



**Polis answer to the European Consultation on the Ten-T Green Paper  
‘Towards a better integrated trans-European transport network at the service of the  
common transport policy’**

**Polis is a network of leading European cities and regions working together to develop innovative technologies and policies for local transport.**

Since 1989, European local and regional authorities have been working together within Polis to promote sustainable mobility through the deployment of innovative transport solutions.

Our aim is to improve local transport through integrated strategies that address the economic, social and environmental dimensions of transport. To this end, Polis supports the exchange of experiences and the transfer of knowledge between European local and regional authorities. Polis fosters cooperation and partnerships across Europe with the aim of making research and innovation in transport accessible to cities and regions.

Decision makers are provided with the necessary information and tools for making sustainable mobility a reality.

**Q1. Should the Commission’s assessment of TEN-T development to date cover any other factors?**

Polis: The two key messages coming out of this completed questionnaire are the need to reinforce the interface between the TEN-T and urban/local transport networks (referred to as a ‘nodes’ in the green paper) and the strengthening of the multi-modal dimension in TEN-T. It is considered that the Commission’s assessment fails to acknowledge the shortcomings of TEN-T policy since the green paper only fleetingly touches upon these two items; yet they are vital to the improved functioning of the TEN-T network and to tackle climate change. They would also allow to better take into consideration the demands for territorial cohesion. Giving due attention to the interface would help improve journey efficiency (a lorry driver can spend as much time entering and leaving a city as it does on the TEN-T leg of a cross-border journey!) and equally importantly help address the issue of rebalancing modes in order to achieve a more sustainable mobility. These are key objectives of transport policy at all levels (local, national and EU).

For this purpose, the Commission’s assessment should also have put a greater emphasis on the need to associate more strongly local transport authorities and network managers to TEN-T policy.

The various policy initiatives coming out of the European Commission in relation to urban mobility (Green Paper), ITS deployment (Action Plan), the greening of transport (package) and the upcoming communication on the future of transport in Europe, need to be given greater consideration in TEN-T since it offers a well established network to accelerate the rolling out of these policies.

**Q3. Would a priority network approach be better than the current priority projects’ approach? What would be the advantages and disadvantages of either approach, and how should it be developed?**

Polis: A priority network is better than the current priority projects as it brings in the main sources of transport demand (major intermodal hubs such as airports and ports and nodes including urban interfaces). This should help reinforce the intermodal dimension of TEN-T, at least if the priority networks are conceived as fully intermodal integrated networks, and not as poorly interconnected modal networks (e.g. priority road network, priority rail network).

**Q4. Would the flexible approach to identifying projects of common interest, as proposed with the 'conceptual pillar', be appropriate for a policy that, traditionally, largely rests on Member States' individual infrastructure investment decisions? What further advantages and disadvantages could it have, and how could it best be reflected in planning at Community level?**

The flexible approach, as proposed with the 'conceptual pillar' is appropriate since it would allow giving a greater importance to policy objectives and criteria for the development of the TEN-T network. It is therefore likely to lead to more efficient investments accelerating the achievement of the European transport policy.

**Q5. How can future challenges in the sectors of waterborne, air transport and freight transport be best taken into account within the overall concept of the future TEN-T development? Do different requirements for freight and passenger transport require different treatment in the TEN-T policy? What further aspects relating to different transport sectors/common transport policy issues should be given attention?**

Polis: The interface with urban areas is important for all three sectors from both a spatial and ITS perspective. Airports are typically located on the outskirts of major cities and air travelers often use urban public transport or roads for onward journeys. Public authorities are encouraging the use of waterways for the goods movement in order to take the strain off road and rail, and urban authorities are increasingly taking advantage of rivers and canals to transport people. With regards to freight transport, the impact of heavy goods vehicles on congestion, accidents and air pollution in urban areas is inducing many urban authorities to introduce measures to control the access of such vehicles, through measures such as restricted access, environmental zones and sustainable urban delivery concepts, including consolidation centers, electric vans, etc. As states by a European region, the Trans-European transport network is only of value if it is relevant to local communities and businesses.

For this reason among others, and to ensure the smooth and sustainable flow of goods and people between the international/national and urban networks, effective interface strategies are required, involving organizational cooperation (between urban and national road authorities and agencies for roads and public transport as well as port and airport authorities) and integrated systems and services, across modes and networks, including travel information, ticketing and charging when relevant. TEN-T provides an ideal framework for facilitating cooperation between the different transport service operators.

**Q6. How can ITS in all modes, as part of the TEN-T, enhance the functioning of the transport system? How can investment in Galileo and EGNOS be translated into efficiency gains and optimum balancing of transport demand? How can ITS contribute to the development of a multi-modal TEN-T? How can existing opportunities within the framework of TEN-T funding be strengthened in order to best support the implementation of the ERTMS European deployment plan during the next period of the financial perspectives?**

Polis: ITS is an important enabler in the transport field in terms of contributing to seamless journeys for people and goods and optimising network capacity. From a TEN-T perspective, ITS plays a significant role when moving from the long distance network onto the local network (it is worth remembering that most journeys start and end in urban areas). Real-time, multi-modal information can enable long-distance travelers to make informed choices about the mode and timing of any onward journey. Multi-modal journey planners are becoming common place in cities and at national level but these are essentially local/national by nature and do not lend themselves well to cross-border journey planning. For what concerns non-road based transport, integrated inter-modal ticketing can further contribute to the seamless journey.

ITS is also a great enabler for freight vehicles in terms of providing information on the traffic situation (through an on-board unit or VMS) and guidance on the most appropriate routes to take, which is especially important in urban areas, while it would also allow to gather data on freight movements for better network management. Given the rising number of schemes to regulate or charge for the movement of freight vehicles in urban areas (and on national roads to a lesser extent), an important role is emerging for ITS to

ensure freight operators are fully aware and equipped to undertake journeys with minimum hindrance and without multiple onboard units.

ITS can play these roles providing that appropriate attention is given to the interoperability of and coordination between the various systems, in particular between local and long distance information, network management and charging systems.

**Q7. Do shifting borderlines between infrastructure and vehicles or between infrastructure provision and the way it is used call for the concept of an (infrastructure) project of common interest to be widened? If so, how should this concept be defined?**

The concept of the TEN-T network should certainly cover non-physical infrastructure such as communications between vehicles and infrastructures.

It should however preserve the principle according to which the infrastructure managers are responsible for communications, services and traffic on this infrastructure.

**Q8. Would a core network (bringing together a priority network approach as referred to in Q3 and a conceptual pillar as referred to in Q4) be 'feasible' at Community level, and what would be its advantages and disadvantages? What methods should be applied for its conception?**

A core network would be feasible and would reinforce the consideration given to European policy objectives, allowing to define them unambiguously. It would allow to use a much needed set of objectively defined criteria for the identification of the core network.

**Q11.02. Is there a need for new financial instruments (including 'innovative' instruments)?**

The coordination between the various European financial instruments could be reinforced if a stronger consideration is given to European policy objectives.

When appropriate, a better connection between the TEN-Ts and the local network, reinforcing intermodality and the integration between the long distance and local networks should be considered as important criteria for the allocation of structural funds in the framework of the European regional policy.

Given the current situation in the financial markets, any initiative to reiterate and innovate infrastructure financing is welcomed. Issues related to Stability Pact agreements and major infrastructure investments could be further looked into.

**Q12. Which new non-financial instruments should be introduced, for what reason?**

Polis encourages strengthening the exchange of good practices and benchmarking between projects. Polis is available to support these activities, in particular on the issue of the integration between local and long distance transport networks.

In general, the Commission could use the TEN-T in a more strategic way to research, test, demonstrate and deploy measures that are originating from other EC strategies and action plans (e.g. internalisation of external costs, road safety, ITS, fuels and energy). The TEN-T could provide the geographical backbone for implementing new EU standards (eg, infrastructure safety) and other initiatives, which should spill over in time into neighbouring (non TEN-T) infrastructure and networks. Initiatives such as Field Operational Tests for ITS or pilot projects for integrated ticketing/charging scheme adapted to the TEN-T could fit into this, providing they do not disadvantage the TENs network at the advantage of other networks.