

**The urban dimension of the EU transport policy
COSLA Response**

General Considerations

1. The **Convention of Scottish Local Authorities** (COSLA) is the representative voice of all Scottish municipalities both nationally and internationally and it has long been advocating that the European Union legislation to fully respect the local competences and autonomy of Councils to organise and provide local services, including transport.
2. COSLA stresses that wherever local transport frameworks and solutions are already well developed, added value from any forthcoming European urban mobility proposal would be better achieved by supporting the development of existing structures. *COSLA would not support any EU measure that would introduce mandatory local transport rules* (planning, green zones, organisation of transport, etc.);
3. The below points conform an officer level response that has drawn from previous COSLA politically agreed positions on EU Urban Mobility

EU competence

4. We notice that the language used in the Transport White Paper (proposal 32) and the Commission Legislative Work Programme signals for EU-wide binding rules in this field. It is however something that we believe goes beyond the conferred EU powers on Transport whereas using the much greater EU powers on Internal Market looks to us as a too extensive interpretation.
5. Local transport is a local power within the UK and Scottish settlements. It is quite debatable that the claim that subsidiarity means that if the local/national level cannot deliver it should be the Commission to act imposing harmonising rules, particularly if argued under existing EU powers on Transport.
6. We are however open to discuss the pros and cons of the need to develop a validated framework for urban road user charging and access restriction schemes and their applications, including a legal and a validated operational and technical framework covering vehicle and infrastructure applications, and specifically if a legislative route is appropriate.

Theme 1 Promoting Integrated Policies

Heterogeneity concerns

7. Harmonisation as a *'one-size-fits-all'* solution is would not fit the different local conditions both in terms of specific local powers and of effectiveness of EU wide standards.

8. The diversity of types of schemes (access restrictions, low emission zones, congestion charging, traffic reduction, revenue raising, comprehensive/selective targeting of vehicles, etc) is seen at an EU aggregated level as a problem however this diversity is the reflection of very specific needs.
9. Detailed EU rules, even in the shape of a legally binding framework of compulsory use whenever a Councils wish to introduce a local scheme , would in practice leave the definition of rules and its updating to Commission, officials, national experts and industry leaving in practice to set local rules according to local conditions.
10. Against the claim of hundreds of different local schemes being a barrier for the internal market rather than going the full haul to the European level it should be possible to attempt first the national legislative route, thus reducing significantly the number of different regimes in place.
11. We are open however for the Commission continuing the process of identifying guidelines, or a reference framework well before considering entering into rules.

Theme 2 *Theme 2 Focusing on Citizens*

Information

12. Exchange of information tools is good for both industry and citizens. For instance setting up a web-based Internal Market Information system for green zones/access restriction/congestion charging building on the existing EU-supported www.lowemissionzones.eu would go a long way to address industry concerns without forcing common standards.
13. EU-supported promotion of best practice of different Local Transport models should be more actively promoted: Scotland would certainly be in EU terms in an advantageous position to show EU-wide leadership.

Theme 3 – Greening Urban Transport

Road user charging

14. This concept encompasses a range of others, including , congestion charging, workplace parking levies, Low Emission Zones and access control.
15. While there have been attempts across the EU and the UK to set up such schemes, local acceptability and performance has often been patchy. This is a local decision and the verdict ultimately rest on the local electorate, even if there are on paper sound environmental or economic reasons to limit access of private vehicles to town centres.
16. Clearly if such a measure is to be implemented there is a bigger chance of being accepted is seen as part of a wider domestic package of measures than a centrally defined isolated EU measure.
17. Road user charging or low emission zones are not the only solution. There are alternative that have similar effective results and costs such as Low Emission Vehicles or workplace parking levies, both of them open for private sector participation.

18. Equally the introduction of such schemes need to assess its implications in other agendas, such as impact in spatial planning, economic development (such economic impact in transport from peripheral or urban areas when no alternative to private transport exists)

Theme 4 – Strengthening Funding:

19. Clearly this is one of the areas of greater EU added value which in many ways given the programme nature of many interventions can do much to achieve the EU goals in a much more effective way and with greater ownership than mandatory EU rules.
20. It is worth noting that the Common Strategic Framework governing the Structural and Rural funds have a specific thematic Objective on Sustainable Transport. Conversely it is unclear how far the Smart Cities and Communities initiative, Covenant of Mayors, Reference Framework for Sustainable Cities and the future Intelligent Energy Europe scheme would link up with the Urban Mobility Action Plan. Finally it is to be greatly welcome the smaller scale initiatives such as the recent Sustainable Urban Mobility campaign

Theme 6 – Optimising Urban mobility

Technical standards

21. While Councils oppose EU legislation on that area due to Treaty and political grounds it is fair to say transport practitioners would be open to some degree of standardisation. Basic standards on non essential issues such as standardised signalling, standard documentation and similar basic issues as to facilitate transport operators and frequent travellers could be open for consideration.
22. Among those, COSLA welcomes the ongoing development at EU level of Intelligent Transport Systems (ITS) and technologies and its implementation at the local level. COSLA supports the EU action to facilitate this, provided it remains technology neutral and it is limited to ensure that systems are interoperable across the EU, avoiding gaps and overlapping of systems. We also support the EU facilitation of the expansion of ITS across the EU, including financial support but only if local authorities retain the ability to define the content, timing and ambition of ITS deployment in their area;

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