By including urban transport in the 2011 Transport White Paper, the EU has taken an important step in the right direction towards a more sustainable and liveable Europe. The central role of cities in developing and implementing urban mobility solutions has also been recognised in the Green Paper on Urban Mobility, the Urban Mobility Action Plan and the Urban Mobility Package.

As EUROCITIES, the political platform representing the interests of more than 130 large EU cities, we welcome the strategic leadership shown by the EU in this regard, and hope that it will continue in the future.

We would also like to underline the clear link between urban mobility and broader EU objectives and strategies: sustainable mobility in urban areas and connectivity between our major urban centres are integral to the achievement of EU’s transport strategy and to ensuring accessibility, inclusion and economic development. They also have a significant contribution to make to the objectives of the Energy Union, our climate goals, and to the ongoing, important work around smart cities.¹

The debate on the EU urban agenda also indicates the importance of cities in delivering Europe 2020 objectives for a smart, sustainable and inclusive Europe. An EU urban agenda means identifying the urban dimension to EU policies, and promoting a joined up approach to policy-making, based on cities’ needs. It also means engaging cities directly and alongside member states in EU policy development to make sure the frameworks put in place enable and empower cities.

In the context of the mid-term review of the Transport White Paper and the implementation of the Urban Mobility Package we would like to reiterate some general principles and also provide our position on specific policies:

Sustainable Urban Mobility Plans

- Getting the balance right between providing guidance on mobility frameworks and leaving flexibility to cities

City authorities fully support SUMPs and believe these are a key tool to achieving integrated mobility planning and leading to a significant shift towards more sustainable modes of transport.

EU actions should continue to support and enable efforts at the local level, rather than imposing a ‘one size-fits-all’ or top-down solutions. Cities are where challenges lie, but also solutions. We face the double challenge of improving mobility while making urban transport more sustainable. City authorities need to develop and deliver transport plans in a flexible way to be able to meet these objectives in a local context that varies from city to city.

EU guidance and exchange of best practice, as it is the case now with the SUMPs Stakeholder Observatory, is a great approach for enhancing the take up of SUMPs. EU financial support for the development of SUMPs would also be helpful.

- Funding conditionality - yes, but how?

City authorities fully support the principle of proving that a project is sustainable in order to receive EU funding. The only question lies with practical aspects of this approach. A standardised European SUMP, which would require audit and certification procedures as a condition for funding eligibility, would be counter-productive especially in those cities that have similar schemes that are not SUMPs as such. Transparency in this respect is essential, but the administrative burdens imposed by the EU must be proportionate. Instead the European Commission should help facilitate the development and implementation of SUMPs by providing funding where necessary.

City authorities would welcome incentive schemes, or a European checklist, which would still allow for different transport plans, or other integrated plans that include sustainable mobility, to be recognised and accepted in the same way by the EU.

Road pricing and access restriction schemes in cities

- No ‘one-size-fits-all’

Tackling congestion requires a range of measures, such as improving system management, pricing and capacity optimisation, and expansion. The appropriate policy mix will depend on the context within each individual city. Different circumstances and governance structures in cities mean that the same access restrictions and pricing schemes will not work efficiently across all European cities. Mandatory criteria (e.g. on access, the assessment of impacts, certification, monitoring and evaluation) would be counter-productive.

Rules on earmarking of revenues would also be difficult to implement at local level since cities have different problems and need to have the freedom to use such revenues according to their local circumstances.

There are, however, areas where action at a European level would be helpful to both cities and road users such as:

- Promotion of best practice in terms of the consultation required before the
introduction of schemes including liaising with key groups representing foreign registered vehicles. A recommended list of consultees with contact details would be helpful to cities.

- Develop standard vehicle documentation enabling cross-border recognition of vehicle age, size, weight, CO₂ emissions and Euro standards.

- Develop standard retrofit documentation enabling cross-border recognition of retrofitted vehicles. In the longer term the European Commission should develop common standards for retrofit equipment.

- Establish a common signifier, compatible with existing signage schemes that could be used to alert drivers that a scheme is in force.

- Promote a central information point for all schemes across the EU to enable effective journey planning, a good example being http://www.lowemissionzones.eu/. This central point could be used as a notice board or consultation mechanism for newly proposed zones and enable effective publication of scheme data to facilitate the development of smartphone apps and the incorporation of information into satellite navigation systems.

- In the longer term legislation to enforce compliance with low emission and green zones, building on the directive facilitating cross-border enforcement in the field of road safety 2015/413/EU.

- Interoperable methods and a framework of non-binding criteria for road charging could be useful

Common high level principles on air quality and on congestion reduction would be welcome, provided these are based on a flexible approach. Common signage and information to users on the existence and price of access restrictions throughout the EU would be also useful.

City authorities would welcome EU proposals on interoperable methods for road charging in the EU, as long as these allow for local flexibility and are not introduced on a mandatory basis. Such proposals should ensure freight transport is covered too. The freight sector should be engaged into any EU strategy on road pricing and access restriction schemes.

We would be keen to contribute to developing and promoting best practice on urban road pricing and access restriction schemes.

Urban road safety:

- EU action plan on road safety:

We support the EU action plan, which has been effective in reducing road deaths, not least through league tables for each member state. We would welcome a stronger focus on Vulnerable Road Users (VRUs), with separate strategies for pedestrians, cyclists and Powered Two Wheelers (PTWs). VRUs are an increasing proportion of deaths, as vehicle occupants are better protected; killed or seriously injured (KSI) for PTWs in particular have not reduced as fast as overall deaths.
We support the review of the EU road safety strategy and the setting of EU targets for reducing seriously injured. Work will be required on better data. It is also important that EU vehicle type approval framework takes account of urban environment, through changes to General Safety Regulation to mandate direct vision requirements from Heavy Goods Vehicles (HGVs).

Further EU funding should be made available, including support for the introduction of road safety measures alongside the promotion of walking and cycling, making infrastructure and vehicles safer.

Air quality:

- EU help on National Emissions Ceilings (NEC) Directive and Real-world Driving Emissions (RDE) test procedure

European city authorities are fully committed to improving air quality, as it is very important for the health and quality of life of our citizens. We constantly take local action to promote cleaner air, such as encouraging walking and cycling, improving public transport, using cleaner vehicles in public fleets, improving traffic management and restricting access for the most polluting vehicles.

Yet many factors affecting air pollution are outside of our control. More ambitious national and European policies are needed to make real progress. We recommend that the proposed revision of the NEC Directive should be strengthened to ensure member states’ efforts on air pollution are reinforced. This will help reduce background concentrations of pollution and reduce overall air pollution to levels that are within the limit values of the Ambient Air Quality Directive.

We are also calling for a quick finalisation of the new Real-World Driving Emissions (RDE) test procedure for the Euro 6 emission standard. The real-world emissions from cars on the roads today are often much higher than those indicated by the official type-approval test results.

Technology neutrality and modal shift towards more sustainable modes of transport

- Use alternative fuels that best fit their local strategies - technology neutrality is key

Technology neutrality remains important for us. In our cities, major investments have been made in a range of alternative fuels. Electricity is a well-suited alternative fuel for short distances. But city authorities still need to retain the flexibility to choose the most appropriate technology, and the policy mix, that suits their local circumstances.

Getting it right in our cities will be decisive: there’s a high potential for deploying alternative fuels in cities; at the same time traffic remains a challenge in terms of congestion, liveability, road safety and parking.

For our cities, the White Paper goal to halve the use of vehicles for urban transport powered by conventional fuels is challenging, due to the lack of vehicle models powered by renewable fuels and technologies.
EU support is therefore important to help remove market barriers that prevent the development of more vehicles with the technology to be powered by renewable fuels, and to create conditions for renewable and climate-neutral fuels to be established in the market. The EU should avoid preventing or hindering member states, e.g. through tax legislation, from attempting to accelerate the market entry of climate-neutral fuels that are particularly suited for vehicles in urban traffic. These include biogas made from waste products from the forestry industry.

- **EU standards for new infrastructure**

We would support the development of standards for equipment, for example, technical specifications for electric vehicle recharging points and storage systems for alternative fuels. These standards should only apply to new or replacement infrastructure.

An increased use of vehicles powered by electricity requires a well-developed charging infrastructure in our cities. The lack of established and implemented standards for charging infrastructure is an obstacle to increased electric power in the vehicle fleet. It is important that such standards are fully established and support the work of the EU.

- **Continuing the ambition for a modal shift towards more sustainable modes**

As cities, we continually work to achieve a modal shift towards more sustainable modes of transport, such as public transport, cycling and walking. EU strategies such as the Transport White Paper should include a stronger focus on this modal shift in urban areas.

Alternative fuels are part of the equation to tackle climate change and reduce greenhouse gas emissions. In cities, however, the most energy-efficient solutions are more sustainable modes of transport such as public transport, cycling, walking and car-sharing. Traffic remains a challenge for cities in terms of congestion, road-safety, liveability and parking, and it is important to encourage citizens towards modal shift.

- **EU support to cycling in cities**

We would welcome EU support to help better connect cycling and public transport schemes, for a modal shift away from cars. The EU could help with data collection and production, for example, providing statistics to facilitate the development of such intermodal schemes and make them as successful as possible. Financing more data collection on active travel and public transport interchanges, and less on ITS and clean fuels, could help develop cycling in cities.

### Strengthening city involvement

- **The member states’ expert group on urban mobility**

As an important part of the follow-up to the Urban Mobility Package, the aim of the member states’ expert group on urban mobility should be to foster an exchange between all levels of governance, for better transport coordination and integration. This would help member states and the Commission achieve the Urban Mobility Package’s objectives.

The Urban Mobility Package encourages more involvement in urban mobility by member state governments. This is a positive new element, but we also believe that engaging local authorities in the different working groups, when national authorities are looking at local issues, is essential. We, as local experts and politicians, should be able to communicate our own unique circumstances and challenges. EUROCITIES as a network can also help facilitate this.
The design and implementation of TEN-T projects

A truly integrated TEN-T network will depend on the meaningful involvement of city authorities in the current planning phase, and later in the implementation phase, of the new strategy. We are convinced that a truly efficient and optimised TEN-T can only be achieved in close partnership with cities.

This means involving city authorities meaningfully in the ‘corridor forums’ in the future and ensuring that member states respect this commitment. This will improve the coordination and the development of TEN-T projects and contribute to the common objective of cohesion, interconnection and interoperability. A return on investment for Connecting Europe Facility (CEF) projects will only be optimised if cities are adequately connected to the origins and destinations of people and goods.

City authorities have rightly been recognised as crucial partners in the new TEN-T legislative framework. Article 45.6 (TEN-T Regulation) clearly proposes the involvement of city authorities in the corridor forums. Yet in practice, they have only been consulted at a later stage, namely from the third corridor forum meeting - by which time the first planning discussions had already taken place. It also remains to be seen to what extent member states will their cities around the table in the future.

It is also important that the funds from the CEF continues to be focused on urban nodes, cross-border connections, missing links and bottlenecks, including urban bottlenecks on the TEN-T core network, in order for it to be fully operational in 2030.

The design and implementation of the Clean Power for Transport Package

If implemented together with cities, the EU strategy to deploy the infrastructure and take up of alternative fuels can add value. However, city authorities should be involved in the development of National Policy Frameworks on alternative fuels, together with the national and EU level. This will ensure an efficient and optimised implementation of the package.

Sustainable urban freight transport:

EU guidelines for better urban freight transport

The role of freight in cities has traditionally not been well researched or understood, and therefore policy responses have not been well developed. The freight sector, which includes a large number of small firms, has also been difficult to reach. Nevertheless, freight logistics makes an important contribution to the urban economy and addressing its impact on the environment and on road safety is becoming more and more important. Some cities are seeing increasing numbers of light goods vehicles on their roads, as a consequence of the growth in internet shopping. The EU could help by promoting better monitoring and management of urban freight flows, and stimulating the private sector to implement efficient urban logistics, for example through incentive schemes for operators and establishment of consolidation centres.
Funding prioritisation

- More EU funding for sustainable modes of transport in cities

In the future, to help address congestion in cities, we would welcome more funding for public transport, cycling and walking strategies in cities, alongside existing funding for clean cars. Even if more cars are green, a green traffic jam is still a traffic jam. A new focus on financing soft modes and public transport should be reflected in future Horizon 2020 calls.

We hope that the forthcoming EU initiatives addressing urban mobility will reflect the recommendations we have developed over the past years and in this paper. Europe’s major cities remain committed to working with European institutions to help steer Europe towards more sustainable urban mobility, with a better quality of life for all our citizens.