directive proposal on clean and energy efficient vehicles and will examine it in detail.

Questions from the Green Paper

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

CEMR supports the idea of recognising the efforts of cities on sustainable mobility. A labelling scheme might be a positive contribution to this aim. Nevertheless, this labelling must take into account the wide variety of local and regional situations throughout Europe and should recognise progresses as compared with the situation of the city at an earlier stage, not a pan-European benchmarking between cities where the situation is not comparable.

However, the most important point should remain the sharing of experiences, not the recognition of efforts.

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

Measures could include attractive, secured and safe zones dedicated to pedestrians and cyclists, implementation of innovative solutions, awareness raising campaigns and charges on car transport. The intermodality with other transport modes and the integration of walking and cycling should play a major role in Sustainable Urban Transport Plans.

The EU can facilitate the exchange of best practice and promote walking and cycling through the upcoming guidance on Sustainable Urban Transport Plans.

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

CEMR calls on the European Commission to renew its efforts to better balance the modal split of the transport of passengers and goods in the EU. CEMR is disappointed that the revision of the White Paper on transport in 2006 has weakened this essential objective of the original 2001 White Paper.

CEMR considers it is essential to promote both restrictive measures to discourage the use of cars (e.g. creation of Green Zones, reduction of accessibility to the city centre, etc.) and incentives measures, such as the development of competitive and coordinated alternatives, embracing a diversity of modes (e.g. investment in public transport, car-sharing, car-pooling, etc.).

Actions directed at citizens and business should also aim to alter lifestyles, attitudes and perceptions so that European society becomes less reliant on car and road use, particularly in cities.

What could be the potential role of the EU?

CEMR supports the development of new tools at European level for the internalisation of external costs and warmly welcomes the intention of the Commission to strengthen and support networks related to urban mobility within networking activities like URBACT and Regions for Economic Change.

CEMR suggests the organisation of a European public awareness campaign on activities regarding sustainable urban mobility together with stakeholders active in that field, as well as an annual European conference on “advanced urban transport solutions”.

A wide room for manoeuvre should be left to local and regional authorities to favour a balanced modal split, whilst at the same time planning for the interoperability between different transport modes. Nevertheless, the EU could play a role by offering guidance and financing opportunities to support their efforts.

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

Economic incentives are needed to promote cost-effective, greener public transport solutions, as well as guidance to cities on how to cut pollution from transport by sharing good examples.

The EU should encourage Member States to reform national vehicle taxation regimes so that they support cleaner vehicles. As well, CEMR supports strong EU-wide measures on vehicles emissions, in particular strong EU emission standards on light and heavy vehicles (strong Euro V and VI norms) and legislation on CO₂ emissions from cars and trucks.

CEMR welcomes that the Commission wants to support the market introduction of clean and energy efficient vehicles by green public procurement. However, the integration of lifetime costs of energy consumption, CO₂ and pollutants emissions as award criteria can have detrimental effects on public transport. Budgets are limited and the extra initial costs of vehicle procurement, even though compensated in the long term, should not lead to cuts in public transport services. National and EU authorities should financially support the purchase of clean vehicles by local and regional authorities.

While the public sector should set a good example, it is important that the private economy and citizens are not relieved from their responsibility.

5. How could joint green procurement be promoted?

CEMR would welcome a wider application of the Commission's support for the development of joint green procurement schemes by public authorities through pilot projects. The EU could also promote the exchange of experience by widely disseminating the evaluation of these pilot projects and its handbook on green public procurement.

The EU should facilitate the joint procurement of clean vehicles through an adaptation of the rules for green public procurement, through the possibility to insert external costs criteria in public tenders and through a general principle of prevalence of the environmental criteria over economic criteria where they are in conflict.

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?

In general CEMR welcomes a common approach to Green Zones and supports a single vision for Green Zones which is sufficiently flexible to allow local variations. In this context, it would be useful to develop a uniform traffic sign to mark environmental zones, recognisable in every Member State. We also request the European Commission to support the exchange of best practices, for instance in the area of technologies for visual recognition of vehicles.

However, this must not prevent from the possibilities of cities to enforce alternative, stricter or greener rules where appropriate, considering the diversity of situations at local level. Ensuring a free flow of traffic cannot be pursued to the exclusion of managing mobility in a sustainable manner overall.

Certain cities experience difficulties to carry out enforcement of local rules governing Green Zones, difficulties increased in case of cross border enforcement (e.g. identification of car owner, recovery of penalties). The EU has a major role to play in order to find a proper solution for decriminalised traffic offences. In particular, it could facilitate exchange of best practice and provide guidance on the practical and legal aspects of this enforcement.

7. How could eco-driving be further promoted?

Some cities have developed projects on eco-driving and gathered quite good experiences. The EU could facilitate the dissemination of good examples and organise awareness campaigns by EU citizens on the impacts of driving behaviours on the environment and quality of life.

The EU could also support the use of vehicles coherent with eco-driving, as well as innovation regarding car equipment.

CEMR also considers that the EU should encourage Member States to promote eco-driving as part of their national driving test procedures.

8. Should better information services for travellers be developed and promoted?

Reliable, attractive and accessible information services are essential to favour urban, rural and regional mobility and intermodality. The integration of information services related to transport and events of the local life (e.g. cultural or sports events, demonstrations , etc.) can make it easier for travellers to move in a sustainable way.

Innovative solutions including different transport modes could be promoted by the EU through its research pilot projects and exchange of information activities.

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?

CEMR supports the use of Intelligent Transport Systems and open standards for interfaces and interoperability (of technology and between transport modes, various functions, areas and countries).

Innovative demand management is a good approach. EU should remove barriers and ensure such approaches are applied consistently across the EU and at all relevant levels.

While ITS can be good tools, they cannot solve the main problems.

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

The Commission should support a wider dissemination of good practices and data in the field of ITS, as well as a voluntary framework for ITS deployment in EU towns and cities to address the interoperability issue.

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

CEMR welcomes the new regulation on public passenger transport services by rail and road, which allows local and regional authorities to define public service obligations and the imposition of social tariffs. We are also pleased that public authorities can introduce selection and award criteria with respect to the quality of transport services. The Commission could support the exchange of information on the implementation of these tools provided by the regulation to improve the quality of transport services.

The EU should provide legal certainty for inter-communal cooperation and in-house organisation of public transport. CEMR believes that local elected representatives are in the best position to choose the economic model which best ensures delivery of high quality public transport that meets the citizens' needs. While increased competition may indeed have positive effects, particularly economic, we are concerned that such benefits may come at the expense of quality and effective coordination between different transport modes.

CEMR agrees with citizens' demand for high quality, efficient and accessible public transport and that the lack of this can be an obstacle to a modal shift from private to public transport. To resolve this, however, national authorities have to provide the local and regional level with sufficient financial resources. Otherwise, restraint local budgets hinder public transport of high quality.

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

CEMR is in favour of dedicated lanes for collective transport, provided that local authorities are free to choose in the end the best solution adapted to local circumstances.

As this might implicate high costs for cities and the resistance of private car users, the EU and national governments should support measures both financially and through information and behavioural campaigns.

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

CEMR sees the danger that such a Charter does not recognize the various situations and needs of the different cities throughout Europe, and the principle of Local Self-government. On the other hand, if the Charter remains on a quite general level, it might not bring any added value. In line with the principle of Subsidiarity, such a Charter should be left to the regional or national level.

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

CEMR is pleased that the Green Paper addresses urban freight transport and is interested in further exchange of good practices in this field.

CEMR believes this issue should be addressed in the upcoming guidance on Sustainable Urban Transport Plans. Cities and agglomerations could be encouraged to produce urban mobility plans including both the question of passenger and freight transport. The commercial mobility needs should be addressed as well.

Research could be promoted by including this theme in European programmes and projects. For instance, the EU could create a collaborative work platform on sustainable mobility dealing both with freight and passenger transport, like the existing platforms for the rail transport (ERRAC) and the road freight transport (ERJRAC). As well, attention has to be paid to the implementation and the applicability of research results.

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

CEMR supports the development of better policy and strategy links between mobility, spatial and economic planning at all levels of governance. In particular, local and regional authorities must cooperate closely to guarantee efficient and coherent transport policies. National governments and the EU should support and encourage this cooperation, set the frame and contribute financially.

As governance is the key to sustainable urban transport, the EU should promote the transport competences of local and regional governments. The EU can encourage national governments to improve transport governance and planning, as well as the cooperation among the local, regional and national levels (better connecting urban transport with regional and national transport services, better integration of land use, urban and interurban planning). CEMR wants the issue of land use to be more prominently addressed in the upcoming Action Plan which will follow the consultation on the Green Paper.

CEMR welcomes that the Green Paper also addresses the issue of agglomerations, not just cities. However, the focus on agglomerations and related issues, such as the question of commuters, should be even stronger in the Action Plan.

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

CEMR welcomes the proposed more intensive and structured dialogue with local and regional stakeholders and Member States on new technologies for increasing safety.

Concerning the problems of safety and security in urban transport, the EU has a relevant role to play. The EU level can promote campaigns on behavioural change and exchange of practices, legislate on vehicle and infrastructure safety standards, support the introduction of safety technologies, encourage the improvement of alarm systems and emergency planning procedures and give guidance to local and regional authorities to enforce traffic rules.

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

European information campaigns adapted to local circumstances and guidance to local operators might be a good way to go.

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

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

While automatic radar devices and video surveillance surely can be meaningful in some circumstances and to some aim, they cannot solve all safety and security problems. It is also important to consider the question of data protection in this context. It should be up to national authorities in cooperation with local and regional authorities to answer these questions.

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?

Without all stakeholders working together, a new mobility culture in Europe will never become reality. Mobility is one of the policy issues presupposing an active cooperation between public authorities at all levels, as well as citizens, business and other relevant actors.

CEMR supports the proposal of European data collection on urban mobility statistics, which should be easily accessible to local authorities. This would clarify the challenges related to urban mobility, enrich the Eurostat database and make comparisons possible.

CEMR also considers that the creation of a European Observatory on Urban Mobility should be explored, provided this does not imply additional administrative burden. Further details and information have to be provided, in order to assess the opportunity to set up such an Observatory.

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?

Financing for public transport should be considered as a one of the priorities of the regional development policy. The more broad and solid basis for financing

urban and collective transport under the current programming period is welcomed as well as the new reference to integrated strategies for clean transport in the ERDF and Cohesion Fund regulations.

However, potential project beneficiaries may not be aware of the extent to which Structural funds can be used to transport initiatives outside of "convergence areas", so that information on funding should be improved. The mid-term review of the Operational Programmes could also be the opportunity to consider better support to urban transport.

CEMR welcomes the numerous EU programmes and projects that investigate innovative transport policies and organise exchanges of good practices. However, CEMR regrets that the European Commission does not offer financing to help cities and regions to develop strong alternatives to car use. CEMR would have welcomed, as part of the Thematic Strategy on Urban Environment, offers to finance the implementation of sustainable mobility plans in selected EU cities.

CEMR considers the CIVITAS programme as most useful and is looking forward to seeing the suggested development based on the CIVITAS approach for a dedicated EU support programme for financing clean urban transport activities outside the research framework.

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

CEMR supports the idea that all stakeholders at all levels, including users, must contribute to financing urban mobility.

National governments must guarantee important, stable and long term financing for public transport investments at local, regional and national level. Market-based instruments can support sustainable urban transport, but not replace public funding.

CEMR supports the promotion of new funding tools that can be implemented by local authorities. Road pricing schemes, environmental taxes, taxes on energy, taxes on CO₂ and urban congestion charges can provide additional resources for sustainable transport modes. But these innovative economic instruments can also act as a financial incentive to trigger the shift of consciousness towards an increased use of public transport or clean and energy efficient modes of transport.

CEMR stresses that those additional resources should be used in priority for investment in public transport and sustainable mobility solutions.

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

The EU should conduct further studies involving more partners on a wider transport infrastructure system.

CEMR underlines how essential it is to ensure a wide dissemination of the results of these research activities and to provide the information in several languages. Local decision makers should be aware of the existence of this information and be able to access it easily. In order to be effective, it is also important that the results can be practically used by local decision makers.

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?

CEMR welcomes the better taking into account of external costs by the Eurovignette directive and supports the introduction of an urban dimension on the occasion of the next revision of the Eurovignette directive, so that road charging applies to all types of vehicles and infrastructures.

CEMR considers the EU should promote road pricing schemes. The choice of introducing urban charging should be the responsibility of the local and regional authorities, which have to assess its benefits and impacts. As well, local and regional authorities should be able to decide themselves what the revenues of road charging are to be used for. The EU can help the local decision-makers to overcome the reticence of citizens. For instance, it should organise the exchange of information and experiences on congestion charging.

CEMR supports the internalisation of external costs and the announcement of a common EU methodology for calculating external costs. In parallel, coordinated efforts to reduce the production of external costs (e.g. negative environmental impacts of transport) are crucial.

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

Sustainable mobility policies represent a great financial challenge for local authorities. In many cases, European support for financing clean and energy efficient urban transport is a precondition that local measures can be implemented. In other cases, European support has important impacts on national, regional and local policy and financial priorities. So that CEMR strongly supports the setting up of a dedicated and flexible fund for urban transport projects.

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