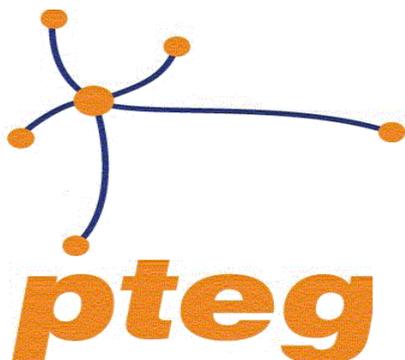


COMMUNICATION ON A SUSTAINABLE FUTURE FOR TRANSPORT:  
VIEW OF PASSENGER TRANSPORT EXECUTIVE GROUP (PTEG), UK  
SEPTEMBER 2009



#### CONTACTS

If you would like any further information contact us:

Catherine Feore, Head of Office, Greater Manchester  
Brussels Office:  
info@greater-manchester.eu

James Sharples, Policy Manager, Merseyside Brussels  
Office: james.sharples@merseyside-europe.org

#### INTRODUCTION: PTEG

Passenger Transport Executive Group (pteg) represents the six Passenger Transport Executives in England 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, Nottingham City Council and Strathclyde Partnership for Transport (STP) are associate members. This response is on behalf of the six PTEs only.

#### BASIC PTEG VIEW

- An increasing majority of EU citizens (according to the Communication's own estimate, 84% by 2050) live in urban areas and the majority of their journeys are in those areas. It follows therefore that if the wider environmental, economic and social objectives set out in the paper are to be met then urban transport must be central to the new Common Transport Policy. Locally accountable transport authorities have a central role to play in the implementation of sustainable urban transport strategies. Empowering and resourcing those cities and city regions to devise and deliver workable transport policies will be the most effective course of action.
- Urban transport should be a greater priority for EU funding (for example currently only 9% of the Structural Funding for transport is earmarked to urban transport) and there is no trans-national (urban) transport fund.
- The EU has a role to play in sharing and promoting best practice in a more focused way than it has hitherto.
- There is a need to further develop 'joined up thinking' on EU policies which have a significant urban transport dimension. Examples include the connections between urban transport policy and EU policies on regional issues, energy, the internal market, social inclusion and the environment.
- Decarbonisation of transport is a major priority. The EU has a legislative role to play in driving up environmental standards; here the focus should be on private transport, such as the car and light commercial delivery vehicles. As important, however, is reduction of the need to travel and promotion of modal shift to more sustainable public transport options.
- The EU should not seek to impose uniform approaches to urban transport issues as cities and city regions need the freedom to pursue and implement locally relevant solutions.

## DETAILED RESPONSE TO CONSULTATION QUESTIONS

(1) Infrastructure. What can the EU do to promote the integration of modal networks as well as their maintenance and upgrade? What should be the priorities for investment? Which measures would allow a better exploitation of the networks and a balanced use of the different modes?

It is hard to disagree with the argument that all the different elements, modes and areas of a transport network should be integrated, including the long-distance/local linkages (point 4.2 in the communication) and that this is not happening fully at present. We would particularly support the emphasis on modal shift in urban areas. Support should generally be focused on the most sustainable modes, on promoting integration (or 'intermodality') and improving the environmental performance of all modes within urban areas and beyond.

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 toward public transport improvements which will improve the sustainability of cities and city regions.

New infrastructure planning should recognise that investment in roads for private car use does not, in the long term, alleviate congestion.

We would support the point that intermodal platforms be promoted (5.1), especially in urban areas. Furthermore, infrastructure expansion should focus on sustainable modes, bottlenecks and integrating appropriate ITS applications. The communication's assertion that common methodologies should be adopted across the EU for appraising infrastructure projects is not given any justification. We agree that, since new infrastructure is costly, the best possible use should be made of existing infrastructure, but would add that this should privilege more sustainable modes and uses within shared infrastructure. Dedicated infrastructure for passenger versus freight uses or for long-distance versus local uses can be very effective but we need flexibility for decisions to take into account local need and restrictions.

Motorways of the sea are useful for diverting traffic from roads but will only work adequately and achieve full sustainability potential where there is good integration with local hinterland transport, privileging sustainable modes.

There is greater potential, as identified, for electronic multi-modal tickets, but not all users will be able to use the technology.

(2) Funding and pricing. What can the EU do to ensure that prices in transport correctly reflect costs to society? What actions should be considered for implementing the 'polluter-pays' and 'user-pays' principles in transport? What should be done with the revenues thus obtained?

A Commission proposal for a review of the EU budget should be presented before the end of 2009. It would be helpful to have a general EU urban transport fund - just as there is dedicated trans-national fund for the environment (LIFE+). Currently, local urban transport measures can only be supported at the margins of EU funds whose primary focus is on related policy areas such as energy and research. As well as a new dedicated urban transport fund, the European Investment Bank, Trans-European

Transport Network and the Structural Funds should also commit to increasing the support they provide for investment in urban transport. Urban transport scores very highly on social, environmental, economic and value-for-money grounds. The balance of EU transport funding should better reflect this and 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.

Regarding Structural Funds for urban transport we note that, according to the European Parliament's recent report on the Urban Transport Action Plan, only 9% of the Structural Funding for transport is earmarked to urban transport. Also, only relatively small amounts of dedicated EU urban transport funding (such as CIVITAS Plus demonstration funding) currently exist. Urban transport scores very highly on social, environmental, economic and value-for-money grounds and is the best form of transport investment for furthering the Lisbon and Gothenburg agendas. The balance of EU transport funding should better reflect this. Furthermore, within the TEN-T the Commission should consider proposing a TEN-T urban priority to look at the urban aspects of TEN-T development and to encourage wider exchange and joint projects between the EU's cities.

On smart prices as traffic signals (4.6) we would agree with the principle of internalisation of external costs, as currently private road transport use is effectively subsidised through not having to cover its full environment, health, social and infrastructure costs. We would also agree that long-term infrastructure investment decisions should take into account the full costs to society of the resulting transport use and compare this with alternatives. We would agree with the Communication's initial assessment that the integration of external costs should be left to member-state level, and that EU legislation should not go beyond the latest Eurovignette Directive revision; however, we feel the EU does have a role in promoting the principle of internalisation to the member states by benchmarking, best-practice platforms and supporting technological development, but not imposing a uniform structure, either via legislation (such as in the Eurovignette Directive) or by making demand-management measures a pre-condition for funding.

The exclusion of urban areas from the scope of the Eurovignette is welcome and should be maintained in the long term. Cities have specific and intense problems regarding congestion and environmental damage and need to retain their current freedoms as regards regulatory charges.

Revenues raised from infrastructure and environmental charges should be earmarked for sustainable transport investment. We would like to avoid a situation where the earmarked revenues are used by member states simply to substitute existing sustainable transport funding: the revenues should always represent investment additional to existing funding.

The Communication asserts that public funding for socio-economic benefits of transport should be assessed through appraisal methods progressively harmonised at EU level (5.2) but no supporting argument is given for this assertion.

We support the inclusion of aviation in the EU Emissions Trading Scheme.

(3) Technology. Many technologies are being developed or are already available to improve the environmental performance of transport, increase safety and reduce

congestion and dependence on oil. What can the EU do to accelerate the development and deployment of these new technologies?

Environmental challenges (3.3) and increasing scarcity of fossil fuels (3.4) are of key importance, especially in urban areas in an increasingly urbanised EU, since that is where the impacts are most felt; in particular the link between any GDP growth and transport carbon emissions must be broken. R&D of emerging alternative technologies and roll-out of proven alternative technologies are an essential component. Emissions standards are important but need to be seen in conjunction with modal shift and more emphasis on collective transport independently of the fuel and technology used. The preamble to the communication notes that a key element of greenhouse gas emissions is “the amount of activity that generates the emissions”. It also notes that “gains in [energy] efficiency have not...been enough to outweigh the larger transport volumes” and that there has been “limited progress in shifting transport to more efficient modes”. There is a clear recognition here that modal shift has not happened enough to meet environmental goals. Yet in the specific section on environmental challenges (3.3) this aspect is not mentioned at all.

Any enhanced focus on ITS should be on applications that are clearly tailored to the needs of the transport user – be it companies or individuals – and have user accessibility built-in. ITS is key to achieving many of the EU objectives. There is a real need to better integrate passenger and freight transport needs, and vehicle and infrastructure developments (especially the consequences of changing fuel and environmental strategies) with demand management. Access to information through ITS is likely to be key to this. We feel this should be as much about innovative and accessible applications of existing technology (such as the French Bison Futé motorway information system) as about developing more high level technology (Galileo satellites). A focus on user needs from ITS – at the level of the individual company or passenger – is key. Accessibility needs to be built in from the outset so that ITS solutions are as comprehensible and accessible to as wide a range of users as possible; this is especially important in the context of demographic change and the ageing population. Accessibility here is two-fold: the technology itself needs to be accessible but it also needs to provide comprehensive information on accessible transport solutions. Accessibility also needs to take into consideration not only people with reduced mobility but also social exclusion factors (affordability and availability of technology, access of deprived areas to infrastructure, etc.)

On stimulating low-carbon technology (5.3) we would agree with many of the mainly general principles put forward. More specifically, we would point out that the two EU funds that currently exist to support such technologies have substantial problems. The R&D Framework Programmes (currently the 7<sup>th</sup> Framework Programme), which support R&D for emerging technologies, are unpredictable: CIVITAS is part of this programme, but is ring-fenced for cities of a certain size and does not recur annually; the remaining FP7 transport priorities change, sometimes quite radically, from year to year; this makes forward planning for funding bids particularly challenging. Intelligent Energy Europe, which funds uptake of proven technologies, is a more stable fund in that it has broad recurring annual priorities, but the budget dedicated to transport (under the STEER and ALTENER strands) is relatively small.

(4) Legislative framework. What can the EU do to further improve working conditions, health, safety and security standards in transport and the rights of passengers? In which sectors should market opening be pushed forward and how? What measures of a regulatory nature should be considered to reduce the transport sector’s environmental impact?

As urban transport authorities we can see a role for the Commission in providing a framework for carbon reduction, for the funding of research and good practice, for common and interoperable technological standards and for Trans-European Networks. At the same time, 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. Cities and city regions across Europe work within very different legal, organisational 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.

On opening up markets (5.4) we would question whether the impetus for this is effective transport delivery or the more ideological need for market consistency across the EU. Open markets require adequate regulatory powers across all modes; the regulatory concerns cited (environmental obligations, effective supervision, uniform protection of workers' conditions, users' rights and PRM concerns) are all appropriate, but a key concern not mentioned is coverage, quality, frequency and cost of service. The EU should provide a general regulatory and fiscal framework but it should not force national, regional and local authorities to liberalise or privatise.

As public transport authorities we believe that it is right that passengers are put first, and we fully support the principle of passenger rights, but in the spirit of proportionality to the duration and cost of the journey undertaken. We are concerned that the continuing EU agenda on passenger rights for various modes may well be appropriate for long distance services but is inappropriate for local services - so much so that it would prove very costly and difficult, and in some cases, impossible to apply and wholly unnecessary for low-cost, high frequency, turn-up-and-go services when a vehicle may be running behind its scheduled time but where frequencies and journey times are still being maintained for passengers.

While EU legislation on emissions standards and targets on biofuels uptake are important tools, an environmentally sustainable transport (4.3) will never be fully realised without privileging public transport use. Furthermore, many elements of sustainability, such as biodiversity, are equally impacted upon by transport land use as by transport emissions. We support a focus on introducing stricter standards on car manufacturers and on ratcheting up environmental specifications for new cars and light commercial vehicles. While 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.

Regarding the proposed follow-up to the EU Road Safety Action Plan, the Commission has limited competence in this area (vehicle safety and infrastructure on TEN-T only). Given this, and the greatly varying record on safety from one member state to another, the greatest impact the EU could have in this area would be intensive facilitation of best-practice sharing on public awareness, driver behaviour, infrastructure provision and management and police enforcement. The EU has a more useful legislative role in the effective enforcement of road traffic offences

which are an integral part of a road safety strategy. While efficient systems are generally in place for domestic offenders, enforcement against cross-border drivers is more problematic. We support action at a European level to establish a robust regime covering both the identification of offenders and the enforcement of penalties against them. Maintenance of transport assets and infrastructure is also key to safety.

On technical interoperability (5.6), we would agree that this is important for economies of scale, but that sufficient flexibility is needed for pre-existing systems and to take into account local specifics and need. However, the rationale for proposed EU harmonisation of rules (the example cited is on access to congested areas) is not backed up with any kind of argument and the value here is less clear.

(5) Behaviour. Sustainability of transport also depends on sound planning and on a change in transport habits. Are there measures that can be taken at EU level to improve accessibility and modify transport needs and behaviour?

Demographic change is a key factor affecting transport over the period of the next Common Transport Policy and beyond. Of the two issues identified here in the communication, ageing (3.1) is more important than migration and internal mobility (3.2), especially in terms of accessibility. However, accessibility goes beyond people with reduced mobility. Accessibility includes decent transport coverage to all areas, including deprived areas, where the poorest elderly live. Deprived areas often have lower private car ownership, greater health problems, a lower concentration of key services (such as health services) and shops, less employment or lower quality employment. Coverage, affordability and accessibility of public transport services in these areas, in ways that match their communities' needs, is essential. Migration will add to passenger and freight transport volumes generally and again many migrant groups may be concentrated in deprived areas.

On the issue of safety and security (4.1), policy that supports and incentivises public transport uptake at the expense of the car will have the greatest positive impact on safety. Personal security perceptions can prevent uptake of certain public transport, such as buses in certain areas at certain times of day, and needs to be better addressed. There is the potential for better knowledge sharing across the EU in this area.

Planning (4.7) should reduce the need to travel and is problematic when it fails to tackle low-density sprawl, is geographically piecemeal, and favours concentration of services and activities in areas not covered by existing (public) transport. Where possible, planning should privilege public transport needs over other concerns. 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. 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.

We would agree that teleworking and virtual services are still under-exploited, despite much of the technology being well-established; here, a cultural shift is needed among employers and service providers.

We agree that educating and informing public behaviour (5.5) is crucial, but would add that this needs to be done at the macro and micro level. The macro level would include: better informing of car owners of the full cost to society of their car use and how this is not covered in what they pay; better informing of the environmental and societal benefits as a whole of public transport use; informing the public that the continued provision of public transport depends on their patronage; better information on the transport implications of planning; informing businesses and other employers of the practicalities and benefits of teleworking. The micro level would include: transport plans for employers, individuals, residential building sites, etc. and individual transport planning services to demonstrate that viable public transport alternatives exist. The EU could conduct its own direct information campaigns in this area as well as funding innovative projects, supporting best practice exchange and encouraging debate in the member states.

(6) Coordinated action. Effective action requires coordination between different levels of government: what can the EU do to facilitate this process and avoid inconsistent approaches? Many of the challenges for transport will be in the urban environment: are there specific measures the EU could take to help local authorities?

We would support the particular emphasis in the communication on the urban governance challenges but note that, while the paper states there is no EU competence in urban transport, there are EU competences in related areas, such as sustainability. Overall we believe that EU transport policy should be based on sound environmental, economic and social principles that prioritise investment in integrated public transport networks in large urban areas.

At EU level, the Commission needs to 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.

EU transport policy and funding need to be shifted toward the urban areas where an increasing majority of citizens live (84% predicted for 2050). The health and quality of life costs of private transport are most keenly felt in cities in terms of loss of time in congested journeys, noise, pollution, accidents and barriers to social interaction. The urban sprawl issue identified by the Commission poses challenges in that it encourages private transport use and also means that city-region and transport authority boundaries do not always reflect where urban areas now end.

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 the UK, outside London, is unusual in Europe in that as public sector sub-regional public transport authorities we have had few powers over the main public transport mode (the bus). However, the UK Local Transport Act 2008 has given PTEs more options for greater control over bus services and we have welcomed this. A key priority should be to enshrine both the principle, and the legal framework, whereby the public sector is able to plan, specify and regulate the public transport network in support of wider city region environmental, economic and social inclusion objectives. Linked to greater powers over public transport networks is the need for sub-regional public

authorities to have greater scope to raise additional funding for transport through locally appropriate taxation mechanisms.

We 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 Commission could also champion low-carbon transport networks.

(7) The external dimension. The transport sector is increasingly becoming more international. Which actions in the transport sector can help to foster relations with our neighbouring countries and encourage sustainable growth there? What measures can help the EU industry and transport operators to thrive in the international context? How can the Union better contribute to sustainable global governance?

Among the global factors identified (3.6), a key issue is that more people and greater economic affluence mean more mobility and more transport.

If the EU wishes to remain at the forefront of providing transport services and technologies (4.4) it needs to be procuring and demonstrating these services and technologies to the maximum on its own territory. The proximity of such service and technology providers is an advantage for transport provision too.

#### EXTRA POINTS

For the most part, the communication is a statement of objectives rather than a detailed proposal for policy instruments. This brings the difficulty that, whereas we might support many of the principles set out in the paper, we would not necessarily support all of the resulting policy responses, which are as yet difficult to predict. This is not necessarily a problem, as long as there is a further opportunity for consultation on any resulting proposals. We would therefore request that a draft of the Common Transport Policy be put out to consultation, or at least that a more detailed consultation be published, before the policy proper is adopted.