POLIS

Think local, act European

Contribution to the development of the
New EU Urban Mobility Framework

September 2021

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On our contribution

POLIS welcomes DG MOVE's ambition to shape a new Urban Mobility Framework. We face an unprecedented situation, with profoundly menacing consequences, which requires swift and decisive actions. The next decade is critical, and we must rise to this challenge together – as Europeans. The New EU Urban Mobility Framework should help all scales of European governance accelerate the shift to Sustainable Urban Mobility.

This position paper is the core of our contribution to the consultation undertaken by the European Commission for its new Urban Mobility Framework. It elaborates on the two fronts that we consider most important – the way key challenges are framed, and specific measures.

The paper sets out by framing the challenge and the lessons learned from the COVID-19 lockdowns. It the lays out the Urban Mobility System we aspire to, and the concerted effort needed to get there. Finally, it elaborates on the Framework's connection to the Strategy, and proposes actions for the next decade.

About POLIS
POLIS is the leading European network of cities and regions focusing on urban transport innovation.

We cooperate to develop sustainable urban mobility solutions for the city of today and tomorrow. POLIS draws its expertise from a network of decision makers, researchers, managers, and practitioners working in authorities at local and regional level across the European Union.

Building on results developed in European projects and in thematic working groups that touch upon key transport challenges, we link innovation and public policy orientations on urban and regional mobility with European policy development.

Learn more at www.polisnetwork.eu.

1. The challenges ahead

Our network and our members took good note of the IPCC's Sixth Assessment Report on Climate Change (2021). Based on the findings of that Report, and on our own experience with promoting Sustainable Mobility, four special concerns should guide the EU's New Urban Mobility Framework:

a) We must **reduce emissions faster** – and the longer it takes to make that shift, the stronger will be the negative impacts of Global warming;

b) We must prepare for **negative impacts which are already inevitable** – especially extreme weather events that will threaten lives and disrupt mobility services;

c) We must advance a **just transition** – one that reduces (instead of accentuates) existing inequities, and is politically viable (or misaligned incentives will block and delay progress);

d) We must foster a **concerted effort, all across Europe** – changes at the local level must be shaped, discussed, decided and implemented at the local level, by local decision makers, but we need a concerted European effort to foster their dissemination, encourage their adoption, and provide support to those who step forward to implement them.

Urban Mobility is an essential lever to advance on these issues: it generates massive emissions, but enables massive behaviour change; it must go on supporting the free and safe movement of people and goods throughout extreme climate events; it can enable access to jobs and several other opportunities, but can also generate and sustain discrimination in that access; it is a top concern for local elected officials and their voters, and a hot subject in local policy.

The real and pressing challenge, at this point, is not studying, promoting, testing or demonstrating Sustainable Mobility. **The real challenge we face is accelerating the shift to Sustainable Urban Mobility** – deploying as fast and widely as possible, and for that purpose providing, through policy and financial instruments at the European and National levels, positive reinforcements and powerful nudges, empowering the local level to act.

Profound changes are needed, and **local and regional governments and transport authorities hold the keys for most of the critical changes**. We must act without

further delays, and follow up on the Green Deal, the Sustainable and Smart Mobility Strategy, and the 'Fit for 55' Package.

2. The COVID-19 stress test

Stress testing is a form of deliberately intense or thorough testing used to determine the stability of a given system, critical infrastructure, or entity. It involves testing beyond normal operational capacity, often to a breaking point, to observe the results.

A lot has been said and discussed about what happened when countries and cities started locking down to deal with the COVID-19 pandemics. It was certainly an atypical situation, from which we should be careful to extract indications for the future.

However, if we look at it as a stress test of our urban mobility systems, we can clearly extract some very useful lessons for the future:

1) **Local and regional authorities stepped forward into the front lines** to deal with the health crisis, which was tackled in hospitals, but also in streets and plazas, buses and trams, trains and subways. As the pandemic put our societies and economies under pressure, cities and regions kept things moving, supporting essential workers, local deliveries, and several public and private services.

2) There was **intense cooperation between cities and regions** from different countries, without any mediation from national governments, building on the strong bonds created through years of European cooperation and networking. Peer exchange and support fostered the quick transfer of good practice.

3) While several private actors in the transport sector went broke or suspended operations, **public transport kept going**, often incurring huge operational losses, to ensure urban mobility. Like national banks protect economies in times of acute economic recession, public transport was what was left standing, and what all could depend upon.

4) Public transport was, and remained, the **mobility lifeline** for many often-forgotten professionals, deemed "essential workers" during the crisis: nurses tending to thousands of patients, and many others cleaning buildings and vehicles, filling supermarket shelves, and keeping supply chains moving. They are essential every day and will remain essential for the next crises (and they will not be teleworking).

5) With biological ecosystems and gene pools, **diversification breeds resilience**. The same applies to urban mobility systems. Creating conditions for safely and comfortably walking, cycling, or using shared micromobility, became top of the agenda for many large cities to reduce the pressure on public transport, make lockdowns bearable, and help local economies bounce back.

6) Air pollution, especially including emissions from transport, **worsened the impact** of the health crisis. It made people even more vulnerable, but also even more aware of the importance of radically cutting emissions. That awareness now expects follow-up in terms of public policies and measures.

7) Empty streets, with smaller volumes of motorized traffic, encouraged speeding, and led to deadlier crashes. The safety of an infrastructure cannot vary with fluctuations in its use. What happened means that **many road and street networks are intrinsically unsafe**, because of structural characteristics that encourage speeding. Traffic calming must be deployed *en mass*e.

8) As health measures are eased, the progressive return to previous unsustainable mobility patterns, from lockdown back to gridlock, shows urban mobility needs **systemic change** – one can't expect the same system to produce different results.

9) Public authorities can achieve massive and fast **behaviour change in European democracies**. People need a compelling reason, public leadership, and well-founded, purposeful regulations. Innovation, fast-tracking of new measures, acceleration of change, agility – all these are possible in the public sector too. Direct cooperation between the European and Local scales of Governance played a very important role in making this happen.

10) As ridership numbers dropped, and only slowly recover, alleged '**fear of public transport**' has been a hot topic for many discussions. Does this fear exist, and is it driving people away from buses and subways? It's a fact that ridership numbers are low, but establishing its cause is quite something else. Allegations are rarely (if ever) substantiated by hard evidence properly collected. The rise of unemployment, furloughs and teleworking provide a better explanation, and beg for a much more relevant discussion about deep changes ahead in the job market (e.g., teleworking, platform microtasks, etc.) and their cascading implications for real estate, land use, and urban mobility, especially commuting, deliveries... and public transport.

3.   The urban mobility system we aspire to

Many cities and regions have signed up to the POLIS Urban Green-Deal Makers Pledge[1], out of a moral duty, to their current and future citizens, to do all they can to stop the Climate Crisis, and to recover from the health and economic crises with sustainable solutions.

To achieve at least a 55% emissions reduction by 2030, we must accelerate the shift to sustainable urban mobility. This requires substantive changes to policies, methods, services, fleets, and infrastructure. Cities and regions hold the keys for most of these changes, which are indispensable for the success of the European Green Deal.

However, these changes raise big and complex challenges, and local and regional governments cannot stand alone. Small, medium, and large cities, provinces, and regions – we are the first responders to health and social crises, and the early adopters of transport innovations.

We must manage complexity and develop multimodal and integrated solutions, every day. We are at the front line – and we need the active cooperation and support from all scales of European governance. This is what POLIS members have committed to:

- **Urban Mobility: a planned approach towards sustainability and safety**

We know that fast, coherent, and sustained progress requires a strategic approach, developed with public input. We also know that clear targets and guidelines are indispensable to empower citizens, stakeholders, and staff, and mobilise the private sector. We will craft and update our planning tools (be they SUMPs, SULPs, Vision Zero Plans, local Green Deals) to deliver on ambitious commitments.

- **An open and fair multimodal system**

We believe urban mobility must ensure a sustainable and healthy freedom of choice, so that people are neither locked in car dependence, nor captive clients of public transport. We will adapt our infrastructure and the combined offer of the public and private operators using it, to become truly multimodal and intermodal, and systematically nudge users towards sustainable choices.

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[1] Cf. "The Urban Green-Deal Makers Pledge", 2020 (download available here)

- **Priority to affordable, safe and sustainable modes of transport**

We know the economic recession and rising unemployment are reducing the disposable income of many families, who need affordable transport options. We also know that these options, including walking and cycling, are the most sustainable, inclusive, and resilient. We will work for a fair transition, ensuring that those who wish or need to use sustainable modes of transport can do so with safety and convenience.

- **Inclusivity as a key-determinant for innovation**

We know that in past decades the transport sector often focused on the needs of adult middle-class men commuting to and from their offices in peak hours, underserving several types of users. We strongly believe urban mobility must understand and respond to the rights and needs of all users, including women and people of all ages and abilities. We will ensure our mobility systems drive social inclusion, through universal solutions based on usability, safety, comfort, and efficiency.

- **Close interaction between public and private mobility services**

We know that for mass behaviour change to happen, the mobility sector must provide a convenient alternative for millions of daily car trips. We also know that investment in public transport is critical, but alone it is not enough. We will work with the private sector to make the sustainable offer grow in capacity and convenience in areas where mass public transport is not the most efficient solution.

We know that private sector innovation can help deliver on public policy goals and drive economic recovery. We will develop adequate and agile regulatory frameworks that maximise the potential of new solutions and mitigate negative externalities. We also know that a car-centric urban environment blocks and delays the emergence of new mobility services. We will enable innovation, unlocking the potential of our streets by lower speeds, space reallocation for active mobility, and multimodal management.

- **Cities and regions as key contributors to the TEN-T**

We strongly believe that Europeans have the right to enjoy free, safe, and sustainable movement of People and Goods across the Union. We know we must think global, and act local, and that active and high-quality urban nodes are indispensable for the success of a European integrated mobility system. We will actively contribute to making the TEN-T network a driver for improvement of European mobility and will work to make the safety and quality of that network reach every street and every road in our territories.

- **Clean our fleets and green our streets**

We know traffic-generated air pollution has profoundly negative effects on the health of our citizens. We also know the electrification of vehicles holds an important promise, if industry and all governance levels work towards zero emissions, using power generated by clean sources, and if we avoid, shift, and improve mobility. We will adopt clean energy in our fleets, encourage vehicle owners and operators to go electric or become less fuel-dependent, and clean the air we breathe, including planting trees in our streets.

4. A concerted effort: Direct cooperation between the EU and the local and regional level

The scale and the speed required of this shift are not compatible with a simple bottom-up approach. On the other hand, the specificity of local contexts and the political legitimacy held by local and regional governments are not compatible with a simple top-down approach. Accelerating the shift to sustainable urban mobility requires a **concerted effort**, that enables direct cooperation between the European Commission and local and regional governments.

Subsidiarity has been a bridge for European governance, but it must not become an obstacle to direct cooperation among European, national, and local decision makers. Making Urban Mobility become safe and sustainable is **everybody's business** and must be a priority at all scales of European governance.

The TEN-T Network and the 100 Climate -Neutral Cities Mission can (and should) be used as a **dynamo** for the diffusion and uptake of European sustainable urban mobility goals, policies, strategies, and tools. Special care must be taken to capitalize on the capacity and experience of existing networks like POLIS, and to not leave behind cities that don't get included in these groups.

We must also highlight the fact that many **disruptive transport innovations** are coming to cities and must be dealt with by local and regional governments. But they aren't impacting all cities and regions, and thus, the challenges they bring aren't necessarily well reflected in the agenda, understanding and priorities of the national level of government. Channelling the energy, technological capability and capital of these private initiatives to advance public goals is essential and requires strengthening direct dialogue between the European and the local level of government.

5. From strategy to framework

Our network and its members have expressed their support to the EU's vision on urban mobility, and specifically to the big picture that is implicitly and explicitly present in the Smart and Sustainable Mobility Strategy.

That Strategy describes an overarching vision for local mobility systems and access to urban areas, and already provides a solid foundation for the New Urban Mobility Framework. We consider, however, that the following aspects need to be better addressed:

1) Substantive progress in **road safety** is indispensable for substantive progress in sustainable urban mobility to occur. This inherent link should be better developed and prioritised. Sustainable mobility must be safe, or it will not be sustainable.

2) The Strategy does not sufficiently recognise the importance of **Public Transport as the backbone** of urban mobility systems that are safe, environmentally friendly, accessible, efficient, and affordable. This should be amended in the Framework.

3) The **reduction of car use and car** ownership should be a core objective of a European Urban Mobility Framework. If not, local and regional governments are forced to deal downstream with a problem that, in fact, is created and sustained at a much higher scale[2]. The current discussion revolves predominantly around reducing air and noise pollution, road casualties and congestion, all of which are symptoms of car use. While making cars cleaner and safer is certainly important, more attention should be given to tackling the root cause of these issues: car use and car ownership. Many policies and calls for projects are moving in the direction of a general adoption of EVs. This raises questions in relation to urban contexts, where the problem of the private car is first and foremost that of available space and source of danger, irrespective of the type of engine.

4) Urban mobility policies are expected to contribute substantially to the revival of local economies after COVID-19. The **overhaul of local economies** (through e-commerce, teleworking, decentralised production etc.) strongly relates to Urban Mobility, and has serious implications.

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[2] Cf. for example "The political economy of car dependence: a systems of provision approach", Giulio Mattioli (2020), Energy Research & Social Science, August.

On the methodological focus of the Framework, we recommend the following:

5) It should provide details on the process for **actual deployment and implementation** of the Strategy's vision: how we support the transition towards efficient, inclusive and climate neutral local mobility systems through better (and more) funding, coordinated R&I, awareness raising, capacity building, piloting and upscaling and procurement? The scale and speed of this transition are beyond compare and require full commitment to action of all stakeholders involved, EU Institutions included.

6) To achieve these ambitions, the Framework should be (unlike its predecessors) **more than a list of studies** and go well beyond this theoretical level of addressing urban mobility, including both **legislative, financial and 'soft policy'** approaches. What we need now, is action.

    The framework should include a proposal for a process to identify **legislative** initiatives that have relevance for urban mobility and that can support the shift. The Strategy indeed contains several legislative actions that have urban relevance. We have listed these in the Annex to this document. The assessment of which "pieces of EU legislation" will contain "some urban mobility elements" (citation from roadmap document) should be made in dialogue with cities, regions, and transport authorities. These legislative actions should become an integral part of the Framework. Territorial impact assessment should also be part of the preparation of the framework and should be mainstreamed in its actions.

    The Framework should build on two axes, each with its legal dimensions: urban mobility as part of an **integrated urban system** - with links to other sectors such as climate, energy, housing, education, health, urban greening (structured in the Climate-Neutral Cities Mission), but also as an integral part of a **European mobility system**, built around the TEN-T, and community law regarding internal market, vehicles, alternative fuels, ITS etc. Both dimensions should be balanced.

    With regards to **financing**, Public Transport is undergoing several changes at once, from fleet renewal to service digitalization, elimination of barriers to accessibility and capacity growth. All these challenges are being tackled by authorities and operators which are facing significant cost pressures following the COVID-19 crisis.

Public and private investments are needed. The Framework should foster the diffusion of best practices, including the application of "polluter pays" and "user pays" principles, and the potential for land value capture. It should also address the fact that EU funding is currently very fragmented, and the EC should monitor what money is spent on public transport and to what extent its fragmented budget is delivering.

With regards to '**soft policy'**, the EC should promote structured capacity building in cities and regions, using various existing and new instruments, including ERASMUS+. We know that ambitious goals require ambitious improvements in our policies, methods, and skills. We also know the potential of European networks to explore future strategies, share smart solutions and enhance peer-to-peer learning. POLIS hopes to be able continue to implement capacity building programmes, to empower and enable cities and regions to pursue these goals, and actively contribute to knowledge exchange, through its own network and with the support of European-funded projects.

For topics with a current **knowledge asymmetry between city and market**, we need curricula, knowledge bases, job profiles, practitioner training, professional certificates, and more, otherwise a territorially balanced, EU-wide deployment of SUMPs, digitalisation, electrification, automation, UAM, micromobility, cycling infrastructure etc., will never happen at the speed that is needed to make the transition succeed.

7) The New EU Urban Mobility Framework should be **well phased**: with the Recovery & Resilience Facility, the COVID-19 exit and recovery being the focus for the first years of the decade, the emergence of new technologies might shape the second half of the decade. This brings the question to the table which Framework actions depend on each other. A timeline or a mid-term revision for the framework will therefore be needed.

6.   A to-do list for the next decade

Urban Mobility covers a wide range of areas. Almost all of them have some link with EU legislation, most are addressed in EU R&I activities. We see a lot of work on the shelf in the next decade to make life for EU citizens better.

6.1   Address the elephant in the room

Private car ownership, use and abuse generates and sustains several urban mobility problems. Electrification provides a partial solution. We need vehicles to be zero-emissions, zero-deaths, and we also need to reduce their number and their size, since that is the only way to free up space for other modes and other economic activities, and to increase permeability and green areas in urban cores.

The economic importance – in terms of jobs and GDP – of the European automotive industry must not be taken as a reason to slow change, but rather the opposite: the longer it takes for the industry to adapt its technology and business models, the more it will risk failing the test of the future, and the more painful its shift will be, later on.

➔ Regulatory demands for reduced emissions should be matched by more stringent regulatory demands for automatic speed reduction (going well beyond ISA).
➔ The EC must initiate a discussion about regulating the weight and size of cars, considering safety, but other implications as well (e.g., are we going to allow a growing fleet of SUVs overcome parking and overconsume battery output?).
➔ The EC should require car manufactures to disclose to potential buyers, in an accessible and visible manner, the full financial costs of private car ownership, including the expected costs with insurance, taxes, fuel, maintenance. The EC should provide the industry and the consumers with a reliable reference that can be used by the industry for this purpose.

6.2   Reconsider congestion

If we define "traffic congestion" as a condition in transport that is characterized by slower speeds, longer trip times, and increased queueing, we must first of all point out that, although commonly considered for motorized traffic, it also affects walking and cycling, due to the insufficiencies of their respective networks.

We must also note that slower speeds aren't necessarily undesirable: they are safer for all road users, they lead to less emissions (within certain speeds, and especially if accelerations and stops are avoided), they don't necessarily lead to congestion (and may have the opposite effect), and in a well-managed network they increase capacity.

➔ The Framework should avoid the recurrent mention of (motorized) traffic congestion as one of the main problems to be solved in urban areas – it is a narrow understanding, that omits the plight of other roads; it is a symptom and addressing the structural causes must take precedence; and a sole focus on it sustains outdated traffic management approaches centred on facilitating traffic flow.

➔ The EC should recurrently point out that modal shift to walking, cycling, public transport is the best way of reducing congestion and emissions.

6.3   Support small and medium-sized cities

About one third of the population in Europe is living in cities with less than 100.000 inhabitants. Most of the small and medium-sized cities (SMCs) are committed and doing their best to shift to sustainable urban mobility. In practice, however, due to low mobility demand and consequently supply, Public Transport in SMCs is not always a real alternative to private car use for many citizens. In addition, new mobility solutions and providers sometimes do not see sufficient market potential and economies of scale in SMCs to bring their services to these territories.

➔ The SMCs can play an important role as a Living Lab for new mobility solutions – in general, they are very flexible and have a strong local and regional network of citizens and companies. The Framework should support this role as Living Lab of the SMCs, as an important step to come to innovation and large-scale deployment of new mobility solutions.

➔ At the same time, SMCs often lack sufficient sustainable mobility alternatives to private car use. The Framework should pay special attention to the needs of SMCs to support the shift to sustainable mobility by initiating and funding of research and innovation actions in the domain of business models, technologies, and citizens engagement with regard to low mobility demand zones.

6.4   Prioritize equity and inclusion

Urban mobility systems have a key role to play in social cohesion. They can drive inclusion, but they can also be the source of persistent disadvantages, namely for women, the elderly, persons with disabilities, children and, more generally, families with

lower incomes. Decades of car-centric transport planning and management did not give sufficient thought nor support to the needs (and rights) of all those who cannot access a car. This is not a 'minority', but well over half the population of any urban area.

An additional problem is due to the fact that in suburban areas many low- and middle-income families have been forced to become either car-dependent or captive public transport users. This many create serious difficulties to the implementation of measures like fuel taxes and road charges, or to the redesign of public transport networks in partnership with the private sector.

→ The Framework should encourage the emergence of combined mobility solutions that, through public-private partnerships, provide safe and affordable mobility solutions in situations where the sole use of the public transport network creates a significant disadvantage.

→ The Framework should encourage the implementation of proper mechanisms for reporting and monitoring discrimination (e.g., for lack of accessibility) and security problems (e.g., sexual harassment in public transport).

→ The Framework should highlight Accessibility and Inclusive Design as an indispensable component of functional, safe, and appealing transport services.

→ The EC should establish the necessary mechanisms to verify that new transport buildings, public spaces and rolling stock built or acquired (and, to the furthest extent possible, renovated) with European funding are accessible for all.

→ The EC should set up Set up coordination between the parking industry, the public transport sector, local authorities and end users with regards to the redefinition of the mobility aspects (parking and collective/shared mobility services) of the European disability card.

→ As defined in the SSMS, the Framework should establish the involvement of competent authorities in the discussion about intermodal passenger rights.

→ The EC should foster the exchange of experiences, and the establishment of standards with regards to accessible mobility services and ticketing.

6.5 Put an end to road deaths

If traffic deaths and serious injuries were the result of a virus, everyone would see that the vaccine has been invented, and that the real challenge we face is not inventing new medication, but rather accelerating the production and distribution of this vaccine and training the professionals who have to apply it (and, along the way, deal with those who do not believe in science). The Safe System approach must be the base of the EC's

approach, and with the New Paradigm for Safe City Streets[3] many of our members have set out the key principles.

To key step to reduce traffic deaths and serious injuries in urban areas is to act on the source of danger, and that is motorized traffic – and most of all, its speed. This must be done, first, at a structural level, i.e., acting on the vehicles (cf. above) and on the infrastructure (through reduced speed limits and traffic calming). Enforcement and Education can increase the effect of these structural measures, but cannot, by themselves, serve as an alternative.

➔ The EC must encourage a European-wide reduction of speed limits in urban areas, acting with Member States to support setting these limits by default at 30 km/h (or lower) in all streets and roads where pedestrian and bicycle traffic is allowed, and (if necessary) at 50 km/h in larger roads and arterials where traffic management can properly manage the risk.

➔ The Framework should establish Vision Zero plans as a recommended approach to advancing road safety at the local, regional and national levels, and set up a mechanism to foster, support and monitor their development and implementation.

➔ A new approach requires investment in capacity building. The EC should emphasize the need for training and technical support, and should launch a program for that effect, combining professional training, tools, and technical support, to empower elected officials, planning and design professionals, advocates and the media.

➔ The Framework should acknowledge the importance of collecting, analysing and sharing (publicly as much as possible) data on road safety, encourage the streamlining at the European level of road safety statistics, and support the development of other types of data, including specifically risk assessment (e.g., EuroRAP) and on near-misses and safety perception (fear, especially by vulnerable road users).

➔ Intelligent Speed Assistance, as regulated, does not solve the main problem, but it is a step in the right direction, and the EC should find ways to encourage its adoption at a faster pace by public and corporate fleets, both through fleet renewals and vehicle retrofits.

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[3] Cf. Declaration on the New Paradigm for Safe City Streets (download available here).

6.6   Sustainable Urban Mobility Plans (SUMPs)

Sustainable Urban Mobility Plans have been established as a concept in many of Europe's larger and medium-sized cities, and capacity in cities has been improved over the years. It is now time that these strategies become more performance-based, and build the basis for the mobility transition. Future SUMPs should go beyond traffic management and instead focus on creating an accessible and attractive public transport offer and incentivising active mobility. They should work towards climate-neutrality, while also improving quality of urban life, and consider accessibility as a key element of sustainability.

New and updated SUMPs should be aligned with EU objectives (the Green Deal, air quality, road safety, accessibility and inclusion, etc.) and international commitments, such as the Sustainable Development Goals (SDGs) and the UN Convention on the Rights of Persons with Disabilities.

➔ If the EU could provide additional funding to cities that have a SUMP that follows European good practice, this would not only incentivise more cities to adopt such plans, but also create direct accountability and stimulate a virtuous cycle of improvement.

➔ At the same time, the EU should continue to provide cities with the necessary support to set up and update their own SUMP.

➔ The European Commission should better incentivise the reporting of cities and Member States on the development and implementation of SUMPS, on progress and challenges, based on key indicators, which should include modal shares and journey times by mode to facilitate the identification of areas to be improved. They should also report on the impact of measures which have been implemented. Collating these reports will create an accessible European library of best practices and provide useful examples, encouraging more cities to develop their own SUMPs.

6.7   Urban freight and logistics

This sector is undergoing a revolution, and this revolution poses major challenges to sustainable urban mobility. The rapid growth of e-commerce, which accelerated during the COVID-19 lockdowns, is growing demand to a scale that is not compatible with existing approaches and regulations (or lack thereof). It is at the same time operating profound changes in the sector, some of them incompatible with sustainability goals – increases in delivery speed, driven by competition, are often being obtained at the cost

of efficiency, safety, and massive amounts of waste (tons of packaging, which end up taxing public waste management systems).

This growth in e-commerce (which has been facilitated by a no-holds-barred approach to its often inefficient deliveries) is also fostering important changes in the labour sector (namely towards gig-work, which raises not only labour issues, but also safety issues) and in local economies (local retail is being forced to compete with large platforms that benefit from the network effect, cross-subsidies and intense externalization of costs, specifically including costs associated with deliveries). A public approach is needed.

➜ The optimisation of urban deliveries should feature more prominently in the Framework, with mention of specific support and awareness-raising measures to be taken. While we welcome the mention already made in the roadmap, the significant portion of total urban emissions caused by urban logistics should warrant a greater focus on their optimisation.

➜ The EC must more beyond studies and pilots and be action-oriented. We know what works, and what doesn't. We need to upscale, and work at the regulatory level. Lack of clear regulations and proper enforcement subject sustainability-committed operators to unfair competition by those who don't adapt. Consumer information, by itself, will not solve this.

➜ The intersections between the urban and the TEN-T logistics involve different actors and processes. The TEN-T working groups at the European level must include enough stakeholders from the local level.

➜ The growth of e-commerce and instant deliveries is expanding the scope of stakeholders that must be involved in the discussion, including at the EC level, namely DG GROW, DG Competition, DG EMPL, DG CLIMA.

➜ Digitalization, data collection and sharing are very important also for this sector. It is important for local authorities have access to data that enables them to better plan and manage flows in their cities, and the Framework should highlight and support this.

➜ The Framework must consider that funding for technological innovation in this sector must be matched with funding for skills improvement and organizational capacity building.

➜ In some Member States, local authorities don't have the power to implement access regulations for freight. The circulation of goods should be free, but also safe and regulated. We invite the EC to analyse this matter.

- → The Framework should consider the fact that, cargo bikes can make a very positive contribution to zero-emissions freight, but they cannot be considered alone. Their deployment requires the implementation of micro-hubs, which must be located in the inner city, where space is more expensive. It also requires a regulation of the local deliveries market that ensures sustainable alternatives are commercially viable and competitive.

- → There's more to sustainable freight than vehicles. The EC should encourage the diversification and prioritisation of solutions that increase efficiency (e.g., pick up and collection points, delivery lockers), encourage cities to be bold, and work with Member States to ensure regional and local governments are empowered to establish and enforce local regulations.

- → The Framework should consider, and the EC should explore and act on, the rise of so called 'gig work' in urban deliveries and its implications for road safety and occupation health and safety, specifically the aggravation of risk factors by algorithmic management, low pay and long work hours, and lack of proper fleet management practices.

- → Transport demand management has become an established approach to managing the transport of people. It's time to seek its application to instant and arguably frivolous deliveries as well. Their growth is not compatible with the sustainability goals we have to meet and is generating serious externalities that must be considered by the EC, especially considering that addressing some of them falls beyond the powers (but not the concerns) of local and regional governments.

- → The creation of urban distribution centres and the regulation of these deliveries (within the frameworks of traffic management, economic activity, and labour health and safety) is becoming more important as they grow. It will be important to understand, at the European level, that this regulation is not incompatible with the free circulation of goods and is essential for a healthy economy within healthy cities.

6.8 Regulating vehicle access through zonal schemes (UVAR) and parking

We expect that in the next decade new issues will determine the way cities plan vehicle access: road safety, space use, and trip purpose. Air quality will remain a factor but will be blended with other societal objectives.

➔ We invite the EC to continue its positive role in supporting a common European approach for UVARs with regards to planning, digitalisation, information, and enforcement.

➔ We invite the EC to bring together an explanatory note on UVARs, and links with current and upcoming EU legislation.

➔ The current developments with regards to end user information about UVARs should be further deployed in the next years, and a decision on how to proceed with digital tools and processes to assess UVAR compliance of vehicles, as well as support enforcement in case of non-compliance should be reached by 2024 the latest.

➔ Ideally C-ITS and geofencing will play an important role in UVARs by the end of the decade. We invite the EC to support R&I in this specific technology use cases, and regulate these technologies that will enhance the capacity of local road operators to better decide which vehicles and vehicle types are allowed in city streets at specific times of day.

➔ The EC should have a European Register of License Plates, to facilitate the enforcement of UVAR regulations in vehicles going cross border. This cannot depend on bilateral agreements.

We also invite the EC to further promotion of urban parking policies as a truly European mobility solution. This can be done by:

➔ Promoting European initiatives on parking data (APDS) and data warehousing.

➔ The integration of parking measures in SUMPs should further be studied and promoted.

➔ Parking measures with a clear positive societal cost benefit ratio should be able to receive funding in operational programmes as part of structural funds.

6.9   Active Mobility

The most direct way to reach a zero-emissions and zero-deaths urban mobility is to support the growth of walking and cycling. Small trips of under 5km account for a large part of all trips in urban areas, including a large part of all trips made by car. There lies the golden opportunity for accelerating the shift to sustainable urban mobility. Improvements in walking and cycling infrastructure are comparatively much less expensive, and some of them (e.g., traffic calming) have high multiplying effects. Active mobility must be a top priority for the Framework.

Reallocation of space in the public right-of-way is one of the most effective and efficient ways of systematically addressing most of the problems affecting the pedestrian and cycling networks. Reallocation also provides space for several indispensable amenities (e.g., seating, vegetation, comfortable bus stops), for supporting the local economy (terraces for seating bar and restaurant patrons, comfort to attract potential customers to shopping streets, etc.). Reducing the space made available to motorized traffic also reduces speeds and traffic volumes (increasing safety and air quality), and allows for the reduction of impermeable areas (through the removal of asphalt) and the planting of greenery, essential to mitigate heat waves, floods, and air pollution (especially particles).

➔ The Framework must acknowledge that, while measures to promote walking and cycling have to be planned, decided and implemented at the local level, by local decision-makers, their fast and wide uptake requires special attention and a concerted effort at all scales of European governance, including the European Commission, and at several domains of transport, not only walking and cycling advocates.

➔ The Framework should not categorize active mobility solely as a last-mile solution. This is a reductionist approach – cycling trips, especially, can be much longer. The Framework should seize the opportunity to boost the adoption of the bicycle as a legitimate mode of transport, including for longer distances, and the creation of high-quality peri-urban and inter-urban bicycle networks.

➔ As opposed to railway networks, explicit references to cycling in documents about peri-urban and inter-urban networks are often absent. As a result, finding European funding for bicycle projects under mobility tends to prove difficult[4]. The EC should change this.

➔ The Recovery and Resilience Facility has taken a first step in the right direction by sanctioning many cycling infrastructure projects across the EU. The importance of Cycling should now be cemented by the Framework.

➔ The Framework should acknowledge that making urban areas cyclable requires more than segregated bike lanes, which are applicable only in a fraction of the road and street network (e.g., 10 to 15%). The Framework should make clear that we must improve conditions in the majority of the network, by reducing speeds, and

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[4] Brussels Mobility, for example, points out that its ERDF footbridge projects across the Brussels canal had to be listed under environment, not mobility, and that in the same vein, the UIA project CAIRGO BIKE, which essentially aims to increase the use of cargo bikes in the BCR, is conceived as an environmental project to reduce air pollution, not a mobility project.

creating low-traffic neighbourhoods, where motorized through-traffic is absent, but cycling through traffic is welcomed.

➔ The growth of cycling in urban areas, and namely the most dense, also requires a substantive increase in the number and distribution of bike parking, close to major destinations (public transport, large public facilities), preferably thorough the conversion of existing private car parking, but also in residential areas, especially in areas where residents do not have the capacity (space to park or strength to carry) to bring their bike (especially the e-bikes) outside of the street, inside their residential building. The EC should encourage Member States to address these specific needs with targeted funding.

➔ Walking, to a longer or shorter extent, is a part of almost all trips. Conventional modal share measurement tends to seriously underestimate walking. The Framework should acknowledge this as seek to establish a proper measurement method.

6.10 Public transport

Public transport is undergoing several changes at once. Alternative fuels infrastructure and fleet investment – which could be facilitated by improved operational efficiency delivered by priority measures – are essential for decarbonisation.

Digitalisation holds the potential to provide more connected, smart mobility. Most importantly, if public transport is expected to take on a larger share of passengers in the years to come, capacity must be created as a matter of urgency. With an ageing society, accessibility will also become crucial.

➔ While authorities and operators are facing significant cost pressures following the COVID-19 crisis, public and private investments are needed to accelerate decarbonisation, digitalisation, accessibility for persons with disabilities, and capacity-creation in public transport. The Framework should acknowledge this and set a viable path for support.

➔ POLIS members experience that Public Transport support mechanisms at EU level are fragmented. The Commission should monitor what money is spent on public transport and to what extent its fragmented budget is delivering.

6.11 Clean vehicles

In this field there are several legislative initiatives that will make or break the mobility transition. POLIS carefully follows the developments in the discussion surrounding:

- Revision of the Alternative Fuels Infrastructure Directive and a roll-out plan with funding opportunities and requirements;
- Revision of the Energy Performance of Buildings Directive including enhanced provisions on charging infrastructure for e-mobility;
- Revision of the CO_2 emission performance standards for cars and vans, for lorries and put in place CO_2 emission performance standards for buses;
- Post-Euro 6/VI emission standards for cars, vans, lorries and buses.

➔ Throughout Europe, we notice that society expects that the local and regional levels will cater for EV-charging infrastructure. At this moment, not all cities and regions have the knowledge, funding and regulatory power to fulfil this role. This can be a real barrier for a balanced deployment of high-quality charging infrastructure.

➔ A specific issue POLIS members face is the relation between charging infrastructure and parking, and more specifically the question of charging infrastructure that is accessible for people with reduced mobility. We invite the EC to look into this issue.

6.12 Governance and integration

Because of the scale and speed of the change we need, the shift to sustainable mobility cannot be carried by the public sector alone – nor can it rely on the market alone. Cooperation is essential, to create urban mobility systems that are multimodal, affordable, safe and sustainable. Regional and local governments and transport authorities must be supported in their quest to channel towards public goals the energy, creativity, technological capability, and capital, of the private sector. This requires clear goals, and support across all scales of European governance.

Capacity and diversity must grow together. This cooperation must, fundamentally, enable the emergence and consolidation of a portfolio of alternatives to private car ownership and use. A portfolio where the total is bigger than the sum of its parts, and that, as a whole, provides equivalent reliability and convenience at the same (or preferably lower) overall cost of private car ownership and use. Disruptive transport

innovations have a positive role to play in the urban mobility scene – if they fit this purpose.

➔ The Framework should acknowledge that clear public goals, guidelines and incentives (possibly, but not necessarily, in the form of subsidies) are important to make sure this emerging portfolio evolves in the right direction, and that it creates gains in efficiency, instead of 'market cannibalization' or added trips and energy consumption.

➔ The Framework should support a healthy ecosystem approach, considering sustainability also at the social and economic level, including, namely, issues related to fair labour and fair market practices. Otherwise, new services will become 'invasive species' and undermine socially responsible business models (to the point of making them non-viable) and end up falling short in the positive sustainable impacts they could have.

➔ The Framework should acknowledge that regulating and supervising new urban mobility services places a growing volume of requests for digital technology-related tasks for which many local public authorities aren't yet equipped, and should set out, with Member States, a path to supporting (including by financing) capacity building in this domain.

➔ There is a capacity gap between private shared mobility operators, for whom digital technology is the core business, and public authorities, namely regional and public authorities[5]. This gap has a structural nature (it flows from the core mission of these entities), and is bound to grow. This is a problem for public and private actors, as it's difficult to build a stable and supportive relationship when the difference in goals between public and private players is compounded by a stark asymmetry in know-how. The EC, together with Member States, should analyse the potential role third party data aggregators can play in a regulatory framework.

➔ Regional and local governments and local authorities, if necessary, through their international networks, must be actively involved in the development of mobility data sharing regulations and standards.

➔ The Framework should acknowledge and highlight the key role that local and regional governments and transport authorities have to play in the governance of innovation, the integration of Public Transport and Shared Mobility, the shaping of Public Private Partnerships, the development of regulatory sandboxes, and the encouragement of new, sustainable, business models.

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[5] Cf. POLIS (2020) Survey Report "Sharing Data for Shared Micromobility" (2021) (download available here)

6.13 Digital transition

Digital multimodal transport systems can support the EU's efforts to achieve climate and societal targets if they promote sustainable mobility options – and if these options are also advanced in the 'physical world'. Full integration is a worthy goal, but for many it's still a distant destination, and smaller, viable steps are necessary first. Thus, while integration should be kept as a goal, we must acknowledge that it is a process involving very different actors, some more prepared or willing than others, and the best way to create momentum is to start by facilitating combination.

While "Mobility as a Service" (MaaS) systems do not usually solve the barriers towards multimodal mobility on the ground, they can help provide easier access and match demand and supply. MaaS systems require access to mobility data held by all stakeholders and can deliver their full potential thanks to smart governance. We must be aware of the role MaaS can play in the ongoing revolution in urban mobility, of the different business implications it has for different actors, and of the different – and not necessarily compatible – strategic interests these actors may have towards MaaS. We must ensure that MaaS will be a tool to nudge users towards the most sustainable choices, not the most profitable ones.

➔ The sharing of non-commercially sensitive data in central data hubs, such as required by the EU's delegated regulation on multi-modal travel information systems (MMTIS), is key to establishing multimodal mobility systems. Data sharing needs to be based on interoperable standardised interfaces and formats, building on previous experience in the integration of diverse data sets.

➔ Data hubs should include data held by transport authorities, public transport operators, taxis, ride-hailing platforms, resource sharing services (e.g., bike sharing, e-scooter sharing) and bodies holding data about individual motorized mobility (e.g., routing services, mobility management bodies).

➔ The EC should ensure that transport authorities, for mobility management purposes, get easier access to publicly valuable non-commercially sensitive data from any service provider.

➔ The Framework should acknowledge that, for the public sector, collecting, treating, and providing data in machine readable form into the public domain, with the level of quality (and the weight of liability) that implies, requires organizational capacity, namely technical skills, sound procedures, and available resources. The creation of digital infrastructure implies upfront costs, and ongoing maintenance costs. This is a

significant weight for cities, and while larger cities tend to have their own resources, smaller cities need to contract out, which makes this more expensive.

Our position on MaaS and Digitalisation[6] and on CCAM[7] have been more extensively developed in specific position papers.

6.14 Urban Air Mobility (UAM)

Urban Air Mobility is a new field for the POLIS community. Cities and regions are slowly starting to understand what their role can be in terms of supporting innovation, operation and regulation. We are contributing on to the coordination of societal stakeholders in this field.

➔ We invite the DG MOVE to actively coordinate the EU institutional players related to UAM.
➔ Specifically for this field, it is important to build capacity in a structured way, and to work towards EU wide certification of recognised 'UAM managers' – the UAM contact persons at city or city regional level.
➔ We invite DG MOVE to closely coordinate new legislation and adjacent regulations in this field with the local and regional level.

6.15 TEN-T Network

The TEN-T vision as described in the S&SMS is well received by Polis and its partners. We hope this vision can be put in operation. We suggest the following to make this happen:

➔ The SUMPs developed in the context of the new TEN-T Urban Nodes profile will need to have a component addressing international accessibility and connectivity. This is currently not well researched or documented – and is definitely a topic to further explore.
➔ Implement the Sustainable Urban Mobility Indicators (SUMI) as framework to measure long term trends in the performance of the nodes.
➔ Formally embed the nodes into the corridor governance structures.

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6 "POLIS-EMTA-UITP Joint opinion on EU-wide integrated ticketing", 2021 (download available here)

7 "Road Vehicle Automation in Cities and Regions", 2018 (download available here)

➔ Urban mobility projects taking place in these nodes should be more easily eligible for funding. This means, specifically but not only, CEF funding. We are aware that this is envisioned in the TEN-T revision, but it's important to highlight its relevance.

➔ Mechanisms to bring the urban nodes issue closer to the attention of the TEN-T ambassadors should be considered, or a specific urban nodes ambassador could be appointed.

➔ More direct support for regional cycling routes (and multi-modal/shared mobility hubs) as a way to make the transition to sustainable mobility in Europe's key urban nodes & functional areas on the corridor (improving sustainable accessibility to and of the corridor).

➔ Clearer priorities for international rail (both passenger and freight), including routes proposed by regions & cities. Too limited focus now on infrastructure.

➔ Better inclusion and representation of cities & regions in this regard, for instance within the MS expert group of urban mobility.

6.16 Mission on climate-neutral cities

Polis wants to ensure that the Climate-Neutral Cities mission will be beneficial for transport departments in cities and regions. In many cases, our interlocutors in cities and regions know very well which measures need to be taken to implement the transition towards zero emission mobility. At a moment when there is momentum for local investment in transition, it would be harmful to slow down this process due to extensive new planning procedures and paperwork.

➔ The emphasis should be on financing, scaling, acceleration and increased awareness and acceptance of envisioned mobility actions.

➔ The understanding of the climate impact of measures should be addressed, and cross-sectoral co-benefits should be exemplified, without seeing urban mobility as a subordinate sector.

Annex: Smart and Sustainable Mobility Strategy actions with urban mobility relevance

Actions for sustainable mobility

1.   Revision of the recast Renewable Energy Directive
10. Revision of the Alternative Fuels Infrastructure Directive[2] and a roll-out plan with funding opportunities and requirements
11. Revision of the Energy Performance of Buildings Directive including enhanced provisions on charging infrastructure for e-mobility
17. Establish sustainable taxonomy criteria for all modes[8]
2.   Adopt relevant implementing legislation under the recast Renewable Energy Directive setting out methodologies for measuring GHG emissions savings and promotion of renewable and low-carbon fuels
21. Zero pollution action plan for air, water and soil; revision of air quality standards and reduction of noise pollution
22. Issue guidelines to support the safe use of micromobility devices
23. Assess the need for measures to ensure a level playing field for local, on-demand passenger transport and ride-hailing platforms
25. Review of the regulatory framework for intermodal transport, including the Combined Transport Directive
28. Issue guidelines for operators and platforms on informing users about the carbon footprint of their deliveries and on offering sustainable delivery choices[10]
3.   Revision of the CO_2 emission performance standards for cars and vans, for lorries and put in place CO_2 emission performance standards for buses
30. Revision of the Energy Taxation Directive[12]
33. Establish EU framework for harmonised measurement of transport and logistics emissions
34. Issue guidelines for operators and platforms to inform passengers about the carbon footprint of their trip and to enable passengers to voluntarily offset it, and for wider use of eco-routing for (in-built) navigation software
4.   Revision of the Weights and Dimensions Directive
5.   Explore the benefits of retrofitting and renewal schemes in various transport modes
6.   Propose post-Euro 6/VI emission standards for cars, vans, lorries and buses
7.   Improve emissions testing in roadworthiness checks

8. Develop coherent rules for environmental, energy and safety performance of tyres

Actions for smart mobility

36. Revise Delegated Regulation 2015/962 on real time traffic information services to extend geographical coverage and datasets; revise Delegated Regulation 2017/1926 on multimodal travel information services to include mandatory accessibility of new dynamic datasets
37. Assess the need for regulatory action on rights and duties of multimodal digital service providers and issue a recommendation to ensure public service contracts do not hamper data sharing and support the development of multimodal ticketing services, together with an initiative on ticketing, including rail ticketing
38. Revision of the Directive on Intelligent Transport Systems, including a multimodal ticketing initiative
39. Complete the EU legal framework on the approval of automated vehicles
40. Assess the need for an agency or other body to support safe, smart and sustainable road transport operations[13]
41. Adopt the implementing legislation for the approval of connected and automated vehicles
46. Further develop the regulatory framework for drones and unmanned aircraft, including U- Space; adopt a Drone Strategy 2.0
47. Assess the need for regulatory actions to ensure safety and security of new entrants and new technologies, such as hyperloop
48. Set up a high-level group ('New Mobility Tech Group') as a first step toward the development of a coherent EU approach and a set of recommendations on facilitating testing and trials of emerging mobility technologies and solutions in the EU ('European Mobility Test Beds')
49. Develop a common European mobility data space and establish a stronger coordination mechanism for the national access points established under the ITS Directive
50. Set out an AI roadmap for mobility
52. Review the current EU type approval legislation to facilitate car data-based services including interaction with energy system
53. Propose a new regulatory framework to open up access to car data to mobility services
54. Propose rules on a trusted environment for corridor data exchange to support collaborative logistics

Actions for resilient mobility

55. Revision of the Regulation on the Trans-European Transport Network (TEN-T)[14]
56. Assess the impacts of the COVID-19 pandemic on connectivity and competition in the market, and propose follow-up measures as appropriate
57. Review the transport relevant State aid rules
58. Prepare crisis contingency plan(s) for the transport sector, including health-safety and operational measures and setting out essential transport services
60. Propose measures to encourage cross-border car rentals
61. Guidance on climate proofing of transport infrastructure, networks and systems
62. Review of the interpretative guidelines on the Land PSO Regulation; revise rules on air PSOs; and provide guidance on freight PSOs
63. Review of the passenger rights regulatory framework, including to ensure its resilience to extensive travel disruptions, and including options for multimodal tickets[15]
65. Revision of the Code of Conduct for computerised reservation systems
69. Issue recommendations for the transition to automation and digitalisation and their impact on the transport workforce
70. Launch initiatives to increase the attractiveness of the transport sector
71. Revision of the Directive on cross-border enforcement of traffic rules
73. Consider new guidance on issues such as the maximum permitted blood alcohol content for drivers of motorised vehicles and on the use of alcohol interlocks
74. Assess the need to propose rules for auditing, inspecting and reporting on infrastructure quality for bridges or other sensitive infrastructure
75. Adapt the eCall legal framework to new telecommunication technologies; consider the extension of eCall to powered two wheelers, trucks, buses and agricultural tractors
79. Consider setting up an EU rapid alert mechanism for security, including cyber threats
80. Explore the need to adapt existing rules to address cyber risks and insider threats, in line of the toolbox on 5G cybersecurity
82. Establish a scheme under the cybersecurity certification framework for automated vehicles