



**SUMMARY REPORT ON THE CONSULTATION
OF THE SUBSIDIARITY MONITORING
NETWORK ON THE ACTION PLAN ON URBAN
MOBILITY**

COM (2009) 490 final

COTER-IV-030

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<http://subsidiarity.cor.europa.eu>

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This report does not aim to reproduce all the contributions to the Subsidiarity Monitoring Network, but rather to synthesize the main elements. The information it contains is purely for illustration purposes. . It is not binding on the CoR administration and does not prejudice the final content of the relevant CoR opinion.

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The consultation of the CoR Subsidiarity Monitoring Network on the European Commission Communication on an Action Plan for Urban Mobility ran from 16 November 2009 to 8 January 2010 on the basis of a tailored questionnaire submitted to the network partners. A total of 14 responses were collected from 12 network partners representing the situation in 11 Member States¹.

Analytical overview of the contributions received

1. Subsidiarity and Proportionality

Respondents agree that **mobility in towns, cities and metropolitan areas is primarily a local and regional issue**. As a result, solutions to possible problems require responses tailored to the particular local and regional circumstances (i.e. metropolitan areas, remote insular areas etc). Nevertheless, **respondents see a role for the EU** in encouraging and supporting national, local or regional initiatives to achieve sustainable mobility within urban and peri-urban areas.

The action plan is generally **considered to be in line with the subsidiarity principle**, in the sense that respondents see a certain value-added for EU level support for national, regional or local initiatives and projects. There is general recognition that a lot can be gained from working together at the EU level through a partnership of local, regional and national authorities, provided that their respective remits and responsibilities are respected. Only one respondent argues that the subsidiarity principle should limit the EU's role in transport to cases with cross-border implications. However, the same respondent does not oppose the EU assuming a role that would encourage experience sharing or urban mobility studies. Finally, one contributor suggests that passenger rights in urban transport should be regulated at the national and not at the EU level. Another respondent questions the added value of some lines of action.

Respondents would like to see the EU taking up a role that would foster behaviour change in citizens, business and operators alike². This would include facilitating experience and best practice sharing by setting up networks and platforms; encouraging research in clean energy efficient transport technologies and ICT; and providing the necessary funding and incentives for new and efficient infrastructures, equipment and innovative projects. Within this framework the European Commission would be primarily responsible for coordination and setting guidelines.

Two respondents go further. One suggests that the EU could set energy consumption targets per transport unit and could encourage local and regional legislation on mobility. The other argues in favour of the EU adopting a standard-setting function by proposing a non-prescriptive "toolbox" of regulatory solutions for local implementation. Cities could then pick from the "toolbox" options that best suit their particular circumstances. It is argued that this would have the added value of achieving a minimum level of homogeneity in the regulatory measures implemented on the ground.

¹ For a list of the partners and their contributions see the Annex. The German Association of Cities also took part in this consultation and the response submitted on their behalf is taken into consideration in this report.

² One respondent refers to this as a "bottom-up" approach.

With regard to the proportionality principle, most responses concur that **the actions contemplated by the European Commission do not go beyond what is necessary** to achieve the objective of a sustainable urban mobility culture in the EU. However, a number of respondents highlight the need for adequate funding as a means to implement the actions. Within this context, one respondent questions the cost-effectiveness of the proposed actions, in particular the establishment of award schemes and the proposal to set up an urban mobility observatory.

2. Links with other EU policies

Respondents were asked to identify synergies between the proposed lines of action and other sectoral EU policies, in particular economic, social and territorial cohesion as well as environmental and climate change policies.

Most respondents seem to concur that activities along the lines contemplated, and especially sustainable urban mobility plans, would constitute a **good basis for an integrated approach in the coherent development of policies in the urban sphere**. In particular, it is acknowledged that sustainable and environment friendly urban mobility would help to improve living conditions in towns and cities and would contribute to economic, social and territorial cohesion, essentially by strengthening sustainable urban development, competitiveness, a healthy environment, cost-saving technological innovations and improved access to all urban infrastructures and urban activity spaces. Some respondents, however, underline that for optimum impact, action on urban mobility must be coupled with effective urban and territorial planning and, most importantly, efforts to avoid urban sprawl.

Asked whether **the action plan can contribute to the attainment of the EU's climate change objectives**, especially by helping to reduce emissions in cities and urban areas, the majority of contributors offer a positive response. Urban transport is identified as a priority for fighting climate change. Respondents put forward a mix of locally applicable measures. These include reducing emissions at source (private cars), further investment in clean transport and propulsion technologies as well as a modal shift towards more sustainable mobility practices. It is also suggested that indicators developed by updating data and statistics and through the proposed urban mobility observatory could contribute to achieving these goals. Attention should, in any case, also be paid to ensuring consistency between urban mobility measures and the EU's air quality objectives, which go beyond CO₂ emissions.

Most respondents agree that the **Sustainable Energy Plans under the Covenant of Mayors** would be more comprehensive if they also covered urban mobility. This would improve the effectiveness of the fight against climate change. However, some suggest that such a decision should be left to towns and cities, so as to take account of particular circumstances.

3. Additional action needed

Respondents were asked to identify additional or other lines of action to be included in the implementation of the action plan. The need for initiatives to foster behaviour change has been underlined, such as encouraging efficient and energy-efficient driving through driving education and through other measures. Respondents point out that a modal shift towards more sustainable urban transport would have a positive effect on congestion and therefore mention sustainable transport modes (public transport, walking, cycling, inland waterways etc), initiatives to incentivise and promote public transport, fiscal and other incentives for the use and installation of environment friendly transport technologies and a better way to tackle urban freight and logistics. In addition, a number of contributors argue that urban and territorial planning is closely linked to sustainable urban mobility since effective planning can be instrumental in reducing unnecessary transport demands and achieving a modal shift. One respondent suggests setting up a panel of experts to study regional and urban planning and its effect on mobility. Finally, some responses point to the fact that citizens and stakeholders in general should be more involved in the action plan's implementation.

Most respondents would support the **establishment of a specific financial instrument to encourage urban and metropolitan areas to take up integrated urban mobility plans** and propose conditions for allocating funds, i.e. setting specific objectives (e.g. modal shift), attainment indicators, and publishing the outcomes delivered by implementing the plans. It is also pointed out that managing a new fund and assessing its conditions should not give rise to additional bureaucracy for local and regional authorities. Finally, it is worth noting that responses consistently highlight the need to provide funds to implement initiatives under the action plan included in the cities' urban mobility plans.

Respondents recognise the value of an **award scheme for cities with low pollution and congestion levels** in raising awareness, setting urban mobility high on the political agenda, and for marketing purposes. It is also seen as an incentive to implement specific measures and indicators. Nevertheless, some point to the difficulty involved in the uniform implementation of such a scheme, since the different circumstances affecting pollution in different urban areas are not necessarily linked to transport. One respondent also argues that an award scheme risked stigmatising deprived areas and could therefore hamper potential urban regeneration initiatives.

Asked to identify their implementation **priorities** for measures under the action plan, respondents provide a range of answers. Securing adequate funding ranks high among the priorities cited, but so do actions to promote the uptake of clean technologies and vehicles; to improve reduced mobility access; and to promote a clean sustainable environment. The need to raise awareness and provide incentives that could lead to behaviour change is also mentioned. Some respondents mention applying the "polluter pays" principle, for instance, through the internalisation of external costs. Others highlight upgrading data and statistics as a priority, which would also facilitate research in urban mobility.

4. Best practices

A number of implemented or planned urban projects already follow the direction set by the action plan and could therefore be defined as examples of "best practice"³. Respondents cited a variety of local and regional instruments, including sustainable mobility solutions. Examples include urban mobility plans in Toulouse, Barcelona, the Canary islands, Austrian and German cities, city contracts in Flanders and programming agreements for improving air quality in the Emilia Romagna region. A number of respondents have already set up technical solutions to optimise public transport and improve travel information, while other respondents cite solutions that optimise urban freight transport. Some of the examples cited have been developed and implemented under existing initiatives, such as CIVITAS.

5. Better regulation

Respondents appear divided in their evaluation of the Impact Assessment presented by the European Commission, especially with regard to whether aspects particular to local and regional authorities have been taken into account. One respondent mentions the difficulty involved in assessing local and regional impacts, while another suggests that cities and metropolitan areas participating in the current action plan's implementation could take part in its review in 2012. It is also suggested that data and statistics collected through the proposed urban mobility observatory might prove useful in this regard. In a broader context, another respondent highlights the necessity of involving citizens and their representative association in the definition and implementation of urban mobility policies.

Finally, most of the respondents agreed that implementing the action plan would imply an increase in the local authorities' financial and/or administrative costs. In this regard, respondents once more highlighted the need for adequate funding. However, some considered that efficiencies gained by optimising transport and reducing negative health and environmental impacts would serve to recoup some of these costs.

³ Since these examples cut across most of the proposed actions they cannot, for the sake of brevity, be described at length. However, details are provided in the individual contributions appended to this report.

APPENDIX – Contributions received in the course of the consultation⁴

A total of 14 responses were collected on behalf of 12 network partners representing the situation in 11 Member States. Contributions were received from the following partners:

- Flemish Government (BE)
- Municipality of Sofia (BG)
- Bavarian Government (DE)
- French Senate (FR)
- Catalan Parliament (ES)
- Extremadura Assembly (ES)
- Government of Canary Islands (ES)
- Legislative Assembly of the Region of Emilia Romagna (IT)
- Municipality of Budapest (HU)
- Austrian State Governors' Conference (AT)
- City of Lodz (PL)
- Eurocities – with individual contributions from the cities of Brno (CZ), Toulouse (FR), and Utrecht (NL) all Eurocities members.

The Bavarian Government also forwarded a decision of the German Bundesrat on the Urban Mobility Action Plan, which has been published on the Subsidiarity Monitoring Network website. Additionally, the German Association of Cities took part in this consultation and the reply submitted on their behalf is taken into consideration for the purpose of the present report.

⁴ Contributions are annexed in English.

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
COTER Commission and "Networks & Subsidiarity" Unit



QUESTIONNAIRE ON THE ACTION PLAN ON URBAN MOBILITY
COM (2009) 490 final

Submitted for consultation of the Subsidiarity Monitoring Network
by Sir Albert Bore (UK/PSE)

Please complete and submit by **Friday 8 January 2010**. You can upload the completed questionnaires directly on the Subsidiarity Monitoring Network webpage (<http://subsidiarity.cor.europa.eu> – remember to be logged in). Alternatively, you can send them by email to subsidiarity@cor.europa.eu.

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Contact person:	
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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas⁵. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

⁵ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:

1. *Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?*

If possible, provide reasons for your answer.

The European Union could take on **three separate roles**:

1. Policy-making and regulation

Achieving sustainable urban mobility in the EU will require an integrated policy. To this end, the EU should establish a framework within which each Member State can pursue an integrated and sustainable urban policy. The Urban Mobility Action Plan provides such a framework, although it is unclear whether the proposed measures will really be able to establish a new urban mobility *culture*.

Cooperation between local, regional and national governments is also of the utmost importance, and the EU can encourage this; it must not, however, restrict local autonomy, as sustainable mobility must always be tailored to the town or municipality's needs.

In concrete terms, the EU could establish targets for energy consumption per transport unit (e.g. per passenger or per 100 kg transported). It could also, through local/regional governments, encourage legislation that results in:

- the continued use of
 - o polluting vehicles and vessels; and/or
 - o small order sizes being penalised;
- the use of
 - o environmentally friendly/energy-efficient vehicles and vessels; and/or
 - o intermodality/comodality; and/or
 - o consolidation (grouping various types of goods together) not being penalised, and therefore gaining a bonus.

Another example is including environmentally friendly (clean) driving as a *compulsory* part of driving lessons (see action 9).

2. Facilitation

The European Union can take on this role by (a) gathering and (b) exchanging knowledge and best practices.

The EU also has an important role to play in terms of awareness-raising (the 'mental shift') and exchange of information, by organising awareness-raising campaigns and promoting the transfer of knowledge (for example bringing together experts and policy makers in forums on operational and strategic matters). All the information/knowledge relating to certain measures should be collected on a single website.

3. Funding

The European Union can fulfil this role (a) by providing financial support and stimuli (e.g. to flagship cities), (b) within a transparent framework that provides for high-quality supportive monitoring (not just a financial audit but perhaps also an audit of the substantive content, with the aid of an evaluation committee) and (c) without imposing an excessive additional administrative burden.

The European Commission can provide financial support for innovative projects relating to sustainable transport and sustainable/multimodal nodes (research and pilot projects). Financial stimuli will be needed in order to launch e.g. test projects relating to low-energy inland waterway vessels and intermodal terminals. Local governments also need to be made more aware of the current European funding options.

2. *Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?*

If possible, provide reasons for your answer.

The proposed actions are useful for achieving the aforementioned objective. These actions will doubtless help to achieve more sustainable urban mobility in the EU and are therefore to be encouraged, but more will probably need to be done in order to bring about changes in urban mobility *culture*.

Alongside this *general* observation, we would make the following 5 brief comments on the Action Plan:

1. First and foremost, it is not clear how **the effectiveness of the proposed actions** will be determined and quantified. In order to be able to quantify the impact of the proposed actions, it is important to have access to (a) a baseline and (b) indicators to be measured. It is also important for the effects of an action (for example in terms of air quality, noise, health, etc.) to be comparable. To achieve this, it is necessary to monitor the local and regional situation closely by means of environmental indicators and, in each case, to indicate which specific factors affect the effectiveness of an action.

2. There is, regrettably, no mention of the **involvement of citizens** in working towards sustainable mobility, despite the fact that vulnerable groups such as children, the elderly, the disabled and so on can use their experience to make a very valuable contribution to practical projects.

3. The Action Plan does not include enough actions specifically focusing on the urban transport of the future, in particular **public transport** and **cycling**; it also does not give **pedestrians** the attention they merit.

4. The proposed actions can only help to improve territorial cohesion if they are implemented everywhere at the same time and are also implemented as part of an **integrated urban policy**.

5. It is, of course, also necessary to **pay specific attention to smaller towns**, which often have fewer administrative resources to devote to the structural funds.

In addition to these comments, we have the following *specific comments* regarding the actions proposed in the Action Plan:

- Regarding **action 10 – research and demonstration projects for lower and zero emission vehicles** – we welcome the attention being paid to electromobility, but other innovative technologies and experiments (such as biogas, etc.) must not be neglected;
- Regarding **action 11 – Internet guide on clean and energy-efficient vehicles** – the current action plan focuses primarily on CO₂ emissions with a view to obtaining an ecolabel. A 'real' ecolabel should also take account of particulate matter and NO_x;
- Regarding **action 14 –optimising existing funding sources** – it is not clear how the European Commission intends to make use of existing funding sources to improve urban mobility. In this connection, it seems appropriate to indicate what percentage of the total budget will be made available for implementing the Urban Mobility Action Plan;

Regarding **action 16 – upgrading data and statistics** – there is certainly a need for better data and statistics at the urban level. This is currently a serious shortcoming in mobility research.

B. Links with other EU policies:

3. *Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?*

Yes, although territorial planning and balancing budgets between territorial planning, mobility and other relevant policy areas probably have a more significant impact on that economic, social and territorial cohesion within urban and peri-urban centres.

In this connection, the Flemish Region has already referred, in its response to the Green Paper, to the importance of the territorial integration aspect, and this focus also applies to the Action Plan.

It is, however, important for the European Commission to show how urban mobility and territorial cohesion in urban and peri-urban centres will be strengthened at European level.

The development of economic, social and territorial concepts will reduce energy dependency, support export-oriented goods and services and improve (transport) amenities in urban areas. If the development of urban and suburban centres no longer caters to ever increasing levels of traffic but rather to the needs of inhabitants, there will be more scope for initiatives to promote cohesion.

4. *Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?*

Yes, although further attention needs to be paid to the global market in emissions certificates. Once a (higher) price is attached to emissions, the economic leverage effect can come into play, which will ally environmental and economic concerns.

In any event, the reduction in energy consumption, the concomitant reduction in emissions of noxious gases and urban greening of the infrastructure will contribute to achieving the EU's energy and climate change objectives.

It is, however, not certain whether this contribution will be large enough.

Indeed, attention needs to be paid, in this context, to the EU's air quality objectives. Actions that have a positive impact on the climate (CO₂) do not always lead to improvements in air quality: for example, diesel cars are generally better for the climate than petrol cars, but they have a more negative effect on air quality (NO₂).

5. *Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?*

Yes, this would appear to be a valuable opportunity, but the inclusion of urban mobility in Sustainable Energy Plans should be done **flexibly**, i.e. differing from city to city.

C. Additional action needed:

6. *Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?*

In addition to promoting cleaner vehicles and vessels, closer attention needs to be paid to the **modal shift to more sustainable forms of transport**.

If the European Commission wants to reduce CO₂ emissions, air pollution, noise pollution and congestion, as it states in the communication, there are valuable opportunities to be found in inland waterway transport, as the majority of European cities are on or near waterways. Better use needs to be made of the opportunities provided by these waterways, in order to improve amenities in urban areas.

There is, to date, still no sustainable alternative to road transport in the context of urban mobility. Inland waterway transport also currently concentrates fully on economies of scale, focusing on monomodal point-to-point transport with relatively substantial feeder services instead of flexible smaller vessels that focus on an almost 'door-to-door' service.

The European Commission has an important role to play on this point (cf. A1). Various types of projects to promote a **modal shift and the use of sustainable modes of transport** (research and pilot projects) could be considered here:

- organisational/logistics projects (urban containers, traffic regulations or environmental zoning excluding lorries from certain parts of town, etc.);
- infrastructure projects (including multipurpose quays); and
- shipping-related projects (such as innovative trans-shipment methods, innovative investments to make small vessels more economically viable, etc.); and so on.

From the perspective of sustainability and intermodality, it would also be worthwhile to undertake an assessment of the policy initiatives – tax incentives, scrapping incentives in certain EU countries – to promote environmentally friendly cars and mobility, and of the groups that make use of these initiatives and their reasons for doing so.

An urban mobility policy must ultimately also be compatible with a territorial location policy in urban and peri-urban areas. If an integrated approach is taken to the two policies, they will reinforce each other, whereas, if the policies are pursued separately, there is a risk that they will be implemented sub-optimally or even contradict each other, which will negate the efforts made both in urban mobility and towards such a territorial location policy. In view of this very real risk, the Action Plan would seem to pay too little attention to the **balance with territorial planning**.

7. *Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans?
Should the access to such financial instruments be subject to conditions?*

Yes. An integrated urban mobility plan is a vital requirement for a sustainable urban policy, and it should therefore have access to financial support.

At the same time, it would be worth considering using European benchmarking to support such financial instruments. For this purpose, clear objectives would need to be established on the basis of objectively quantifiable data (energy consumption, emissions, land take, etc.).

This financial instrument should at any rate encourage urban and metropolitan areas to draw up integrated urban mobility plans. The implementation of the mobility plans, however, is even more important. It is therefore more appropriate to fund specific projects. One precondition for this could be that the local authority must have an integrated urban mobility plan including the project as an action.

8. *Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper⁶ suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.*

Yes. Incentives and/or award schemes are good levers, both psychologically and sociologically, for achieving the objectives set, and may encourage cities and municipalities to put sustainable mobility higher on the political agenda.

However, award schemes are only worthwhile if the bar is set high enough: only cities that really excel in a number of fields should be eligible for an award.

Furthermore, the development of the system for awarding the 'blue flag', and consequently the development of relevant indicators, should also take sufficient account of the diversity of territorial circumstances in the EU (population density, the region's level of industrialisation, etc.).

⁶ CdR 236/2007 final.

9. *What would your priorities for action/implementation be?*

With regard to implementation, the *general* priorities should be the following:

1. actions that speed up the introduction of environmentally friendly vehicles and vessels and thus have an impact on the emission of noxious gases and/or substances (including co-funding of prototypes and emission-free urban distribution centres);
2. actions that apply the 'polluter pays' principle;
3. actions that have a positive impact on mobility.

The following actions should be given *specific* priority:

– **Action 3 — Transport for healthy urban environments.**

Given the impact on public health in densely populated cities.

– **Action 7 — Access to green zones.**

Given the fact that the European Commission is promoting low-emission zones as a possible measure to improve local air quality, and the Flemish Region would also like to look into the options for introducing low-emission zones.

– **Action 12 — Study on urban aspects of the internalisation of external costs**

In view of the precarious budgetary situation of governments, and given that Belgium aims to introduce a smart road pricing system.

– **Action 14 — Optimising existing funding sources.**

In view of the precarious budgetary situation of governments, and taking account of a better balance with regional subsidisation.

– **Action 16 — Upgrading data and statistics.**

In view of the need for better data and statistics at an urban level, which currently constitutes a serious shortcoming in mobility research.

D. Best practices and experience:

10. *Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?*

Please provide a short description of these measures or initiatives.

* In connection with **theme 1 – promoting integrated policies**

Territorial principles (local hubs, location policy, urban area policy) are central to **Flanders' territorial structure plan**, which should make it possible to optimise urban transport, both within and between urban areas. Encouraging people to both live and work in urban areas and promoting

strategic projects – not least in areas around stations – and other aspects of a territorial location policy, opens up opportunities to shape sustainable urban mobility. This policy document has been in effect since 1997, and has made its presence felt in countless initiatives at municipal, provincial and Flemish level.

In addition, on 21 December 2007, the Flemish government – in implementation of the decision of the Flemish government of 14 December 2007 – concluded '**city contracts**' with 13 inner cities. These city contracts run for a period of six years (2007-2012), with an interim evaluation at the end of 2009.

Many projects within these city contracts incorporate elements relating to sustainable urban mobility, such as:

- the project for the economic and environmental development of Bruges (N31 and canal bypass);
- the commercial dock bridge project in Ghent;
- the Blue Boulevard project in Hasselt;
- the Hoog Kortrijk project;

etc.

These city contracts are **an expression of the city's overall vision of sustainable development and the financial administrative support provided in this connection by the Flemish government.**

They came about at the request of the cities themselves, which wanted the Flemish government to take a more inclusive approach to urban projects. Cities that manage to set up inclusive projects that integrate various intended effects need the Flemish government to be a partner that operates in the same inclusive way.

City contracts are therefore an important priority for the Flemish government, in order to achieve smooth cooperation between authorities and more customer-oriented services. Due to the importance the Flemish government attaches to these city contracts, their development is included in 'Flanders in Action' as project IV.2: 'the government in action'.

They include commitments made both by the Flemish government and by the cities, in line with the vision developed by the city.

With specific regard to **action 1 – accelerating the take-up of sustainable urban mobility plans** – almost every town and municipality in the Flemish Region has a mobility plan. The Flemish government subsidises 2/3 of the costs of drawing up these plans, through the mobility agreement, and (infrastructure) projects that fit in with this mobility plan are also eligible for subsidies from the Flemish Region. The Environment Cooperation Agreement promotes the incorporation of environmental aspects in municipal mobility plans.

In addition, the Mobility Decree explicitly states that the mobility plans are policy plans that should set out the broad outline of a long-term vision for sustainable mobility development. This decree also explicitly provides a legal basis for also establishing mobility plans at intermediate levels, for example

for a transport zone (going beyond the administrative limits of a city).

* In connection with **theme 2 – focusing on citizens**

With specific regard to **action 6 – improving travel information** – the Traffic Centre took part in the European project 'i-Travel – Service Platform for the Connected Traveller' (FP7 project, running from 01/01/2008 to 30/09/2009). The i-Travel concept aims to provide a 'virtual travel assistant' that assists travellers before and during their journeys and provides personalised information and support wherever, whenever and however necessary.

* In connection with **theme 3 – greening urban transport**

With specific regard to **action 11 – Internet guide on clean and energy-efficient vehicles** – the website www.ecoscore.be provides information on clean and energy-efficient vehicles. Vehicles are given an ecoscore that takes account of emissions of greenhouse gases (mainly CO₂) that cause global warming and also of emissions that have a direct negative impact on human health (such as particulate matter, nitrogen oxides and so on). The impact of certain emissions on ecosystems is also taken into consideration, as is noise to a lesser extent. Each vehicle is given an ecoscore between 0 (very environmentally unfriendly) and 100 (very environmentally friendly). The site provides various search options.

* In connection with **theme 5 – sharing experience and knowledge**

With specific regard to **action 18 – contributing to international dialogue and information exchange** – the mobility and traffic safety policy section of the Flemish government's Mobility and Public Works department is in the process of producing a book of examples of European cities at the forefront of sustainable mobility.

* In connection with **theme 6 – optimising urban mobility**

With specific regard to **action 19 – urban freight transport** – the Waterways and Ship Canals Agency has been attempting to incorporate inland waterway transport in importing and exporting goods within urban areas.

With specific regard to **action 20 – intelligent transport systems (ITS) for urban mobility** – the Traffic Centre took part in the European project 'i-Travel – Service Platform for the Connected Traveller' (FP7 project, running from 01/01/2008 to 30/09/2009). The i-Travel concept aims to provide a 'virtual travel assistant' that assists travellers before and during their journeys and provides personalised information and support wherever, whenever and however necessary.

With specific regard to **action 20 – intelligent transport systems (ITS) for urban mobility** – the Traffic Centre and the Roads and Traffic Agency are taking part in the European ROSATTE project (FP7 project, running from 01/01/2008 to 30/06/2010). The aim of the ROSATTE project is to

establish an efficient and quality-assured data supply chain from public authorities to commercial map providers with regard to safety-related road content.

With specific regard to **action 20 – intelligent transport systems (ITS) for urban mobility** – the Traffic Centre is taking part in various initiatives and/or information-exchange forums, such as the POLIS Traffic Efficiency and Mobility working group, EasyWay, Ertico, ITS Belgium, etc.

In addition, the Flemish government recently set up **Belgian Mobility Card nv (BMC)** as a subsidiary of VVM De Lijn. BMC nv will be a shared platform for the interoperable smart card for public transport, and is an important step forward towards the interoperability of various forms of transport. This initiative could perhaps serve as an example for other countries facing similar problems.

E. Better regulation:

11. *Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?*

Yes. However, a proper impact assessment is very difficult, because there is not always necessarily a link between the efforts made and the ultimate results and social effects: the impact is the result of a complex and interlinking network of factors, not just administrative policies.

12. *Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?*

This question is asking for an assessment that is difficult to make at the moment. First impressions suggest that the implementation of the Action Plan will **not result in increased financial costs** for cities, local authorities or the region.

Nonetheless, the urban, regional and national mobility plans need to be aligned with each other, which will require close(r) cooperation between the various authorities. This **will involve some administrative costs.**

The financial and administrative effects will in any event be an important focus.

Urban mobility cannot and must not be seen as a stand-alone concept.

With regard to **freight flows** (see action 19) to and from urban areas, supplies to and exports from towns and cities are part of the overall logistics chain, which makes it vital to link together chains and networks. With regard to the latter, the best possible use needs to be made of inland waterway shipping, and it is also worth looking and the options for:

- clustering;
- introducing environmentally friendly vehicles and vessels.

Concerning **territorial planning** (not a specific action), we would note that this aspect is accorded an important role in the discussions relating to the six themes, but is not implemented in more practical terms in the 20 proposed actions. Closer attention should therefore be paid to this aspect.

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
COTER Commission and "Networks & Subsidiarity" Unit



QUESTIONNAIRE ON THE ACTION PLAN ON URBAN MOBILITY
COM (2009) 490 final

Submitted for consultation of the Subsidiarity Monitoring Network
by Sir Albert Bore (UK/PSE)

Please complete and submit by **Friday 8 January 2010**. You can upload the completed questionnaires directly on the Subsidiarity Monitoring Network webpage (<http://subsidiarity.cor.europa.eu> – remember to be logged in). Alternatively, you can send them by email to subsidiarity@cor.europa.eu.

Name of the Authority:	Sofia Municipality
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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas⁷. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

⁷

Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:
1. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i>
<i>If possible, provide reasons for your answer.</i>
Encouraging integrated policies and the use of the more environmentally friendly and energy-efficient transport; increasing funding
2. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i>
<i>If possible, provide reasons for your answer.</i>
Yes
B. Links with other EU policies:
3. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i>
Yes
4. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i>
Yes
5. <i>Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?</i>
Yes
C. Additional action needed:
6. <i>Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?</i>
Protection from noise pollution caused by urban transport for those living near rails and other routes.
Yes
7. <i>Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper⁸ suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.</i>
Yes. Low noise levels should be added.

⁸ CdR 236/2007 final.

8. What would your priorities for action/implementation be?
Encouraging integrated policies Increasing funding More environmentally friendly urban transport Focus on the citizen

D. Best practices and experience:
<i>9. Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?</i>
<i>Please provide a short description of these measures or initiatives.</i>
Electronic information displays at stops Improved access for persons with reduced mobility – low-floor vehicles, wheelchair ramps Automated payment systems for passengers Introduction of natural-gas vehicles

E. Better regulation:
<i>10. Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?</i>
<i>11. Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?</i>

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
COTER Commission and "Networks & Subsidiarity" Unit



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Submitted for consultation of the Subsidiarity Monitoring Network
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Name of the Authority:	Bavarian government
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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas⁹. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

⁹ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

F. Subsidiarity & Proportionality:
<p>12. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>In view of the subsidiarity principle the focus of the EU transport policy should be on implementing major projects, and in particular the development of the trans-European transport network. As a rule, urban transport has no cross-border implications and therefore does not fall within the EU's remit. Any EU involvement in financing apart from the existing options (e.g. Structural Funds) would also be inappropriate. However, it would certainly be useful to promote the exchange of experience provided this does not create any additional red tape – cf. German <i>Bundesrat</i> decision of 18.12.2009, BR-Drs. 756/09).</p>
<p>13. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>We are pleased that the EU activity is mainly confined to measures such as studies and the exchange of experience; however, we would take a critical view of such measures if intended to prepare the way for the drafting of binding legislation, or for involvement in legislative activities. In view of this, the measures proposed by the EU are intrinsically unsuited to achieve the desired goal, as Member States, the regions and local authorities have the main responsibility here.</p>
G. Links with other EU policies:
<p>14. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i></p>
No.
<p>15. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i></p>
Only to a very limited extent.
<p>16. <i>Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?</i></p>
No.
H. Additional action needed:
<p>17. <i>Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?</i></p>
No.
<p>18. <i>Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans?</i> <i>Should the access to such financial instruments be subject to conditions?</i></p>
<p>First question: no Second question: n/a</p>

<p>19. <i>Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper¹⁰ suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.</i></p>
<p>No, especially given that actual congestion often depends on housing structures, geographical situation, and that pollution is influenced by weather conditions.</p>
<p>20. <i>What would your priorities for action/implementation be?</i></p>
<p>Studies and the exchange of experiences (see answer to question 2).</p>

<p>I. Best practices and experience:</p>
<p>21. <i>Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?</i></p>
<p><i>Please provide a short description of these measures or initiatives.</i></p>
<p>Examples which are regional responsibilities:</p> <ul style="list-style-type: none">* DEFAS Project (= Comprehensive Electronic Passenger Information and Connection System) to improve passenger information and ensure connections via different transport modes and transport companies; in future (DEFAS FGI Bayern) with real-time data in the electronic timetable for Bavaria* Support for unobstructed development of local public transport stations (Metro/suburban railway) using funding from the Municipal Transport Financing Act regional programme* Developing contacts between Bavarian transport networks and stakeholders from EU accession countries to facilitate access to legal, technical and political experience on appropriate development of administrative and task-based structures and on creation of integrated transport systems* Promotion of freight transport centres, e.g. to reduce empty returns in urban areas

<p>J. Better regulation:</p>
<p>22. <i>Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?</i></p>
<p>No. In particular, on the subject of "internalising external costs/urban charging systems" the document overlooks the fact that many Member States or regions lack the requisite legal basis; moreover, in view of constitutional arrangements and proportionality, such legal bases cannot easily be created.</p>
<p>23. <i>Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?</i></p>
<p>Only indirectly via the costs which arise at EU level and which are shared by Germany as a net contributor.</p>

¹⁰ CdR 236/2007 final.

Decision of the *Bundesrat*

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Action Plan on Urban Mobility

COM(2009) 490 final; *Bundesrat* document 14030/09

The *Bundesrat* decided at its 865th meeting on 18 December 2009, on the basis of paragraphs 3 and 5 of the EUZBLG, (Law on cooperation between the federation and the states on European Union affairs) to adopt the following opinion:

Comments on the action plan in general

1. The *Bundesrat* welcomes the fact that in many areas the Commission has limited its role and proposed measures that conform to the subsidiarity principle, for example studies and exchanges of best practices, in accordance with position taken by the *Bundesrat* in its opinion entitled "Towards a new culture of mobility in the city" (*Bundesrat* document 681/07).
2. At the same time, the action plan contains a number of initiatives which from the point of view of subsidiarity, and the efforts that are being made to reduce bureaucracy, need to be viewed critically. The *Bundesrat* reiterates the position which it already expressed in the resolution on the Green Paper that essentially the EU has no competence over urban transport and that any interference in Member States', states' and municipalities' responsibilities is to be resisted.
3. The *Bundesrat* stresses that EU funding efforts must be carried out within the framework of EU competences, and that they are only justified if they respect the subsidiarity and proportionality principles and create European added value. Therefore, EU transport policy should focus on the implementation of territorially large-scale projects, in particular the consolidation of the Trans-European transport networks. Any EU involvement in the funding of urban transport that goes beyond the existing possibilities (for example, structural funds) should be rejected. The point which has been highlighted by the Commission that whilst, on the one hand, the growth of complex transport systems has increased funding needs, on the other, public resources have diminished, does not, in the *Bundesrat's* view, provide adequate justification.
4. The *Bundesrat* would like to underline, as it has done already in connection with the Green Paper on urban mobility (opinion of the *Bundesrat* of 20 December 2007, *Bundesrat* document 681/07 (resolution)), that municipalities have primary responsibility for urban mobility. It also stresses once again that it rejects any EU policy discussions relating to urban mobility that would lead to interference in the decision making processes of national, regional and local players. Instead, the *Bunderat* expects the Commission to adhere to the subsidiarity principle, according to which municipalities have autonomous decision making powers over municipal

transport policy, in the future as well. This equally applies to the measures proposed in the action plan.

5. The *Bundesrat* notes that the action plan presented by the Commission does not put forward or announce any legislative measures. Insofar as the proposed practical activities have been introduced in order to prepare the ground for binding rules and legislation, the *Bundesrat* rejects these as well. It sees the Commission's role as being limited to supporting exchanges of experience and best practices amongst cities. The diverse range of solutions adopted in German cities to tackle transport problems could be of particular interest to other European cities.
6. The *Bundesrat* notes that European directives and regulations of a horizontal kind, as well as those relating to specific modes of transport, have an impact on urban transport and that municipalities are increasingly over-burdened by European rules on air quality and noise management. EU rules targeting emissions therefore need to be developed and harmonised in conjunction with implementing measures (e.g. plaques, road signs) and complementary policies (modernisation, promotion).
7. The *Bundesrat* in this context reaffirms the position it adopted in its resolution on the "Communication from the Commission to the European Communities - A sustainable future for transport: towards an integrated, technology-led and user friendly system" (c.f. *Bundesrat* document 603/09 (resolution)) and, taking into account the subsidiarity principle, sees a particular need for harmonisation at European level of technical specifications for vehicles (for example, upgrading existing vehicles with systems for reducing nitrogen oxide), infrastructural equipment and transport services, as well as vehicle registration (number plates and plaques) for access to green zones, in accordance with European rules on exhaust gases and noise. In view of growing transport needs in the economy and in tourism across Europe, it is essential to maintain transparency as regards differing local requirements. Harmonised vehicle and zonal registration can facilitate access, reduce costs and improve acceptance.
8. The *Bundesrat* welcomes the announcement made by the new German government in its coalition agreement that it will take a proactive approach towards the EU initiative. It will support the government's calls for the EU to respect the subsidiarity principle and local autonomy.
9. The *Bundesrat* recognises that the six themes put forward by the Commission in the action plan on urban mobility ("promoting integrated policies", "focusing on citizens", "greening urban transport", "strengthening funding", "sharing experience and knowledge", "optimising urban mobility") touch upon areas that are of key importance for urban mobility. The *Bundesrat* agrees with the Commission that an integrated perspective and integrated strategies towards surrounding areas are essential if urban transport problems are to be overcome, and believes, in this context, that cities should pursue sustainable policies. Thus, they should continue to promote environmentally friendly forms of transport such as public transport, as well as bicycle and pedestrian traffic.

Comments on individual actions

Action 6 - Improving travel information

10. The *Bundesrat* welcomes the idea of Europe-wide inter-modal travel information, including information which addresses the needs of disabled persons. It assumes that the Commission will make use of existing initiatives and structures such as EU-Spirit and DELFI. The *Bundesrat* believes that efforts to win over as many transport companies - which are the source of travel information – as possible will only be successful if the information is centrally processed by a neutral, publicly owned, non-commercial platform.

Action 12 - Study on urban aspects of the internalisation of external costs

Action 13 - Information exchange on urban pricing schemes

11. The *Bundesrat* is critical of the fact that the Commission has decided, under the heading on the internalisation of external cost, to discuss urban pricing policies. It refers here to point 16 of its opinion published in *Bundesrat* document 681/07 (resolution) and requests the Commission to refrain from producing conclusions and recommendations on topics such as congestion charging and parking policies, in accordance with the subsidiarity principle. The *Bundesrat* will support the German government in its rejection of congestion charges and blanket bans on inner-city driving. City congestion charges also have a number of disadvantages (for example, the high costs associated with their introduction and operation, socio-political and data protection issues, shifts in congestion).
12. The *Bundesrat* calls on the Commission to limit its role to the initiation of information exchanges on city congestion charging and to avoid formulating any recommendations of its own. In this context it should also be noted that on account of the fact that circumstances in the Member States differ, the pre-conditions for city congestion charges at national level also vary.

Action 16 – Upgrading data and statistics

Action 17 – Setting up an urban mobility observatory

13. The *Bundesrat* is unable to identify any added value in the proposed study on improvements in data collecting and the setting up of a virtual monitoring centre. It calls on the Commission to critically examine the costs and benefits of such measures before making any proposals. Increases in bureaucracy resulting from new obligations to provide information are to be rejected.

Opinion to be forwarded directly

14. The *Bundesrat* will forward this opinion to the Commission directly.

**ACTION PLAN ON URBAN MOBILITY
COM (2009) 490 FINAL**

Draft remarks:

The French Senate's Committee for European Affairs

Action Plan on Urban Mobility (COM (2009) 490 final)

* * *

The French Senate's Committee for European Affairs:

- considers that, as urban mobility and urban transport measures are primarily national, regional and local responsibilities, the Commission should centre its efforts on driving measures and pooling experience, and avoid becoming a service provider;
- considers that it is unnecessary and therefore contrary to the principle of proportionality to set up "an urban mobility observatory".

Reasons:

This action plan follows on from the Green Paper on urban mobility discussed by the Committee for European Affairs on 27 November 2007. The plan is based on the premise that cities need transport systems that are both efficient and environmentally sound. While not denying that "responsibility for urban mobility policies lies primarily with local, regional and national authorities", the Commission suggests encouraging strategic transport planning, nurturing the pooling of local experience, launching media campaigns on urban mobility and even providing financing via the Structural Funds, the research programme and the European Investment Bank.

The Commission breaks the action plan down into seven themes, the most important being "Greening urban transport", and into 20 "actions".

Neither the aim nor the general framework of the action plan is in dispute, although the Commission does sometimes state the obvious. The exchange of local experience does indeed appear to be a sound means of dissemination, witness the number of foreign delegations that have come to seek information on the self-service bike rental systems in Paris and Lyon.

Nevertheless, the proposals that involve the Commission ceasing to be an intermediary and facilitator and moving into the role of service provider might be considered less well-founded. The Commission suggests for instance that it could "provide help on how to optimise urban logistics efficiency" (Action 19) or offer "assistance on ITS applications for urban mobility (...), for example, electronic ticketing and payments" (Action 20). It also plans to set up an "urban mobility observatory", to accompany the media launch of a "European mobility week". But does anyone remember that such a "European week" was already held from 16-22 September 2009? Or what was the outcome? Is a

European-level initiative the right approach? Disregarding the advertising agencies of the 27 Member States, which were undoubtedly satisfied with the event, how cost-effective were these measures? In other words, is it worth going to such lengths for such a modest result?

All in all, there does not appear to be sufficient value added to justify this action plan in its current form.

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
COTER Commission and "Networks & Subsidiarity" Unit



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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is green/environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas¹¹. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

¹¹ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:

1. *Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?*

If possible, provide reasons for your answer.

Urban mobility accounts for 30% of all mobility in some of Europe's regions, but its environmental and economic impacts go far beyond the percentage points. Consequently, in order to achieve the goal of sustainable, safe and efficient mobility - an aim shared by all European countries - particular attention should be paid to reducing these impacts at the regional and urban levels. Where the EU is concerned, key factors to be promoted include: technology and information exchanges, promoting the most sustainable modes of transport and the integration of all modes into a single network of mobility networks. In our view, therefore, EU-level action is crucial to making virtual platforms available for exchanging information and good practices via the Internet, promoting the new technologies in vehicles and communication systems, guaranteeing all the universal right to move between Member States without barriers and helping to achieve the goals of improving air quality and reducing transport-related greenhouse gas emissions.

2. *Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?*

If possible, provide reasons for your answer.

We consider the 20 measures proposed by the CoR to be appropriate to achieving sustainable urban mobility in the EU, because they include most of the aspects that need to be addressed to achieve this goal, whilst respecting the principle of subsidiarity, moving closer to users and taking account of their behaviour, with the aim of ensuring that all modes of transport are taken into account and also promoting the integration of networks and information for Europe as a whole. In order to get better results from the action plan, urban mobility should be seen as mobility taking place in an area formed by one or more local authorities, with behaviour being based on dependent mobility. In Catalonia's case, for example, in order to achieve the action plan's aims for cities, these should be considered jointly with the metropolitan region they form part of, as provided for in - in our case, Catalan - legislation. In our view, Action 1 (Accelerating the take-up of sustainable urban mobility plans), requires a first step, which is the metropolitan area's sustainable mobility plan. This would ensure synergies between the activities implemented by all towns in the same area and between the interlinking transport infrastructure and services.

B. Links with other EU policies:
3. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i>
<p>The economic, social and regional cohesion of urban and peri-urban centres must meet one condition: it must integrate urban development and economic policies with mobility policies that ensure people can access work, home and the main sites of cultural interest, healthcare, education and recreation with the lowest possible impact on the environment and as safely as possible. Some of the proposed actions are central to this integration, especially those set out in points 1, 2 and 6.</p>
4. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i>
<p>All of the proposals further the EU's energy and climate change objectives to a greater or lesser degree, but because the fight against climate change is now being fought on so many fronts, it would be useful to focus more on this aspect. Whilst implementing many of the actions proposed would certainly reduce CO2 emissions, they must also reflect the proposals to reduce climate change that the EU is promoting. Per capita energy consumption should also be reduced, and the most effective way of achieving this is to clamp down on private vehicle use and propose walking, cycling and green public transport. Minimum Community targets should thus be set for metropolitan and urban mobility, rebalancing modal distribution and improving energy consumption and CO2 emissions. The aim of these targets should be similar to those for emission reduction plans and at least one intermediate control point should be established.</p> <p>These goals should be supported by a set of indicators that could be included in Action 17 (Setting up an urban mobility observatory).</p>
5. <i>Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?</i>
<p>Unless an urban mobility dimension is added to Sustainable Energy Plans, one of the key players in energy in the EU would be excluded from the field of transport. Local councils and regional authorities are the tier of government closest to the citizens and their actions consequently have the greatest impact on them.</p>
C. Additional action needed:
6. <i>Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?</i>
<p>1. One issue that is crucial to achieving sustainable mobility in metropolitan areas is understanding the effects of land-use planning and mobility in a way that goes beyond merely carrying out transport studies. The introduction to Theme 5 succinctly sums up this issue, but what is needed</p>

is a shared understanding of the real effects on mobility of regional, urban and infrastructure policies. A panel of experts should, therefore, be set up to undertake an integrated and standardised study of the regional and urban planning carried out in the last 20 years in the EU Member States and its effects on mobility and to closely monitor current experiences, in order to find out which have been most successful in achieving a sustainable and efficient metropolitan and urban mobility.

2. Metropolitan and urban mobility policy is closely linked to businesses' policies employee mobility policies. It is no coincidence that road congestion and public transport crowding occur during the rush hours for going to and leaving work and school/college. It would therefore make sense to start a project on specifically on work-related mobility or mobility in the main centres of activity in metropolitan areas.
3. One of the areas of mobility in EU Member States on which it is hardest to find and standardise information is the mobility of goods, especially in its urban form. This aspect should certainly be given greater prominence under Action 16 (Upgrading data and statistics).
4. The low occupancy of private cars is only too familiar a problem, whilst increasing the average car occupancy is known to be one of the most effective ways of reducing the cost and environmental impact of mobility. The average occupancy of private vehicles in the Barcelona metropolitan area is 1.22 people. Raising this figure is as important as people knowing how to drive in a way that minimises energy consumption. Consumption does not prevent congestion, whereas increasing occupancy actually reduces it. The same applies to improving the loads carried by goods vehicles. Action 9 (Energy-efficient driving as part of driving education) could be more wide-ranging and be drafted to include the word 'efficient' after 'driving' or even better, be reworded as follows: 'Promote measures to encourage efficient and energy-efficient driving'. One such action might be to build these practices into driving lessons, although other measures that help drivers to implement them should not be overlooked. These include: Web sites, common identification systems throughout Europe or rewards for drivers who implement them as a rule.

*7. Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans?
Should the access to such financial instruments be subject to conditions?*

We would support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans, provided that these are supported by short- and medium-term implementing mechanisms designed to achieve the stated aims, which must of course be consistent with those set by the EU.

8. *Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper¹² suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.*

It would certainly be appropriate to fund incentives and/or an award scheme, although these would have to be highly selective and focus on aspects that the public wishes to see improved at a given time. We would also propose that the minimum period for achieving change be two consecutive years. By way of example, we suggest that awards are granted for achieving low levels of pollution, the lowest fatality rate possible or a reduction in per capita energy consumption.

9. *What would your priorities for action/implementation be?*

We take the view that the action plan's measures should be introduced gradually and that the EU's proposal in Appendix 1 is sound. We therefore consider that:

- the first phase of Action 5 (Improving accessibility for persons with reduced mobility) should be brought forward.
- Action 11 (Internet guide on clean and energy-efficient vehicles) is not such a priority, as a number of web sites already include some of this information. The action could thus be postponed until 2011.

D. Best practices and experience:

10. *Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?*

Please provide a short description of these measures or initiatives.

Some of the measures set out in the action plan have already been implemented in the Barcelona metropolitan area and the surrounding towns for a number of years. The European dimension will undoubtedly strengthen these measures and will create synergies, considerably improving their impact.

On 13 June 2003, the Autonomous Community of Catalonia adopted Law 9/2003 on mobility, laying down the obligation to draw up mobility plans that set out mobility strategies and activities in the region to achieve a sustainable and safe form of mobility and detail the obligations for urban mobility plans in the region. The Barcelona metropolitan area's mobility plan was adopted in September 2008

¹² CdR 236/2007 final.

by the Catalan government and is currently being implemented.

Subsequently, the cities of Barcelona and Granollers adopted their own mobility plans, along the lines of the regional master plan and have also started to implement some of the actions it provides for.

Intensive work is also being done to draw up mobility plans in the main centres of activity in the metropolitan area, including the airport, universities and other public building complexes.

E. Better regulation:

11. *Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?*

Section 4, on looking ahead, states that the plan's implementation will be reviewed in 2012. The same section states that the appropriate steering mechanisms will also be set for the Member States. We believe that mechanisms should be put in place to ensure that metropolitan or urban areas taking part in the measures detailed in the action plan are also involved in assessing it. A mechanism could probably be designed on the basis of Action 17 (Setting up an urban mobility observatory). Organisations already exist in this field, including the European Metropolitan Transport Authorities (EMTA), which have developed a mobility barometer that could help achieve the goals set out in the action plan.

12 *Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?*

At the beginning, yes, because many of the practices proposed require initial studies and investments and pilot phases and will need to be accepted by the public and by business. In the medium term, they will lead to savings as a result of making transport more efficient and reducing its detrimental impact on health and the environment.

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
COTER Commission and "Networks & Subsidiarity" Unit



QUESTIONNAIRE ON THE ACTION PLAN ON URBAN MOBILITY
COM (2009) 490 final

Submitted for consultation of the Subsidiarity Monitoring Network
by Sir Albert Bore (UK/PSE)

Please complete and submit by **Friday 8 January 2010**. You can upload the completed questionnaires directly on the Subsidiarity Monitoring Network webpage (<http://subsidiarity.cor.europa.eu> – remember to be logged in). Alternatively, you can send them by email to subsidiarity@cor.europa.eu.

Name of the Authority:	Extremadura Assembly
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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas¹³. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

¹³ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:
1. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i>
<i>If possible, provide reasons for your answer.</i>
The EU has a substantial role in three respects: <ul style="list-style-type: none">– with a view to establishing a common action programme which ensures a uniform response to urban mobility throughout the Community, preventing action being taken at local or regional level with no regard for its effectiveness or support, with a lack of coordination and integration.– with a view to promoting, supporting and guiding plans, measures and programmes implemented by the national, regional or local authorities in the framework of Community programming.– with a view to combining political and financing efforts for the achievement of environmental objectives and the promotion of an efficient transport system.
2. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i>
<i>If possible, provide reasons for your answer.</i>
We consider that the proposed measures respond in an orderly and sufficient way to the need for immediate and effective action in the field of urban mobility. Particularly significant are the campaigns designed to encourage habits favourable to sustainable mobility, those intended to link transport with a healthy urban environment and those to promote accessibility for people with reduced mobility.
B. Links with other EU policies:
3. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i>
Many of the proposed measures respond to a desire to integrate the various mobility policies and actions. This integration will facilitate coordinated action, which will in turn necessarily have a positive impact in economic terms (it will contribute to sustainable development by reducing costs through the introduction of new technologies, e.g. intelligent transport systems (ITS)), in social terms (with benefits derived from accessibility and the creation of healthy environments) and in territorial terms (by encouraging interconnection and interoperability in the transport sector).
4. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i>
Certainly. Proof of this is provided by the measures relating to the study of the urban aspects of the internalisation of external costs, the support for intelligent transport systems, the guide to clean and energy-efficient vehicles and the support for research and demonstration projects for low or zero-emission vehicles.

<p>5. <i>Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?</i></p>
<p>Yes. No sustainable urban mobility project can be devised without considering its potential impact on sustainable energy.</p> <p>It is also very important that town halls be involved in view of their responsibility for urban transport, which needs to take account of all aspects of sustainable urban mobility.</p>

<p>C. Additional action needed:</p>
<p>6. <i>Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?</i></p>
<p>Indeed. The measures proposed for achieving the objectives (combating climate change, promoting an efficient transport system, social welfare) could be complemented with other initiatives of a short or long-term nature which would be innovative and would develop or deepen action taken in connection with some of the proposals, for example, progress on user rights and habits favourable to sustainable mobility.</p>
<p>7. <i>Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans? Should the access to such financial instruments be subject to conditions?</i></p>
<p>Yes. We think it would be appropriate to establish a specific financial instrument for urban mobility plans with a view to identifying in economic terms policies likely to have a significant impact on people's quality of life.</p> <p>In addition to compliance with the objectives, preconditions for access to the financial instrument should include co-financing by the authorities responsible for urban transport.</p>
<p>8. <i>Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper¹⁴ suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.</i></p>
<p>In our opinion labels are the best way of acknowledging quality in urban mobility, because they are easily understood by the public and long-lasting.</p>
<p>9. <i>What would your priorities for action/implementation be?</i></p>
<p>Priorities are measures to promote accessibility for people with reduced mobility, progress on studies on the internalisation of external costs and progress on intelligent transport systems, without forgetting the need for sufficient sources of financing to carry out the various activities.</p>

14 CdR 236/2007 final.

D. Best practices and experience:
10. <i>Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?</i>
<i>Please provide a short description of these measures or initiatives.</i>
The Region of Extremadura has implemented the following measures: <ul style="list-style-type: none">– financial support for the acquisition and adaptation for people with reduced mobility of vehicles to be used for the provision of scheduled public road transport services (interurban transport),– campaigns to promote and raise awareness of public transport: promotion of public transport in schools and the Súbete project to encourage the people of Extremadura to use public transport (taxis, buses, trains, aeroplanes),– financial support for certain population groups on the basis of age or receipt of social benefits, in the form of a 50% subsidy for the use of scheduled public road transport services (interurban transport),– investment in intelligent transport systems (Sigetex project – Extremadura transport management system - first phase),– investment in improving information to businesses and users (Riteax project – Extremadura transport information network),– investment in intermodality initiatives for the use of means of transport (Supex project – Extremadura transport unified payment system - second phase. The planned third phase will involve the introduction of a single ticket).
Some town halls have taken measures to promote urban mobility.

E. Better regulation:
11. <i>Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?</i>
Yes. Particularly worth emphasising is the trouble taken to justify European Union intervention in providing national, regional and local authorities with sufficient instruments and solutions, in the financial area, in the interchange of data and planning, and with a view to familiarising users, consumers and people with reduced mobility with urban mobility policies.
12. <i>Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?</i>
The implementation of the action plan or any project or activity in this field will require the mobilisation of financial and human resources to ensure its correct, effective and coherent application. This spending will, however, make it possible to reduce other expenditure by the various authorities, ensuring that the action will be effective.

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
COTER Commission and "Networks & Subsidiarity" Unit



QUESTIONNAIRE ON THE ACTION PLAN ON URBAN MOBILITY
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Submitted for consultation of the Subsidiarity Monitoring Network
by Sir Albert Bore (UK/PSE)

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Name of the Authority:	Government of the Canary Islands, Officer for External Action
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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas¹⁵. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

¹⁵ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:
<p>1. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>The EU should ensure that sustainable urban mobility is implemented on the basis of the specific characteristics and specificities of individual European urban centres rather than on the hitherto centralised interests of the Member State to which the regions belong, especially in sectors within the remit of local authorities, such as urban transport, in order to achieve genuine social cohesion.</p> <p>Recognition of the territorial dimension of urban mobility policy, with specific attention to disadvantaged regions such as the outermost regions (Article 349 of the Treaty on the Functioning of the EU) and adapted to real transport and cost needs.</p>
<p>2. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>Yes, always provided that they are adequately funded, in regions where the geographic, demographic and economic challenges for setting up sustainable transport systems entail additional costs out of proportion to the service provided by local authorities (e.g. in the archipelagos, a visit from a medical specialist could in some cases involve travelling between islands, whereas in the rest of Europe, it only involves urban mobility). Sustainability in island regions depends on factors and parameters not taken into consideration in efficient transport systems in other geographical environments.</p>
B. Links with other EU policies:
<p>3. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i></p>
<p>Yes, subject to a proper review of funding policies for investment in sustainable development for all regions (local authorities) concerned.</p>
<p>4. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i></p>
<p>Land transport is undoubtedly a priority implementation goal for combating climate change. This is due as much to its high emissions output as to its strong growth.</p>

5. *Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?*

The local level is undoubtedly the best suited to address urban mobility priorities and, moreover, it is closely linked to energy sources.

C. Additional action needed:

6. *Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?*

Yes, a few, such as:

- a. including the need to reduce demand for unnecessary transport in regional planning and management, and in case of unavoidable increases in transport demand, ensure that this is met by public transport.
 - b. setting up funding instruments for inter-modal infrastructure and for high-capacity passenger bus lanes, which facilitate mass transport and therefore sustainable mobility.
 - c. promoting public transport through incentives to support sustainable mobility initiatives and reduce private transport, municipal tax incentives to reward the use of low-emission vehicles ...etc.
- In other words, concrete applications for citizens as a decisive aspect of sustainable urban transport.

7. *Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans? Should the access to such financial instruments be subject to conditions?*

Yes, it is absolutely vital since there should be no conditions (hitherto generalised) for access that discriminate against specific or individual regions, as is the case for outermost regions, where connectivity needs are greater because they are islands, remote, fragmented and small. Proof that resources are applied to the objectives should be enough, always on the basis of EU legislative guidelines.

8. *Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper¹⁶ suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.*

This could turn out to be positive but we believe that this measure will not guarantee the implementation of sustainable mobility unless resources are available. It will be positive for urban zones operating mobility parameters, but it is not an incentive in itself since there are other public service needs.

¹⁶ CdR 236/2007 final.

<p>9. <i>What would your priorities for action/implementation be?</i></p>
<p>Funding for measures and infrastructure that provide socially competitive sustainable transport alternatives to private transport to enable the effective application of publicity and awareness-raising policies: regular and reliable timetables, integrated ticketing, accessibility, compensation for unprofitable routes, information in real time, low costs, etc.</p>

<p>D. Best practices and experience:</p>
<p>10. <i>Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?</i></p> <p><i>Please provide a short description of these measures or initiatives.</i></p>
<p>The Autonomous Community of the Canary Islands funds local authorities responsible for urban transport:</p> <ul style="list-style-type: none">– The development of inter-modal infrastructure, high-capacity bus lanes and intelligent transport systems are key to sustainable transport.– Investment in fleets with a seven-year life span and low emissions.– Investment in and cost of maintaining bus stations and other regular passenger transport infrastructure.– Investment in applying new information and communication technologies to improve user information.– Other actions, measures, or policies to promote the use of regular public transport services.– Preparation of sustainable mobility plans. <p>The recent law of the Autonomous Community of the Canary Islands (13/2007, 17 May) on road transport regulates the rights of passenger transport users.</p>

<p>E. Better regulation:</p>
<p>11. <i>Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?</i></p>
<p>12. <i>Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?</i></p>
<p>Yes, because it requires infrastructure and human and material resources.</p>

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas¹⁷. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

¹⁷ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:
<p>1. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>In tandem with essential financial support to strengthen the integrated policies and the local-regional authority agreements in the Member States, the EU should continue to support and promote the guidelines and strategies identified in the Green Paper <i>Towards a new culture for urban mobility</i> (COM(2007) 551 final), the European Parliament resolution on the urban mobility action plans (2008/2217-NT) and the recent Communication on the <i>Action plan on urban mobility</i> (COM(2009) 490 final). EU funding should be closely linked to these Community policies and should support integrated action plans at both regional and sectoral level. In this context, it is important to secure the involvement and support not only of local authorities, countries and regions of the EU but also of the public and of businesses.</p>
<p>2. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>The urban mobility actions pencilled in for the 2009-2012 period are certainly aimed at sustainability, but they need to be grounded in multisectoral strategic policies involving and supplementing a variety of measures for public transport and sustainable mobility, as well as environmental policies and production and construction activities, following the example of the regional air quality agreements (see the answer to question 10 below).</p> <p>In this context, the scope and results could probably be improved by planning and consolidating the six proposed themes over large macro-areas, through measures that should also involve sectoral operators and businesses and the general public, for example: joined-up sectoral planning among the various tiers of local and regional government, plans to renew the vehicle fleet, info-mobility plans for public and private transport, mobility for cyclists and pedestrians and the accessibility of town centres, modal interchanges, upgrading and attractiveness of public transport, and so on.</p>
B. Links with other EU policies:
<p>3. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i></p>
<p>They should certainly tie in with integration and planned management of the area. In the case of mobility, this would involve urban planning to ensure that new settlements are sited in places where adequate infrastructure is already present or scheduled, so as to avoid urban sprawl.</p>

<p>4. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i></p>
<p>Yes, particularly if they are targeted as outlined above.</p>
<p>5. <i>Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?</i></p>
<p>It is important that the Sustainable Mobility action plan included in the Covenant of Mayors should link up the various themes and plans, and should, for example, draw up a basic inventory of emissions in line with (existing or proposed) planning for the various sectors (town planning, construction, transport, environment, production, etc.) so as to give a clear and transparent assessment of present and future scenarios and the related aims and outcome indicators.</p>

<p>C. Additional action needed:</p>
<p>6. <i>Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?</i></p>
<p>The six proposed themes (promoting integrated policies, focusing on citizens, greening urban transport, strengthening funding, sharing experience and knowledge, and optimising urban mobility) are certainly comprehensive. The European Commission will need to play a guiding role during the implementation stage.</p>
<p>7. <i>Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans? Should the access to such financial instruments be subject to conditions?</i></p>
<p>If funding were available for preparing mobility plans, it would certainly encourage their development, within a broader programming context and with planning of the measures to be carried out and the anticipated results.</p>
<p>8. <i>Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper¹⁸ suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.</i></p>
<p>Compiling indicators for urban mobility and public transport is essential for setting specific improvement goals, and an incentive scheme could be introduced in this context.</p>

¹⁸ CdR 236/2007 final.

9. *What would your priorities for action/implementation be?*

Those agreed among the various local and regional authorities who plan their implementation at the various levels, so as to achieve more effective results and cushion the (social and economic) impact on the region.

D. Best practices and experience:

10. *Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?*

Please provide a short description of these measures or initiatives.

Air quality agreements:

On 15 September 2009 the Emilia-Romagna region, together with the nine provincial authorities and the 13 local authorities with over 50,000 inhabitants, signed the **Eighth programming agreement on air quality - 2009-2010 update**, for the implementation of measures to mitigate instances of air pollution. The agreement follows on from those adopted annually since 2002.

In this context, since 2005 all nine provincial authorities have drawn up plans for improving air quality, on the basis of a delegation granted by the region.

The 2009-2010 agreement confirms the previous years' measures regarding traffic. Between 8.30 a.m. and 6.30 p.m. on Mondays to Fridays during the winter months (October to March), there are restrictions on private traffic in urban areas for the most polluting vehicles. The annual programming agreements on air quality commit signatories to carry out measures with a low environmental impact in the fields of sustainable mobility, regional logistics, sustainable construction and production activities. For the period from 2001 to 2010, the public and private resources invested in this in Emilia-Romagna total EUR 963 million, with EUR 523 million of this coming from the regional authority (over EUR 291 million in the three years 2007-2010).

Expenditure has focused above all on renewal of the regional bus fleet (to make it less polluting), improving cycle paths and sustainable mobility of people, renewal of railway rolling stock on the lines which are the responsibility of the region, and curbing energy consumption in the production and civil sectors.

In addition to the signatory local authorities, over the years a growing number of other local authorities in the region have signed up to the agreement on a voluntary basis. Indeed, over the last few winters many more local authorities have signed the air quality agreements. Over ninety local authorities thus signed the last agreement, showing the high level of involvement achieved: the agreements now cover over 2.7 million inhabitants, or around two thirds of the entire population of the region.

The Emilia-Romagna region's updated integrated transport plan for 2010-2020 draws on this multi-sectoral experience and on other themes emerging at European and national level; the preliminary

document for the plan was approved by the regional executive in its Decision No. 1887 of 23 November 2009.

E. Better regulation:

11. *Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?*

It undoubtedly offers good support for the Plan's strategies, and should be supported by the action of local, regional and national authorities.

12. *Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?*

It should encourage concertation and thus the convergence of significant funding (to achieve critical mass) on strategic and operational decisions agreed by regional and local authorities, so as to attain more effective results, highlighting the need for targeted, consensual use of the (albeit limited) resources deployed.

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
COTER Commission and "Networks & Subsidiarity" Unit



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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas¹⁹. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

¹⁹ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:
<p>1. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>There are no regional authorities in Hungary. The EU's role in the field of sustainable mobility should be exactly the same as in other Central and Eastern European countries: cities which are struggling to overcome specific problems in their transport systems (aging vehicles, decrepit infrastructure, the rise of individual transport) should be able to get support for the solutions which are most appropriate to local needs. This means giving priority to renewal of rail-based rolling stock and to renewal and expansion of infrastructure in order to make public transport significantly more competitive. Cities must be encouraged to develop projects that can be rapidly and effectively implemented, and to follow European best practices while adapting them to local conditions. The EU should continue encouraging cities and surrounding areas in developing and implementing integrated transport plans.</p>
<p>2. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>We find the Action Plan too weak. We regret that the modal shift towards more sustainable modes of transport, that is to support a shift towards more sustainable forms of transport, such as public transport, cycling and walking, has not been emphasised at all in the Action Plan. European cities insist on the need to consider modal shift as a key solution for reducing pollution and congestion in urban areas in the future.</p> <p>The Action Plan should include initiatives for urban areas to achieve significant changes in the modal split. Packages of measures are needed – across a range of areas: from demand management tools and freight logistics to mobility management and road safety. The initiatives must be cross-sectorial and part an integrated long-term framework. European cities would like to participate in the planned working groups to develop such ideas (e.g. road pricing).</p> <p>Another weakness of the document is the lack of emphasis on public transport, especially on the fixed-track solutions. In the period of car dominated planning, between the 1950s and the 1970s many cities have eliminated their tram lines, replacing these with extended roads which were first occupied by buses and later by cars. The same cities today regret their decisions and spend enormous amounts of money to re-build something which once existed. The Commission guidelines should include statements on the priority of public transport modes and should suggest financing solutions besides new development of such systems also on the improvement of these in cities where they still exist (i.e. Structural Funds means should be available not only for new developments but also for improvements of public transport infrastructure and rolling stock). It is also crucial to create incentives towards city-region cooperation in public transport, based on area-wide transport associations.</p> <p>Apart from working out integrated sectorial policies, another important factor is abiding these policies as well as the clarification of the roles of individual participants (ex: organizations responsible for</p>

supplying, service providers and units relying on services) and the establishment of regulations concerning their operational standards.

The main objective is to strive for giving the new measures realistic content that can be interpreted and adopted as well as fulfilled by the cities and providers of public utility services.

In order to achieve the above objective its very important to create a single platform in order to make the tasks to be achieved by cities clear. It is also important to provide a uniform interpretation for cities regarding their responsibilities.

B. Links with other EU policies:

3. *Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?*

The intention is good, but the relevant transport decision makers and operators need to be convinced that they have a real role in local public services, with greater focus on improving the quality of services and renewing vehicle stock and infrastructure, with a view to promoting sustainable urban development. Failing this, the measures may not have a real impact, which would not be a desirable outcome either for the Commission or for cities in the Member States.

4. *Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?*

The Mobility Plan fails to emphasises stronger public transport and a more favourable modal split, or to identify measures in support of them, and is therefore too weak to achieve real change. In the absence of a stronger EU position, is the attitude of cities which will decide whether these measures really make a positive contribution to achieving the objectives.

5. *Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?*

Yes, definitely.

C. Additional action needed:

6. *Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?*

More coordination is needed between stakeholders in urban (regional) transport, together with supervision at EU level. It is not sustainable for transport sectors (e.g. road and urban transport) to be in a situation where public transport modes are permanently disadvantaged in both financial and physical terms, where there is confusion between the roles of those commissioning and providing services, and where cities deliberately or otherwise let public transport go into decline.

<p>7. <i>Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans?</i> <i>Should the access to such financial instruments be subject to conditions?</i></p>
<p>Yes. Such comprehensive urban mobility plans should cover the whole functional urban area. EU guidance on this should help to include in such plans air quality and climate change, collective transport, intelligent transport technology and systems, mobility management and soft modes, noise, responsible car use, road safety and the urban dimension of international accessibility. Another condition should be effective monitoring, following the preparation of comprehensive mobility plans.</p>
<p>8. <i>Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper²⁰ suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.</i></p>
<p>Yes, definitely – in the absence of specific incentives, the mobility plan will be ineffective and remain merely a guideline document.</p>
<p>9. <i>What would your priorities for action/implementation be?</i></p>
<ul style="list-style-type: none">i. Establishing institutional structures (at national, regional and local levels)ii. Development and long-term establishment of financing structuresiii. Community responsibilities for transport infrastructure and vehicle stock.iv. Community rates for services/faresv. Long-term interaction between public and individual transport

D. Best practices and experience:

<p>10. <i>Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?</i></p> <p><i>Please provide a short description of these measures or initiatives.</i></p>
<p>Budapest participates in the Mobility Week movement. The "Budapest Szíve" (Heart of Budapest) programme is currently undergoing and has made considerable progress in calming city centre traffic.</p>

²⁰

CdR 236/2007 final.

E. Better regulation:
11. <i>Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?</i>
We did not find the section of the action plan referring to the impact assessment.
12. <i>Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?</i>
In the short term yes, but improved efficiency could enable costs to be recouped, though not in the same area. If the action plan were more specific and provided support for renewal of public transport and decrepit infrastructure, as well as for closer regional cooperation, it would certainly be worthwhile for cities and local councils to take on additional tasks.

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
COTER Commission and "Networks & Subsidiarity" Unit



QUESTIONNAIRE ON THE ACTION PLAN ON URBAN MOBILITY
COM(2009) 490 final

Submitted for consultation of the Subsidiarity Monitoring Network
by Sir Albert Bore (UK/PES)

Please complete and submit by **Friday 8 January 2010**. You can upload the completed questionnaires directly on the Subsidiarity Monitoring Network webpage (<http://subsidiarity.cor.europa.eu> – remember to be logged in). Alternatively, you can send them by email to subsidiarity@cor.europa.eu.

Name of the Authority:	Austrian State Governors' Conference
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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas²¹. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

²¹ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:
<p>1. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>We believe the European Union's role lies with research, funding and exchanges of experience. This will allow us to draw up joint strategies and solutions to guarantee sustainable urban mobility. However, cities are clearly responsible for choosing the measures which they consider to be most suitable because in each of them the conditions are different. For this reason, obligatory standardisation of passenger rights should be avoided. Regulation of this kind should be left to the national level.</p>
<p>2. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>Above, all exchanges of experience, for which the European Union can set up the appropriate platforms, will lead to the achievement of targets. Many cities, however, need financial support to implement measures.</p>

B. Links with other EU policies:
<p>3. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i></p>
<p>Considering that the action plan only provides for studies and the setting-up of platforms, we believe that its direct contribution to cohesion will be limited. The measures taken by cities will have primary importance.</p>
<p>4. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i></p>
<p>This will depend on which concrete actions cities take. In any case, measures that focus solely on emissions would not suffice. Such measures alone (even though cities have considerable influence over them) will be inadequate to achieve the targets. The actions on clean propulsion technology set out in the action plan, which focus on the source of emissions, must under all circumstances be driven forward.</p>
<p>5. <i>Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?</i></p>
<p>Local and regional authorities should on principle be left to decide in what shape and form such concepts and plans should be introduced.</p>

C. Additional action needed:
<i>6. Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?</i>
In the action plan, as well as in European transport policy in general, the need to shift transport towards environmentally-friendly forms of transport has not been adequately highlighted. A clearer, joint commitment to a modal shift, towards an "environmental alliance", would be desirable here. Coordination between the individual policy areas at European level should be significantly improved as well (between, transport and the environment, transport and competition policy, etc.).
<i>7. Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans? Should the access to such financial instruments be subject to conditions?</i>
It would make sense, as a matter of principle, to support the setting-up of urban mobility plans financially. Such support could be made conditional on the inclusion of certain goals (shift in transport/modal shift).
<i>8. Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper²² suggested the equivalent of an EU-wide "Blue Flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.</i>
Many cities are keen to make use of various ranking and award schemes in order to promote themselves. Such "labels" certainly have advantages. However, the question which needs to be asked is: what is the concrete purpose of the proposed labelling scheme? Should it be a precondition for the granting of special funding for improvement measures?
<i>9. What would your priorities for action/implementation be?</i>
All the measures contained in the action plan are to be welcomed, on principle. Regarding the issue of data collection, the financial impact on local and regional authorities needs to be illustrated.

D. Best practices and experience:
<i>10. Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?</i>
<i>Please provide a short description of these measures or initiatives.</i>
Many cities have introduced strategic transport plans which have been adopted at political level (for instance, in Vienna the Master Plan for Transport was introduced, which reflects the cities' clear commitment to environmentally-friendly forms of mobility).

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CdR 236/2007 final.

E. Better regulation:
11. <i>Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?</i>
It is still unclear how local and regional authorities will be drawn into the assessment. Therefore, we cannot at present answer this question in the affirmative.
12. <i>Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?</i>
The collecting and processing of data will require an additional organisational effort within the administration, which cannot yet be gauged.

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
COTER Commission and "Networks & Subsidiarity" Unit



QUESTIONNAIRE ON THE ACTION PLAN ON URBAN MOBILITY
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Submitted for consultation of the Subsidiarity Monitoring Network
by Sir Albert Bore (UK/PSE)

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Name of the Authority:	City of Lodz
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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas²³. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

²³ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:
<p>1. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>The EU should focus on creating a European financial instrument for the 2014-2020 period to promote urban mobility. According to the European Parliament resolution of 23.04.2009, only 9% of Structural Fund transport funding for the 2007-2010 period was earmarked for urban transport. This is not enough to enable effective action to promote urban mobility, ensure environmental protection and combat climate change.</p> <p>The EU should also focus on information activities, with a platform for the exchange of experience, together with statistical and standardisation measures.</p> <p>The EU should set general guidelines. Decisions on scope, scheduling and financing arrangements should be taken at local level.</p>
<p>2. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>Yes, given that the Commission has committed itself to supporting local authorities (through educational and information measures) in developing mobility plans, promoting best practices and optimising sources of funding.</p>
B. Links with other EU policies:
<p>3. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i></p>
<p>Yes, given the idea that urban mobility initiatives should also seek to establish inter-urban networks in order to link up major cities, ensure their economic development and facilitate the rapid transport of individuals and goods.</p> <p>Greater cohesion is possible provided there is a close cooperation between individual regions.</p>
<p>4. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i></p>
<p>Yes, the Action Plan promotes environmental and energy-efficient vehicles and energy-efficient driving as part of driver education, provided that tasks undertaken are implemented according to schedule. The Plan also supports environmental public transport as an effective means of ensuring environmentally friendly transport in cities and conurbations.</p>

<p><i>5. Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?</i></p>
<p>Yes, because the Committee of the Regions stresses the need for local and regional authorities to join forces; multilevel and multi-dimensional governance is the only effective option for making measures to combat climate change more effective.</p>

<p>C. Additional action needed:</p>
<p><i>6. Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?</i></p>
<p>We feel that the Action Plan covers the subject comprehensively.</p>
<p><i>7. Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans? Should the access to such financial instruments be subject to conditions?</i></p>
<p>Establishing a specific financial instrument requires integrated and effective urban mobility measures. However, this issue should be decided at the level of cities; certain conditions relating to specific features of cities should be discussed in European forums (Committee of the Regions, Eurocities).</p>
<p><i>8. Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper²⁴ suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.</i></p>
<p>Yes, given that – as mentioned above – the creation of a financial instrument including financial incentives and rewards requires integrated and effective urban mobility measures.</p>
<p><i>9. What would your priorities for action/implementation be?</i></p>
<ol style="list-style-type: none">1) changing public awareness and attitudes to the use of public transport;2) ergonomics programmes for urban transport;3) setting priorities for public transport;4) promoting hybrid engines in relation to vehicle registration financial issues;5) efforts to step up the development and use of new inter-operable information communication technologies, especially satellite and NFC technologies;6) programmes to promote local deliveries of goods in cities;7) measures to increase national and Community funding for ITSs;8) programmes to develop "soft" mobility.

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D. Best practices and experience:

10. *Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?*

Please provide a short description of these measures or initiatives.

- One of the advantages which Lodz has here is that transport projects co-financed by the EU and planned by the City Council together with the Marshal of Lodzkie Region, MPK – Łódź Sp. z o.o. (Lodz Public Transport), PKP S.A. and PKP PLK S.A. (Polish State Railways) fully complement one another. In the current EU budget period, these stakeholders have obtained EU co-financing for the following projects to create a coherent urban transport system :
 - ✓ *extension and modernisation of east-west tram routes (Retkinia – Olechów) and also of the power supply system and a system for local traffic management;*
 - ✓ *Lodz suburban railway;*
 - ✓ *making Lodz city centre public transport more efficient using telematics systems;*
 - ✓ *making Lodz public transport more competitive by purchasing five low-floor trams;*
 - ✓ *modernising the Lodz – Zduńska Wola – Kalisz section of railway line number 14;*
 - ✓ *revitalising railway line number 15 Bednary – Łódź Kaliska;*
 - ✓ *preparing for the construction of a high-speed line.*
- in partnership with railway companies, the city of Lodz is also preparing implementation of its main current undertaking, an enormous project for a new city centre, together with the construction of the closely associated multimodal hub which is essential if the project is to function properly. The aim of the project is to breathe new economic and social life into the central part of the town, to create a new, viable city centre with numerous public spaces, and to transform Lodz into an attractive city with an easy-to-use multimodal transport hub;
- all of these projects will be the backbone of a balanced and environmental public transport system. At the same time there will be new solutions in terms of area traffic management, IST, tariff integration, as well as modern ticket sales and passenger information systems. In view of this, Lodz is already acting in line with the European Commission's support as expressed in the document for IST and interoperable payment systems, including the use of smart cards;
- a new project is included in the list of individual projects under the Infrastructure and Environment operational programme for "Improving the functioning of public transport in Lodz city centre through the use of telematics systems"; among other things this includes a city card, which should be an important bonus for the city especially given that its implementation during the current budget period will provide very useful experience for future initiatives;
- Lodz regional tram network (to a limited extent);
- construction of the first stage of an urban information system;
- the construction of strategic car parks near to areas of recreational value;
- for many years, Lodz has also been actively involved in events relating to Mobility Week and European car-free day.

E. Better regulation:
11. <i>Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?</i>
Yes, because it aims to achieve an integrated, cross-cutting approach to improving the state of the environment and quality of urban areas while ensuring healthy living conditions for town dwellers.
12. <i>Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?</i>
There is no danger of this happening, provided a financial instrument is created starting from the EU's next multiannual budget to enable the co-financing of transport modes. Such an instrument would represent yet another opportunity for Lodz, which is already making very active use of EU funds for the improvement of transport infrastructure, thus enhancing its economic competitiveness and eliminating the undesirable environmental impact of individual transport.

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
COTER Commission and "Networks & Subsidiarity" Unit



QUESTIONNAIRE ON THE ACTION PLAN ON URBAN MOBILITY
COM (2009) 490 final

Submitted for consultation of the Subsidiarity Monitoring Network
by Sir Albert Bore (UK/PSE)

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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas²⁵. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

²⁵ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:
<p>1. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>The EU should support positive experience exchange among various cities and also grant financial means for its implementation.</p> <p>Citizens and their representatives often do not accept innovations easily - they prefer habitual behaviour. Good applicable examples along with some financial support for their implementation could change stereotypes for the better.</p> <p>We prefer bottom up system.</p>
<p>2. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>The proposed actions should include not only urban but also immediate neighbouring regions.</p> <p>Cities and their neighbouring regions suffer from densely build-up suburban areas which is a burden for their transport systems. Public transportation depends on public financing. In order to ensure their traffic carrying capacity, the cities often subsidize public transportation to their neighbouring regions.</p> <p>The proposed actions should include city logistics to a greater extent.</p> <p>City logistics is one of the suitable tools for limiting excessive goods transportation.</p>
B. Links with other EU policies:
<p>3. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i></p>
<p>Definitely, corresponding and at the same time good quality transport services influence all aspects of life within urban and peri-urban areas.</p>
<p>4. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i></p>
<p>It is very probable. Lowering transport emissions has already positively affected environment in various cities. Energy efficient vehicles contribute to more efficient traffic flow.</p>
<p>5. <i>Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?</i></p>
<p>Yes, energy costs of public transportation belong inseparably among these plans.</p>
C. Additional action needed:
<p>6. <i>Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?</i></p>

Facilities and tools for effective “last mile” transportation could be discussed in more detail. The Action Plan should include city logistics to a greater extent.

7. Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans? Should the access to such financial instruments be subject to conditions?

Yes, elaboration of such plans is financially very challenging; their proceeding requires stakeholder involvement.

One of the conditions for accessing these financial means should include the obligation of cities and regions to follow these plans on a long term basis and to publicize impacts of implemented measures.

8. Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper²⁶ suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.

Funding incentives yes, an award scheme should not be a priority in our opinion; initial conditions of individual states or regions should also be taken into account.

9. What would your priorities for action/implementation be?

Our priority is to see concrete results of these actions.

D. Best practices and experience:

10. Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?

Please provide a short description of these measures or initiatives.

Yes, an integrated public transportation system with unified tariffs has been successfully introduced in our region (incl. trains, trams, buses and trolleybuses), passenger rights and duties in public transportation have been established. There is also a pedestrian zone retaining system in operation. Panels with real time connection information have gradually been installed at all traffic junctions. The City of Brno is a member of the CIVITAS initiative; special minibuses for handicapped will be purchased, a new public traffic information centre will be established - all thanks to the CIVITAS ELAN project.

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CdR 236/2007 final.

E. Better regulation:
11. <i>Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?</i>
Not completely, these plans will always reflect diverse local legislative and existing conditions. Willingness of politicians to pass and enforce even unpopular measures also plays key role.
12. <i>Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?</i>
Very probably, introducing new solutions always requires greater efforts as well as a higher level of financial and personal engagement.

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
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Name of the Authority:	City of Toulouse – EUROCITIES member
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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas²⁷. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

²⁷ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:
1. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i>
<i>If possible, provide reasons for your answer</i>
The EU should launch incentive programs to help financially local authorities to build new public transport infrastructures. The reason for this need is a lack of funds dedicated to public transport. The PT projects are not necessarily heavy modes : they have to be adapted to each place and its needs.
2. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i>
<i>If possible, provide reasons for your answer.</i>
The actions are not sufficient. More work has to be done for developing Public Transport Projects and infrastructures.

B. Links with other EU policies:
3. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i>
Not really. The cohesion will be improved by creating a better public transport <u>network</u> .
4. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i>
Yes
5. <i>Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?</i>
Yes

C. Additional action needed:
6. <i>Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?</i>
Improving cities public transport network is compulsory to help territorial, social and economic cohesion.
7. <i>Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans? Should the access to such financial instruments be subject to conditions?</i>
This is not really necessary in France because we already have a legislation tool regarding urban mobility planning.
8. <i>Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper²⁸ suggested the equivalent of an</i>

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<i>EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.</i>
Yes
9. <i>What would your priorities for action/implementation be?</i>
Offering funding sources for new PT infrastructures

D. Best practices and experience:
10. <i>Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?</i>
<i>Please provide a short description of these measures or initiatives.</i>
- Toulouse has been much implied in the MOBILIS Project of CIVITAS Program : actions in favour of sustainable mobility such has : <ul style="list-style-type: none">i. developing clean PT transportii. controlling private cars access to the city centreiii. creating new public space in favour of soft modesiv. building a new legislations for goods distribution in the city centrev. helping traffic fluidity for public transport buses...
- We have just reviewed our Urban Mobility Plan which includes many actions in favour of sustainable mobility.
- Toulouse has developed a Multimodal mobility management system and observatory.

E. Better regulation:
11. <i>Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?</i>
Yes
12. <i>Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?</i>
Yes

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
COTER Commission and "Networks & Subsidiarity" Unit



QUESTIONNAIRE ON THE ACTION PLAN ON URBAN MOBILITY
COM (2009) 490 final

Submitted for consultation of the Subsidiarity Monitoring Network
by Sir Albert Bore (UK/PSE)

Please complete and submit by **Friday 8 January 2010**. You can upload the completed questionnaires directly on the Subsidiarity Monitoring Network webpage (<http://subsidiarity.cor.europa.eu> – remember to be logged in). Alternatively, you can send them by email to subsidiarity@cor.europa.eu.

Name of the Authority:	City of Utrecht – EUROCITIES member
Contact person:	Mark Degenkamp
Contact details (phone, email)	+31 30 2863747, m.degenkamp@utrecht.nl

BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas²⁹. Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

²⁹ Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:
1. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i>
<i>If possible, provide reasons for your answer.</i>
Facilitating and setting standards. Urban mobility is a local responsibility, but its influence is much bigger than local. So that's a good reason for Europe to be involved. EU should help local/regional authorities to fill in their responsibilities as good as possible. This should be done by: <ul style="list-style-type: none">- Facilitating, by means of developing and sharing knowledge, tackling cross border enforcement issues and subsidising innovative projects. Local/regional authorities individually do not have enough power to tackle these issues.- Setting standards for regulations; this does not mean prescribing what a city should do, but to provide a toolbox of standard (regulatory) options (e.g. sets of entrance criteria) from which a city could choose. This to prevent a patchwork of many slightly different regulations, which is difficult to understand for citizens and companies and which makes cross border enforcement difficult if not impossible.
2. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i>
<i>If possible, provide reasons for your answer.</i>
Yes, except for one point: I would appreciate more attention to setting standards (in the sense as mentioned at question 1).

B. Links with other EU policies:
3. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i>
Yes, especially the sustainable urban transport plans should be a good basis for coherent policies in all its aspects.
4. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i>
The actions it selves do not contribute; it depends on the way the actions are adopted by local authorities. And that means that the way the actions are carried out and presented are very important: they should be easily accessible and simple in use for all local and regional authorities, big and small. Information should be high quality, but not too academical; requirements to participate in EU projects should not frighten smaller authorities to participate, etc.
5. <i>Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?</i>

Yes, for the simple fact that transport is one of the biggest energy consumers. A Sustainable Energy Plan not taking transport into account is not complete.

C. Additional action needed:

6. Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?

See 2.

7. Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans? Should the access to such financial instruments be subject to conditions?

Apart from the fact that it is very difficult to formulate criteria to subsidise the setting up of integrated urban mobility plans, I wonder whether the financial stimulus should be a reason to set up such a plan.

I think it is more logical to subsidise actions formulated within those plans. That in itself can be a stimulus to set up the plan. And then, of course there have to be conditions, but they should not be too difficult, especially the administrative side.

8. Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper³⁰ suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.

Funding incentives are welcome. But an award scheme is very difficult, since pollution and congestion are depending on so much more than the local urban transport policy. Is there a Europe-wide level playing field for cities, which makes a scheme possible? I think there isn't.

9. What would your priorities for action/implementation be?

The funding opportunities.

D. Best practices and experience:

10. Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information exchange platforms etc)?

Please provide a short description of these measures or initiatives.

³⁰

CdR 236/2007 final.

Yes , many, some examples:

- Our transport plan is part of an integral urban policy on economy, housing, urban development, environment and transport.
- Utrecht participates in CIVITAS MIMOSA with 18 projects.
- The Utrecht integral urban freight policy is a national and European example and consists of both infrastructural, regulatory and logistic measures. Innovative examples are Cargohopper and our Beer Boat.
- The environmental zone for trucks has been introduced as part of a nationwide covenant on environmental zones. This means access criteria are standardized and several compensating measures have been implemented.

E. Better regulation:

11. *Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?*

--- (no clear opinion)

12. *Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?*

No, local actions have already been executed or are running. I don't think we have to change things drastically.

COMMITTEE OF THE REGIONS – DIRECTORATE FOR CONSULTATIVE WORK
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Name of the Authority:	Association of German Cities ³¹
Contact person:	Ulrich Haarmann
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BACKGROUND

The Urban Mobility Action Plan consists of a comprehensive support package aiming to provide local, regional and national authorities with incentives, support and tools to develop a culture of sustainable urban mobility in the EU, which fosters competitiveness, is environmentally friendly and promotes an inclusive and cohesive society. Urban mobility should not be seen in isolation, but should be addressed with the objectives of other community policies (cohesion, environment, growth and jobs) in mind.

The action plan includes short and medium term practical solutions in the form of 20 actions across 6 thematic areas³². Actions are to be launched until 2012 and will be based on partnership with and voluntary commitment by local, regional and national authorities in cooperation with the European Commission in selected areas. They will be implemented through existing EU programmes and instruments. The European Commission underlines that local, regional and national authorities will be free to make use of the support and tools offered under the action plan and that all actions will be implemented through existing programmes and instruments.

Please complete the questions overleaf:

³¹ Not a member of the CoR Subsidiarity Monitoring Network.

³² Promotion of integrated policies, citizens' rights, green urban transport, funding, experience and knowledge sharing, optimisation of urban mobility.

A. Subsidiarity & Proportionality:
<p>1. <i>Given the responsibilities/competences of local and regional authorities in your country, which do you think should be the role of the EU as regards achieving sustainable urban mobility?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>The European Union should encourage and support local authorities without imposing new restrictions and without reducing their room for manoeuvre. Any kind of guidance, support, possibilities to exchange experience, and data gathering exercises are more than welcome. But action 7 causes concerns that the EU could seriously hamper cities' efforts to comply with European air quality legislation. It would evoke a lot of incomprehension among citizens and local politicians if the EU first set environmental quality targets, then fails to adopt the necessary measures at source, and finally even torpedoes the efforts of those cities, which, despite of limited resources and tools at their disposal, desperately seek a way to comply with the aforementioned quality targets.</p>
<p>2. <i>Do you consider the proposed actions appropriate for achieving the objective of sustainable urban mobility in the EU in a satisfactory manner?</i></p> <p><i>If possible, provide reasons for your answer.</i></p>
<p>The action plan neglects to a far extent the principle that environmental damage should as a priority be rectified at source and that the polluter should pay (art. 191 TFEU; former art. 174 TEC). Most environmental problems occurring in urban areas are the consequence of individual transport and the fact that vehicles run by combustion engines remain the backbone of individual transport. Apart from action 12 the action plan falls short of our expectations regarding measures at source to reduce CO₂, NO_x, and particular matter emissions as well as noise emissions from cars and commercial vehicles. I.e., the system of Euro emission standards for vehicles is not sufficient to allow member states to comply with European air quality legislation. The timetable of new standards to enter into force is not all aligned with the timetable of the aforementioned legislation. Instead of taking measures at the source of the pollution, the EU forces cities to adopt painful measures at the end of the chain, like restrictions on the access to city centres which are most affected by these kind of pollutants. We therefore ask the Commission to adopt stricter measures to tackle the problems of urban environment at the source.</p>

B. Links with other EU policies:
<p>3. <i>Do you consider that the proposed actions would contribute to higher economic, social and territorial cohesion within urban and peri-urban centres?</i></p>
<p>No.</p>
<p>4. <i>Do you consider that the proposed actions would contribute to achieving the EU's energy and climate change objectives?</i></p>
<p>Probably, the contribution of the action plan to the achievement of EU's climate change objectives will remain rather limited.</p>

<i>5. Would you support the introduction of an urban mobility dimension in Sustainable Energy Plans to be prepared by cities within the context of the Covenant of Mayors?</i>
A lot of German cities are already committed to “greening” and to “decarbonising” urban transport systems. An extension of the scope of the sustainable energy plans would therefore only reflect the wide scope of climate change action plans already in place on city level.

C. Additional action needed:
<i>6. Do you consider that there are other or additional lines of action relating to urban mobility that have not been proposed by the Action Plan?</i>
See response to question 2. Furthermore, it would be desirable that Council and Parliament adopts the proposal of the Commission for the revision of the directive on road charges for heavy goods vehicles as soon as possible.
<i>7. Would you support the establishment of a specific financial instrument encouraging urban and metropolitan areas to set up integrated urban mobility plans? Should the access to such financial instruments be subject to conditions?</i>
As the community initiative URBAN I and II have clearly proven, external financial support from the EU can set a valuable incentive to pursue integrated approaches. The adoption of an integrated approach should be the main condition.
<i>8. Would you support the extension of the scope of the Action Plan by funding incentives and/or an award scheme? The CoR opinion on the Green Paper³³ suggested the equivalent of an EU-wide "Blue flag Scheme" to be awarded on the basis of specific indicators to urban areas with low levels of pollution and congestion.</i>
Any kind of naming and/ or shaming system involves the risk of stigmatization of deprived neighbourhoods which would seriously threaten the object pursued by many cities to regenerate and to sanitize the public image of these neighbourhoods.
<i>9. What would your priorities for action/implementation be?</i>
See response to question 6.

D. Best practices and experience:
<i>10. Has your municipality/city or region (or the constituent members of your association) already implemented measures or initiatives helping to achieve sustainable urban mobility in line with the Action Plan (e.g. implementation of urban mobility plans, passenger rights in urban transport, rules and best practice regarding access to green zones, information</i>

³³ CdR 236/2007 final.

exchange platforms etc)?

Please provide a short description of these measures or initiatives.

- German cities have a very long experience in strengthening the public transport infrastructure and systems in their cities. Many cities rely on urban rail systems and use buses only as additional tool. Others dispose of broad experience in purchasing “clean” vehicles, like buses run by gas or electricity. Today, city planners follow the concept of a city of short distances (Stadt der kurzen Wege) in order to avoid new traffic flows. Finally, German cities dispose of impressive network of cycling paths, a high number of projects seek to help citizens to rediscover streets as public space to live and not only to drive. In many cases, all these measures have been implemented in the framework of integrated urban mobility plans.
- The system of regulating the access to green zones is based on national legislation, but the association of German cities has issued a guidance paper on the question how to deal with possible exemptions (i.e. for retailer, craftsmen, or coaches).
- Many local public transport enterprises run their own systems of passenger rights and guarantees.
- The association of German cities offers a number of different platforms and working groups for both politicians and experts to exchange experience. Via our involvement in the framework of CEMR we also foster the exchange of experience on European level.

E. Better regulation:

11. *Do you feel that the impact assessment accompanying the Action Plan is comprehensive and takes into account aspects particular to local and regional authorities?*

12. *Do you feel that the implementation of the Action Plan will result in increased financial or administrative costs for your city, local authority or region?*

A harmonisation of green zones on European level, which requires an adaptation of the existing green zones would cause considerable financial and administrative costs.