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FEEDBACK

CoR Opinion on the EU Mobility Strategy

General remarks:

- ★ The rapporteur rightly states “mobility is inextricably linked to spatial planning”, but references this exclusively to cities, which draws a rather incomplete picture. Mobility and transport infrastructures form a multimodal web, making up a functional area surpassing the core-city boundaries. These specific structural patterns are shaping the user’s choices and the resulting transport flows. Thus, supra-municipal or metropolitan governance institutions (in a formal or informal way) are most relevant for linking land-use and transport planning and thus guaranteeing a *systemic* impact of mobility planning and policy.
- ★ Unfortunately, this political level does sometimes not only lack the necessary formal responsibilities but is also often overlooked in the EU NUTS-classification system. That might be especially true with regard to the German case, where the terms “region” and “regional” are mainly understood as the “Länder”. But in our case the NUTS 1 or 2 level is poorly suited to grasp the interdependencies in the functional area, because e. g. the Länder as states are covering a much too broad territory.

More specific feedback to the working document’s guiding questions:

What are your experiences with sustainable urban mobility plans (SUMP)? How do you see the relationship between SUMP and regional mobility plans? What do you think the appropriate scale would be?

- ★ The FrankfurtRheinMain Region established its first “regional” SUMP at the end of 2020, guided by the core principles of avoiding unnecessary transport and shifting necessary transport to more sustainable modes. Thus, a renaissance of rail, strengthening walking and biking as well as creating mobility hubs are its core projects. With this experience we really appreciate the SUMP concept and see it as a very good “blueprint” for practice on the ground. It is also an intelligent tool for soft policy coordination between the EU local transport systems.
- ★ But at the same instance we are convinced that any mobility plan targeted exclusively at the city-level will only be able to have limited impact: The causes for a lot of challenges to be addressed - like noise and air pollution or greenhouse gas emissions (mainly through motorised individual transport) - are often structurally rooted outside the city limits in the wider peri-urban area. Therefore, the best level for mobility planning might be the respective functional area, especially in polycentric peri-urban territories. The SUMP revision in 2019 partly acknowledged this by the introduction of a new

first principle “plan for sustainable mobility in the whole functional city” (together with a good practitioner’s guide on SUMP in Metropolitan Regions).

- ★ In this context the Eurostat definition of a “functional urban area” with its narrow focus on a core-periphery model is also part of the problem. Such an oversimplified approach cannot grasp the structural and functional realities in polycentric regions. There the interdependent commuter and logistic flows pose an additional challenge on the way to a more sustainable transport system.

How can the strategy respond to the broader challenges and can a SUMP help with this? What effective incentives can cities use to encourage behavioural change with regard to choice of transport? How do we ensure that the plans do not leave out simple sustainable forms of urban mobility such as cycling and walking?

- ★ To address broader challenges linked with mobility, the close alignment of mobility planning, land-use planning and regional development strategies are key. These linkages are, as already argued, best achieved on the level of the functional area - which highlights the necessity for strong “regional” governance institutions and processes. This should be reflected in the revision of the Urban Mobility Package.
- ★ Our Regional Authority aims to transfer that thought into practice, e.g. with regard to biking: the FrankfurtRheinMain Region is currently planning and implementing a regional bicycle network and new high-speed bike lanes as part of our mobility strategy which. Those are also firmly anchored in our binding regional land-use plan. The same applies on municipal level for walking: the most natural way of moving will become more enjoyable and feels saver as soon as a renewed prioritisation in the use of public (street) space will take place in urban planning. But this cannot be forced by higher levels of authority. It must be the result of democratic political decision-making on the ground.
- ★ The most sustainable means of transport is collective public transport which therefore must be at the core of the future’s mobility system. This is especially relevant for regional rail and light-rail connections for people and goods. As the best “pull factor” for behavioural change is an efficient, convenient, reliable and outreaching public transport system, a lot of additional infrastructure investments are needed. This is a matter of policy priorities, which the EU Mobility Strategy could have underlined more prominently.
- ★ Another (linked) challenge is the reshaping of mobility choices in the rather rural parts of our Metropolitan region. Individual car possession is often the only mobility alternative existing there today. Therefore, developing flexible on demand-solutions or collective projects like a “Bürgerbus” as well as the deployment of an infrastructure for alternative fuels besides the urban cores are relevant task we have to tackle. The best practice-exchange between EU regions will hopefully be helpful in this endeavour.

What are your experiences and ideas with regard to EU funding for mobility? Do you think enough money is available in the new programming period for the necessary investments in sustainable and smart transport?

- ★ FrankfurtRheinMain could profit from a very much welcomed funding support for the planning of a new tangential rail connection in the West of Frankfurt (“Regionaltangente West”) which might be part of a much-needed rail ring around Frankfurt.
- ★ But mobility and transport seem to be one of the sectors rather negatively affected by the reshaped priorities in the new EU-funding landscape, as the CEF budget decreased especially for non-cohesion countries. Though there were limited ERDF funded projects that supported the use of electric busses in the last funding period, the funding possibilities for mobility projects in the regional funds stays

rather limited in highly developed regions. With regard to INTERREG, a future funded collaboration on mobility issues would be desirable, as we see especially potential in a knowledge exchange on SUMP's on the level of the functional area. The potent cluster "climate, energy and mobility" in Horizon Europe and the missions for climate-neutral cities are of course welcomed. But from the perspective of (smaller) public authorities and with regard to the cost-benefit assessment of the application process those funding opportunities stay rather indirectly interesting.

- ★ Furthermore, though frequently referenced by the EU institutions the new Recovery Facility does not substantially alter the picture: Some member states – including Germany – do not put an explicit accent on mobility measures and use the budget exclusively for cofinancing their already existing national stimulus packages. Unless the EU institutions will be able to get the national governments reconsider their priorities, the added value for sustainable mobility through the Recovery Facility will be rather limited. Besides that, a real consultation with regional and local stakeholders did not take place in Germany.

Do you support the idea of using cities and regions as testing grounds for the mobility transition?

- ★ Metropolitan Regions and (polycentric) peri-urban areas are not only most affected by negative externalities of transport, but do also face severe structural challenges in the sustainable mobility transition. Therefore, there is no other way than getting sustainable mobility policies to work there. It's not a matter of missing testing grounds, but a challenge of a wider deployment of solutions.

How can EU policies support cities and regions with the mobility transition, which does not just involve making existing transport more sustainable?

- ★ Of course, digital solutions like Mobility as a Service (MAAS) and Intelligent Transport Systems (ITS) can help to make the transport system more user-centric and efficient, but all of this still builds on realising and maintaining the necessary infrastructures and (physically) deploying services. Insofar we do welcome the strong emphasis on digitising transport in the strategy and do strive to introduce respective systems in our region. But at the same time, we have to be aware that digitisation *alone* is not a solution towards a more sustainable and efficient transport system.
- ★ Furthermore, to fully exploit the potential of Cooperative, Connected and Automated Mobility (CCAM) an uninterrupted 5G coverage not only on mayor TEN-T corridors, but also in Metropolitan Regions is crucial.
- ★ In general, we also need a better linkage of regional and local transport systems with the TEN-T. Only by this can we fully realise the connector function of urban nodes and prevent these hubs from developing into new bottlenecks as existing (often dual used) infrastructures are more and more overstrained. Thus, the upcoming revision of the TEN-T guidelines must attribute a higher priority to urban nodes in the whole TEN-T system, building on an understanding of urban nodes as respective functional urban areas. The latter applies even more as functional urban areas are the territories where also most of the inter-modal and multimodal connections take place physically.

How can the EU ensure that authorities and businesses cooperate better on policy issues?

- ★ With regard to the announced ITS-revision, the upcoming Data Act or the setup of an EU Mobility-Dataspace a real level playing field between public and private actors has to be established first. Any rules and obligations on data access and data exchange have to apply in the same way for private enterprises as they will do for public authorities. This is especially relevant in our concrete German case where crucial regional transport services are supplied by public enterprises.