

CONSULTATION RESPONSE FORM

Commission Document 279/4- A Sustainable Future for Transport: Towards an integrated, technology-led and user friendly system

PART 1 - Information about you

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| Company Name or Organisation (if applicable) | CONVENTION OF SCOTTISH LOCAL AUTHORITIES (COSLA) |
| Please tick one box from the list below that best describes you /your company or organisation. | |
| <input type="checkbox"/> | Small to Medium Enterprise (up to 50 employees) |
| <input type="checkbox"/> | Large Company |
| <input type="checkbox"/> | Representative Organisation |
| <input type="checkbox"/> | Trade Union |
| <input type="checkbox"/> | Interest Group |
| <input checked="" type="checkbox"/> | Local Government |
| <input type="checkbox"/> | Central Government |
| <input type="checkbox"/> | Police |
| <input type="checkbox"/> | Member of the public |
| <input type="checkbox"/> | Other (please describe): |
| <p>If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:</p> <p>The Convention of Scottish Local Authorities (COSLA) is the representative voice of all 32 Scottish Local Authorities both nationally and internationally. Taking stock of the extensive consultation with our member Councils to develop existing political positions as well as its lobbying work at EU level on EU Transport's dossier, in preparation for the forthcoming term of the new European Commission and European Parliament, the COSLA Regeneration and Sustainable Development Executive Group have agreed last June the following lobbying messages that will inform COSLA lobbying work in the coming years, starting with the review of the EU Transport White Paper.</p> | |
| <p>If you would like your response or personal details to be treated confidentially please explain why:</p> | |

PART 2 - Your Comments

General

1. What do you consider to be the most significant challenge facing transport policy over the next ten years?

We agree that the Comision analysis of future trends of transport is essentially correct. Likewise DfT views on the same item are largely coincident with our own. Therefore the key issue for us in this consultation is to clearly define and narrow down what the EU should and could do, and this is the underlying logic of all the following answers we provide, particularly on Section V of this questionnaire which we believe it addressed the crucial issues of this consultation.

2. What policy options do you believe that the Commission should consider in the development of the White Paper?

As outlined in Questions 9, 10, 11, 12 and 13 we are quite keen in the Commission to fully exploit its conferred competences through a combination of EU legislation, policy initiatives, exchange of experiences, funding and technical support. However we stress the need for it to be done strictly under the legal principles of conferral and subsidiarity. Our key point is whenever competences and structures already exists at local level no EU involvement is desired (let alone their duplication) other than supporting the development of such structures.

Any EU policy for transport must recognise the wide variation in responsibility for transport provision across member states and respect the rights of each country to determine where political accountability should reside.

3. What should the Commission's role be?

The challenges outlined in the Communication are the correct ones.

Having said that COSLA supports EU initiatives on transport matters provided it fully respect the principle of conferral – whereby the EU should only intervene on matters that the EU Treaties have explicitly allowed it to – and fully respect of the principle of subsidiarity and proportionality – whereby the respect of local competences and local freedom to organise and provide local transport services is fully observed.

COSLA also believes that EU involvement should not take place only where the EU has some legal competences on transport, but also *only when* its actions can provide real EU added value;

Section III- Trends and Challenges – page 6

4. Are the trends and challenges identified in this section the right ones?

The general challenges identified in the Green Paper are overall correct both from an EU-wide and for a UK and Scottish perspective. In relation to this, it is interesting to note the Study Regions 2020 that has been published also by the Commission as it provides a snapshot of the different territorial impact of each of the highlighted challenges of the White Paper.

5. Are there any other trends and challenges that need to be included here and require European action?

Certainly coming from a peripheral area of the EU such as Scotland, the COSLA positions on EU transport always highlight the need to have Territorial Cohesion as both a challenge and an objective for the EU to meet. Ensuring sustainable and efficient transport links with the rest of the EU are one of our key expectations from this White Paper and related DG TREN reviews.

Section IV- Policy objectives- page 9-12

6. Do you believe that the Commission has identified the right policy objectives?

As mentioned above, overall the Commission analysis is the correct one. However this is a very general paper therefore the question is how the Commission would narrow them down and whether it has political, financial and legal means to do work against them.

7. Should the EU pay attention to other policy objectives? And if so which one(s)?

Since this Communication gives a focus on the sustainability dimension of transport, certainly more than was the case in the previous White Paper, which is something we very much welcome, from a local government perspective we would encourage a greater emphasis on modal shift and behavioural change.

8. Where specific operational goals have been identified in this section do you consider them to be deliverable?

It is clear that the undertone of our contribution is clearly in asking the EU to focus on goals and solutions that are realistic and respectful of each level of government respective competences. In this respect aspects of all the highlighted goals can be facilitated from the EU level provided the EU narrows them down to meet their actual legal and financial powers.

As a way of example, and continuing with the above mentioned objective of modal shift, we believe that this can be a realistic and deliverable from the EU level if the Commission focused on:

- Making comparative analysis of existing local and national transport strategies
- Producing comparable data on how policies towards the modal shift is progressing in each part of the EU.
- Screening existing EU transport legislation to ensure that they favour modal shift, amending or recasting it accordingly.
- Since modal shift also implies significant investments in transport infrastructure, provide appropriate funding.
- Research the potential role for new technologies in promoting the desired modal shift.

However all of the above proposed measures to foster behavioural change that can realistically come from the EU level need to be undertaken by recognising from the outset that for reasons of geography, economics and ease of travel by car is still the preferred option for many citizens and therefore any public transport alternative needs to address issues of accessibility, speed and ease of use sufficient to attract users away from cars.

Section V- Policy instruments for sustainable transport- page 13-18

9. Where the Commission has identified specific policy instruments do you believe that these are correct?

- The policy instruments as outlined in Section V are conceptually valid. However the question is whether the EU is level that is best placed to address them and whether it has the legal and administrative capacity to do so. Therefore all the proposed instruments in Section V should be examined within the context of the concerns and options outlined in Q10 , Q11 and Q12.

10. If you have a view on a specific policy instrument identified by the Commission (as described in the breakdown of Section 5 in “The proposal”) please identify the policy instrument and set out your view.

- COSLA welcomes the development of Intelligent Transport Systems (ITS) and technologies and its implementation at the local level. COSLA supports the EU action to facilitate this, provided it is 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;
- While transport solutions should start at a local level, especially as regards to urban mobility, COSLA welcomes EU support for local initiatives by the organisation of the exchange of best practice. Likewise COSLA would support the continuation and further development of EU financial support for local innovative transport actions that otherwise could not be financed locally or nationally;
- Given the geographic situation of Scotland, we would particularly encourage the development within the TEN-T framework of ‘motorways of the sea’ essentially sea links for freight as a sustainable, energy efficient way of improving connectivity, particularly in the North Sea and Baltic Regions.
- However COSLA would not support any EU measure that would introduce EU wide mandatory local transport rules such as green zones as this would go beyond EU Transport competence and would damage the subsidiarity principle and local powers.

11. What do you think the EU’s role should be?

- COSLA stresses that, (and this is the crucial point for us) **wherever local transport frameworks and solutions are already well developed, added value from any forthcoming EU transport 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);
- While transport solutions should start at a local level, especially as regards to urban mobility, COSLA welcomes EU support for local initiatives by the organisation of the exchange of best practice. Likewise COSLA would support the continuation and further development of EU financial support for local innovative transport actions that otherwise could not be financed locally or nationally;
- We believe that there should be more area based integrated strategies with a strong transport component such as an EU North Sea Strategy hopefully to be developed over the

coming years.

- Towards the next EU Budget Review, COSLA would express its hopes that EU transport financing is simplified and made fully consistent with national funding and that financial allocations correspond to the stated ambitions, and vice versa.

12. What additional policy instruments would you wish to be included?

- COSLA encourages a holistic approach is needed whereby freight movement should be considered as well as passenger traffic. Likewise, economic development together with sustainable development provisions, including emissions and climate change, should be woven into any action plan to ensure outcomes on the ground are complementary to current local priorities;
- We would stress the need that, in line with the principle of Territorial Cohesion, all regions of the EU, considered at least on a NUTS II¹ basis, are able to be linked with the Trans European Transport Network;
- Therefore we would demand that access to the TEN-T network via secondary links is ensured both at national and EU planning and financing stages of TEN-T deployment;
- We believe that there should be more area based integrated strategies with a strong transport component such as an EU North Sea Strategy hopefully to be developed over the coming years.
- Towards the next EU Budget Review, COSLA would express its hopes that EU transport financing is simplified and made fully consistent with national funding and that financial allocations correspond to the stated ambitions, and vice versa.

13. Rather than policy instruments what specific policy options should the EU be developing?

- COSLA would like to emphasize the need that consistency is ensured between the EU transport initiatives TEN-T projects and the local and regional transport plans;
- We recognise the need for Member States, Devolved Administrations and local authorities to work in partnership in deciding, planning and financing transport infrastructure;
- COSLA would like to stress the need for proper coordination and cross-referencing of the ongoing and forthcoming EU transport strategies and initiatives coming from within the Commission Transport Directorate General but also between it and other Directorates such as Regional Policy and Maritime Affairs.
- Indeed we are witnessing that the overall EU Transport policy is being reviewed at the same time as sectoral ones such as Urban Mobility and TEN-T are also under review. Any policy review would ideally start establishing the general framework and then addressing specific areas within it, rather than doing both things in parallel.

¹ NUTS stands for Nomenclature of Territorial Units for Statistics and level two refers in Scotland to the four statistical grouping of the 32 local authorities: Highlands and Islands, South of Scotland, West of Scotland and East of Scotland.

- Similarly we are keen to stress the need that the EU Transport initiatives be directly linked and coordinated with those presented elsewhere in the Commission such as DG Environment or DG REGIO.

If you have any other general comment that you would like to make concerning this consultation, please give them here:

I would to express the wish for us to be alerted of future DfT and other HMG consultations on EU legislative dossiers as we have a vast pool of policy resources that could in some cases provide constructive inputs to the UK position.

We would prefer to have electronic copies of your response so please email this completed form to: EUFutureofTransport@dft.gsi.gov.uk

Alternatively you can post the completed form to:

**EC Consultation on “A Sustainable Future for Transport”
Department for Transport
1/31 Great Minster House
76 Marsham Street
London SW1P 4DR**

The deadline for responses is: **Monday 7 September 2009.**