

European Commission Communication
**“A sustainable future for transport: Towards an integrated, technology -led
and user friendly system”**
Submission from Transport for London

Introduction

Transport for London (TfL) is the integrated statutory body responsible for London's transport system. It came into existence in July 2000 as a result of the Greater London Authority Act 1999. It is a functional body of the Greater London Authority and reports to the Mayor of London. TfL's role is to implement the Mayor's Transport Strategy and to manage the transport operations for which the Mayor is responsible. The Act merged 14 predecessor entities into a single organisation able to take a holistic view of London's transport needs. London Underground became part of TfL in 2003.

TfL manages London's buses, trams, Underground services, the Docklands Light Railway, river services, licenses London's black cabs and mini cabs, is responsible for London's strategic highways including all of London's traffic signals, and promotes cycling and walking initiatives. In November 2007, TfL became responsible for the new London Overground suburban train services which operate on the north London rail network.

TfL's response to the Commission's stakeholder consultation on the 'Future of Transport'¹ in March 2009 outlined the main transport challenges facing European cities. This includes the growth of cities themselves, accessibility, modal shift, freight, improving the journey experience, and environment and climate change. This submission builds on that earlier paper and contains specific policy recommendations themed as follows:

1. Supporting population and employment growth
2. Modal shift
3. Climate change and the environment
4. An efficient transport system
5. Putting passengers first
6. Safer roads
7. Funding

1. Supporting Population and Employment Growth

If cities, as the Green Paper 'Towards a new culture for urban mobility'² points out, are powerhouses of Europe's economy then transport provides the connectivity and distributes the benefits. London has a population of around 7.6 million and some 4.7 million jobs. Its transport system caters for about 24 million

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http://ec.europa.eu/transport/strategies/doc/2009_future_of_transport/contributions/20090319_tfl.pdf

² Towards a new culture for urban mobility, COM(2007) 551 final

trips a day and a significant volume of UK freight movements. In spite of the current economic recession, around one million more people – and 750,000 more jobs – are expected to be accommodated in Greater London by 2031, in turn leading to at least three million more trips each day.

Whether cities are growing or not, they develop over time. It is vital that land use planning and transport strategies are complementary. Investment decisions on new health and education facilities for example should promote maximum accessibility for all and make best use of available capacity and connectivity of the transport system. Sustainable urban mobility plans have an important role in such decision-making. However, TfL does not support a mandatory requirement to produce such plans; rather the European Commission should encourage their adoption and highlight best practice.

Sustainable urban transport plans should be encouraged and underpinned by best practice

2. Modal Shift

Encouraging people to change from private cars to public and sustainable transport is one of the quickest and effective ways to reduce greenhouse gas emissions, improve air quality and reduce transport noise. Since 2000 the mode share of private motorised transport in London has fallen by around six per cent, levels of cycling have doubled and public transport use has risen dramatically, particularly buses which have experienced a 40 per cent increase in patronage. The programme of committed investment in public transport, cycling and walking in London, is expected to deliver a further four per cent reduction in car mode share, with substantial growth in cycling and rail-based public transport usage. However, the potential exists to achieve an even bigger shift through sustained investment, a value-for-money fares policy, an integrated approach to transport and land-use planning and better streetscapes to improve the journey experience and encourage walking and cycling.

Modal shift to sustainable, low carbon transportation should be the cornerstone of the 2010 Transport White Paper

TfL has pioneered the use of both persuasive and dissuasive policies to encourage modal shift. Since its introduction in February 2003 the central London Congestion Charge has consistently maintained a 25 per cent reduction in the number of vehicles driving in the zone. Revenue raised from the scheme is re-invested in transport, some £137m in 2007/8. As a result the central scheme continues to enjoy positive public support. Although the London Congestion Charge has been a success, its characteristics cannot be replicated in every city and in any case its success depends on being part of a package of measures which, amongst other things, should provide alternatives to car use. Geography, existing public transport patterns and cultural factors mean that cities need the freedom and flexibility to develop schemes which best meet their individual

circumstances. Nonetheless the European Commission can usefully promote best practice in the development of road pricing in cities.

Promotion of best practice in the design of urban road pricing systems

TfL has developed a suite of smarter travel initiatives to encourage modal shift by giving people access to public and sustainable transport options. This includes the widespread take-up of workplace travel plans (covering around 10 per cent of London's workforce and achieving over 10 per cent reduction in car use at those sites) and school travel plans (covering 71 per cent of London's schools and leading to reduced car use of over six per cent at those sites). A three-year, £5m area-based smarter travel initiative has been in place in the London Borough of Sutton in south west London since 2007. After two years it has achieved a 50 per cent increase in cycling, 13 per cent increase in bus patronage, 19 per cent reduction in car trips to school and a two per cent reduction in car mode share.

Promotion of best practice in the development of work and school travel plans to support modal shift

3. Climate Change and the Environment

3.1 Greenhouse gas emissions

The Mayor of London has set a specific target of reducing London's CO₂ emissions by 60 per cent (from 1990 levels) by 2025. CO₂ is London's dominant type of climate change emission and ground-based transport is a significant source accounting for around 22 per cent of overall emissions. Some degree of climate change is inevitable and TfL, together with other transport providers, will have to improve the resilience of transport systems to extreme weather.

Support for transport operators to improve the resilience of their networks to more extreme weather conditions

TfL believes substantial reductions in transport-related CO₂ emissions can be achieved through the mass market introduction of existing low-carbon technologies, particularly for road and rail. Technological hurdles to the decarbonisation of aviation and waterborne transport remain more challenging but the issue remains of relevance to cities where airports or waterways are close by. The question of the overall carbon footprint of airports must also be addressed. To achieve substantial CO₂ reductions, incentives must be in place to encourage take-up of low-carbon vehicles with discouragement for higher CO₂-emitting vehicles. The appropriate support infrastructure for alternative fuel sources, such as electric charging points and bio-fuels or hydrogen refuelling facilities, must also be provided. In London the Mayor is committed to the provision of a network of 25,000 charging points by 2015, with around 10 per cent in publicly accessible locations. The intention is for a fleet of 100,000 electric vehicles as soon as possible.

EU funding should be directed at large -scale low-carbon demonstration projects to help cities progressively decarbonise their motorised transport

With the development of new low -carbon transport in its infancy and pilot schemes / projects taking place across Europe, it is essential that standards are developed at a European level as soon as possible before large investment in infrastructure occurs. This is particularly important for the development of electric vehicles. The take-up of electric vehicles will be hampered unless standards for electric charging points are agreed. TfL, for example, would only be able to supply a limited number of different types of charge points to cope with the variety of systems on different vehicles before the system becomes unworkable. There is an urgent need to agree common standards for electric charging points to ensure a car from one member state can be taken to another. In addition electric car owners should be able to access electricity supplies in other member states, for example an 'international' electricity account so that citizens can be billed at home for electricity purchased from a distributor in another member state. Agreed Europe-wide interoperable systems are especially important for the future development of electric freight if they are able to operate at long distances including cross-border.

European standards covering power supply and charging facilities should be developed as soon as possible

More emphasis on market incentives is needed to support European leadership in low-carbon technology innovation. For example, the US has a clearly defined package of market incentives for electric cars. European countries need to develop similar packages to attract industry and products to the European market. Individual member states alone do not have the market size to be able to effectively compete with the likes of the US or China. The UK has committed £250m to support the electric car market. However, if this were spent alongside similar packages in France, Germany and other EU countries, the impact would be much greater.

Coordination of measures to incentivise electric vehicle production and take-up

As a result of electric road vehicles and electrification of rail networks, electricity is going to play an ever increasingly important role as a transport fuel. The CO₂ efficiency of transport will become more closely linked to the CO₂ efficiency of electricity production. The EU should recognise that the decarbonisation of electricity generation could go a long way to meeting transport renewable energy targets and push national governments into adopting stretching targets for decarbonisation of electricity supply. As electricity is decarbonised a further advantage should be an increased security of energy supply as a result of a decreased reliance on imported fossil fuels from politically volatile states.

Stretching targets for the progressive decarbonisation of electricity supply

Whilst much can be done at a local level to accelerate the take-up of low-carbon technology (for example, parking and road pricing incentives and the provision of support infrastructure such as electric vehicle charging points), the European Commission has an important role in regulating CO₂ vehicle emission standards. With standards for CO₂ from cars already agreed, TfL believes similar challenging targets should be set for vans and lorries. Furthermore international agreement is needed to tackle aviation and shipping emissions.

Challenging targets for van and lorry CO₂ emissions and speedy international agreement on emissions from shipping and aviation

In London a trial of LED traffic signals that reduce power consumption by around 60 per cent has been successfully undertaken with funding available to install similar signals at around 300 junctions (3,500 traffic signals). Current examples of emerging technology which may be applicable to street lighting include 'smart' management systems that can reduce unnecessary burning hours; lower power light sources; and innovative methods of energy generation. TfL intends to continue to develop best practice policies for low carbon transport.

Active promotion and dissemination of best practice in low carbon transport

Passenger numbers at London's airports are expected to grow by 60 per cent in the period to 2031. Efforts must be redoubled to tackle the environmental impacts of aviation if demand growth is to be met in a sustainable manner. This will require either a breakthrough in aviation efficiency or significantly lower than forecast growth.

Research, investment and regulation at a European level to improve aviation carbon efficiency

3.2 Air quality

Many of Europe's large cities face significant air quality problems, particularly in relation to Particulate Matter (PM) and oxides of nitrogen (NO_x) both NO and NO₂. Despite improvements in recent years London faces an enormous challenge to meet EU PM₁₀ limit values by 2011 in a small number of central London locations. The highest concentrations of PM₁₀ and NO₂ are found around busy roads, diesel railways and Heathrow airport. Indeed transport is responsible for over two thirds of PM₁₀ emissions in London and nearly half of NO₂ emissions.

Further action is needed to reduce emissions from private vehicles. More can be done to make car users aware of these emissions and TfL believes car retailers should include clear data on air quality emissions with greenhouse gas emissions

at the point of sale for new and used vehicles. Overall there needs to be a greater emphasis on the development of new technologies which 'green' vehicles such as harder-wearing tyres, more sophisticated abatement technology and automatic hybrid-switching.

Clear information on air quality and green house gas emissions should be available at the point of sale for all new and used vehicles and greater progress on 'greening' vehicles including improved tyres and abatement technology

EURO emissions standards need to be as stringent as possible to deliver real benefits in urban environments. In particular emission testing needs to reflect real-world driving conditions. Other measures to reduce CO₂ must not have negative consequences on air quality and local air pollutants should be considered holistically. Consideration should be given as to whether EURO emission standards can also incorporate CO₂.

Stringent EURO standards that deliver under real-world conditions and consideration for incorporating CO₂

London's Low Emission Zone has been effective in accelerating the replacement cycle of lorries and coaches for cleaner vehicles³. Other cities have adopted various forms of low emission or green zones, whether through pedestrianisation, restricted access (including those covering vehicular emissions), quiet zones, speed limits and urban charging schemes. London is an example of a city adopting a variety of such measures within a single city to suit local contexts and acceptability/practicality factors.

The number of green zones schemes is growing and TfL recognises this can present a problem for vehicles moving between zones. Given the importance of local decision-making, an attempt to prescribe certain solutions or templates at a European level would be unhelpful. Rather, the European Commission should encourage cities and regions to base their zones on agreed European norms, for example, EURO emission standards. ITS can potentially play an important part in alerting drivers to the existence of a zone and provide a mechanism for payment where appropriate through satellite navigation systems and mobile phone technology. This is particularly important for road hauliers who are most likely to cross borders. Interoperable information and charging systems for low emission / green zones should be a priority. Finally European standards and certification for emission abatement equipment should be developed.

³ Prior to the introduction of phase one of the scheme in February 2008 covering heavy lorries over 12t only 70 per cent of vehicles met the required emission standard. That figure now stands at 96 per cent

Cities and regions should be encouraged to base low emission / green zones on EURO standards ; ITS solutions should be fostered to provide information and payment options for schemes ; standards and certification for abatement equipment should be developed

3.3 Noise

Alongside measures to reduce greenhouse gas emissions and improve air quality, TfL believes the European Commission should develop and promote 'quiet vehicle' standards. The initial priority is to expedite new, tighter noise standards for all vehicles and tyres. The Commission should also, wherever possible, identify 'next generation' noise reduction techniques to incentivise their development and support "quiet vehicle" standards in the most sensitive locations, an example being super-quiet lorry standards for essential night deliveries. Tackling noise from vehicles is made more difficult by the lack of agreed criteria for cities to follow, unlike EURO standards for emissions. As a result cities have only a limited range of policy options.

Development of noise standards for all vehicle classes including freight vehicles based on a system similar to EURO emission standards

Aircraft noise is a problem in many cities and particularly in London. Given the expected growth in aircraft over the next ten years, in addition to measures to tackle CO₂ and other emissions from aircraft, further progress is needed in developing quieter aircraft.

Support through research and other EU funding to encourage the development and use of quieter aircraft

4. An Efficient Transport System

4.1 Interoperable rail systems

Since the 2001 Transport White Paper progress has been made in improving the interoperability of Europe's railways to create a single market. Removing technical barriers to equipment supply and the operation of continuous services between member states have important benefits to passengers. However, requirements for standardisation and interoperability should not be excessive and should recognise that some systems will always have operating requirements that make them unsuitable for standardised products. Standardisation and interoperability should be market-led; the EU should encourage operators and suppliers to cooperate to design and deliver products that permit more efficient and cost-effective operations (with economies of scale) and act to facilitate this process, rather than imposing rules for interoperability on a top-down basis.

A clear distinction must be made between national and urban / suburban rail systems. The latter serve travel markets that are based almost exclusively within the cities where they operate. They do not run any services between EU member states and are extremely unlikely to do so in future because of the nature of the

markets they serve and the physical segregation of their networks. Examples of such urban rail transport systems in London include London Underground and Crossrail (a new east-west railway currently under construction). Such systems should have automatic derogation from wider rules relating to interoperability which are not relevant because of the nature of their operations and the distinct local markets they serve. Where standardisation can be of benefit is in the supply of technical equipment. TfL supports the current discussions on the Urban Rail Platform which are market-led and fully involve suppliers, operators and transport authorities.

More generally TfL commends the UK's Project Appraisal methods. These are well-rounded and would provide a good standard around which Europe could harmonise given that they are well regarded.

In developing an interoperable European rail market, a clear distinction should be made for urban and suburban rail systems which do not operate cross-border and which by definition are local in nature. Extending the requirements of national railways to such systems would impose disproportionate costs

4.2 Integrated travel information and ticketing

TfL believes ITS will play an important part in the future of travel information, particularly personalised information, whether via websites, mobile telephone or journey planning services or satellite navigation systems designed for walking trips. The potential for improved services is great.

Interoperability is clearly a key consideration, but so too is the investment public authorities and others have made in existing systems. The new Transport White Paper should recognise interoperability will require considerable investment, especially for those cities that have already invested in ITS systems of their own design and which will need to be re-engineered to meet new standards. These cities should be given time to reap the benefits foreseen in the business cases for their original investments. Further, parochialism is always a threat. Development of interoperable systems must be customer-led and where other industries – notably the mobile telecommunications industry – have already created effective, successful interoperable standards for information services that are popular with customers these should be used in preference to developing new ITS-specific standards for the same purposes.

Ticketing systems present a particular ITS challenge. The ticketing policies and systems used in individual cities within Europe have over many decades evolved to form a highly diverse mix. Cities differ from each other in the technology they use, in the prices they charge and in the products they offer for urban travel. Some cities – notably New York – are actively discarding the pre-purchased ticketing model and embracing direct payment as a faster, simpler fare collection model for citizens. This change is based upon the realisation that the payments

industry already provides interoperable standards that span national boundaries and can be used for urban transport fare collection without the need for any further development. TfL is actively researching this concept and believes that moving to a fare collection system based on payment industry standards and protocols (primarily provided by Visa and MasterCard) has the potential to reduce the cost of service provision while making it faster and simpler for citizens to pay for transport. Importantly, these products are already widely available to European citizens and to transport operators and authorities across the continent – hence, their use would quickly achieve interoperability for urban transport across the EU. Adopting this approach would also avoid the need for the expensive development of entirely new technical standards and interfaces solely for use by the transport industry.

In progressing interoperability of ITS systems, recognition of the investment already made by cities must be considered and maximum use must be made of existing, successful standards wherever these can be found

4.3 Freight

In London freight makes up about 17 per cent of road vehicles and is forecast to grow by 15 per cent by 2025. Put into context, a 10 per cent increase in freight mileage is more than all bus mileage in London. This growth will increase congestion and servicing costs. Road freight already accounts for 23 per cent of London's CO₂ emissions from transport. Without measures to encourage more sustainable distribution, the growth in freight will lead to more CO₂ emissions and more noise. As mentioned already in this submission TfL supports the development of 'quiet vehicle' standards for freight vehicles.

TfL's experience suggests there is a balance between high and low-tech solutions for freight activity. TfL has pioneered the use of Delivery and Servicing Plans and Construction Logistics Plans as part of a sustainable strategy for urban mobility covering all users and modes. These plans are based on how businesses procure goods and services and are aligned to benchmarking performance tools such as London's Freight Operator Recognition Scheme which aims to increase operational efficiency, reduce CO₂ emissions, contribute to lower congestion, lower the risk of potential collisions and reduce freight operator costs. The Plans themselves are flexible and can range from a single street to a broad framework covering a large scale redevelopment area. However individual elements of these plans could be made substantially more robust by common technology standards for detailed street mapping such as delivery bay locations with data provided by cities. They would also benefit from future technology platforms such as those proposed by projects such as the Cooperative Vehicle Information Systems (CVIS) which is being used for booking freight delivery space.

Working with cities and the freight industry, the European Commission should facilitate the development of common technology standards for detailed street mapping systems

5. Putting Passengers First

5.1 Transport for all

TfL is committed to providing a transport system accessible to all users. All of London's buses have low floors and ramps and London Tramlink and the Docklands Light Railway are fully accessible. Currently 53 out of 269 London Underground stations have step-free access with a further 20 stations scheduled to be step-free by 2010. However, providing step-free access in a metro system, parts of which are 150 years old, is a difficult and expensive process. Whilst full accessibility remains the ultimate goal, any European requirements on accessibility must recognise the difficulty in adapting fixed infrastructure built many years ago, such as metro systems, to standards applied to new build.

Requirements on accessibility take into account the historical legacy faced by metro and rail operators

5.2 Passenger rights

TfL aims to deliver a high level of service to all its passengers by providing a safe, reliable, welcoming and value-for-money service at all times. This principle is enshrined in passenger charters which cover all the transport modes for which TfL is responsible. TfL notes the European Commission's intention to move towards uniform rights. Whilst agreed minimum rights for long distance travel, particularly where services cross national frontiers, may seem sensible, imposing uniformity on urban transport systems is problematic. Urban transport is characterised by high-frequency services, many of which are congested at peak periods, and widely differing levels of infrastructure development. Workable, harmonised standards are likely to be set at the lowest common denominator. TfL favours the encouragement of comprehensive passenger charters by urban transport operators which set out rights and responsibilities of users at the highest practical level for each locality concerned.

Rather than legislative harmonisation, urban transport providers should be encouraged to develop comprehensive passenger charters

5.3 Security

The security of passengers on London's transport system is of paramount importance to TfL. Mindful of the right to privacy and data protection requirements, TfL uses a number of surveillance technologies including CCTV to help ensure the security of passengers. CCTV has also been a useful tool in reducing crime, aiding detection and making passengers feel safer. Any changes to the existing data protection regime must be balanced against the benefits in terms of perceived and real security that surveillance technologies can provide.

Rules on data protection and privacy are balanced against the benefits of security surveillance technologies can bring to passengers

6. Safer Roads

6.1 Pedestrian-friendly vehicles

In 2008 204 people were killed on London's roads, 94 of whom were pedestrians. Further progress on designing pedestrian -friendly vehicles must be a priority. If better vehicle design could halve pedestrian deaths, then every year nearly 50 people in London would not lose their lives.

Improved vehicle standards which improve pedestrian safety in the event of a collision

6.2 Driver distraction

The development of pedestrian -friendly vehicles is an important step towards improving road safety but it is not the only practical step. Technology such as in-vehicle information systems can contribute to a safe and efficient traffic flow but it can also have negative effects on road safety due to driver distraction. This may be particularly relevant in large urban areas where the road network is complex, traffic volumes are high, and different road users are sharing the streets. TfL would like to see standards for in-vehicle information system design and installation which contribute to road safety. Non -distracting products could help ensure this type of technology plays an important part in road safety in the future.

EU standards for in-vehicle information systems to minimise driver distraction

TfL has digitally mapped London's roads and is piloting Intelligent Speed Adaptation (ISA)⁴ technology. Current research suggests the implementation of "voluntary" ISA would ensure compliance with the local speed limit in every vehicle and could reduce the number of collisions resulting in injury by around 10 per cent and fatal collisions by around 20 per cent. TfL believes the European Commission should encourage the take-up of such devices. The fitting of ISA to company vehicles would reduce the disproportionate number of those driving for business reasons being injured. More generally it would reduce stress levels and improve concentration, further improving road safety.

Promotion of Intelligent Speed Adaptation in corporate fleets, including freight, passenger transport and company cars and vans and the development of standards which allow technology such as ISA to function across member state borders

⁴ Intelligent Speed Adaptation is a general term for Intelligent Transport Systems that serve to limit the speed of a vehicle (for example restricting the vehicle to the posted speed limit).

6.3 Access to casualty databases

TfL carries out casualty and collision monitoring across London together with research on road safety issues. It shares these findings with other transport professionals, both in London and across Europe whenever it is able to do so, but would like to learn more from other large cities. It would be helpful if the CARE database (Community database on Accidents on the Roads in Europe) ⁵ was improved and developed to encourage more uniformity across Europe. This would then permit valid comparisons of casualty and collision data between metropolitan areas. It could be a powerful tool for exchanging information and expertise among transport professionals.

Improvement of the CARE database to encourage uniformity and better access for responsible authorities

6.4 Cross-border enforcement

A fair and equitable enforcement system for road traffic offences is an essential part of road safety regimes. If drivers believe they will not be censured for infringements they are less likely to comply. While such a system works well in most member states for their own residents, the system is much less effective where foreign registered vehicles are concerned. The problem of identifying and then enforcing penalties against such vehicles, especially where automatic systems like cameras are involved, means that many of these offences go unpunished.

TfL believes the European Commission's draft directive facilitating cross-border enforcement in the field of road safety ⁶ is an important first step in tackling the problem of foreign-registered vehicles evading road traffic penalties. The amendments from the European Parliament in its First Reading ⁷ build on the Commission's proposal for an electronic data exchange network to identify vehicle owners by establishing an effective enforcement apparatus in the event of non-compliance. In the longer term TfL would like to see the scope of the directive extended beyond the existing four road-safety related offences to all road traffic offences. As cities experiment with road pricing and green / low emission zones, compliance by all road vehicles is important if such schemes are not to be undermined.

⁵ http://ec.europa.eu/transport/roadsafety/road_safety_observatory/care_en.htm

⁶ 2008/0062 (COD) Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL facilitating cross-border enforcement in the field of road safety

⁷ European Parliament legislative resolution of 17 December 2008 on the proposal for a directive of the European Parliament and of the Council facilitating cross-border enforcement in the field of road safety (COM(2008)0151 – C6-0149/2008 – 2008/0062(COD))

Early agreement on the existing cross-border enforcement directive with a longer term aim of a fully enforceable system for all road traffic offences across the EU

Road safety must remain a top priority for all cities. A commitment to a new Road Safety Action Plan beyond 2010 would be welcome

7. Funding

Meeting the growth in demand for urban public transport from increasing populations and modal shift from private cars will require considerable investment in new infrastructure and the modernisation of ageing assets. TfL alone is currently funding a multi-billion pound investment programme in London's public transport system.

7.1 European Investment Bank

TfL welcomes the support given to cities by the European Investment Bank (EIB) for transport investment. Further development of funding streams for rolling stock leasing and equity / mezzanine financing, not just senior debt would be important additions to the EIB's portfolio. Similarly cities would benefit from a willingness by the EIB to fund smaller transactions rather than those costing hundreds of millions at present.

Expansion of EIB funding products

7.2 CIVITAS

CIVITAS has been an important contributor to the development of best practice in integrated, sustainable urban transport strategies. As the programme develops, TfL would welcome the small and medium-sized city criteria being lifted so that successor CIVITAS projects are open to all cities.

CIVITAS open to all cities

7.3 An urban TEN-T funding stream

The Trans-European Transport Network (TEN-T) has been successful in helping fund a large number of pan-European transport projects, interconnecting national networks and overcoming technological barriers. What is sometimes forgotten is that many of the trips carried out on the network begin and end in urban areas yet there has been minimal investment from community sources in developing these interchanges. With over 60 per cent of the EU's population living in urban areas⁸, investment in these trip start and end points should be considered in association with the TEN-Ts themselves. High quality, efficient interchanges can promote sustainable transport for the length of a trip and thus support policies on modal shift. In a step up from the INTERREG programme for regional projects,

⁸ Towards a new culture for urban mobility, COM(2007) 551 final

TfL would like to see dedicated EU funding for urban transport hubs connecting to the TEN-Ts.

Dedicated EU funding for urban links to the TEN-Ts

7.4 Demonstration projects in EU research

TfL remains a committed partner in EU research projects furthering the development of innovative solutions to urban mobility. While there will always be a place for theoretical projects testing concepts, the new Transport White Paper is an opportunity to re-orient research policy to one where projects have a much higher visibility amongst citizens. There needs to be greater emphasis on large scale demonstration projects in participating cities to give innovative projects, particularly those concerning climate change and electric vehicles already mentioned in this submission, a head start.

Greater emphasis on demonstration projects in EU research funding
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Conclusion

The next Transport White Paper must be fully integrated with policies tackling climate change and promoting growth and jobs. Many of the challenges facing Europe cannot be addressed without action by city and regional authorities. The White Paper must reflect their importance and closely involve them in the development of policy. This does not mean widening the scope of existing legislation, as often this will not work in an urban context. Rather it means developing new approaches and new solutions which are flexible enough to cope with the great diversity of European cities, and the lives of the people who live and work in them.

Many of Europe's cities are adopting innovative solutions to tackle problems such as congestion and pollution. While action at a European level can be helpful, as the recommendations in this submission highlight, cities must have the freedom and flexibility to develop policies which best meet their individual challenges. Imposing top down solutions and adopting a one-size-fits-all approach will be counterproductive.

The White Paper should act as an enabler, to help cities achieve modal shift and to help cities innovate. Although Europe's cities have individual challenges, they have much in common and much to learn from each other. The White Paper's aim must be to promote world-class best practice and innovation in Europe's transport policy.

Peter Hendy
Commissioner, Transport for London

September 2009

Annex: Recommendations

1. Sustainable urban transport plans should be encouraged and underpinned by best practice.
2. Modal shift to sustainable, low carbon transportation should be the cornerstone of the 2010 Transport White Paper
3. Promotion of best practice in the design of urban road pricing systems.
4. Promotion of best practice in the development of work and school travel plans to support modal shift.
5. Support for transport operators to improve the resilience of their networks to more extreme weather conditions.
6. EU funding should be directed at large scale low carbon demonstration projects to help cities progressively decarbonise their motorised transport.
7. European standards covering power supply and charging facilities should be developed as soon as possible.
8. Coordination of measures to incentivise electric vehicle production and take-up.
9. Stretching targets for the decarbonisation of electricity supply .
10. Challenging targets for van and lorry CO₂ emissions and speedy international agreement on emissions from shipping and aviation.
11. Active promotion and dissemination of best practice in low carbon transport.
12. Research, investment and regulation at a European level to improve aviation carbon efficiency.
13. Clear information on air quality and green house gas emissions should be available at the point of sale for all new and used vehicles and greater progress on 'greening' vehicles including improved tyres and abatement technology.
14. Stringent EURO standards that deliver under real -world conditions and consideration for incorporating CO₂.
15. Cities and regions should be encouraged to base low emission / green zones on EURO standards; ITS solutions should be fostered to provide

information and payment options for schemes; standards and certification for abatement equipment should be developed.

16. Development of noise standards for all vehicle classes including freight vehicles based on a system similar to EURO emission standards.
17. Support through research and other EU funding to encourage the development and use of quieter aircraft.
18. In developing an interoperable European rail market, a clear distinction should be made for urban and suburban rail systems which do not operate cross-border and which by definition are local in nature. Extending the requirements of national railways to such systems would impose disproportionate costs.
19. In progressing interoperability of ITS systems, recognition of the investment already made by cities must be considered and maximum use must be made of existing, successful standards wherever these can be found.
20. Working with cities and the freight industry, the European Commission should facilitate the development of common technology standards for detailed street mapping systems.
21. Requirements on accessibility take into account the historical legacy faced by metro and rail operators.
22. Rather than legislative harmonisation, urban transport providers should be encouraged to develop comprehensive passenger charters.
23. Rules on data protection and privacy are balanced against the benefits of security surveillance technologies can bring to passengers.
24. Improved vehicle standards which improve pedestrian safety in the event of a collision.
25. EU standards for in-vehicle information systems to minimise driver distraction.
26. Promotion of Intelligent Speed Adaptation in corporate fleets, including freight, passenger transport and company cars and vans and the development of standards which allow technology such as ISA to function across member state borders.
27. Improvement of the CARE database to encourage more uniformity and better access for responsible authorities.

28. Early agreement on the existing cross -border enforcement directive with a longer term aim of a fully enforceable system for all road traffic offences across the EU.
29. Road safety must remain a top priority for all cities. A commitment to a new Road Safety Action Plan beyond 2010 would be welcome.
30. Expansion of EIB funding products.
31. CIVITAS open to all cities.
32. Dedicated EU funding for urban links to the TEN -Ts.
33. Greater emphasis on demonstration projects in EU research funding.