

THE REVISION OF THE TEN-T GUIDELINES

PROPOSED AMENDMENTS TO THE TEN-T REGULATION (No 2021/0420)

*STRENGTHENING URBAN NODES AND INNOVATION TO ENHANCE
THE CAPACITY, SUSTAINABILITY, AND COMPETITIVENESS OF THE
EUROPEAN TRANSPORT SYSTEM*

May 2022

*Regulation of the European Parliament and of the Council on
Union guidelines for the development of the trans-European
transport network, amending Regulation (EU) 2021/1153 and
Regulation (EU) No 913/2010 and repealing Regulation (EU)
1315/2013)*

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● ERRIN'S AND POLIS' KEY POLICY MESSAGES ON URBAN NODES IN THE REVISED TEN-T GUIDELINES

In June 2020 ERRIN and POLIS published an opinion paper – [*“Strengthening urban nodes and innovation to enhance the capacity, sustainability, and competitiveness of the European transport system”*](#) – on the revision of the TEN-T guidelines based on our experiences as regional and local actors with the TEN-T implementation. The opinion set out key messages for the common provisions on urban nodes, research, and innovation.

This document translates the policy messages brought forward in the opinion into concrete proposals for amendments as a response to the spring 2021 consultation on the TEN-T regulation (No 1315/2013) revision with a specific focus on urban nodes.

This document has been established in co-creation between ERRIN and POLIS members.

About ERRIN

Established in 2001, [ERRIN](#) promotes the regional and local dimension in European research and innovation policies and programmes. The network gathers over 120 members who primarily collaborate through 13 Working Groups, covering both thematic areas and overarching policy issues. ERRIN supports project development and knowledge exchange between members to enhance regional and local research and innovation capacities, with the aim to foster sustainable and inclusive growth in all regions.

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.

1. GENERAL APPRECIATION

The revision as a whole, and specifically the new Chapter 7 and the urban nodes references in objectives (Art. 4) is very close to the ERRIN and POLIS proposed approach. We welcome how the new regulation clearly shifts urban nodes in the centre of the TEN-T. This is a new accent. It allows the EU to reach the ambitions of the Green Deal and to reach climate neutrality by 2050. We invite all institutional stakeholders to maintain that approach throughout the co-decision process.

Assessment of the 2021 position document in relation to the revision

REDEFINING AND REVALUING URBAN NODES IN TEN-T POLICY	😊 Very positive
THE IMPORTANCE OF URBAN NODES IN TEN-T POLICY	😊 Very positive
GIVE EQUAL PRIORITY TO URBAN NODES AS OTHER PRIORITIES IN THE REGULATION	😊 Very positive
A MORE COMPLETE DEFINITION OF URBAN NODES	😞 Straightforward approach, with the risk of being challenged
TRANSCENDING THE CURRENT CRITERIA FORMAL CRITERIA FOR URBAN NODES	😞 straightforward approach, with the risk of being challenged
STRENGTHEN INNOVATION IN URBAN NODES TO ACHIEVE A MORE SEAMLESS, SUSTAINABLE, AND EFFICIENT	Overall innovation ambition of TEN-T has increased Focus on urban nodes as ‘hot spots’ of innovation
INCREASED EMPHASIS ON INTERMODALITY AND ACHIEVING A MODAL SHIFT	😊 Focus on hubs for people and goods

2. INTRODUCTORY REMARKS

2.1. SUBSIDIARITY and SELECTION OF URBAN NODES

The new selection criteria for urban nodes (100.000 inhabitants or largest city in the NUT2-region) has the advantage of achieving a wide coverage of all major cities in Europe. It is also a ‘simple’ and understandable principle.

To accelerate the progress towards reaching the 2030 and 2050 objectives to complete the core and the comprehensive network, the criteria of urban nodes have been expanded. To do so, a new set of criteria is introduced that is based **on the potential urban node having a high quality Sustainable Urban Mobility Plan (SUMP)** with clearly anchored and prescriptive policies and actions, as well as developed intermodality and system integration. This can lead to TEN-T projects with a strong socio-economic impact.

This will allow:

- To achieve many objectives showing a strong added value for transport policy, such as filling “missing links”, intermodality, and sustainability; and
- To achieve transversal EU objectives, such as a strengthening of economic, social, and territorial cohesion, developing a safe and sustainable mobility, the accessibility and connectivity of all EU regions, and strengthening economic growth and competitiveness in a global perspective.

2.2. IMPLEMENTATION PLANS AND MONITORING, EVALUATION AND REPORTING ARRANGEMENTS

In the new approach, Urban Nodes are required to

- Prepare a SUMP, and relate to the Member State about this
- Collect and submit to the Commission urban mobility data (see below) on an annual basis
- Partake in the overall monitoring of corridor implementation and performance, conducted by the corridor coordinator

We would recommend to **streamline the communication processes** to and from Urban Nodes related to these requirements. The existing TEN-T portal TEN-TEC can play an important role here, **or a new portal can be established to submit the SUMP and the data/indicators**. In both cases the involvement or supervision of the member states should be required.

3. CONCERNS ABOUT SPECIFIC ARTICLES

3.1. DEFINITIONS

ERRIN and POLIS agree in broad lines with the provided definitions.

The most crucial element is of course **the Urban Node’s definition (in article 3)**. We would like to bring this in line with the SUMP logic and expand the node’s concept to the Functional Urban Area.

A functional urban area consists of a city and its commuting zone. Functional urban areas therefore consist of a densely inhabited city and a less densely populated commuting zone whose labour market is highly integrated with the city (OECD, 2012).¹

The concept of an integrated transport system for each urban node, especially journeys from the city centre to the peri-urban areas where many of the daily commutes take place, play a key role in the Urban Area's planning. Therefore, the scope of an urban node should zoom out on the urban-regional or the FUA as well. Doing so would lead to a better integrated and decarbonised transport system.

There might be specific issues with geographically clustered urban nodes, where neighbouring urban nodes agglomerate in a polycentric FUA. We are convinced that on an urban node level, pragmatic operational solutions will be found. This could be encouraged by the co-legislators in stressing that nodal functions in such polycentric agglomerations can be supported by locally specific supra-municipal governance institutions.

We suggest the following amendment to the definition:

(f) 'urban node' means an urban area where elements of the transport infrastructure of the trans-European transport network, such as ports including passenger terminals, airports, railway stations, bus terminals, logistic platforms and facilities and freight terminals, located in and around the urban area, are connected with other elements of that infrastructure and with the infrastructure for regional and local traffic;

(f) 'urban node' means a **functional** urban area where elements of the transport infrastructure of the trans-European transport network, such as ports including passenger terminals, airports, railway stations, bus terminals, logistic platforms and facilities and freight terminals, located in and around the urban area, are connected with other elements of that infrastructure and with the infrastructure for regional and local traffic;

3.2 LIST OF URBAN NODES (Annex 2)

Following the change of definition of urban nodes, the list of nodes in Annex 2 can be understood as **the locations of the urban nodes (name of the city), not as the perimeter for the implementation of the TEN-T infrastructure.** This perimeter should be defined by the member states in view of the urban nodes functionality, context and infrastructures.

¹[https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Functional_urban_area#:~:text=Short%20definition%3A%20a%20functional%20urban,city%20\(OECD%2C%202012\).](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Functional_urban_area#:~:text=Short%20definition%3A%20a%20functional%20urban,city%20(OECD%2C%202012).)

3.2. SECTION 7 - URBAN NODES

3.2.1. Article 39: Urban nodes Components

POLIS and ERRIN welcome the current description, as it extends the currently very traditional urban nodes approach with relevant new aspects, such as bypasses and the specific reference to increasing efficiency.

We suggest to move all reference to **first and last mile connections between and to the access points to the trans-European transport network (such as referred to in Article 39(1)(b), to the 'Additional Priorities' article 41**, in order to prioritise projects that potentially can increase the performance of the trans-European transport network, such as metros or tramways.

3.2.2. Article 40: Urban nodes requirements

ERRIN and POLIS welcome the overall approach to the Urban Nodes Requirement section.

We confirm the timeline as proposed in the article. This seems feasible for most urban nodes. Many of them already engage in SUMP or similar planning approaches.

The remaining concerns are the following:

- With regards to the EU legislation that is listed throughout the document (**Directive 2014/94/EU on the deployment of alternative fuels infrastructure, Directive 2010/40/EU on the framework for the deployment of Intelligent Transport Systems, both under revision**) we suggest to reference urban nodes in these respective legislative texts, rather than to include concrete references to legislation that is still 'under construction' in the context of this regulation (which is likely to be up for revision by the end of this decade).
- The specific reference to **Multimodal Digital Mobility Services (MDMS) by 2030** requires a central role of public authorities in the conceptualisation and implementation of MaaS. This must also be reflected in the legislative proposal that is expected to be issued by 2023.
- **A clearer understanding of 'in the vicinity' might be needed in the Article 10 (d)**. The requirement to develop at least one multimodal freight terminal by 31 December 2040 within or **in the vicinity** of the urban node, should imply that such infrastructures that serve several urban nodes can qualify to comply with the requirement.

Suggested amendments:

Art 40 (b) (ii)

(ii) collection and submission to the Commission of urban mobility data per urban node covering at minimum greenhouse gas emissions, congestion, accidents and injuries, modal share and access to mobility service, as well as data on air and noise pollution. Thereafter these data shall be submitted every year;

(ii) collection and submission to the Commission of urban mobility **information data** per urban node covering at minimum greenhouse gas emissions, congestion, accidents and injuries, modal share and access to mobility service, as well as data on air and noise pollution. Thereafter these data shall be submitted every year;

To avoid the confusion with MDMS and digital transport data as legislated in the ITS Directive.

Art 40 (c) (i)

(i) for passenger transport: sustainable, seamless and safe interconnection between rail, road, air, the active modes of transport and, as appropriate, inland waterway and maritime infrastructure;

(i) for passenger transport: sustainable, seamless and safe interconnection between rail, road, air, the active modes - **including EUROVELO Infrastructures** - of transport and, as appropriate, inland waterway and maritime infrastructure;

Art 40 (c) (ii)

(ii) for passenger transport: ability for passengers to access information, book, pay their journeys and retrieve their tickets through multimodal digital mobility services;

(ii) for passenger transport: ability for **long distance** passengers to access information, book, pay their journeys and retrieve their tickets through multimodal digital mobility services;

Art 40

The Commission shall adopt, no later than one year after the entry into force of this Regulation an implementing act establishing a methodology for the data to be collected by the Member States referred to under point (ii) of paragraph (b). That implementing act shall be adopted in accordance with the examination procedure referred to in Article 59(3).

The Commission shall adopt, no later than one year after the entry into force of this Regulation an implementing act establishing a methodology for the **information data** to be collected by the Member States referred to under point (ii) of paragraph (b). That implementing act shall be adopted in accordance with the examination procedure referred to in Article 59(3). **Urban Nodes shall be associated with establishment of the methodology for the data to be collected.**

3.2.3. Article 41: Additional priorities for urban nodes

What is currently not well described is the concept of 'c) first and last mile connections to and between access points. We understand the concept of the 'first and last mile', currently mentioned in article 39. We suggest to add this to the Urban nodes Additional Priorities.

Although we agree with the priorities mentioned in this section, as they strengthen sustainable and innovative mobility solutions, multimodality and modal shift, **it would be good to understand the legal implications of this section, as well as the relation to future financing and funding programmes** (national, interregional and European). To put the question more concretely: will these priorities be aligned with current and future European funding instruments?

This is important, because the cost to comply with the urban nodes requirements will be substantial. The explanatory memorandum focuses on additional costs through planning requirements, but so far being an urban node in TEN-T was a privilege, that meant funding opportunities. The aspect of benefits and access to funding programmes needs to be strengthened and clarified, if not for this MFF period, then for the next, and if not under CEF2.0, then in a cross-programme manner.

The Recovery and Resilience Facility, with a focus on spending in the years 2022-2023 is not likely to be a real solution to bridge the funding gap. The RRF is focused on current policy priorities, and not on new priorities as they will evolve from the TEN-T in its revised concept. **We encourage the Commission to produce a funding guide available for the development of urban mobility projects.**

3.3. Article 52 - Governance of European Transport Corridors and horizontal priorities

The appointment of a coordinator in charge of urban nodes would not be efficient. It is more appropriate that the coordinators in charge of the new European corridors include this priority in their work plan. Representatives of urban nodes should be invited to the corridor fora. Improving the governance of TEN-T policy and urban nodes is a prerequisite for the good implementation of future projects. Regional and local authorities play a key role in the management and development of transport systems and as such the empowerment of them should be strengthened.

Suggested amendments

Art.52 - 2

2. The “Corridor Forum” shall be formally established and chaired by the European Coordinator. The Member States concerned shall agree on the membership of the Corridor Forum for their part of the European Transport Corridor and ensure representation of the rail freight governance.

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4. SUMP

4.1. CONCEPT AND APPROACH

POLIS and ERRIN welcome the push for SUMPs. We are convinced local action needs proper planning. The choice for a functional area based SUMP-definition and urban-peri/urban connectivity should be reflected in European and national SUMP-support frameworks and tailor future hands-on support offers on EU-level by the European Commission (e.g. CIVITAS 2030, Cities Mission etc.)

For making the perspective of “going beyond the city” in SUMPs reality, we definitely need strong regions, planning for the whole functional area (also with regards to logistics) - especially in polycentric regions where there will be several urban nodes in future. Technical, political and financial support for such a planning governance will be highly welcome.

4.2. ANNEX V - SUSTAINABLE URBAN MOBILITY PLANNING REQUIREMENTS FOR URBAN NODES

POLIS and ERRIN, welcome the approach chosen for the SUMP requirements. It is a precise but flexible list of minimum standards. The requirements point rightly in the direction of the functional urban area as the main focus for mobility planning.

Proposed amendment:

4. Effective functioning of TEN-T: A SUMP should duly take into account the impact of various urban measures on the traffic flows, both passenger and freight, on the transEuropean transport network with the aim to ensure seamless transit, bypass, or interconnection through and around the urban nodes, including of zero-emission vehicles. It shall in particular include actions to alleviate congestion, improve road safety and remove bottlenecks affecting the traffic flows on the TEN-T.

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