Sustainable Urban Transport Plans
Preparatory Document in relation to the follow-up of the Thematic Strategy on the Urban Environment

Main document

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the Thematic Strategy on the Urban Environment

25 September 2007
Disclaimer

This document and its annex are not legally-binding. It represents a synthesis of the information and experience available to the Commission. It is intended as a summary of the current state of the art with respect to best practice on sustainable urban transport which recognises the diversity between conurbations across the EU. The document should be seen more as a procedural aid and a reminder of the key elements and good practice that could be considered when developing Sustainable Urban Transport Plans at local levels. It aims to assist the consultation on the Green Paper on urban mobility and further developments on SUTPs will be undertaken in the context of the follow-up to the Green Paper.

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1. **INTRODUCTION**

The Commission's Thematic Strategy on the urban environment\(^1\) was adopted in 2006 and described a number of common environmental challenges and problems faced by most European conurbations although the scale and intensity of these problems vary.

These issues comprise: poor air quality, traffic volumes and congestion, high levels of ambient noise, neglect of the built environment, high level of greenhouse gas emissions, social exclusion and urban sprawl. These are serious pressures since they have significant effects on the environment, health and economic performance of European conurbations.

The Thematic Strategy stressed that urban mobility contributes significantly to these pressures. That is why it strongly recommended the development and implementation of Sustainable Urban Transport Plans (SUTP) and proposed that guidance be prepared to help local authorities in this respect. This was fully supported in 2006 by the European Parliament's resolution on the Commission's Thematic Strategy and by the renewed EU Strategy on Sustainable Development\(^2\) adopted by the European Council.

Since the adoption of the Strategy, the Commission decided to launch a wider debate on urban mobility and this preparatory document aims to assist this Green Paper consultation exercise by providing a synthesis of available information on sustainable urban transport plans. It is supplemented with an annex on best practice examples and useful references which are made available on DG Environment's EUROPA website\(^3\). The current document is not prescriptive. It is based upon the input and feedback from extensive stakeholders' consultations, the results of Community research in the field of land use and urban transport\(^4\) and the report of the Commission's working group on sustainable urban transport plans\(^5\).

Any further development or refinement of this preparatory document will be considered as part of the follow-up of the Green Paper consultation on urban mobility.

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\(^1\) COM(2005) 718 final, see: [http://ec.europa.eu/environment/urban/home_en.htm](http://ec.europa.eu/environment/urban/home_en.htm)

\(^2\) Renewed EU Sustainable Development Strategy European Council (10117/06, 9 June 2006)

\(^3\) [http://ec.europa.eu/environment/urban/urban_transport.htm](http://ec.europa.eu/environment/urban/urban_transport.htm)

\(^4\) Land Use and Transportation Research: [http://www.lutr.net](http://www.lutr.net); CIVITAS: [http://www.civitas-initiative.eu](http://www.civitas-initiative.eu)

2. CHALLENGES FACING THE URBAN ENVIRONMENT & URBAN TRANSPORT

2.1. Mobility patterns undermine technological progress

Though situations may differ from one city to another, economic growth tends to be coupled with increased car ownership and traffic volumes (measured in vehicle x kilometres, passenger x kilometres and tonne x kilometres). This growing factor continuously undermines the benefits yielded by each step of technological progress in the field of energy efficiency, emissions or noise of road vehicles.

In most European conurbations, single occupancy cars is by far the prominent mode of passenger transport and most of our goods are carried by motorized road vehicles. In many European conurbations, the dominance of car use, even for short distance trips and during congestion periods, clearly shows a high degree of dependency on this mode of transport.

Key figures on mobility trends

Current situation

Passenger cars are responsible for 75% of passenger kilometres (pxkm) travelled

Car ownership per household is increasing (+ 38% in average between 1990 and 2004 for the EU 25, and between +14% and +167% per country)

50% of car trips are less than 5km, 30% are less than 3km

Less than 5% of passenger journeys are made by bicycle

Less than 10% of passenger journeys are made by public transport

Walking and cycling are decreasing

Average car occupancy remains close to one.

Urban freight is typically between 20% and 25% of road space use (space used x hours)

Urban freight typically contributes to between 10% and 20% of urban road traffic (vehicle x kilometres)

Between 2000 and 2030 (Baseline scenario, outlook 2030)

The demand for passenger transport (pxkm) is expected to grow by 42% (road traffic would then count for 85% and car traffic for 75% in 2030)

Freight transport tonne kilometres are expected to grow by 63% (road traffic would count for 45%)

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2.2. **Sprawling conurbations: more car dependency and increased car travel lengths**

Due to urban sprawl - i.e. scattered or unstructured urban expansion – Europeans travel further even though they spend a limited and almost constant daily time in travelling. This demands ever faster and seamless travel conditions.

The usual, easy and cheap response to this short term pressure has often been to increase and expand road capacity to the detriment of other transport modes, without coordinating with land use and pricing policies. This yields in return more urban sprawl hence more difficulties to connect urban expansions to public transport and an increase in car ownership.

As a result some conurbations now face dramatic growth in peripheral (suburbs to suburbs) and radial (suburbs to centre) car traffic. In French conurbations, car traffic – measured in vehicle kilometres - from centre to the edge has increased by 83% whereas peripheral traffic has increased by 36% over a 10 year period.

In European countries with lower levels of economic development, the picture is different but the same trends are expected when these countries experience economic growth unless sustainability considerations are integrated into urban transport policies.

2.3. **Contribution to climate change: a major challenge**

Climate change is happening. EU policies aim to limit the future global average temperature increase to 2°C above pre-industrial levels in order to limit the damage. Over the past 100 years, the global average temperature has risen by about 0.6°C and the European average temperature by 0.95°C. Doing nothing is not a sensible option. The more action is postponed, the greater the risk of irreversible climate change, as costs rise and options to stabilise greenhouse gas concentrations at lower levels are closed off. Without further action, global emissions are likely to grow within the next two decades.

If current trends continue, CO₂ emissions from transport will be some 40% higher in 2010 than in 1990. In 2030, transport CO₂ emissions are expected to have grown by 27% compared to the situation in 2000 and would count for 29% of the total CO₂ emissions in the EU. Road traffic would contribute 84% of the transport emissions. Urban road traffic contributes to at least 40% of transport related CO₂ emissions and approximately 10% of overall CO₂ emissions in the EU. Car traffic and urban deliveries by road both contribute significantly to the overall urban traffic-related CO₂ emissions.

In March 2007, the European Council\(^7\) committed the EU to at least a 20% reduction of GHG emissions by 2020 (compared to 1990 level). Effective action on Urban Transport is central to achieving this target.

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\(^7\) Sources: Commission impact assessment of the Thematic Strategy on urban environment (2005) and EEA report on urban sprawl (2006)

\(^8\) Sources: Commission staff working paper ‘Winning the battle against global climate change’ (2005); DG TREN report on energy & transport: trends to 2030 (2005); Council conclusions 7242/05 (11 March 2005) and Council Presidency Conclusions 7224/1/07 (2 May 2007) on climate change
2.4. **Urban air pollution: a persistent challenge**

Traffic-related emissions of air pollutants continue to contribute to air quality problems and associated health effects in most European urban areas. Traffic emissions of particulate matter (PM$_{10}$ and PM$_{2.5}$) and NO$_x$ are the local pollutants of most concern as the daily limit value of PM$_{10}$ and the annual limit value for NO$_2$ are exceeded most extensively (more than 150 agglomerations are concerned). Road traffic may also contribute to high levels of benzene and poly-aromatic hydrocarbons (PAH) in some conurbations.

In the year 2000, exposure to particulate matter, particularly PM$_{2.5}$, was estimated to reduce average statistical life expectancy by approximately nine months in the EU-25. This equates to approximately 3.6 million life years lost or 348 000 premature mortalities per annum. Significant progress triggered by current legislation is expected in reducing harmful emissions of particulate matter and its precursors between now and 2020 such that the average loss in statistical life expectancy is expected to reduce to around 5.5 months. This would still equate to 272 000 premature deaths per annum in 2020. The associated health costs of particulate matter would still amount to several billions of euros per annum.

2.5. **Road safety in conurbations**

Two thirds of overall road accidents and one third of overall road deaths occur in agglomerations. In conurbations, powered two-wheelers, pedestrians and cyclists are frequently victims of road accidents where the 14-25 age group is most affected.

Most accidents occur along arterial roads and at crossings due to poor road design, poor driving and excessive speed. In some conurbations speed limits are exceeded by more than half of road vehicles.

2.6. **Exposure to road traffic noise: a threat to our health and quality of life**

Current trends concerning road saturation (more stop and start driving leading to higher noise levels) and urban sprawl might lead to increased exposure to road traffic noise in conurbations. The effects of noise emission legislation for road vehicles have already largely undermined by the overall growth in the volume of traffic.

Urban traffic noise levels usually exceed the guidelines set by the World Health Organization for the protection of health. Moreover, urban transport noise levels

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9 Presidency Conclusions (7224/1/07, 2 May 2007) of the European Council on climate change

10 Sources: Commission *impact assessment* of the Thematic Strategy on air quality (2005); Member states reports on exceedances of air quality limit values (2004)

11 Sources: White Paper on European Transport Policy (2001); DG TREN website on the European road accidents database (CARE)

contributes annoyance and sleep disturbance which affect health. Latest assessments suggest that around 20% of the Union’s population suffer from noise levels that scientists and health experts consider to be unacceptable, where most people become annoyed, where sleep is disturbed and where adverse health effects are to be feared. An additional 40% of people are living in so-called "grey areas" where noise levels are such as to cause serious annoyance during the daytime.

Epidemiological studies suggest a higher risk of cardiovascular diseases, including high blood pressure and myocardial infarction, in persons chronically exposed to high levels of road traffic noise such as those that occur in urban areas (e.g. 4 000 premature deaths per year attributed to road traffic noise exposure in Germany, between 200 and 500 premature deaths per year in Denmark).

2.7. Transport energy consumption: high dependency on fossil fuels

Transport alone currently accounts for 30% of overall EU energy consumption. A half of all road transport fuel is combusted in urban areas. Some 98% of the transport related energy market depends on oil, the largest part of which (75%) is due to road transport.

Energy import dependency is rising: in the next 20 to 30 years, 70% of the Union’s requirements will be met by imported products, some from regions threatened by insecurity. Increasing demand for fossil fuels (mostly petrol, diesel and gas) contributes to more greenhouse gas emissions. By 2030, transport related energy consumption is expected to grow by 30%. In 2030, 55% of the transport related energy consumption is predicted to be due to passenger transport, and 45% due to freight transport according to the baseline scenario.

3. WHY SUSTAINABLE URBAN TRANSPORT PLANS (SUTP)?

Available assessments summarized in chapter 2 of this document show that transport tends to bring about persistent and detrimental impacts, whether it is at local, regional or global level, particularly with regard to environment and health. The influence of urban transport on these trends is significant and technological progress alone is unlikely to solve these problems in the short term.

Urban transport demand is dominated by road transport and needs to be addressed by a joint effort at the local, national and European levels of governance. In addition, local urban authorities can contribute to meeting Community objectives on sustainable transport, environment, cohesion and competitiveness (see Annex of this document for further details on these policies). Compliance with air and noise EU legislations requires that plans addressing urban transport are drawn up in many conurbations.

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13 Sources: DG TREN report on energy & transport: trends to 2030 (2005); Commission's Energy website


The size of the challenges faced by the EU in these areas – notably as regards climate change, air quality, ambient noise, congestion and road safety - will require strong support from local authorities responsible for urban transport management and land use planning in order to jointly bring about more sustainable urban transport patterns.

Integrated and holistic solutions are therefore needed to curb these trends. That is why the Commission, the Council and the European Parliament encourage local authorities to cooperate in order to establish and implement sustainable urban transport plans with a view to preventing and reducing environment and health pressures in European conurbations and contribute significantly to Community wide policies. As stated for instance by the Thematic Strategy on the urban environment, the ‘wider implementation of Sustainable Urban Transport Plans including specific measures to promote low CO₂-emission and energy-efficient vehicles will help reduce greenhouse gas emissions (…)’

4. DESCRIPTION OF KEY ELEMENTS OF AN SUTP

'Effective, transport planning requires long-term vision to plan financial requirements for infrastructure and vehicles, to design incentive schemes to promote high quality public transport, safe cycling and walking and to coordinate with land-use planning at the appropriate administrative levels. Transport planning should take account of safety and security, access to goods and services, air pollution, noise, greenhouse gas emissions and energy consumption, land use, cover passenger and freight transportation and all modes of transport. Solutions need to be tailor-made, based on wide consultation of the public and other stakeholders, and targets must reflect the local situation.'


4.1. Concept and scope

Experience shows that SUTP comprise a combination of urban mobility management measures and should cover all modes and forms of transport in a relevant geographical area. It addresses, vehicle movements and parking, public and private transport, passenger and freight movements and motorised and non-motorised modes.

The basic characteristics of the SUTP planning approach can be summarized as:

- A participatory approach involving the public from the outset and throughout the process of decision making, implementation, assessments and reporting;
- A knowledge based approach building on available best practices and results of research as well as robust staff capacities;
- An integrated approach which strives to integrate horizontal (i.e. with other relevant policies, strategies and plans), vertical (i.e. with relevant levels of governance) and spatial (i.e. considering relevant geographical area) aspects;
- A method of political and technical cooperation which strives to involve relevant actors whose skills and decisions may be essential for drawing up and implementing the SUTP;
- A measurable approach focusing on the achievement of quantifiable and tailor made targets derived from operational objectives and aligned with a vision for sustainable urban transport in accordance with an overall sustainable development strategy;

- A move towards external costs internalisation taking into account the wider societal costs and benefits.

4.2. **Main steps to achieve**

According to the available knowledge, the key steps to developing and implementing a SUTP usually comprise the following:

- preparation
- review of current situation and analysis of ‘business as usual’ scenario
- definition of a vision, operational objectives and measurable targets
- impact assessment and definition of sets of mobility management and infrastructure related measures
- attribution of responsibilities, budgets and staff resources
- adoption
- monitoring and reporting
- reviewing and revising while needed.

The elaboration of a SUTP is a process which involves citizens and stakeholders at all stages and which takes full advantage of available knowledge and good practice.

The elaboration and implementation strive to integrate and coordinate actions and policies between different sectors, while involving all relevant authority levels and neighbouring authorities.

4.3. **Main objectives and targets to consider**

Most successful urban transport plans combine a clear vision and political leadership with effective implementation.

SUTPs can help in particular compliance with Community laws on air quality and ambient noise as well as contributing to Community objectives including those for transport encompassed in several EU policies (sustainable development, climate change, air quality, ambient noise, urban environment, transport, energy and cohesion).

SUTPs can also address the core urban challenges concerning mobility patterns, congestion, urban sprawl, greenhouse gas emissions (mainly CO₂), energy efficiency and fossil fuel dependency, air quality (mainly PM₁₀, PM₂.₅, NOₓ, HC), exposure to ambient noise and road safety.
The setting of objectives and measurable targets aligned with a vision for transport that is embedded in a local sustainable development strategy seems crucial in this respect, as are the measures and actions which aim to deliver those targets.

SUTPs objectives and targets should be coherent with the objectives and targets set by the EU renewed Sustainable Development Strategy on 'Sustainable transport'.

### Objectives and targets for sustainable transport according to the EU renewed Sustainable Development Strategy (2006)

**Overall Objective:** To ensure that our transport systems meet society’s economic, social and environmental needs whilst minimising their undesirable impacts on the economy, society and the environment

**Operational objectives and targets (relevant excerpts)**

- Decoupling economic growth and the demand for transport with the aim of reducing environmental impacts.
- Achieving sustainable levels of transport energy use and reducing transport greenhouse gas emissions.
- Reducing pollutant emissions from transport to levels that minimise effects on human health and/or the environment.
- Achieving a balanced shift towards environment friendly transport modes to bring about a sustainable transport and mobility system.
- Reducing transport noise both at source and through mitigation measures to ensure overall exposure levels minimise impacts on health.
- Halving road transport deaths by 2010 compared to 2000.

4.4. **Main mobility management measures to consider**

Rather than applying a "one size fits all" approach, the mix of measures for particular conurbations will vary because the underlying problems are also different. However, available evidence and experience show that there is a need in most cases for a set of consistent push and pull measures from the ten following categories:

- Coordinating land use and transport planning
- Promoting and improving collective transport
- Encouraging cycling and walking
- Urban freight management
- Parking management
- Urban road pricing

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– Traffic calming and reallocation of road space to most environmentally friendly vehicles and modes of transport

– Restricting access for the most polluting road vehicles (low emission zones)

– Fostering the use of cleaner, quieter and lower CO$_2$ road vehicles

– Soft and smart measures (car-sharing, business and school travel plans, mobility management centres, awareness raising campaigns)

The proposed mix of measures is to be selected following environment and health impact assessments$^{17}$, cost-benefit and cost-effectiveness analyses and thorough consultation.

Attention has to be paid to ensure that the measures are mutually supportive (e.g. benefits brought about by measures in favour of cleaner vehicles can be undermined by car traffic growth brought about by decisions taken in the field of land-use, parking or public transport).

4.5. Public participation

Practically, SUTP's modalities of public participation are aligned with those set out by article 2 of the Directive 2003/35/EC$^{18}$, in order to ensure that the public is given early and effective opportunities to participate in the elaboration and modification or review of the plan. The participation seems best implemented while defining the vision, objectives and targets, while assessing and developing policies and measures, while setting priorities and while reviewing the plan.

Article 2 of the Directive 2003/35/EC

*Public participation concerning plans and programmes

1. For the purposes of this Article, "the public" shall mean one or more natural or legal persons and, in accordance with national legislation or practice, their associations, organisations or groups.

2. Member States shall ensure that the public is given early and effective opportunities to participate in the preparation and modification or review of the plans or programmes required to be drawn up under the provisions listed in Annex I.

To that end, Member States shall ensure that:

(a) the public is informed, whether by public notices or other appropriate means such as electronic media where available, about any proposals for such plans or programmes or for their modification or review and that relevant information about such proposals is made available to the public including inter alia information about the right to participate in decision-making and about the competent authority to which comments or questions may be submitted;

(b) the public is entitled to express comments and opinions when all options are open before decisions on the plans and programmes are made;

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$^{17}$ If a SUTP is required by legal, regulatory or administrative provisions, it should comply with the Directive 2001/42/EC on the assessments of the effects of certain plans and programmes on the environment. See: http://ec.europa.eu/environment/eia/home.htm

$^{18}$ See: http://ec.europa.eu/environment/aarhus/index.htm
5. EXPERIENCES, GOOD PRACTICES AND PRACTICAL INFORMATION RELEVANT TO SUTPS

A large body of experience, best practice examples and practical information which are relevant to the management of urban mobility already exist and are available on the worldwide web.

In order to help local authorities access this information, the Environment DG has collated, reviewed and summarized it in an annex to this document which is made available at the following website:

http://ec.europa.eu/environment/urban/urban_transport.htm

This annex provides information about the ten categories of mobility management measures listed in chapter 4.4. For each of them, experiences of a number of conurbations and the substance of key relevant research projects are summarized. This annex also provides the readers with other practical and relevant information on databases, networks of experts, reviews, manuals etc.

6. ASSISTANCE FROM COMMUNITY FINANCIAL INSTRUMENTS

The Renewed EU Sustainable Development Strategy, states that "In order to ensure that EU funding is used and channelled in an optimum way to promote sustainable development, Member States and the Commission should co-ordinate to enhance complementarities and synergies between various strands of Community and other co-financing mechanisms such as Cohesion Policy, rural development, Life+, Research and Technological Development (RTD), the Competitiveness and Innovation Program (CIP) and the European Fisheries Fund (EFF)."

The Urban Thematic Strategy also highlighted the funding opportunities available under these mechanisms that could be used to support attainment of the Strategy's objectives.

6.1. Cohesion funds

The Community strategic guidelines on Cohesion 2007-2013 adopted by the Council on the 6th of October 2006, contain the principles and priorities of EU cohesion policy and suggest ways the European regions can take full advantage of the €308 billion available for national and regional aid programmes over this period. National authorities use the Guidelines as a basis for drafting their national strategic priorities and planning for 2007-2013, the so-called National Strategic Reference Frameworks (NSRFs).

Establishment and implementation of sustainable urban transport plans can benefit from cohesion funding under the three objectives of the cohesion policy (convergence, competitiveness and cooperation). The Commission has published guidelines on “Cohesion Policy and cities: the urban contribution to growth and jobs in the regions” to help national and regional authorities in this respect.
Commission Guidelines relating to urban transport for the preparation of Cohesion Policy programmes (source: COM(2006)385 final)\textsuperscript{19}

– Sustainable urban mobility means making the best use of all the transport infrastructures, coordination between the various transport modes and the promotion of the least polluting modes.

- Successful management of urban transport often requires the city and its surrounding region to coordinate transport planning, construction and land-use. New projects should form part of an integrated transport strategy for the urban area. Issues considered should include road safety and other public health concerns, including noise reduction and air quality.

– It is important to improve the affordability, efficiency and effectiveness of public transport, as well as linking the different transport modes. An issue for public transport in many cities is the need to reduce criminal behaviour and improve the safety of employees and users.

– Cities should, as part of an integrated approach and where possible, promote the use of cycling, walking and other alternative and “soft” forms of transport. This includes: demand management, regulated access to or even the pedestrianisation of the city’s sensitive zones; the construction of cycle and pedestrian paths; encouragement of energy efficient vehicles and alternative transport fuels, such as biofuels.

– Transport planning should take account of those without cars or those unable to drive (e.g. older people, young people and those with mobility impairments). The goal is to ensure access to jobs and services (healthcare, shopping) and to facilitate personal autonomy without reliance on the private car.

– Active management of congestion, transport demand and public transport networks, with a view to improving air quality, reducing noise and encouraging physical activity. This is in line with the thematic strategy for the urban environment, set out in the 6th environmental action programme.

6.2. LIFE+\textsuperscript{20}

The recently adopted LIFE+ regulation stipulates that ‘The general objective of LIFE+ shall be to contribute to the implementation, updating and development of Community environmental policy and legislation, including the integration of the environment into other policies, thereby contributing to sustainable development. In particular, LIFE+ shall support the implementation of the 6th EAP, including the thematic strategies, and finance measures and projects with European added value in Member States.’

Since SUTPs are promoted by the thematic strategy on urban environment, they can be supported by LIFE+ funds, within the component 'Environment policy and governance'.

6.3. Intelligent Energy Europe programme\textsuperscript{21}

Intelligent Energy Europe is the Community's support programme for the promotion of Renewable Energy Sources and Energy Efficiency. Parts of this programme address energy aspects of the transport sector through STEER and ALTENER. The transport

\textsuperscript{19} \url{http://ec.europa.eu/regional_policy/consultation/urban/index_en.htm}
\textsuperscript{20} \url{http://ec.europa.eu/environment/life/index.htm}
\textsuperscript{21} \url{http://ec.europa.eu/energy/intelligent/projects/index_en.htm}
element has comprised about one sixth of the budget over the period 2003-2006. It has been agreed to extend the programme to at least 2013, with a budget of €730 million.

The programme supports European projects through calls for proposals. It does not support investments in ‘hardware’, technology or RTD projects, but concentrates on the creation of favourable market conditions, international transfer of experience and promotion of best practices, institutional capacity building, accelerating learning curves, information dissemination, education and training of market actors.

6.4.  **European Investment Bank (EIB)**\(^{22}\)

Between 2000 and 2004, EIB support for the urban transport sector amounted to €10.7 billion of direct financing, with 92% for public transport projects and 8% for other urban transport infrastructures. Some 70 urban transport projects were financed, of which 55 were public transport projects mainly located in the EU.

6.5.  **European Bank for Reconstruction and Development (EBRD)**\(^{23}\)

The EBRD supports the transition of the transport sector by financing economically viable infrastructure and transport projects. The EBRD’s policy aims to build efficient, reliable and secure transport systems including in urban transport.

6.6.  **7th Framework Programme (FP7)**\(^{24}\)

The 7th Framework Programme for Research (FP7, 2007-2013) on Technological Development and Demonstration activities foresees a dedicated Transport Theme (indicative budget : 4 160 M€). This addresses sustainable urban mobility through CIVITAS-Plus\(^{25}\) initiative and the greening of surface transport. Further research is indeed considered useful in innovative urban management and planning practices, new technologies to protect the environment and sustainable urban mobility of people and transport of goods. Applied research and technological developments, demonstration and take-up actions, dissemination of knowledge, transfer of results, training and exchange of best practices together with international cooperation will be supported by FP7.

7.  **SUMMARY & OUTLOOK**

This document brings together some of the good practice and experience which seem to be useful for the development of SUTPs; most of which come from projects and works of experts supported by Member States and the Commission. The follow-up on SUTPs will be addressed at European level as part of the follow-up to the Green Paper on urban mobility.

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22 [http://www.eib.org/environment/index.htm](http://www.eib.org/environment/index.htm)


