

Sustainable commuting around urban areas

Moving forward, with local action crucial to reach destination



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01 Main messages

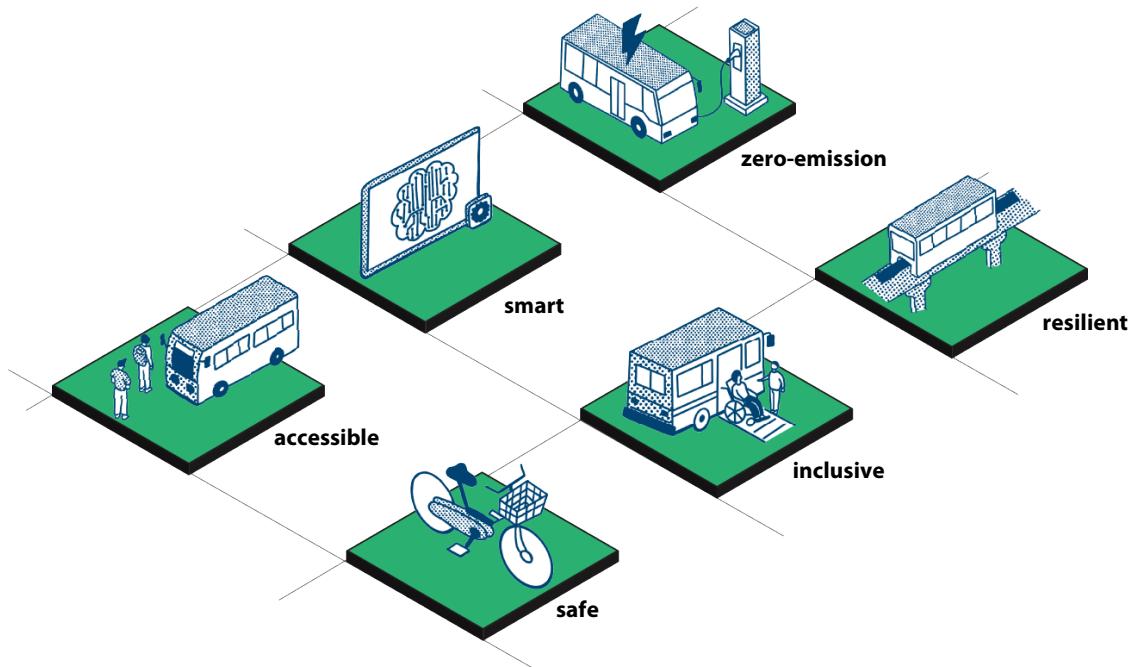
Why this area is important

- 01** Urban mobility, i.e. the movement of people and goods within urban areas, affects around 75 % of the population in the EU. Urban areas attract employment and economic activity, resulting in heavy commuter traffic. Population growth is faster in surrounding commuting zones than in city centres, indicating a trend towards suburbanisation¹.
- 02** Urban mobility is primarily managed locally. The Commission's 2021 urban mobility framework² defines sustainable mobility in urban areas across several key dimensions (*Figure 1*). This requires a focus on people-centred, multimodal urban transport systems that provide active, collective and shared mobility, underpinned by low- and zero-emission solutions.

¹ OECD (2012), *Redefining “Urban”: A New Way to Measure Metropolitan Areas*, OECD Publishing, Paris.

² COM(2021) 811.

Figure 1 | Key features of sustainable mobility in urban areas



Source: ECA, adapted from the Commission's new EU urban mobility framework (2021).

03 Enhancing sustainable urban mobility has several benefits, including reductions in greenhouse gas (GHG) emissions, congestion and travel time, as well as improvements in air quality and quality of life. A major challenge is to provide attractive alternatives to car usage.

04 In order to increase sustainable mobility, the Commission promoted the concept of **sustainable urban mobility plans (SUMPs)**. These are defined as strategic mobility plans aimed at improving, in a sustainable way, accessibility to and mobility within a functional urban area, for people, businesses and goods. For statistical purposes, the term “functional urban area” is defined at EU level as a city together with its commuting zone, with the latter being an area surrounding a city in which at least 15 % of employed residents work in that city.

05 The objective of the audit was to assess the actions taken by the Commission and relevant authorities in member states to support sustainable transport for commuters in large metropolitan areas. To this end, we assessed whether: (i) the Commission’s legislative, policy and support actions were appropriate in providing effective commuting transport; (ii) the design, implementation and monitoring of the SUMPs by relevant authorities in the sampled six member states (Czechia, Spain, France, Hungary, Poland, Portugal) were fit for purpose; and (iii) the selection, implementation and results of 21 sampled EU-funded projects were effective in addressing sustainable commuter mobility. We expect our observations to be useful for the Commission in evaluating the progress of its policy with a

view to future updates and related guidance. For more background information and details on the audit scope and approach, see [Annex I](#).

What we found and recommend

06 Overall, we conclude that the EU's legal framework on urban mobility has been enhanced by the Commission's sustained efforts. Notably, it now requires sustainable urban mobility plans to be prepared for 431 urban areas. However, we identified various shortcomings that undermine the plans' effectiveness, particularly in relation to their coverage of commuter flows and level of ambition in changing travel habits away from car use. Future improvements will primarily depend on action at local level.

The Commission's sustained efforts to strengthen the EU's urban mobility framework were partially successful

07 In the field of transport, any action at EU level has to comply with the subsidiarity principle, meaning that the EU should act only when objectives can be better achieved by EU action rather than by member states acting alone.

08 Twenty years after the Commission acknowledged the benefits of urban mobility planning, such planning was made compulsory for 431 urban areas ("nodes") with the revision of the trans-European transport networks (TEN-T) Regulation, adopted in 2024. In the meantime, before securing sufficient support from member states for such a requirement, the Commission had actively promoted the preparation of SUMPs.

09 While the regulation strengthened the framework, it did not:

- require member states to ensure that SUMPs conform to the EU guidelines;
- include the indicators suggested by the Commission (such as modal share), instead empowering it to define: (i) a limited number of indicators on urban mobility; and (ii) a methodology for data collection and submission by member states. This resulted in a delay as the implementing act has not yet been adopted. Moreover, there is no assurance yet that it will include any indicator measuring changes in modal share, even though this is key in order to assess whether urban mobility is becoming more sustainable (paragraphs [25-35](#) and [55](#)).

10 The stronger emphasis on sustainable urban mobility is also reflected in the rules and agreements governing EU funding programmes (cohesion policy funds, the Connecting Europe Facility and the Recovery and Resilience Facility) (paragraphs [36-37](#)).

11 The EU strategic framework for urban mobility aims to support the EU's binding climate objectives by promoting sustainable transport and thereby helping to reduce emissions. EU law set binding national targets on reducing greenhouse gas emissions overall, but without providing separate targets for the transport sector alone. This leaves it up to member states to choose implementing measures across sectors. Consequently, no targets were set at city level, or for urban mobility alone. Similarly, EU law did not set any targets on modal shift (moving commuters to more sustainable modes of transport), despite its relevance for environmental performance and transport efficiency. Overall, the EU policy objectives for urban mobility were not very specific (paragraphs [38-44](#)).

12 The Commission took the following action to support cities.

- It introduced numerous support initiatives (capacity-building, practice-sharing and guidance) which, although valued by local authorities partially overlap, leading to a complex landscape that can be challenging to navigate for city authorities (paragraphs [45-50](#)).
- It published guidelines for preparing SUMPs, complemented by over 30 guides on specific subjects. Since the guidance does not yet address all aspects of relevance and partially lacks updated information or alignment with the SUMP guidelines set out in the TEN-T Regulation, the Commission is working on streamlining and updating it (paragraphs [51](#) and [83](#)).

13 Except for some evaluations carried out in preparation for future policy decisions, the Commission has not yet monitored the effect of its policy as urban mobility data reporting will only be mandatory for member states from the end of 2027. It will be based on indicators and a methodology yet to be defined by the Commission in an implementing act (paragraphs [52-59](#)).

» Recommendation 1

Enhance the support provided to member state authorities

The Commission should:

- (a) complement its current SUMP guidance by covering all relevant aspects to be addressed by a SUMP, in particular how to best apply (i) the concept of functional urban areas and (ii) shared mobility in suburban areas, as well as how to best integrate land-use and spatial planning with mobility planning;
- (b) set up a single information point to guide member state authorities on the opportunities provided by the various support initiatives available (such as funding or capacity-building).

Target implementation date: Q4 2027.

» Recommendation 2

Monitor modal share

As part of the preparation of the implementing act on indicators, the Commission should work with member states to define an indicator on modal share – a crucial element of any sustainable mobility policy – which should be based on a consistent data collection methodology.

Target implementation date: Q4 2026.

Most audited SUMPs included relevant measures but had gaps in area coverage and monitoring

- 14** Defining the area that a SUMP will cover is crucial for its effectiveness: the area should encompass all relevant commuter flows. The TEN-T Regulation requires SUMPs to cover a “functional urban area” which includes commuting zones in that urban area or in its vicinity. This implies cooperation and coordination between national and local authorities and across administrative boundaries (paragraphs [60-64](#)).
- 15** All but one of the six audited SUMPs defined the areas based on administrative boundaries rather than on commuter flows, thereby overlooking a sometimes substantial proportion of these flows, ranging from 4 % to 64 % for the audited SUMPs. This is mainly due to

insufficient coordination among municipal authorities and their lack of power beyond respective boundaries (paragraphs [65-68](#)).



Recommendation 3

Promote proper geographical area coverage by SUMPs

The Commission should monitor whether the SUMPs submitted to it cover the functional urban areas of the cities concerned, as set out in the TEN-T Regulation. Where SUMPs do not cover such areas, the Commission should engage with member state authorities (in particular the national SUMP contact points) to address this situation.

Target implementation date: Q4 2028.

16 Most of the SUMPs we audited included measures and/or targets covering various aspects of sustainable mobility. This included:

- improved accessibility for all users (i.e. access to essential goods and services and to jobs) through developments such as multimodality, on-demand transport and shared mobility;
- reducing greenhouse gas emissions from the transport sector by fostering sustainable modes of transport, for example by implementing low-emission zones and promoting active mobility such as cycling or walking (paragraphs [69-79](#)).

17 The targets set by the audited SUMPs for emissions reduction in their corresponding urban areas were mostly neither fully aligned with, nor comparable to, those set at national level. The lack of any process to ensure such an alignment, and differing timelines for preparing or updating the respective documents, contributed to this situation (paragraphs [80-81](#)).

18 Despite some good examples, SUMPs often did not include measures to discourage the use of private cars. While most SUMPs included parking management measures (e.g. parking restrictions in certain areas), only half of them included measures on other aspects such as land-use and spatial planning and mobility management by employers for their staff (paragraphs [82-86](#)).

19 National and regional authorities in the six member states visited do not monitor SUMP implementation. However, out of the six audited SUMPs, two are monitored by the relevant local authorities and two more local authorities intend to do so. For the two SUMPs that are currently monitored, the effectiveness of their implementation was

partially hampered by a lack of local authority powers and funding constraints. While sufficient funding is essential for success, only the two currently monitored SUMPs included details on funding needs, and even these only indicated possible funding sources to cover these needs (paragraphs [87-91](#)).

20 Monitoring data on the overall impact of implemented SUMPs on sustainable commuter mobility and modal share was not available. While relevant authorities in the six member states conducted mobility surveys at certain intervals, timing and coverage issues reduced the usefulness of these surveys (paragraphs [92-94](#)).

The projects we audited supported the SUMPs' objectives, though not all led to significant effects on commuter needs

21 With regard to the sample of 21 projects we audited, we found that (paragraphs [95-96](#), [99](#) and [103-105](#)):

- all projects were consistent with the relevant SUMP or another pertinent mobility strategy, even though project selection authorities did not always assess this criterion;
- a majority of the projects were supported by a needs assessment;
- the vast majority of the completed projects fully delivered their planned outputs;
- all 12 projects for which sufficient data was available for an assessment had some effect in addressing commuter needs, albeit to differing degrees: half of them showed significant positive effects, while the other half had more moderate effects due to weaknesses in project planning and implementation.

22 We found the following weaknesses in the checks carried out by the project selection authorities (paragraph [97](#)).

- For projects funded by the Connecting Europe Facility-Transport, the assessment of their alignment with the relevant SUMPs started only with projects financed under the 2021-2027 period.
- For projects funded by the Recovery and Resilience Facility in the two audited member states, there was no verification of their alignment with the relevant SUMPs or no evidence of such verification.

23 Several projects (eight out of 21), in particular those financed by the Connecting Europe Facility-Transport and the Recovery and Resilience Facility, had not defined result indicators. In two member states where projects had an indicator to measure reductions in

greenhouse gas emissions, the calculation of the reduction was based on inadequate methodologies. There was no methodology defined at EU level (paragraphs [100-102](#)).

24 Our simulation of the potential impact of one project per audited member state on reducing commuters' travel time showed, albeit with caveats, that public transport was quicker than car travel at peak hours in two out of six cases, showing the potential for further improvement (paragraphs [106-108](#)).



Recommendation 4

Provide a robust methodology for measuring changes to greenhouse gas emissions

For the post-2027 multiannual financial framework, the Commission should develop a suitable methodology for measuring changes to greenhouse gas emissions, which beneficiaries of transport-related projects financed by EU funds can use to report reliable data for the related indicators.

Target implementation date: Q4 2028.

A closer look at our observations

The Commission's sustained efforts to strengthen the EU's urban mobility framework were partially successful

- 25** The responsibility for transport policy is shared between the EU and the member states³. Therefore, any action at EU level in this field has to comply with the subsidiarity principle set out in the Treaty on the European Union⁴. This means that the EU should act only when the objectives can be better achieved by EU action rather than by member states acting alone.
- 26** Urban mobility – one aspect of transport policy – is managed at national, regional and local level. It is strongly linked to the Commission's binding objective of making the EU climate-neutral by 2050. The 2021 European Climate Law⁵ which stipulates this objective also sets a binding target for 2030, namely a reduction in greenhouse gas (GHG) emissions by at least 55 % (compared to 1990).
- 27** Every policy and strategy should start from a sound diagnosis, for which the collection of relevant, reliable data is necessary. The same data is needed to evaluate progress and share best practices.

³ Article 4 of the Treaty on the Functioning of the European Union.

⁴ Article 5 of the Treaty on European Union.

⁵ Regulation (EU) 2021/1119.

28 We assessed whether:

- the EU policy documents and legal acts included appropriate provisions to foster cities' alignment with EU urban mobility objectives;
- the Commission's support initiatives (capacity-building, practice-sharing, guidance) were fit for purpose;
- the Commission monitored progress on urban mobility appropriately.

Reaching consensus on strengthening the EU legal framework took time, and urban mobility objectives remain broad

29 Urban and suburban mobility play a key role in achieving the EU's GHG emissions reduction targets. Sustainable urban mobility planning is a tool for cities to address land use, transport habits and transport infrastructure in a comprehensive way in order to improve transport sustainability, safety and efficiency.

30 We assessed changes in the EU's strategic and legal framework regarding urban mobility planning, GHG emissions from transport, and related objectives.

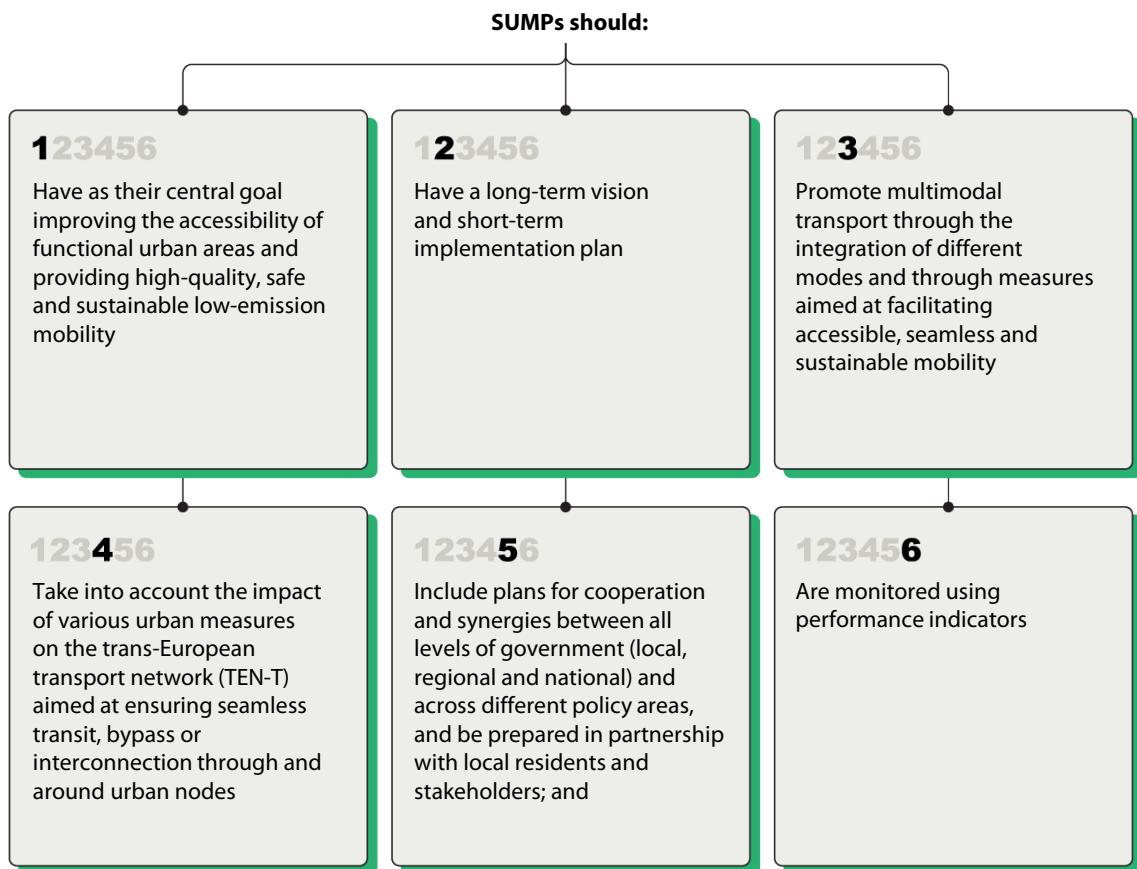
It took 20 years to make sustainable urban mobility planning compulsory for many urban areas, but alignment with EU guidelines remains voluntary

31 As long ago as 2004, in an urban strategy⁶, the Commission identified a need to require capital cities and cities of more than 100 000 inhabitants to adopt and implement sustainable urban transport plans (including transport and land use planning, targets set at local level and progress monitoring systems). This requirement was formalised only in 2024 in a legal act, namely the revised trans-European transport network (TEN-T) Regulation⁷. In the meantime, sustainable urban transport plans evolved into a new concept: sustainable urban mobility plans (SUMPs). The main characteristics of a SUMP are described in *Figure 2*.

⁶ COM(2004) 60.

⁷ Regulation (EU) 2024/1679 (TEN-T Regulation).

Figure 2 | Sustainable urban mobility plans – main characteristics



Source: ECA, based on Annex V of the TEN-T Regulation.

32 In those intervening 20 years, the Commission had regularly evaluated the possibility of requiring cities to adopt and implement SUMPs, but concluded that it lacked support from member states. As a result, relevant policy documents (*Figure 1* in *Annex I*) adopted between 2006 and 2020 only provided for the Commission to promote the uptake of such plans (e.g. by disseminating information and guidelines).

33 In 2021, two Commission evaluations⁸ concluded that there was a need for stronger action at EU level. Therefore, the Commission's 2021 proposal⁹ to amend the TEN-T Regulation included a requirement for member states to ensure, by 2025, that SUMPs are adopted for the urban nodes identified by the TEN-T Regulation. The Commission sees SUMPs as a tool to encourage seamless traffic flows from, to and across urban nodes without gaps.

⁸ SWD(2021) 47 and SWD(2021) 117.

⁹ COM(2021) 812.

Moreover, based on a Commission proposal, the 2024 TEN-T Regulation included significantly more urban nodes than the 2013 TEN-T Regulation¹⁰ (431 compared to 79).

34 During negotiations between the Commission and the EU's co-legislators (the European Parliament and the Council), the deadline proposed by the Commission was extended from 2025 to 2027 and the proposed requirement for member states to ensure that SUMPs conform to defined standards was removed. Instead, the regulation eventually adopted in 2024 emphasises that local authorities should make every effort to align SUMPs with the guidelines in Annex V¹¹.

35 To support urban nodes in adopting and implementing SUMPs, the 2024 TEN-T Regulation required member states to develop support programmes by July 2025.

36 The increased focus on sustainable urban mobility is also reflected in the rules governing the EU schemes funding mobility-related projects (*Annex I*).

- Cohesion policy funds for the 2014-2020 period: although not a legal requirement, but rather as a result of the line taken by the Commission during the negotiation of the national and regional programmes implementing cohesion policy, all the programmes under which the projects we audited were funded (*Annex II*) required projects to be included in, or aligned with, a strategic framework for urban mobility projects, such as a SUMP or an **integrated territorial investment** strategy. In Hungary, however, for the two projects that we audited from the 2014-2020 period, the SUMP with which the projects should align could be completed by the end of the projects rather than when the projects were selected; this reduced the effectiveness of the SUMP requirement.

- Cohesion policy funds for the 2021-2027 period: as was also the case for the 2014-2020 period, all the audited programmes required urban mobility investments to be aligned with a SUMP or, if none existed, with a comparable mobility strategy. But the Commission also went a step further by insisting, during the negotiation of the partnership agreements (between the Commission and each member state) and national and regional programmes implementing the policy, on aligning funding allocations with its policy objectives, in particular shifting from road infrastructure to sustainable and smart mobility.

¹⁰ Regulation (EU) 1315/2013.

¹¹ Article 41(2) of the **TEN-T Regulation**.

- Connecting Europe Facility for Transport: in 2019, the Commission amended the 2014-2020 work programme¹², which sets out conditions for the awarding of grants, and added as a requirement that EU-funded actions implementing transport infrastructure in nodes of the core TEN-T network, including urban nodes, must be consistent with SUMPs where applicable. The 2021-2027 work programme went a step further by specifying that EU-funded measures related to “multimodal passenger hubs” must form part of a SUMP established in accordance with the EU guidelines, or of an equivalent plan¹³.

37 The Recovery and Resilience Facility, established in 2021, allows investments in roads (mainly on the TEN-T network), but these investments do not count towards the facility’s climate objectives. In fact, 37 % of the total funding allocation in each national plan should support climate objectives. By contrast, investments in sustainable transport (such as cycling infrastructure or infrastructure supporting zero-emission rolling stock) do count. All six member states’ recovery and resilience plans included objectives, measures or investments to improve sustainable urban and suburban mobility.

EU regulation on transport-related emissions left member states free to choose their own reduction objectives and implementing measures

- 38** In 2020, in its Communication on a climate-neutral future¹⁴, the Commission highlighted that increasing the modal share of public transport, active mobility and multimodal mobility, combined with more stringent emissions standards for vehicles, would drastically lower pollution from transport, especially in cities.
- 39** To achieve the overall GHG reduction target (paragraph **26**), the 2018 Effort Sharing Regulation¹⁵ set one reduction target per member state, relating to emissions from a number of sectors, including domestic transport (but excluding aviation). With their national targets, member states should collectively contribute to reducing emissions at EU level, in the sectors specified in the regulation, of 40 % by 2030 compared to 2005 levels. Member states were free to choose which measures to implement across sectors to achieve their targets.
- 40** Considering the significance of transport emissions, the Commission included in its 2020 sustainable and smart mobility strategy a non-binding EU objective of a 90 % reduction in

¹² C(2019) 7303, Annex, p. 10.

¹³ C(2021) 5763, Annex, p. 13.

¹⁴ COM(2020) 562.

¹⁵ Regulation (EU) 2018/842.

emissions for the transport sector by 2050 (from 1990 levels). Similarly to the Effort Sharing Regulation, which did not set targets at member state level for the transport sector alone, the 90 % target was also not broken down by member state.

41 Likewise, and in accordance with the subsidiarity principle, no targets were set at city level. Nevertheless, the Commission proposed stronger regulatory requirements in relation to those aspects of urban mobility and transport where it deemed such interventions to have clear European added value. This included setting emission limits for cars, vans and heavy-duty vehicles at EU level to avoid differing standards among member states. Moreover, from 2027, road transport will be included in the EU's emissions trading system, designed to cut emissions by raising the cost of fossil fuels and encouraging cleaner transport alternatives.

42 In the same vein, member states are also free to choose the objectives they want to pursue in the field of urban and commuter mobility. The main objectives from EU policy documents are the following.

- The 2020 sustainable and smart mobility strategy¹⁶ only includes generic objectives, such as making all transport modes more sustainable and promoting a multimodal transport system.
- The 2021 new EU urban mobility framework¹⁷ includes the following three objectives, which are not specific and not measurable: (i) transition to safe, accessible, inclusive, smart, resilient and zero-emission mobility (“sustainable urban mobility”); (ii) increase the use of sustainable transport solutions; (iii) efficient connectivity between rural, peri-urban and urban areas through sustainable mobility options. See also *Figure 1* in *Annex I*.

43 While the EU seeks a modal shift in passenger transport toward public transport, cycling, and walking, no targets have been set at EU level on modal split. As was the case for emission targets (paragraph 41), the impact assessment accompanying the 2009 action plan on urban mobility concluded that requiring cities to set modal split targets would not be in line with the subsidiarity principle, whereas the monitoring of such targets would be.

¹⁶ COM(2020) 789.

¹⁷ COM(2021) 811.

44 A European Parliament study¹⁸ and the Expert Group on Urban Mobility¹⁹ recommended that the Commission and the member states set targets on changes in modal split over time. The expert group specified that member states should include these targets and tools in their national transport policies. Modal shift is a crucial element of any transport and mobility policy framework, as it contributes directly to improving the environmental performance and efficiency of transport, as well as public health.

Despite some overlap, the cities valued the Commission's numerous support initiatives

45 The Commission has established a large portfolio of support initiatives from which cities and other stakeholders can benefit. We analysed: (i) its capacity-building and practice-sharing initiatives; and (ii) the documents it published to guide cities in the preparation of SUMPs.

46 In terms of capacity-building, the EU made funding available mainly: (i) under cohesion policy; (ii) through the technical support instrument; and (iii) by supporting the Joint Assistance to Support Projects in European Regions (JASPERS) advisory programme (a joint initiative of the European Commission and the European Investment Bank).

47 JASPERS provides advice to authorities on strategic planning and on project preparation. It also organises workshops and training courses. In the context of country-specific or multi-country assignments it provided such advice for the preparation of SUMPs and of national SUMP support programmes. Both the national and the local authorities we interviewed particularly valued this support.

48 The technical support instrument provides tailor-made technical expertise to EU member states to design and implement reforms. Member states have to apply for this support via calls for proposals. As of mid-2024, eight member states had received support from this instrument for sustainable urban mobility assignments.

49 Moreover, the Commission has identified²⁰ more than 50 initiatives providing capacity-building and practice-sharing activities, including on urban mobility. Some were

¹⁸ [Modal shift in European transport: a way forward](#), European Parliament, 2018.

¹⁹ [Inclusive and sustainable future of urban mobility in Europe](#), Expert Group on Urban Mobility, 2025.

²⁰ European Commission, [Call for evidence – Ares\(2025\)3030877](#), 2025 and Portico, [Urban initiatives and organisations](#), accessed on 16 October 2025.

put forward by the Commission (*Annex III*) while others were set up by cities or other stakeholders. In 2025, the Commission announced the [EU agenda for cities](#) initiative, which includes plans to tackle the fragmented and difficult-to-navigate support landscape for cities. In response to the Commission's call for evidence launched to prepare this initiative, the POLIS network²¹ (bringing together 123 cities, regions and related authorities) asked²² for a unified EU capacity-building framework. It proposed the establishment of a dedicated technical support instrument for cities including a substantial focus on urban mobility. In the meantime, aware of some overlap in the scope and activities of these initiatives, the Commission and some of the initiatives themselves have been introducing measures to improve coordination and complementarity among them.

50 The national, regional and local authorities we interviewed were aware of the Commission's initiatives, participated in those they considered useful for their individual needs, and were generally satisfied with the support and activities provided. However, some also referred to overlaps in information, confusion due to the proliferation of platforms, and the need for better coordination and a unified EU platform to enhance accessibility and efficacy.

51 In terms of guidance, the Commission published its first guidelines for preparing SUMPs in 2013 and updated them in 2019. These guidelines were complemented by over 30 topic guides on specific subjects, such as accessibility, shared mobility and parking management. The Expert Group on Urban Mobility concluded that some were lacking updated information or alignment with the SUMP guidelines. The Commission's 2021 new urban mobility framework also included a commitment to complement and streamline the set of SUMP guidance to ensure its quality and relevance remain high, but did not set a deadline for doing so. As of September 2025, this work was ongoing.

The Commission's monitoring has been limited, partly because urban mobility data reporting will be mandatory only from the end of 2027

52 The Commission is responsible for the effective application, implementation and enforcement of EU law²³. According to the 'Better Regulation' guidelines, it is important to monitor systematically the effects of the implementation and application of legislation, in

²¹ POLIS website.

²² POLIS, *EU policy agenda for cities: A framework to deliver accessible, affordable, and sustainable urban mobility*, 2025.

²³ Article 17(1) of the [Treaty on the European Union](#).

order to enable the member states and the Commission to carry out a meaningful evaluation of interventions at some point in the future²⁴.

53 The Commission carried out evaluations of its policy in preparation for new policy decisions (paragraphs 33 and 43). However, regular monitoring of urban mobility is not yet possible due to a lack of data.

54 As long ago as 2009, the Commission identified clear added value in taking action at EU level to ensure the collection of harmonised urban mobility data. Since then, the Commission has conducted studies and worked with cities to identify those indicators for which data could reasonably be collected without excessive administrative cost. The process of harmonising the data and indicators on urban mobility is very time-consuming, partly due to the very different approaches among member states and cities to collecting this data.

55 In its 2021 proposal for the revised TEN-T Regulation, the Commission included provisions on collecting selected urban mobility data for each urban node²⁵ (e.g. GHG emissions and modal share). However, the revised 2024 TEN-T Regulation does not include references to specific indicators; instead, it empowers the Commission to adopt, by no later than 19 July 2025, an implementing act “defining, in a limited number, the indicators to be used for data collection” covering the fields of sustainability, safety and accessibility and “establishing a methodology for the collection and submission of data”²⁶. The Commission has not yet adopted this implementing act, but expects to do so in 2026.

56 The main reason for the delay is an extensive consultation process with member states on the definition of the data and indicators to be collected. This postponement will make it more challenging for cities and member states to report data by December 2027 as required by the TEN-T Regulation.

57 Based on our review of the preparatory work on the definition of indicators, the Commission’s methodology for the collection and submission of data is unlikely to be very prescriptive. This may complicate the consolidation of collected data at EU level and hinder the Commission’s ability to monitor and evaluate progress towards the EU objectives on urban (including suburban) mobility.

²⁴ SWD(2021) 305.

²⁵ Article 40(b)(ii) of the COM(2021) 812 final.

²⁶ Article 41(2) of the TEN-T Regulation.

58 In terms of uptake of SUMPs and their alignment with EU guidelines, the TEN-T Regulation requires member states to submit the SUMPs to the Commission without giving the Commission an explicit monitoring role. As a consequence, the Commission does not assess SUMPs' alignment with the EU guidelines²⁷. This represents a missed opportunity to evaluate sufficiently early whether the new requirement on SUMP adoption and implementation (paragraphs 33-34) is likely to have the desired impact. An evaluation of the TEN-T Regulation is due in 2033, by which time it will be too late to take corrective action if needed.

59 The Commission's [EU Urban Mobility Observatory](#) currently keeps an EU city database on SUMPs, providing information on the 431 urban nodes (paragraph 33) and other EU cities with a population above 50,000 that are at different stages of SUMP development. According to the platform, at least 358 of the 431 urban nodes (83 %) had already adopted mobility plans before this became a legal requirement. However, only around 65 % of these plans were considered to be SUMPs (i.e. in line with the EU guidelines) by the cities that sent the information. Moreover, the information in the platform may not be entirely accurate as it is based on self-declarations.

Most audited SUMPs included relevant measures but had gaps in area coverage and monitoring

60 The TEN-T Regulation requires member states to ensure that local authorities adopt and monitor well-designed SUMPs for every urban node by December 2027. They should be aligned with EU guidelines ([Figure 2](#)). The guidelines included in the 2024 TEN-T Regulation are similar in content to the previous guidelines issued by the Commission in 2013 and 2019. They stipulate as a general aim that a plan should improve sustainable urban mobility in the functional urban areas (paragraph 04). Several aspects which the Commission considered important for a SUMP were also indicated in its specific topic guides or recommendations.

61 The urban areas we audited developed SUMPs before they were made compulsory by the 2024 TEN-T Regulation (paragraph 34). [Table 1](#) indicates the dates of the current plans as well as the dates of their predecessors. We analysed the plans in effect as of January 2025.

²⁷ Articles 41 and 42, Annex V of the [TEN-T Regulation](#).

Table 1 | SUMPs of the audited urban areas

| Urban area | SUMP assessed (current) | Previous mobility plan |
|------------|-------------------------|------------------------|
| Budapest | 2023 | 2019 and 2015 |
| Katowice | 2023 | 2016 |
| Lille | 2023 | 2011 and 2000 |
| Lisbon | 2019 ¹ | 2016 |
| Prague | 2024 ² | 2019 |
| Seville | 2021 | 2006 |

¹ New SUMP approved in September 2025, after the end of our audit work.

² In 2024, the action plan accompanying the SUMP was updated but not the core document.

Source: ECA.

62 According to the TEN-T Regulation, a SUMP should include targets and indicators underpinning the current and future performance of its urban transport system, and its implementation should be monitored using performance indicators. Member states must ensure that this monitoring takes place.

63 We therefore examined whether:

- the SUMPs of the six sampled urban areas (in six member states) were aligned with the SUMP guidelines in terms of geographical area coverage;
- the SUMPs of the six sampled urban areas were aligned with the SUMP guidelines in terms of content;
- the monitoring of the SUMPs by member states' authorities was appropriate.

The area coverage of most SUMPs was insufficient, thereby excluding a certain share of commuter flows

64 Defining the area that a SUMP will cover is crucial for its effectiveness: it should encompass all relevant commuter flows. The 2024 TEN-T Regulation²⁸ requires SUMPs to cover the entire functional urban area of a city, which often spreads beyond a city's administrative boundaries. In fact, cooperation across such boundaries is one of the key EU principles for the preparation of SUMPs²⁹. This is particularly because the governance of transport is

²⁸ Article 3(13) of the [TEN-T Regulation](#).

²⁹ [SUMP guidelines](#), 2019.

complex, involving multiple layers – national, regional and local authorities as well as public and private providers – each with distinct responsibilities and priorities.

65 Member state authorities can either define themselves the functional urban area or apply the existing EU definition (paragraph **04**).

- In all cases but Prague, the area covered was restricted to municipal or regional administrative boundaries, in line with national guidelines (*Table 2*). According to the national and local authorities we interviewed, this is mainly due to a lack of powers, on the part of the municipality or entity developing the SUMP, in respect of other surrounding municipalities, or the difficulty of coordination between various authorities.
- While the Hungarian guidelines provide an appropriate definition, the SUMP for the urban area of Budapest was not based on this definition: it did not consider any commuters from areas outside its city borders.
- None of the audited SUMPs applied the EU definition.

Table 2 | Differences in recommended SUMP coverage

| Member state/EU | Area to be covered by SUMP |
|--|---|
| EU guidelines | Functional urban area as defined by EU law³⁰ (statistical definition) (paragraph 04) |
| Czechia Guidelines | Area defined by traffic movements rather than administrative boundaries, calculated using Czechia's own methodology (80 % of commuter trips should take place in or originate/end in the selected territory). |
| Spain Guidelines | Administrative areas covered by the authority or authorities that prepared the SUMP. |
| France Law | Administrative area covered by the authority responsible for public transport. |
| Hungary Guidelines | Functional urban areas, taking into account the relevant commuting zone, rather than administrative boundaries, calculated using Hungary's own methodology. |
| Poland Based on national practice; there are no national guidelines | Area primarily designated within regional administrative boundaries, taking into account the flow of commuters, based on Poland's own methodology. |
| Portugal Guidelines | Administrative areas covered by the authority or authorities that prepared the SUMP. |

Source: ECA.

66 As a result, the audited SUMPs did not take into account a certain proportion of commuter flows (ranging from 4 % to 64 %). This proportion was particularly significant in Seville, at 64 % (294 440 trips), and Budapest, at 46 % (694 615 trips) ([Interactive platform](#) created by Eurostat for this audit, and [Annex IV](#)). Excluding a significant share of commuter flows, particularly those from areas furthest from the city centre, where cars are used most, reduces the relevance and usefulness of a SUMP. It hinders the plan's ability to comprehensively address mobility challenges and achieve sustainable mobility goals, where intervention is needed most.

67 Based on our analyses of the six sampled urban areas, we also found the following ([Figure 3](#)).

- In four cases, there were supramunicipal bodies responsible for transport planning across boundaries. In two cases, this meant that the limited area covered by the

³⁰ Regulation (EC) 1059/2003 and its Implementing Regulation (EU) 2019/1130 (annex).

SUMPs had no impact on public transport planning as transport planning covered larger areas.

- In three cases, areas not covered by the relevant SUMPs (but still within the functional urban area) were served to a lesser degree, if at all, by urban public transport, despite at least 15 % of those areas' employed residents needing to commute to those cities for work.

Figure 3 | Areas covered by SUMPs compared to the functional urban area and implications on public transport planning and availability

| Urban area covered by the functional urban area the SUMP a supramunicipal body that manages mobility | SUMP coverage compared to the FUA Smaller Bigger | Public transport in areas outside the SUMP within the functional urban area | |
|--|--|--|---|
| | | planning | Yes No |
| Budapest | The SUMP covers the city of Budapest (8 % of the functional urban area) | ✓ The public transport system covers the suburban areas, as it was planned this way years before the concept of SUMP was established. | availability Good public transport availability outside the SUMP area. |
| Katowice | But there are areas of the functional urban area not covered by the SUMP | ✗ Metropolia, the area managed by a supramunicipal body, is smaller than the FUA and the SUMP. | Public transport availability outside the SUMP area is lower. |
| Lille | 40 % of the functional urban area ¹ | ✓ The “Bassin de mobilité”, the area managed by a supramunicipal body, is almost three times bigger than the FUA. | Good public transport availability outside the SUMP area. |
| Lisbon | 66 % of the functional urban area | ✗ “Area metropolitana”, the area managed by a supramunicipal body, covers the same area as the SUMP. | Public transport availability outside the SUMP area is much lower. |
| Prague | 86 % of the functional urban area | ✓ “Prague integrated transport”, the area managed by a supramunicipal body, is almost three times bigger than the FUA. | Good public transport availability outside the SUMP area. |
| Seville | The SUMP covers the city of Seville (3 % of the functional urban area) | ✗ No integrated transport planning in a broader area than the SUMP. | Public transport availability outside the SUMP area is much lower. |

¹ The maps show the functional urban areas situated within national borders. Data on commuter flows from Belgium to Lille are not available and therefore not reflected in the map.

68 A number of EU urban areas have commuter flows spreading across borders: according to a Commission Communication³¹ on border regions, there are around 2 million cross-border commuters in the EU. While Lille is concerned by this issue, its SUMP did not cover the cross-border area with Belgium. A Commission study³² identified sub-optimal cross-border public transport services between Belgium and France due to missing links, with most bus lines stopping at the border and cross-border lines not meeting actual demand.

Most audited SUMPs include measures on accessibility and emissions reduction, while there were fewer measures discouraging car usage

69 We assessed whether the SUMPs we audited included measures to lead to improved accessibility for all users and a reduction in transport emissions.

70 The implementation of SUMPs should lead to improved connectivity to and availability of public transport and hence improved accessibility (access to essential goods and services). Public transport includes, among other modes, buses, trains, metros, trams and cable cars³³.

71 According to a Commission study³⁴, lack of transport availability and accessibility, together with affordability, are the main elements leading to transport poverty. Transport poverty includes being unable to reach key destinations, or taking excessive time to do so. Based on data from the Commission's Joint Research Centre³⁵, we observe that within the six sampled urban areas transport poverty was higher in suburban areas than in the city centres.

72 The importance of accessibility for commuters is illustrated by the example of Lille. Based on publicly available data, we compared the accessibility of jobs by public transport and by car and observed that the total number of jobs accessible within 45 minutes from

³¹ COM(2017) 534.

³² Study on providing public transport in cross-border regions – mapping of existing services and legal obstacles, European Commission, 2021.

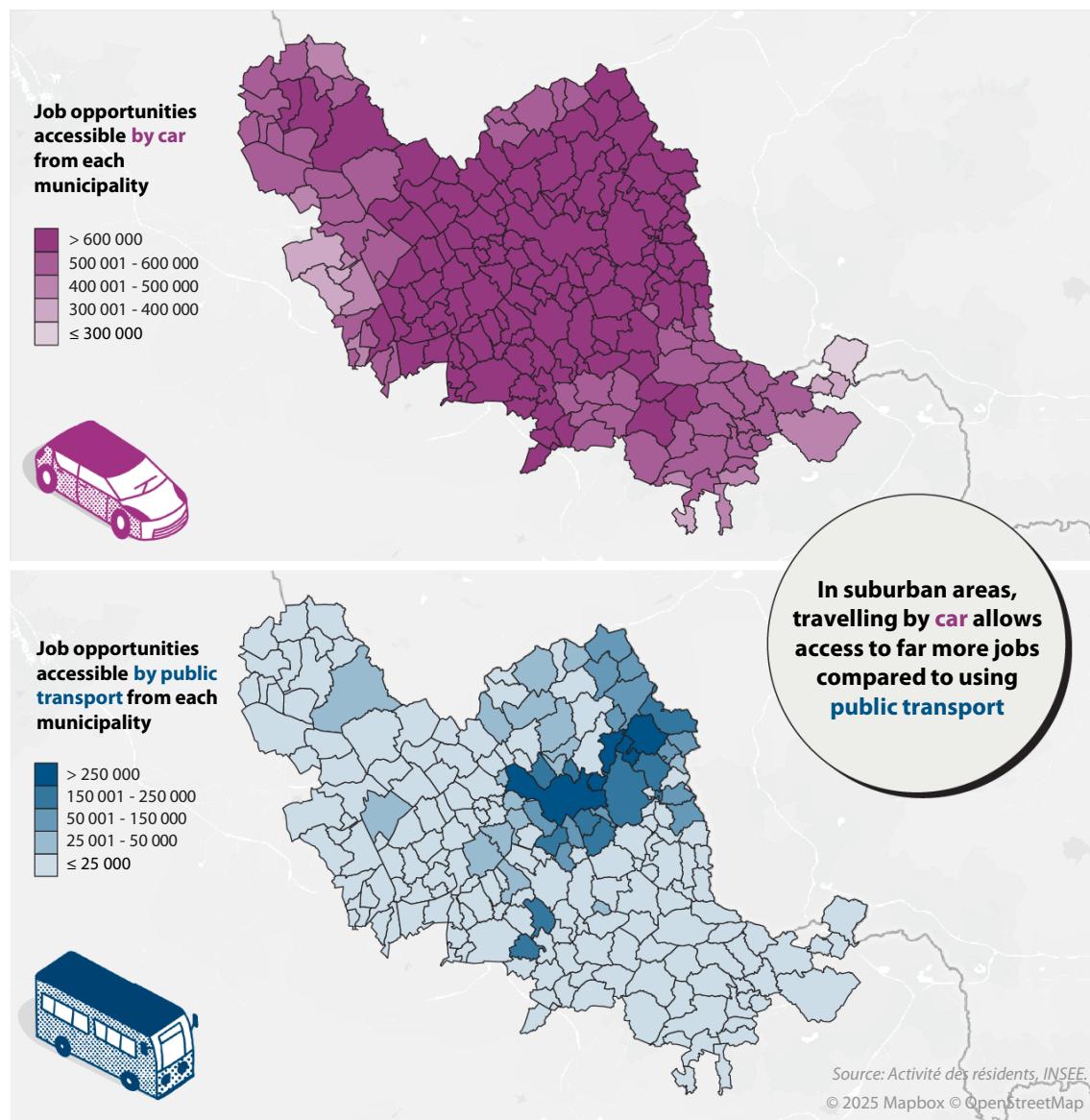
³³ The context of public transport in Europe, Expert Group on Urban Mobility, 2022.

³⁴ Transport poverty: definitions, indicators, determinants, and mitigation strategies, European Commission, 2024.

³⁵ Data from JRC, partially available in the Transport Poverty Hub.

suburban areas was much lower, when commuting by public transport than when commuting by car (*Figure 4*).

Figure 4 | Functional urban area of Lille – accessibility of jobs by public transport (within 45 minutes)



Source: ECA, based on data from INSEE.

73 Providing sufficient connectivity to public transport for areas and individuals, including those with disabilities, requires a comprehensive and well-integrated public transport network and multimodal hubs. Moreover, on-demand public transport can be a cost-effective transport solution to connect suburban areas where population density is insufficient to justify regular lines with predetermined schedules and stops. Shared mobility (e.g. car-sharing or bike-sharing), often provided by private companies, can also be an alternative to or bridge gaps in the public transport network. Finally, multimodal

travel information and integrated ticketing (a single ticket that enables passengers to access multiple transport services) also improve accessibility.

74 Our analysis of the six audited SUMPs showed that nearly all included measures on the issues mentioned in the previous paragraph (*Table 3*).

Table 3 | Measures in SUMPs to improve accessibility for all users

| SUMPs include measures on: | Number of SUMPs (out of 6) |
|---|---|
| Public transport (e.g. better network, more infrastructure) | 6 |
| Multimodal hubs | 5 |
| Accessibility for people with disabilities and reduced mobility | 6 |
| Integrated ticketing | 5 (the remaining 1 has no measures as integrated ticketing already exists) |
| On-demand transport | 4 |
| Shared mobility | 6 (all but one limited to city centres and not very detailed) |

Source: ECA.

75 All the sampled urban areas already applied integrated tariffs. Each had their own travel app, although only four of the apps allowed passengers to buy tickets directly. In some instances, integrated ticketing was implemented despite not being included in the SUMPs, as it resulted from decisions made at either national or regional level.

76 On-demand transport can be considered a public transport service within the meaning of the Public Passenger Transport Services Regulation³⁶. This means that, under certain conditions, public transport operators can be compensated or given exclusive rights by public authorities to provide public transport services which are in the general interest but would otherwise not be commercially viable. The national legislation of Spain, France, Hungary, Portugal and (since July 2025) Czechia recognises on-demand transport as a public transport service. In Poland, on-demand transport is not yet covered by the law governing public transport.

77 Shared mobility is not considered a public transport service within the meaning of the Public Passenger Transport Services Regulation. There is therefore a risk that shared

³⁶ Regulation (EC) 1370/2007.

mobility will not be made available in suburban areas for commercial viability reasons. Only Lille's SUMP included shared mobility actions in suburban areas.

78 Next to improving accessibility, the implementation of SUMPs should contribute to reducing transport emissions. This can be achieved in various ways, such as: (i) reducing car usage, by increasing the share of sustainable modes of transport; and (ii) using vehicles which produce fewer emissions.

79 Our analysis of the six audited SUMPs showed that all of them include targets or measures to foster sustainable modes of transport (*Table 4*).

Table 4 | Targets and measures in SUMPs to foster sustainable modes of transport

| SUMPs include: | Number of SUMPs |
|--|--|
| Targets for reducing GHG emissions | 5 |
| Targets on modal share (i.e. increase the share of transport modes other than cars) | 5 Not all referred to specific modes beyond reducing car use (<i>Annex V</i>) |
| Targets for decarbonising the public transport fleet | 4 |
| Measures aimed at decarbonising public transport fleets (e.g. replace high emission vehicles by low-emission ones) | 5 |
| Measures aimed at enhancing active mobility (walking and cycling) (e.g. new infrastructure) | 6 |

Source: ECA.

80 Urban areas are central to achieving national objectives on lowering GHG emissions and reducing car use to support alternative modes of transport, as they account for a considerable share of GHG emissions (paragraph **03** in *Annex I*). We compared such national objectives with the objectives of the six audited SUMPs (*Annex V*) and found that:

- in two cases the objectives were not comparable (Budapest, Katowice);
- in three cases the objectives were not aligned, or not fully aligned (Lisbon, Prague, Seville);
- in one case the SUMP had similar or more ambitious objectives (Lille).

81 In fact, there is not always a process in place to ensure alignment between objectives at national level and those set at city level. Moreover, the timelines for preparing national strategies and SUMPs do not necessarily align.

82 A 2019 report on the future of road transport³⁷ highlighted that policies enhancing multimodal transport should be complemented by policies limiting car access, discouraging the use of private cars. Such policies can address: (i) parking management³⁸; (ii) the provision of financial incentives; (iii) land-use and spatial planning; (iv) mobility management³⁹ by companies, organisations and institutions for their staff; and (v) vehicle access regulations.

83 Our analysis of the six audited SUMPs showed that most include parking management measures but half or fewer address the other aspects mentioned in the previous paragraph (*Table 5*, and *Box 1* for a good practice examples). In this context, we note that:

- a research study on modal shift⁴⁰ published by the European Parliament in 2018 identified land-use planning facilitating the use of private motorised vehicles above other modes as one of the main barriers to achieving a significant shift to more sustainable modes of transport in urban areas;
- the Commission has not yet issued any specific guidance on how SUMPs should be linked to land-use and spatial planning.

Table 5 | Measures in SUMPs that aim to discourage the use of private cars

| SUMPs include measures on: | Number of SUMPs |
|--|-----------------|
| Parking management | 5 |
| Financial incentives | 1 |
| Land-use and spatial planning | 3 |
| Mobility management by employers | 3 |
| Low-emission zones or vehicle access regulations | 3 |

Source: ECA.

³⁷ The future of road transport, Commission, Joint Research Centre, 2019.

³⁸ Topic guide on **Parking and SUMP. Using parking management to achieve SUMP objectives effectively and sustainably**, Commission, 2022 and recommendation on **Increasing the positive impact of parking policies on the city**, Expert Group on Urban Mobility, 2024.

³⁹ Topic guide on **Integrating mobility management for public and private organisations into SUMPs**, 2023.

⁴⁰ Modal shift in European transport: a way forward, European Parliament, 2018.

Box 1

Good practice examples (Lille)

Financial incentives: Lille Metropolis has a scheme aimed at reducing private car usage during peak congestion hours by paying drivers for each car journey they avoid on defined corridors.

Link between the SUMP and spatial planning: Lille Metropolis has developed a framework document (“*Charte de l'espace public*”), to guide the transformation of public spaces across its 95 municipalities. First adopted in 2007 and updated in 2021, the charter includes common objectives and operational guidelines to ensure a coherent and coordinated approach to designing public spaces.

It sets out a series of mandatory commitments to be applied by every project, and requires project evaluations to meet minimum performance levels on issues such as sustainable mobility and environmental quality.

Mobility management by employers: Lille Metropolis, which developed the SUMP, has a body in charge of mobility management, which coordinates employers' mobility actions. Among other things, it promotes a voluntary scheme introduced in 2020 by the French mobility orientation law (“*Loi d'orientation des mobilités*”) under which employers subsidise their employees' use of sustainable modes of transport. This is on top of the legal requirement for employers, established in 2009, to cover 50 % of the cost of their employees' public transport season tickets (e.g. monthly or annual passes).

84 We found that, independent of the SUMPs, all the sampled cities but Katowice have introduced **vehicle access regulations** in some areas, with varying criteria for defining such areas and the conditions that apply to them. In three cases, the restrictions do not contribute to lasting changes in commuters' habits or to modal shift as they only apply during periods of high air pollution (Seville) or affect only coaches and trucks (Budapest, Prague).

85 For the administrative areas of the six cities, we also analysed the **parking requirements** for new building developments, as a key element of the relationship between spatial planning and sustainable mobility. Research has shown that parking availability encourages car ownership and use, which affects modal share⁴¹.

86 Local authorities face the challenge of balancing two goals: requiring minimum parking to accommodate car ownership, and restricting parking to discourage car use in favour of

⁴¹ Christiansen et al, *Parking facilities and the built environment: Impacts on travel behaviour*, 2017; McAslan, D., Sprei, F., *Minimum parking requirements and car ownership: An analysis of Swedish municipalities*, 2023.

sustainable modes of transport and to improve urban space use and quality of life in cities. This is reflected in the regulations of the cities.

- In Lille and Lisbon, fewer parking spaces were allowed for new buildings in areas closer to public transport stations, encouraging modal shift to public transport.
- On the other hand, all cities' planning regulations set minimum parking space requirements for new residential buildings and five also do so for office buildings. In Prague, for example, the total minimum required number of parking places for a residence with a gross floor area of 1 000 m² containing 12 apartments ranges from 5 in the city centre to 28 in suburban areas. Only Katowice applies a maximum for multi-unit residential buildings, and Lille and Lisbon for offices. National regulations in Hungary, also affecting Budapest, changed in 2025, increasing the minimum number of parking spaces required in residential and office buildings.
- The regulations of half of the sampled cities (Katowice, Prague, Lille) allow more parking spaces in suburban areas than in the city centre, thereby supporting car ownership and an expansion of urban areas to surrounding low-density areas. This expansion has environmental, economic and social consequences, such as increased car use and increased commuting time, and consequently higher GHG emissions⁴².

Implementation and monitoring of the audited SUMPs are not guaranteed

87 Only the Czech and Polish national authorities assess the compliance of SUMPs with national and/or EU guidelines; however, they do not assess the relevance of the proposed measures.

88 Furthermore, none of the national or regional authorities monitor the implementation of SUMPs. As a result, the member states are not in a position to determine whether the plans will achieve their intended outcomes.

89 Indicators are used to monitor outcomes. We found that all but one (Seville) of the SUMPs we examined included performance indicators (though in one case only on emissions reduction). As regards monitoring by local authorities, we found the following.

- Only the authorities of the urban areas of Budapest and Prague were monitoring the level of implementation of individual measures as of January 2025. In both cases, the

⁴² Urban sprawl in Europe, joint EEA-FOEN report, 2016.

planned implementation of SUMP measures had faced obstacles mainly due to funding constraints.

- The authorities of the urban areas of Lisbon and Seville were not monitoring the implementation of the plan.
- Katowice and Lille's SUMPs were only approved recently (in 2023 and 2024, respectively) and have not yet been monitored, although the authorities of both have planned monitoring and evaluation mechanisms.

90 Sufficient funding is a key factor for the successful implementation of a SUMP. We found that only Budapest and Prague's SUMPs included estimates of the expenditure needed for the implementation of the proposed measures, and an indication of possible funding sources. If the amount of available funding is not clear, there is no assurance that the plans can actually be implemented as envisaged.

91 Another factor that may affect SUMP implementation is the division of responsibilities between different levels of government, as set out in national legal frameworks. Prague's SUMP included a measure to introduce a toll system to reduce car traffic. However, the measure was not implemented, partly due to insufficient political support and partly due to municipalities not having the power to introduce tolls.

92 Urban mobility is a dynamic system in which one component impacts on the other⁴³. We were not in a position to assess the overall impact of SUMP implementation on sustainable commuter mobility and modal share in the sampled urban areas as relevant data was not available at the time of our audit.

93 In all the sampled urban areas, the authorities conducted mobility surveys to estimate modal shares and assess passenger satisfaction. However, timing and coverage issues affected the meaningfulness of these surveys (*Annex VI*). While the surveys' methodologies and reporting largely adhered to Eurostat recommendations⁴⁴, they varied across cities and over time. This makes it challenging or impossible to compare the surveys' results, or changes in modal share over time.

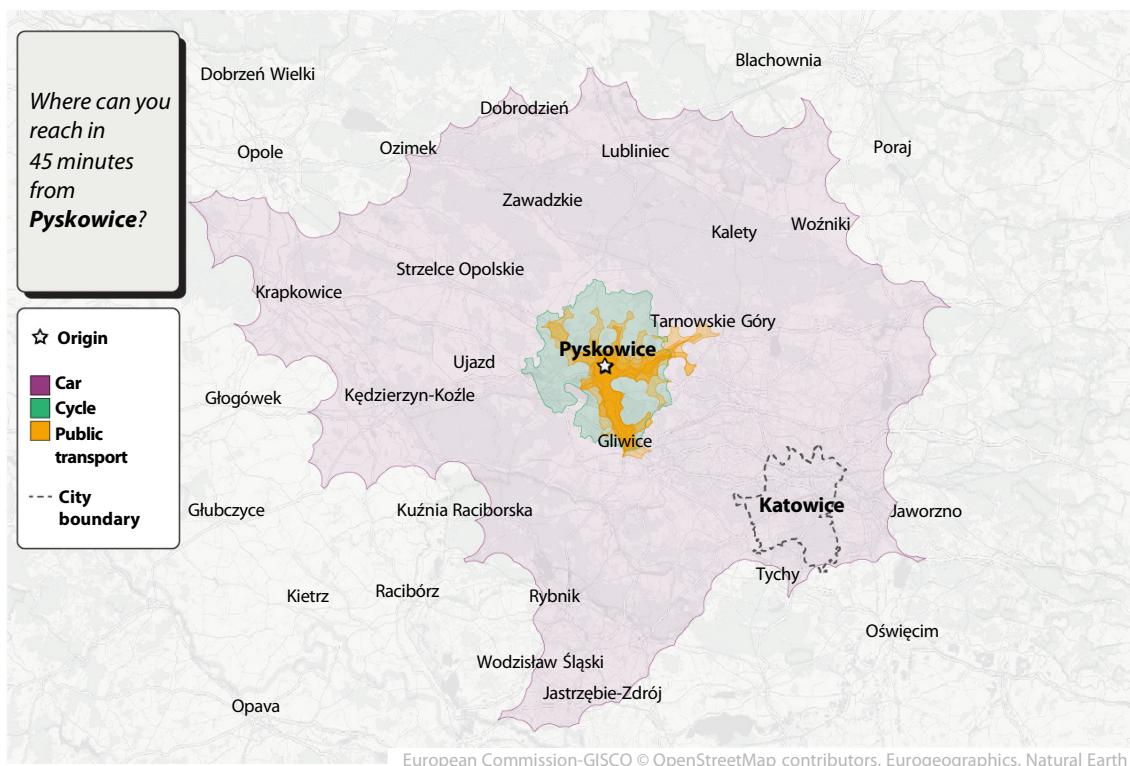
94 In our [special report 06/2020](#) on sustainable urban mobility, we found that only destinations in small central areas of some of the cities we visited could be reached faster by public transport than by car. For the current audit, to assess the situation in suburban areas, we selected, based on commuter flows, a point of origin in the commuting zone of

⁴³ Paragraph 461 of the [SWD\(2020\) 331](#).

⁴⁴ [Eurostat guidelines on passenger mobility statistics](#), 2021.

each of the sampled urban areas and analysed the area that could be reached within 45 minutes by public transport, car or bicycle. We found that cars could reach many more areas, even in rush hours with congestion, as illustrated in [Figure 5](#) for one suburban area of the functional urban area of Katowice. See also [Annex VII](#) for illustrations regarding the other five urban areas ([Interactive platform](#)).

Figure 5 | Catchment area for cars, public transport and cycling in one suburban area within Katowice's functional urban area



Source: ECA, based on Eurostat's calculations ([GISCO Reference Database](#), [interactive platform on isochrone maps](#)).

The projects we audited supported the SUMPs' objectives, though not all had significant effects in meeting commuter needs

95 We assessed whether:

- the project selection procedures applied by the authorities that are responsible for managing EU funds (including the selection and implementation of projects) were appropriate;
- the 21 projects we audited ([Annex II](#)) delivered their expected outcomes.

Despite some shortcomings in selection procedures, all audited projects were aligned with SUMPs

96 We assessed whether the project selection procedures ensured that projects receiving EU funding were aligned with the SUMP of the related urban area and were based on an assessment of mobility needs. This assessment helps ensure projects will be effective and give value for money.

97 We found that all audited projects were consistent with the relevant SUMP or another pertinent mobility strategy, even though project selection authorities did not always assess this criterion.

- Connecting Europe Facility-Transport (3 projects): for the 2014-2020 period, the European Climate, Infrastructure and Environment Executive Agency (CINEA) responsible, did not check that the projects were consistent with the corresponding SUMPs, despite such alignment becoming mandatory in 2019. This aspect was, however, verified for the 2021-2027 period (paragraph [36](#)).
- Recovery and Resilience Facility (2 projects): in one member state (Portugal), we were unable to trace how the relevant national authorities selected the project. In another member state (Spain), the relevant national authorities did not check the projects under the audited call for proposals for alignment with an approved SUMP, even though such alignment was a requirement of the call.

98 Of the 16 audited projects funded under cohesion policy, we also found that the managing authorities selected all but one through non-competitive calls for proposals (mostly through a continuous intake of project applications). In Hungary, only projects decided at government level through a decree could apply in response to a call. Non-competitive selection procedures do not necessarily guarantee the selection of those projects that would contribute most to the EU sustainable urban mobility objectives or give the best value for money (paragraph [02](#)). We acknowledge, however, that it may be less burdensome than competitive calls (i.e. with applications being submitted by a deadline, assessed and ranked).

99 With regard to project proposals taking account of mobility needs (including aspects such as future demand, feasibility and cost versus benefits), we found the following.

- A majority of projects (13 out of 21, i.e. 62 %) were supported by a needs assessment.
- Six projects lacked such an assessment, and for one the assessment was only partial (analysis of options for meeting the needs identified). By way of example, this led to a new park-and-ride facility built under one project in France having an occupancy rate

below 15 % more than three years after opening, which raises questions about the necessity and size of the facility.

- For one project (Recovery and Resilience Facility, Portugal), the beneficiary prepared a demand analysis and a feasibility study only after the project had been included in the country's recovery and resilience plan. We note that the project was removed from the plan by the relevant national authorities in May 2025 as it incurred delays for various reasons, making it impossible to complete the project by the end of the plan's implementation period.

Nearly all audited projects delivered their planned outputs, but much fewer led to significant effects in meeting commuter needs

100 Monitoring data is necessary to measure the achievements of EU interventions. Indicators are a tool used for measuring outputs (e.g. length of a new tram line in km) and results (e.g. reduction in journey time).

101 For the projects audited, we found differences in the selection and definition of indicators which were linked to the EU funding source used and the related legal acts (*Table 6*).

Table 6 | Output and result indicators

| EU funds | Output indicators defined? | Result indicators defined? | Comments |
|-----------------------|------------------------------|------------------------------|--|
| Cohesion policy funds | Yes 15 out of 16 projects | Yes 13 out of 16 projects | The EU legal basis ⁴⁵ defined common output and result indicators, some of which are potentially applicable to sustainable urban mobility projects. It also required the authorities responsible for programme implementation to define further output and result indicators. |

⁴⁵ For the 2014-2020 period: [Regulation \(EU\) No 1301/2013](#), Annex I and [Regulation \(EU\) No 1300/2013](#), Annex I; for the 2021-2027 period: [Regulation \(EU\) 2021/1058](#), Annex I.

| EU funds | Output indicators defined? | Result indicators defined? | Comments |
|--|--|----------------------------|--|
| Recovery and Resilience Facility | No at project level But both audited projects contributed to the targets set in the corresponding national recovery and resilience plans (e.g. targets on budget spent or projects completed promoting sustainable mobility). | No | The legal basis did not require the definition of result indicators. |
| Connecting Europe Facility – Transport | No The grant agreements did, however, specify deliverables and milestones. | No | Neither the legal base nor the calls for projects required the definition of indicators. |

Source: ECA.

102 For those projects which had result indicators, these concerned increases in the number of passengers or users, travel time savings and emissions reduction. For transport projects funded under cohesion policy programmes, result indicators measuring GHG emission reduction were optional in the 2014-2020 period, while in the 2021-2027 period they are to be used for interventions whose objectives include reducing GHG emissions⁴⁶. The methodologies used to calculate the estimated emission reduction were left to the discretion of the relevant authorities, as there is no methodology at EU level. Consequently, they differed among the audited projects and in 4 out of 7 cases were not based on justified assumptions. **Box 2** provides examples of calculation methods.

⁴⁶ SWD(2025) 61 final, indicator 29, p. 74.

Box 2

Reduction of GHG emissions – calculation methods

The following examples illustrate the varying quality of GHG emissions reduction calculations.

- (1) Sound methodology: GHG emissions reductions were estimated using commuter data, average vehicle fuel consumption, and kilometres of travel avoided due to the project.
- (2) Inadequate methodologies: (i) a uniform CO₂ reduction rate per euro spent was used, regardless of the specific characteristics or actual emission reduction potential of the various projects; (ii) it was assumed that all potential users of cycle paths would shift from individual car transport; (iii) in one SUMP, emissions reduction targets were set for each municipality. Each municipal target was then divided by the length of cycle paths planned to be built in that municipality. This approach took no account of the actual or potential use of the paths – merely building them was sufficient to meet the targets.

103 We found that out of the 16 audited projects that had been completed by the time of our audit, only two did not fully **deliver the planned outputs** (whether expressed in the form of indicators or otherwise described) (*Box 3* and *Box 5*).

Box 3

Multimodal hub project not delivering the planned outputs

The project in Hungary aimed to create a new multimodal hub, including a town by-pass road.

Due to considerable cost increases, important sustainable mobility elements of the project (modernisation of the train station, improved access to platforms and tracks), as well as the construction of an underpass bridging the two sides of the train station (and of the town), were postponed indefinitely. While some planned sustainable mobility elements were delivered (park-and-ride and bike-and-ride areas, rebuilt bus stops, connecting pedestrian and cycling paths), most of the funding was used for road construction and for relocating the rail loading area.



Note: Road that was meant to continue into an underpass.

Source: ECA.

104 All 12 projects for which data was available had some effect in addressing commuter needs and improving sustainable mobility, though to varying degrees in each case. Six projects led to significant positive effects (e.g. increase in operations of bus lines or achievement of target numbers of users and passengers (*Box 4*)) while for the other six the effects were more modest. We were unable to assess nine projects due to a lack of indicators and monitoring data (paragraph *101*) and/or because the projects were still ongoing.

Box 4

Multimodal hub with significant positive effects



Architecture design: Grzegorz Raczek/General Designer: Mostostal Zabrze Biprohut S.A. ©All rights reserved.

Source: ECA.

The project involved constructing a multimodal hub in Poland bringing together four modes of transport, namely bus, train, car (with park-and-ride areas) and cycling. It was used by almost 850 000 passengers in its first year of operation (2023). The train station is located 150 metres from the hub, connected via a tunnel. Before the project, the local and regional bus stops were scattered in several locations, up to 650 metres from the train station.

The construction of the hub made bus transport more accessible and convenient for people living in the region. The number of bus operators running regional and international connections increased from 22 prior to the project, to 32 in 2023. Transfer times for passengers also decreased substantially.

105 Factors relating to (i) project planning, design and selection and (ii) implementation explain why six projects had more modest effects (*Box 5*).

Box 5

Factors explaining the modest effects of some projects

Project planning, design and selection (3 projects)

- Lack of a needs analysis led to one park-and-ride facility being underused and another lacking direct metro access, thus requiring a shuttle-bus transfer. Drivers can park at the latter facility even if they are not continuing their journey by public transport.
- One cycling path is not well suited to commuting (see picture below): it is a scenic path that meanders and loops (including a roundabout for leisure purposes), it is made of wooden boards and does not separate pedestrians from cyclists, meaning it does not meet commuting or safety standards.

Implementation – missing outputs (2 projects)

- Important sustainable mobility components of one project were not implemented (*Box 3*).
- A travel and ticket information system was completed with a major delay of 4.5 years. It does not yet include real-time data as initially planned, and requires an additional device to purchase tickets (only 7 tickets per day on average were bought in 2023, and 12 in 2024).

Implementation – coordination among neighbouring authorities (1 project)

- A cycling path, which was intended to connect a suburb to the city and form part of the regional cycling network plan, remains unlinked to the city and the regional cycling network due to a lack of agreement between regional and city authorities since 2018 (see picture below). The path, though built only recently, already shows signs of degradation and lacks essential features such as lighting and shade.



Source: ECA.

106 We also analysed the potential effects on travel time of one project in each of the six audited urban areas ([Annex VIII](#)). To this end, we compared travel scenarios by car and by public transport, using and not using the project infrastructure, for a hypothetical commuter from a suburb who could potentially benefit from the project. We selected the destination point in an area with a high concentration of jobs in the city.

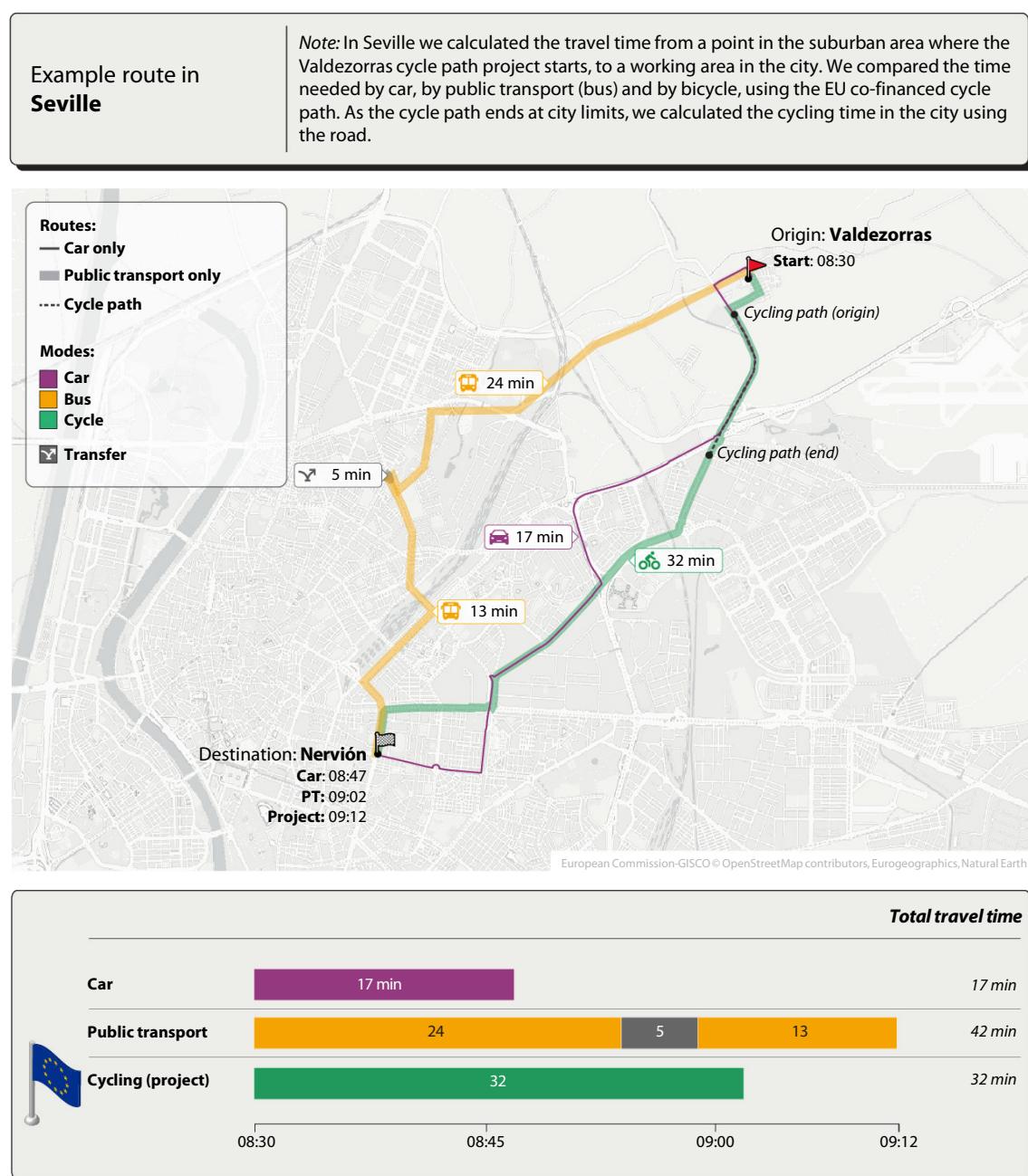
107 By doing so, we assessed whether the project improved the competitiveness of public transport compared to car use. The analysis is subject to the following limitations.

- The results represent a snapshot as of early 2025. Travel times are likely to evolve as SUMPs are implemented.
- Other scenarios may have led to different results.
- Although the competitiveness of individual car transport is influenced considerably by the availability of parking spaces in commuting destinations and by access regulations, the scenarios using individual car transport did not consider the time needed for parking, as this can vary greatly from case to case (paragraphs [82-84](#)).

108 We observed that in two cases public transport was competitive, timewise, with car travel while in another four cases the opposite was true.

- Budapest and Prague: commuting time by public transport was competitive with car travel at peak hours.
- Katowice, Lille, Lisbon and Seville: public transport was not competitive with car travel. In Seville, however, cycling represented a better alternative to car use than public transport ([Figure 6](#)). We calculated the cycling travel time based on a constant speed, but as the cycling path stops at the city limits ([Box 5](#)), cyclists need to continue their journey on the road, making their commute slower and less safe.

Figure 6 | Comparison of travel time in Seville



Source: ECA based on Eurostat's calculations ([GISCO Reference Database, Interactive platform with route maps](#)).

This report was adopted by Chamber II, headed by Mrs Annemie Turtelboom, Member of the Court of Auditors, in Luxembourg at its meeting of 10 December 2025.

For the Court of Auditors



Tony Murphy
President

Annexes

Annex I – About the audit

Urban mobility and the EU's strategic framework

01 In 2020, in the EU, three out of four citizens were living in urban areas and this number is expected to rise to 85 % by 2050. Urban areas are often characterised by high concentrations of economic activity and employment, which lead to a substantial daily flow of commuters. Urban mobility refers to the movement of people and goods within urban areas and is an important component of city life.

02 According to the OECD, commuting zones have seen faster population growth than cities themselves, suggesting a common trend of “suburbanisation”. The largest population increases have been observed in the commuting zones surrounding large metropolitan areas¹.

03 Populations living in suburban areas often rely on private cars, causing congestion and pollution. Urban congestion is estimated to cost around €180 billion per year², and urban transport accounts for about a quarter of the EU's total CO₂ emissions from transport³, which in turn represents one quarter of the EU's total emissions⁴. According to the European climate law⁵, urban areas have an important contribution to make to the EU Green Deal's binding objectives of reducing emissions by 55 % by 2030 and making the EU climate-neutral by 2050.

04 A comprehensive strategy on how to organise mobility in an urban area is instrumental in shaping urban development in many ways, such as enhancing accessibility to jobs, services

¹ [Redefining urban areas in OECD countries](#), OECD, 2012.

² [Handbook on the external costs of transport](#), Commission, 2019.

³ [EU urban mobility state of play](#), Commission, SWD(2021) 470.

⁴ [EEA greenhouse gases — data viewer](#).

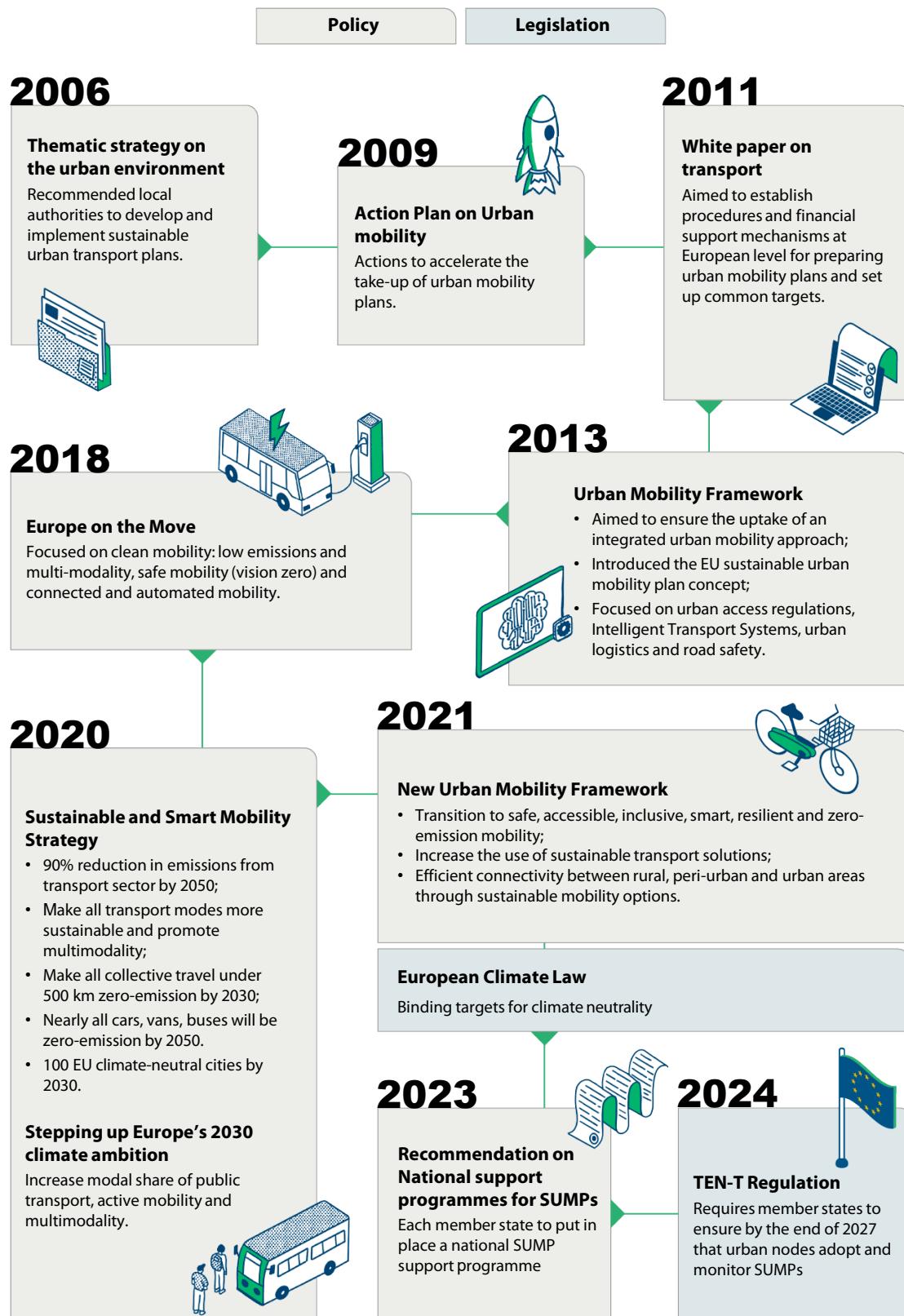
⁵ [Regulation \(EU\) 2021/1119](#).

and goods and reducing pollution levels. In 2006, the Commission strongly recommended that local authorities develop and implement sustainable urban transport plans⁶. Since then, the Commission has issued a number of non-binding policy documents (“Communications”) and some legal acts presenting visions and goals for sustainable urban mobility (*Figure 1*). Sustainable transport was first defined as a goal by the Council in 2001⁷.

⁶ COM(2005) 718.

⁷ Presidency conclusions, Göteborg European Council, 2001.

Figure 1 | Evolution of the EU legal and policy framework on urban mobility



Source: ECA, based on Commission's documents.

Roles and responsibilities

05 Transport and urban mobility are areas of shared competence between the Commission and the member states. The roles and responsibilities are listed in *Figure 2*.

Figure 2 | Roles and responsibilities



Commission

Directorate-General (DG) MOVE is mainly responsible for the design and implementation of EU transport policy. This includes the design of the TEN-T network, which includes transport infrastructure in urban nodes.

EU funding sources are managed by different DGs under different management modes: DG MOVE and the European Climate, Infrastructure and Environment Executive Agency (CINEA) manage the Connecting Europe Facility-Transport (direct management); DG REGIO is responsible for cohesion policy (shared management); DG ECFIN and SG RECOVER (task force under the Secretariat-General) are responsible for implementing the Recovery and Resilience Facility (direct management).

In 2022, the Commission set up the **Expert Group on Urban Mobility**, comprising representatives of all member states, selected cities and thematically relevant organisations. It assists the Commission in developing and implementing legislation and policies in the field of sustainable urban mobility.



Member states (local, regional and or national authorities)

Local, regional or national authorities address connectivity to and within urban nodes, and urban mobility issues (including through the implementation of strategies, such as urban mobility plans).

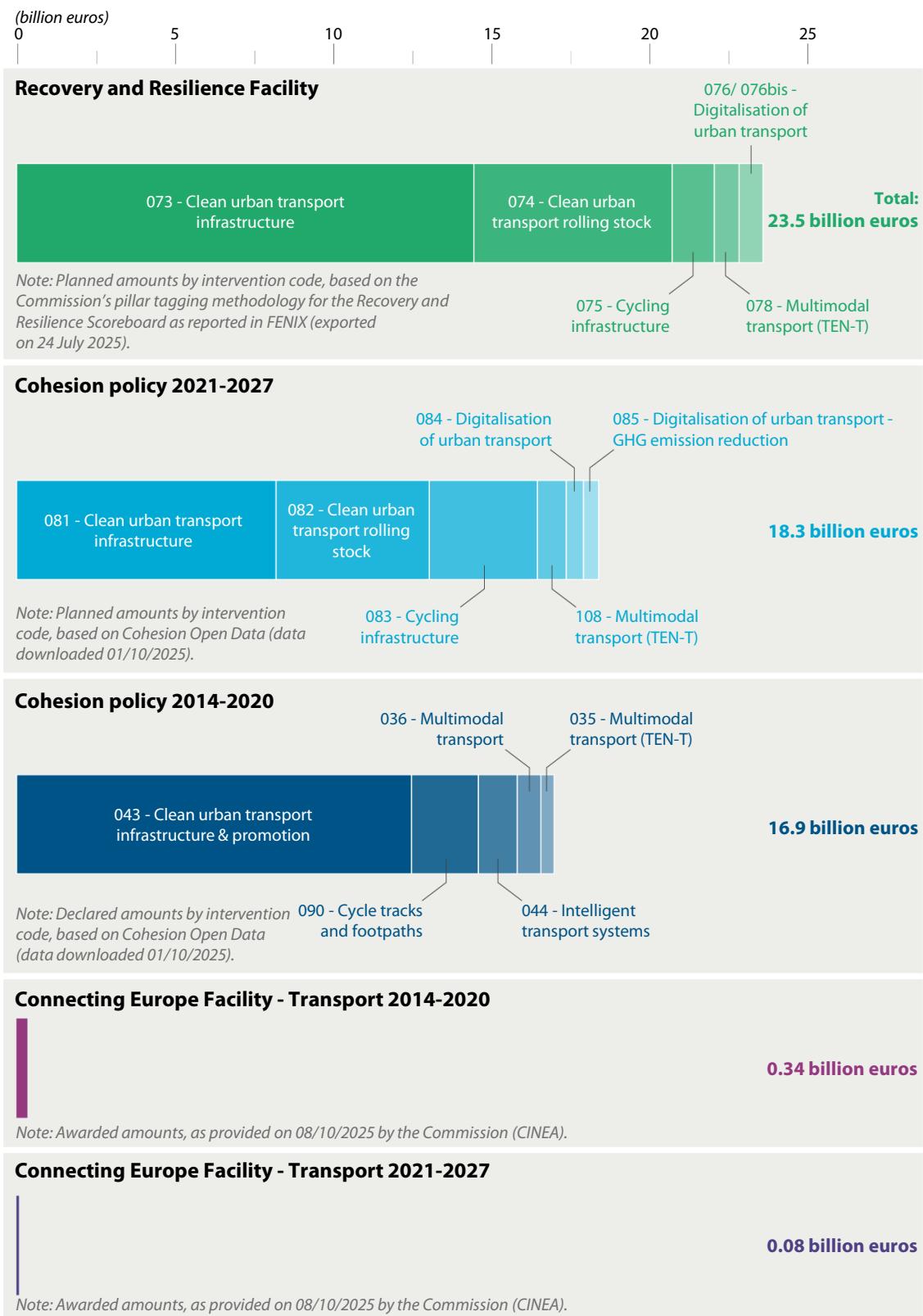
Local, regional or national authorities implement EU funds (such as those under cohesion policy). The selection of projects to be (co-)financed by EU funds is also done at this level for the cohesion policy funds and the Recovery and Resilience Facility.

Source: ECA.

Key financial information

06 The main sources of EU funding for investment in urban transport and mobility are the cohesion policy funds, the Connecting Europe Facility, and the Recovery and Resilience Facility (*Figure 3*).

Figure 3 | EU funding programmes – Investments in urban mobility



Source: ECA, based on Commission's data.

Audit scope and approach

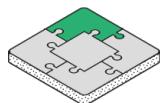
07 This report assesses the actions taken by the Commission and relevant authorities in member states to support sustainable transport for commuters in large metropolitan areas. To this end, we assessed the extent to which:

- the Commission's legislative, policy and support actions were appropriate in providing effective commuting transport;
- the design, implementation and monitoring of the SUMPs by relevant authorities in the audited six member states were fit for purpose;
- the selection, implementation and results of 21 audited EU-funded projects were effective in addressing sustainable commuter mobility.

08 Our audit covered the period from 2004 until 2024 for policy development and 2014 until 2025 for EU funding sources supporting urban mobility projects. We analysed evidence from a range of sources as listed in *Figure 4*. Our [audit methodology](#) complies with the international standards on auditing issued by the [International Organization of Supreme Audit Institutions \(INTOSAI\)](#).

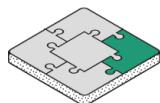
Figure 4 | Evidence sources

Documents



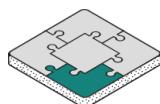
Legislation, policy papers, reports, guidance and guidelines, national, regional and local, and reports and studies published by research bodies, associations and academics.

Data



Data from different sources, mainly from the Commission, Eurostat, the Cohesion Open Data Platform, national, regional and local authorities. In collaboration with Eurostat, we used Geographic Information Systems for spatial analysis and visualisation of suburban mobility in the sampled urban areas, such as commuter flows ([Annex IV](#)), accessibility ([Annex VII](#)), and potential impact of selected projects on commuter's travel time ([Annex VIII](#)).

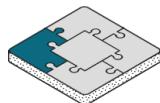
Audit visits to six urban areas in six member states



In member states, we focused on the urban areas of Budapest (Hungary), Katowice (Poland), Lille (France), Lisbon (Portugal), Prague (Czechia) and Seville (Spain). We analysed national, regional and local transport and mobility plans, legislative and policy documents, funding support, etc.

We judgementally selected these sampled urban areas based on criteria such as their total population and proportion of the population living in suburban areas, materiality of EU funds allocated to sustainable mobility, and modal share (such as the percentage of trips to work done by car), covering both good and less good performers.

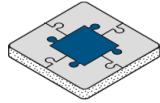
21 projects



We examined a sample of 21 projects: 16 funded by the cohesion policy funds, two by the Recovery and Resilience Facility and three by the Connecting Europe Facility-Transport ([Annex II](#)). We analysed the underlying documentation, focusing on EU funds' allocation, and projects' design, selection process, implementation and results achieved.

We judgementally selected projects co-financed under the cohesion policy funds, the Recovery and Resilience Facility and the Connecting Europe Facility-Transport. Nineteen projects were located in the six sampled urban areas; two additional projects (financed by the Connecting Europe Facility-Transport) were located in Amsterdam and Paris. We selected projects relevant for commuter mobility and covering different types of investment (e.g. projects on transport infrastructure and intelligent transport systems).

Interviews

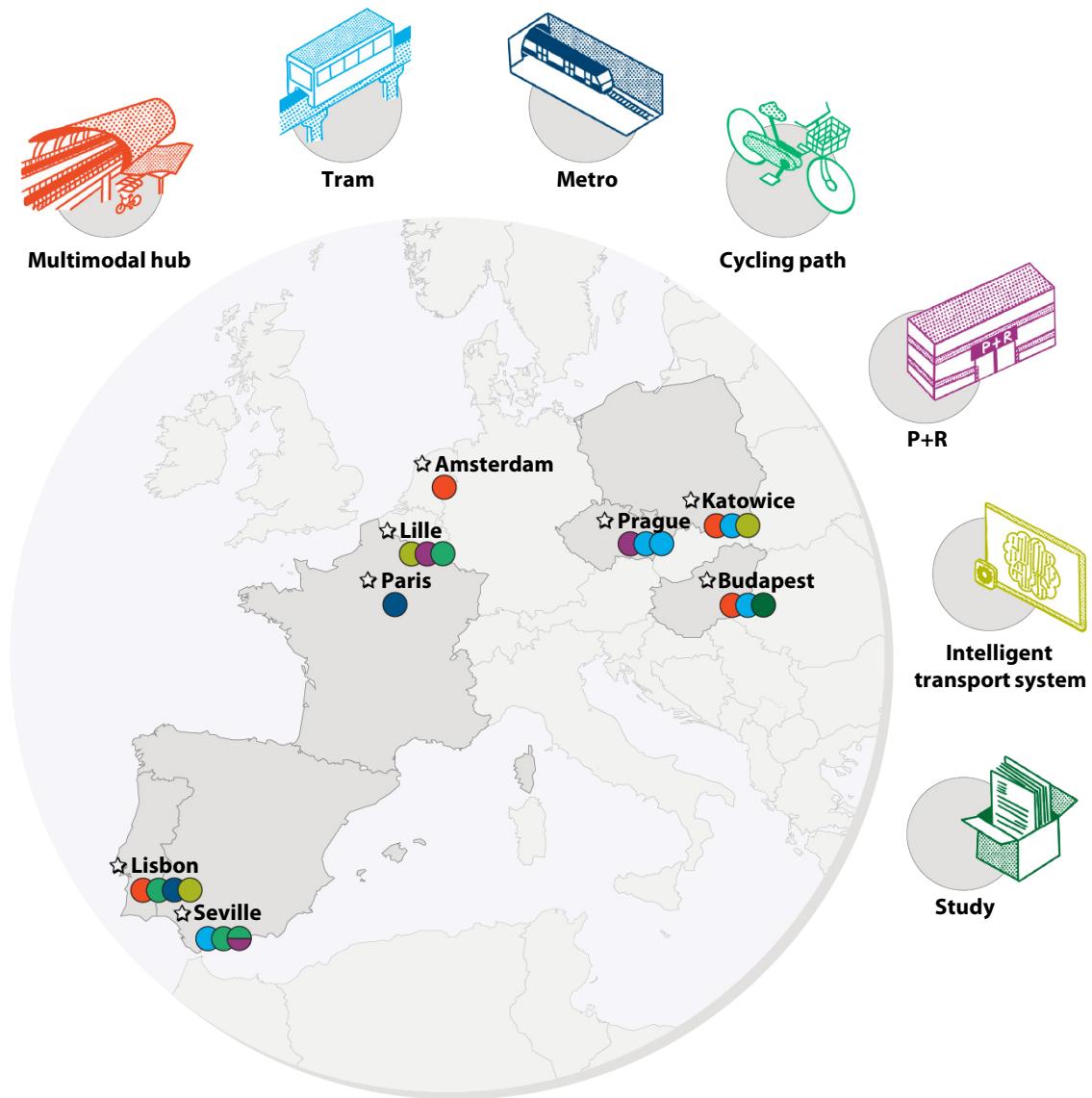


Interviews with staff from Commission directorates-general, national authorities, regional authorities, local authorities, beneficiaries of EU funding and stakeholders operating at EU or local level.

Source: ECA.

09 *Figure 5* shows the location of the projects we audited and the type of investment.

Figure 5 | Location and type of audited projects



Annex II – List of audited projects

| Urban node | Funding source | Project name | Total eligible costs planned (euros) | EU funding planned (euros) |
|------------|--|--|--------------------------------------|----------------------------|
| Amsterdam | Connecting Europe Facility-Transport 2021-2027 | Smart Mobility Hub Amsterdam | 29 117 889 | 8 735 366 |
| Budapest | Cohesion policy 2014-2020 | Tram 1 extension until Etele square | 26 014 139 | 20 425 075 |
| Budapest | Cohesion policy 2014-2020 | Development of intermodal transfer connections of Bicske railway station and development of P+R car parks | 34 433 914 | 29 268 827 |
| Budapest | Cohesion policy 2021-2027 | Connecting H5-H6/H7 lines (study) | 18 918 000 | 16 080 300 |
| Katowice | Cohesion policy 2014-2020 | Western Gate of Silesia Metropolis – transfer centre in Gliwice | 46 241 813 | 31 137 890 |
| Katowice | Cohesion policy 2014-2020 | Dynamic Passenger Information System II | 8 475 284 | 6 356 463 |
| Katowice | Cohesion policy 2014-2020 | Integrated project for the modernisation and development of tram infrastructure in the Śląsko-Zagłębiowska Metropolis together with the purchase of tram rolling stock – Stage I | 143 357 046 | 90 421 210 |
| Lille | Cohesion policy 2014-2020 | P+R Tourcoing | 3 470 672 | 1 735 336 |
| Lille | Cohesion policy 2014-2020 | Nord-Pas de Calais Travel and Ticket Information Unifying System — SMIRT Central | 8 740 261 | 4 370 130 |
| Lille | Cohesion policy 2021-2027 | Aménagement cyclable Boulevard Carnot | 2 014 395 | 1 007 197 |

| Urban node | Funding source | Project name | Total eligible costs planned (euros) | EU funding planned (euros) |
|------------|--|---|--------------------------------------|----------------------------|
| Lisbon | Recovery and Resilience Facility ¹ | Light Metro Odivelas-Loures | 250 000 000 | N/A –loan |
| Lisbon | Cohesion policy 2014-2020 | Parque Intermodal da Venda do Pinheiro | 497 442 | 248 721 |
| Lisbon | Cohesion policy 2014-2020 | Loures Ciclável-Eixo Ribeirinho de Ligação Vila Franca de Xira/Loures/Lisboa | 2 785 128 | 1 392 564 |
| Lisbon | Connecting Europe Facility-Transport 2014-2020 | MOBIL.T | 20 979 190 | 4 195 838 |
| Paris | Connecting Europe Facility-Transport 2014-2020 | Line for Airport and Research Area – LARA | 319 485 000 | 63 897 000 |
| Prague | Cohesion policy 2014-2020 | Tram line extension Divoká Šárka–Sídliště Na Dědině | 31 933 928 | 27 143 839 |
| Prague | Cohesion policy 2014-2020 | Construction P+R Černý Most | 13 280 353 | 6 640 177 |
| Prague | Cohesion policy 2021-2027 | Tram line extension Sídliště Barrandov–Holyně–Slivenec, 2 nd phase (segment Holyně–Slivenec) | 9 861 155 | 8 381 982 |
| Seville | Cohesion policy 2014-2020 | 1 st phase extension tram | 24 510 000 | 19 608 000 |
| Seville | Cohesion policy 2014-2020 | Cycling path connecting Valdezorras–Old airport–Alcosa | 1 481 005 | 1 184 804 |
| Seville | Recovery and Resilience Facility | Agrupación de Sevilla | 21 952 628 | 18 142 667 |

¹ Investment TC-C15-i03: Light Rail Transit Odivelas–Loures was removed from Portugal's recovery and resilience plan as part of the [amendment](#) adopted by the Council on 13 May 2025.

Annex III – Examples of Commission support initiatives

| Initiative | Scope | Activities | Created | EU funding source (period 2021-2027) |
|--|--|--|---|--------------------------------------|
| EU Urban Mobility Observatory (ELTIS) | Sustainable urban mobility | Capacity building (repository of guidance, observatory) | 1998 | Connecting Europe Facility |
| European Mobility Week | Sustainable urban mobility | Awareness-raising campaign | 2002 | DG MOVE own budget |
| CIVITAS | Sustainable urban mobility | Capacity building, practice sharing, research, innovation and coordination; with focus on cities and urban mobility practitioners CIVITAS Forum conference, alternating annually with Urban Mobility Days | 2002 | Horizon Europe |
| Urban Mobility Days | Sustainable urban mobility | Urban mobility policy conference, alternating annually with CIVITAS Forum | 2020, preceded by the European Conference on Sustainable Urban Mobility Plans (2014-2019) | Connecting Europe Facility |
| EIT Urban Mobility | Sustainable urban mobility | Capacity building, practice sharing, research and innovation; with focus on start-ups, businesses, universities, research institutes and the public sector | 2019 | Horizon Europe (80 % EU financing) |
| URBACT | Sustainable urban development, sustainable transport as one of its thematic objectives | Practice sharing, capacity building | 2002 | URBACT IV (around 80 % EU financing) |
| European Urban Initiative | Sustainable urban development, mobility as one of its themes | Capacity building, knowledge and practice sharing, support to innovation Cities Forum biennial conference | 2021, building on the Urban Innovative Actions (2014-2020) | European Regional Development Fund |
| EU Covenant of Mayors for Climate & Energy | Climate and energy, including sustainable mobility (e.g. under “Coalition of the Willing on Sustainable Mobility”) | Commitment to implementing EU climate and energy objectives, practice sharing | 2008 | Horizon Europe |
| EU Mission for Climate Neutral and Smart Cities | Climate, including sustainable mobility | Capacity building, practice sharing, research and innovation | 2021 | Horizon Europe |

Source: ECA.

Annex IV – Commuter flows

01 For the six sampled urban areas, *Table 1* compares the commutes that start and end within the functional urban area with those that start and end within the SUMP area.

Table 1 | Comparison of commuter flows

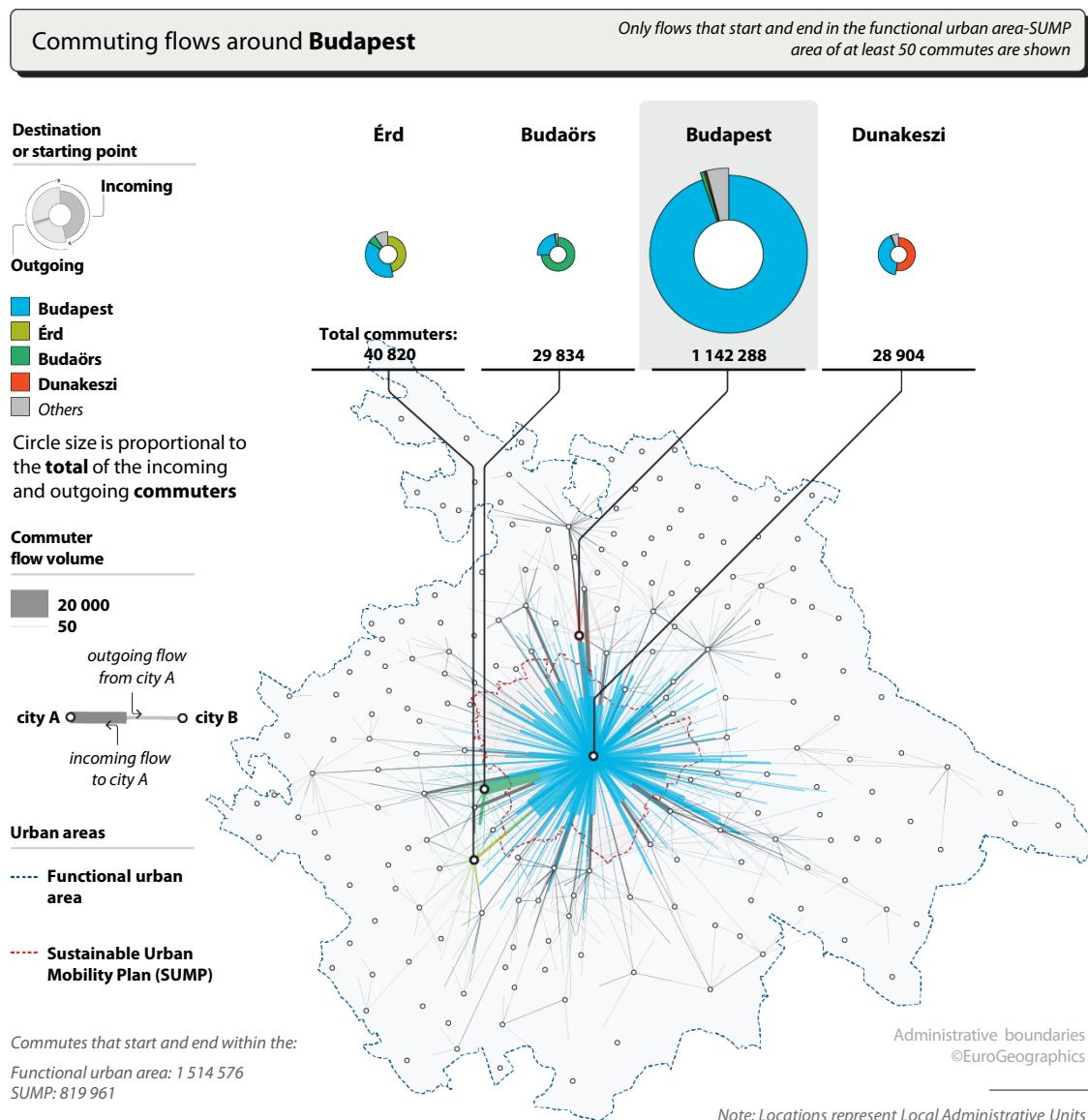
| | Functional urban area | SUMP area | Difference |
|---------------|-----------------------|-----------|--------------------------------|
| Budapest (HU) | 1 514 576 | 819 961 | 694 615 (46 %) |
| Katowice (PL) | 330 534 | 368 029 | - 37 495 (- 11 %) ¹ |
| Lille (FR) | 544 748 | 427 752 | 116 996 (21 %) |
| Lisbon (PT) | 1 651 930 | 1 488 686 | 163 244 (10 %) |
| Prague (CZ) | 812 480 | 773 909 | 38 571 (5 %) |
| Seville (ES) | 459 217 | 164 777 | 294 440 (64 %) |

¹ In the Katowice area, 37 495 corresponds to the difference between 49 167 commuter flows inside the SUMP but outside the functional urban area, and 11 672 commuter flows inside the functional urban area, but not covered by the SUMP (the latter corresponds to 4 % of the total commuter flows in the functional urban area).

Source: Eurostat.

02 *Figure 1* to *Figure 6* below show the commuter flows in the sampled functional urban areas.

Figure 1 | Commuting flows around Budapest



Source: ECA, based on Eurostat's calculations ([GISCO Reference Database](#), [Interactive platform with commuter maps](#)).

Figure 2 | Commuting flows around Katowice

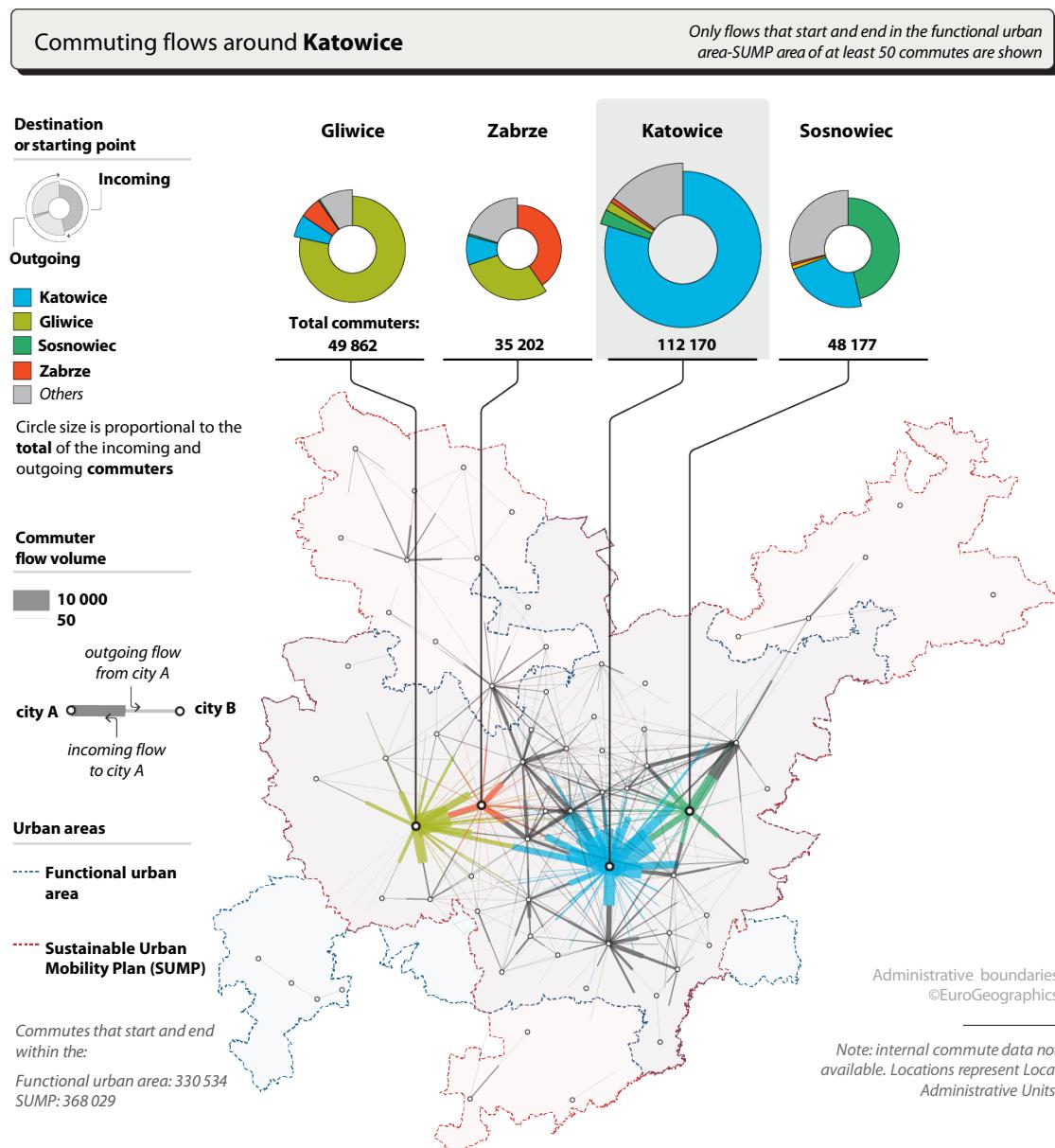
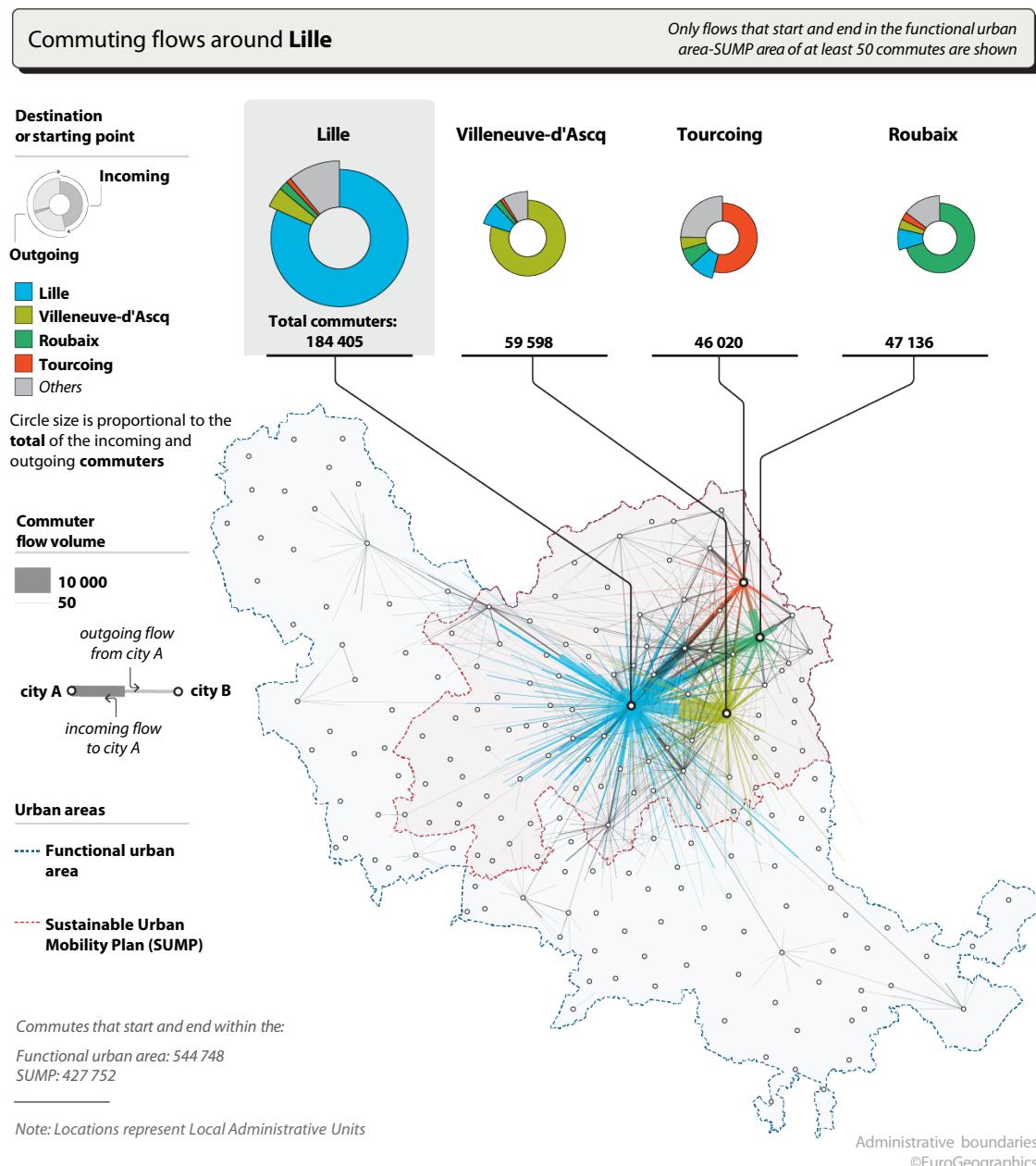
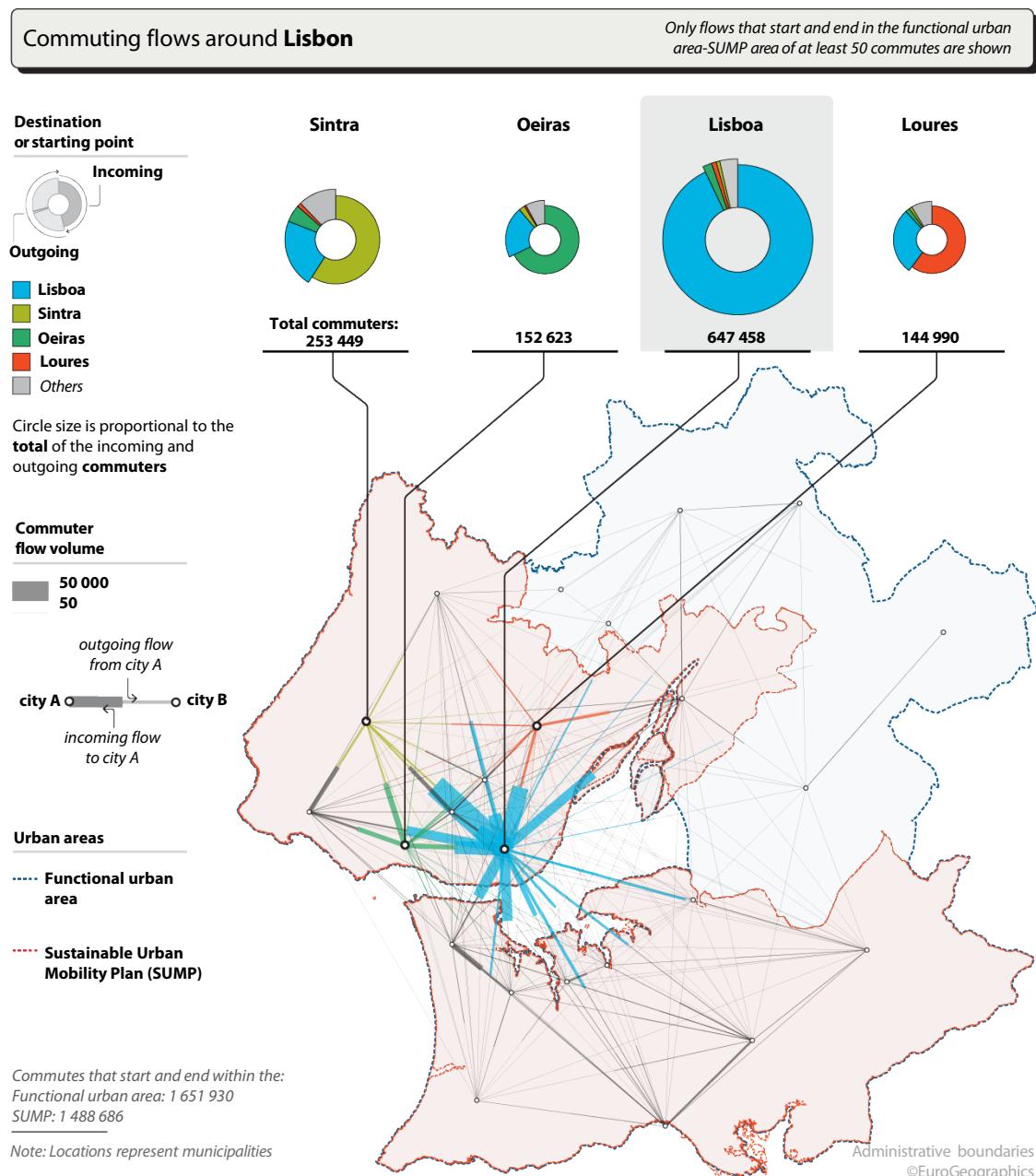


Figure 3 | Commuting flows around Lille



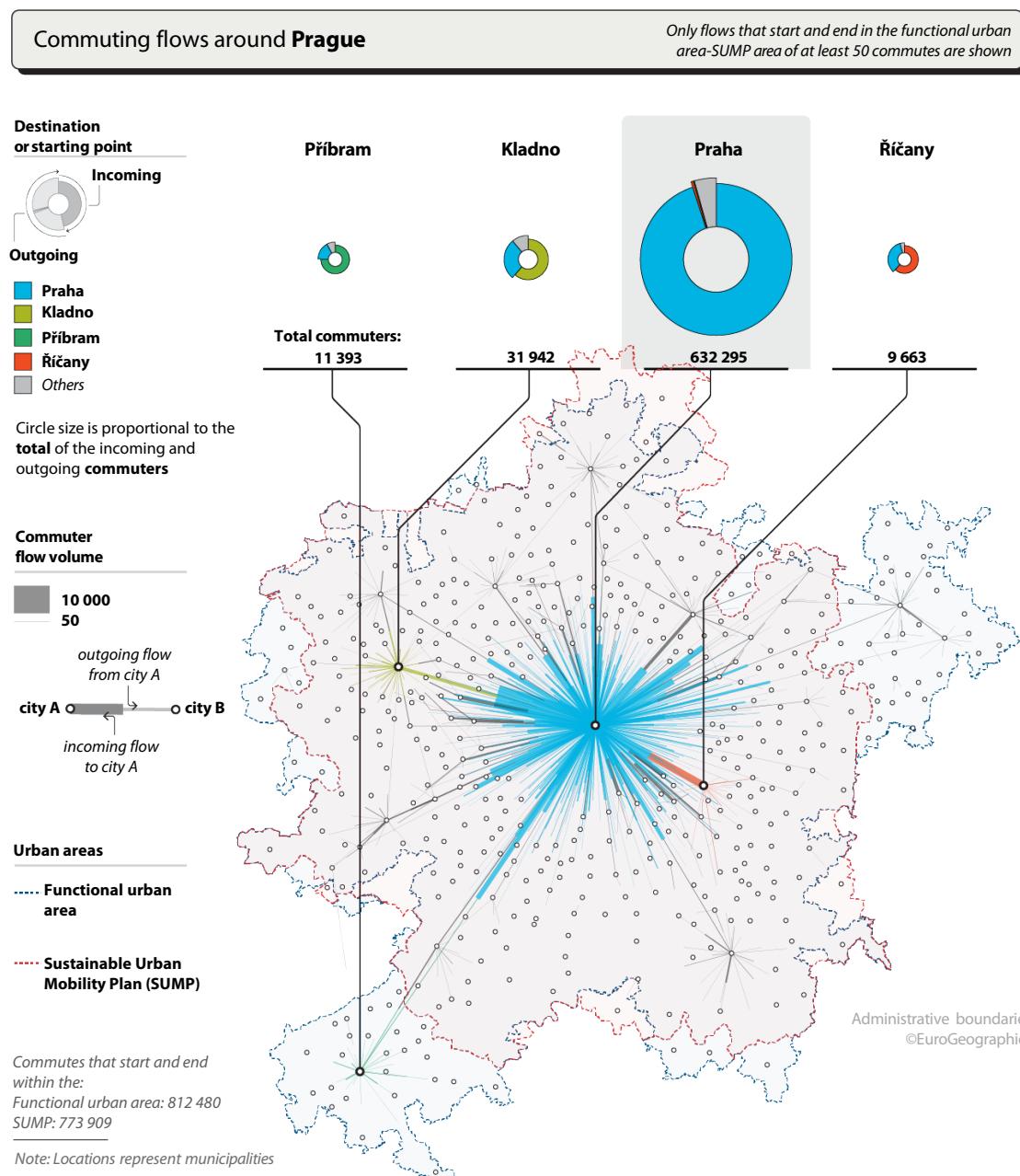
Source: ECA, based on Eurostat's calculations ([GISCO Reference Database](#), [Interactive platform with commuter maps](#)).

Figure 4 | Commuting flows around Lisbon



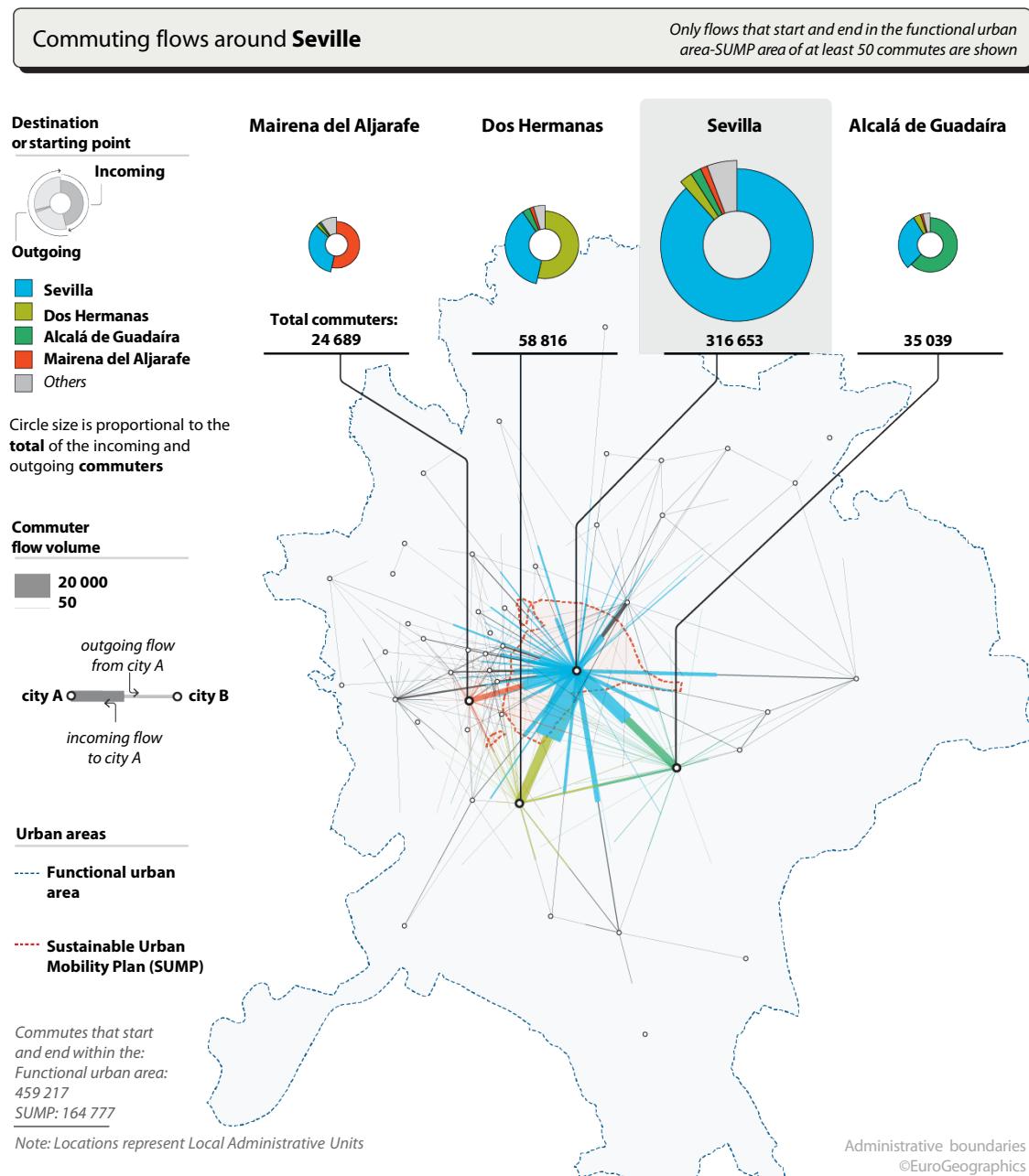
Source: ECA, based on Eurostat's calculations ([GISCO Reference Database](#), [Interactive platform with commuter maps](#)).

Figure 5 | Commuting flows around Prague



Source: ECA, based on Eurostat's calculations ([GISCO Reference Database](#), [Interactive platform with commuter maps](#)).

Figure 6 | Commuting flows around Seville



Source: ECA, based on Eurostat's calculations ([GISCO Reference Database](#), [Interactive platform with commuter maps](#)).

Annex V – Objectives on sustainable mobility

01 [Table 1](#) provides details on national objectives regarding GHG emissions reduction from transport and/or modal share as included in the latest update of the national energy and climate plans and in national mobility strategies. National energy and climate plans had to be submitted to the Commission in 2019 and updates were due in 2024.

02 For the six sampled urban areas the table also details the modal share objectives as well as emission reduction objectives included in the SUMPs.

Table 1 | National objectives and objectives in the SUMPs of the six sampled urban areas

| Member state | National energy and climate plan | | National mobility strategies | SUMPs |
|--------------|----------------------------------|---|---|--|
| | Latest update | Objectives on emission reduction from transport | Objectives on emission reduction and/or modal share | Objectives on emission reduction and/or modal share |
| Czechia | 2024 | 12 % reduction in GHG emissions from transport by 2030 compared to 2019 due to realised investments and measures. | <u>2021 Urban and active mobility strategy</u> Target modal split by city size by 2030. Example: for cities with over 500 000 inhabitants (Prague): walking 28 %, cycling 2-7 % (depending on season), public transport 50 %, car 15-20 % | <u>Prague (2019): objectives to be achieved by 2030</u> Increase share of public transport, cycling and walking from 70 % (baseline 2016) to 73 % by 2030. Reduce GHG emissions (CO ₂ eq) from transport (2016 baseline 16.70 tonnes/inhabitant). |

| Member state | National energy and climate plan | | National mobility strategies | SUMPs |
|--------------|----------------------------------|---|---|--|
| | Latest update | Objectives on emission reduction from transport | Objectives on emission reduction and/or modal share | Objectives on emission reduction and/or modal share |
| Spain | 2024 | 16.3 % reduction in GHG emissions from transport by 2030 compared to 2023. 41.3 % traffic reduction in urban areas by 2030 compared to 2023. | <u>2021 Law on climate change and energy transition</u> Full decarbonisation by 2050 Mandatory establishment of SUMPs and low-emission zones in all cities with over 50 000 inhabitants by 2023 | <u>Seville (2021): objectives to be achieved by 2030</u> Reduce car use from 40.5 % to 33 % (from 2017 baseline) Reduce GHG emissions for road transport by 58 % (baseline 2005), in line with the EU objective of 55 % |
| France | 2024 | No specific target for transport in the updated plan The plan is based on the national “low carbon strategy”, which sets a target of 28 % reduction in GHG emissions from transport by 2030 compared to 2015 | <u>2020 National low carbon strategy</u> 28 % reduction in emissions by 2030 compared to 2015 and full decarbonisation by 2050 <u>2024 draft update of the strategy</u> 25 % increase in public transport usage by 2030 compared to 2019 <u>2019 Mobility law</u> Triple modal share of cycling (from 3 % to 9 %) by 2024 compared to 2018 | <u>Lille (2023): objectives to be achieved by 2035 (from 2016 baseline):</u> Reduce car use from 59 % to 40 % Increase share of public transport from 11 % to 20 % Increase share of cycling from 1 % to 8 % Increase share of walking from 29 % to 32 % Reduce GHG emissions from transport by 37 % |

| Member state | National energy and climate plan | | National mobility strategies | SUMPs |
|--------------|----------------------------------|--|---|---|
| | Latest update | Objectives on emission reduction from transport | Objectives on emission reduction and/or modal share | Objectives on emission reduction and/or modal share |
| Hungary | 2024 | No specific target for transport in the updated plan | <p><u>2014 National Transport Infrastructure Development Strategy</u></p> <p>Reduce GHG emissions by 31 kt CO₂ each year until 2030 (from 2020) and then by 17 kt CO₂ each year until 2050</p> | <p>Budapest (2023): objectives to be achieved by 2030 (from 2021 baseline):</p> <p>Reduce car use from 35 % to 20 %</p> <p>Increase share of public transport from 47 % to 50 %</p> <p>Increase share of cycling from 2 % to 10 %</p> <p>Increase share of walking from 16 % to 20 %</p> <p>Reduce GHG emissions from transport by 33%</p> |
| Poland | 2019 | <p>37.5 % reduction in CO₂ emissions of the fleet of new passenger cars by 2030 compared to 2021</p> <p>This target, or any other specific target for the transport sector, are not included in the draft updated plan (2025)</p> | <p><u>2019 National transport strategy</u></p> <p>6 % increase in CO₂ emissions in transport by 2030 compared to 2017 (due to projected increase in the volume of passenger and goods transport)</p> | <p>Katowice (2023): objectives to be achieved by 2050 (from 2018 baseline)</p> <p>Zero-emission transport</p> <p>Reduce car use for daily journeys from 44 % to 22 % (and from 58 % to 29 % for work commuting)</p> |
| Portugal | 2024 | 40 % reduction in GHG emissions from transport by 2030 compared to 2005 | <p><u>2019 National active mobility strategy</u></p> <p>10 % modal share for cycling in cities by 2030 (that must result directly from reduced use of private cars); total length of cycle paths of 10 000 km by 2030</p> <p>35 % modal share for walking by 2030</p> | <p>Lisbon (2019): no specific objectives</p> |

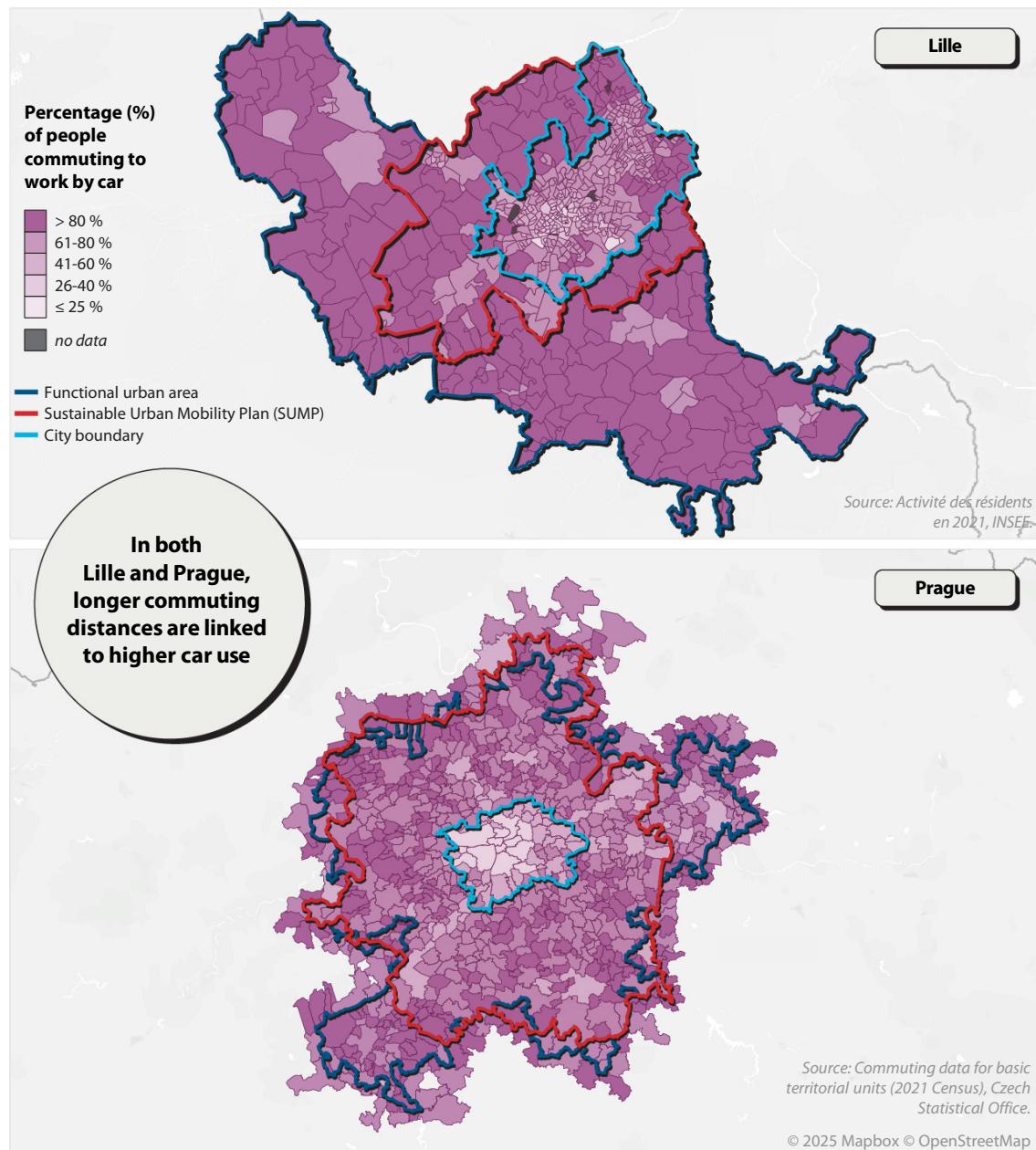
Source: ECA.

Annex VI – Issues affecting the meaningfulness of mobility surveys

01 For the sampled urban areas, the surveys were affected by the following timing and coverage issues.

- **Timing.** Due to the costs involved, the surveys were not conducted regularly. Consequently, the surveys' results were outdated in two of the urban areas (the last surveys had been conducted in 2016-2017) or impacted by COVID-19 in four urban areas (the surveys had been conducted in 2021).
- **Coverage.** All the surveys we analysed, except the 2021 survey in Lisbon, covered commuters from suburban areas. However, the extent to which commuters from suburban areas are considered in the surveys can substantially alter their overall results regarding modal share. The lower the number of commuters from suburban areas, the better the result on the modal share of public transport. This is because there is a substantially higher share of individual car transport in the suburban areas, as illustrated by the following examples:
 - (1) In the 2021 Prague transport survey, the share of commuters using a car was 25.3 percentage points higher for those going to Prague from the surrounding Central Bohemian Region (46.1 %) than it was for people living in Prague (20.8 %).
 - (2) In the 2017 Lisbon mobility survey, the difference was 13.7 percentage points between commuters from the Lisbon Metropolitan Area (59.8 %) and from the city (46.1 %).
 - (3) In the 2007 mobility survey in Seville, the difference was 14.0 percentage points between commuters from the metropolitan area and from the city.
 - (4) Similarly, the 2021 census data for Lille and for Prague shows that as commuting distance (and time) increases, the use of individual car transport tends to increase, as illustrated in *Figure 1*.

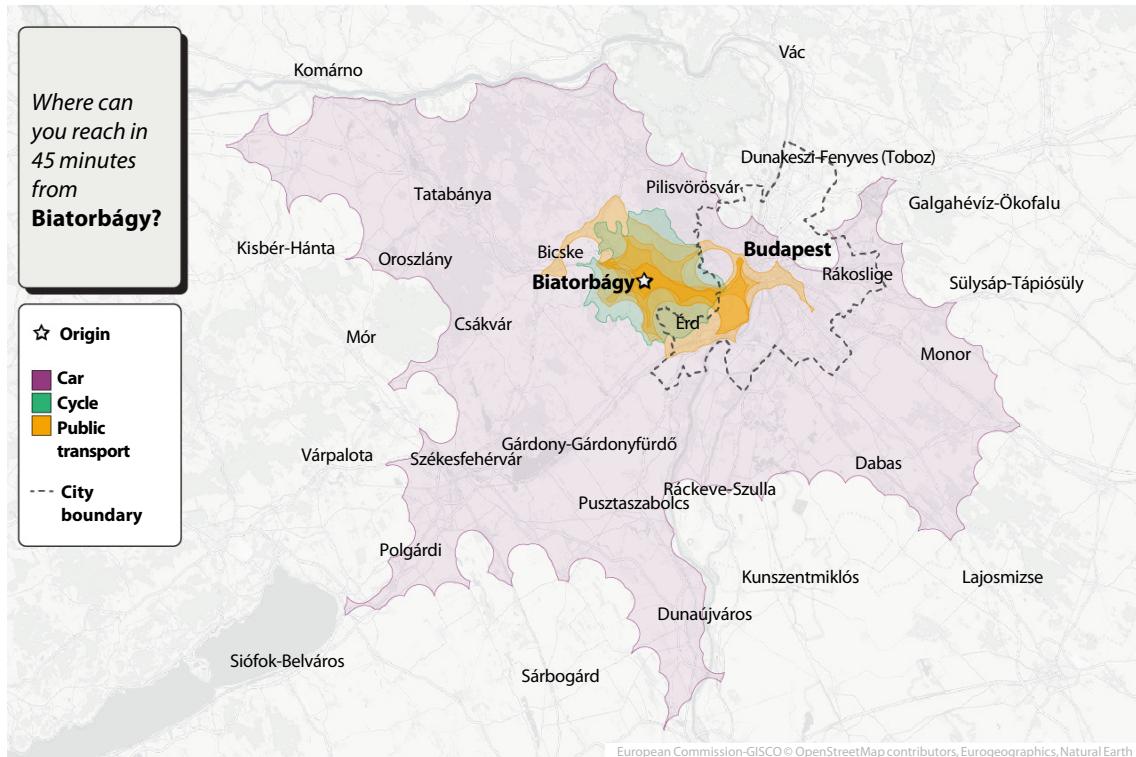
Figure 1 | Car use for commuting in Lille and Prague



Source: ECA, based on data Activité des résidents en 2021, INSEE (for Lille) and Commuting data for basic territorial units (2021 Census), Czech Statistical Office (for Prague).

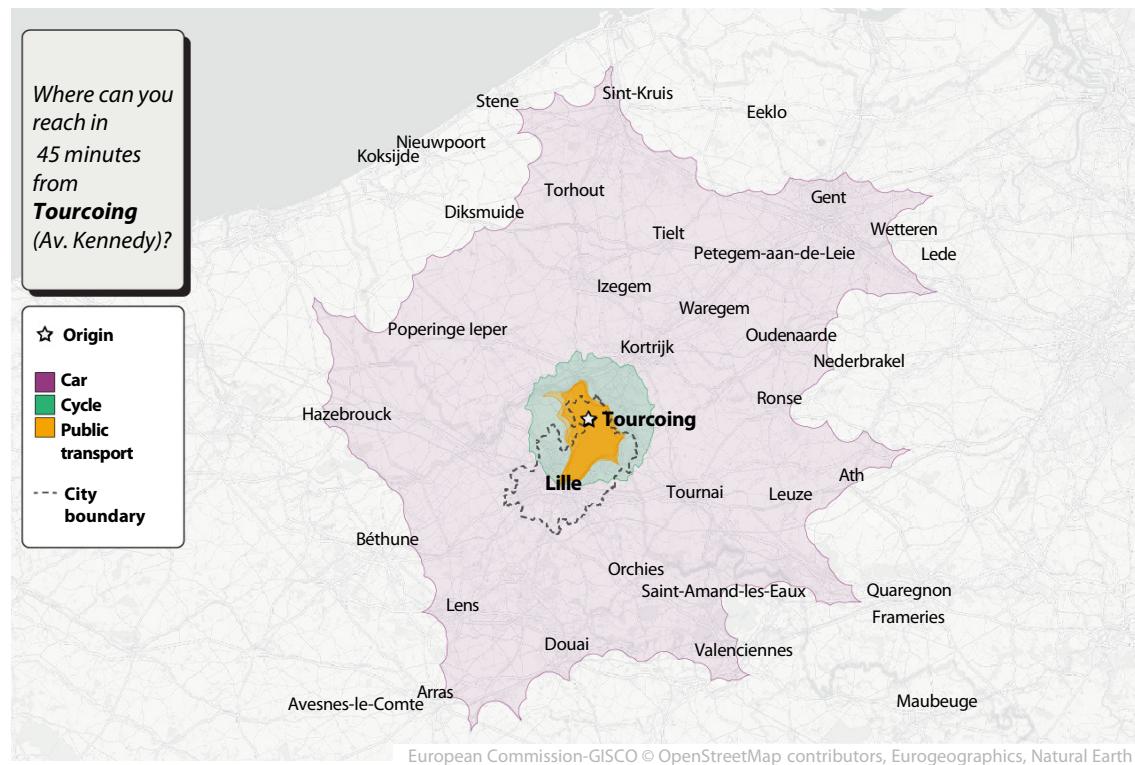
Annex VII – Maps on accessibility within 45 minutes

Budapest



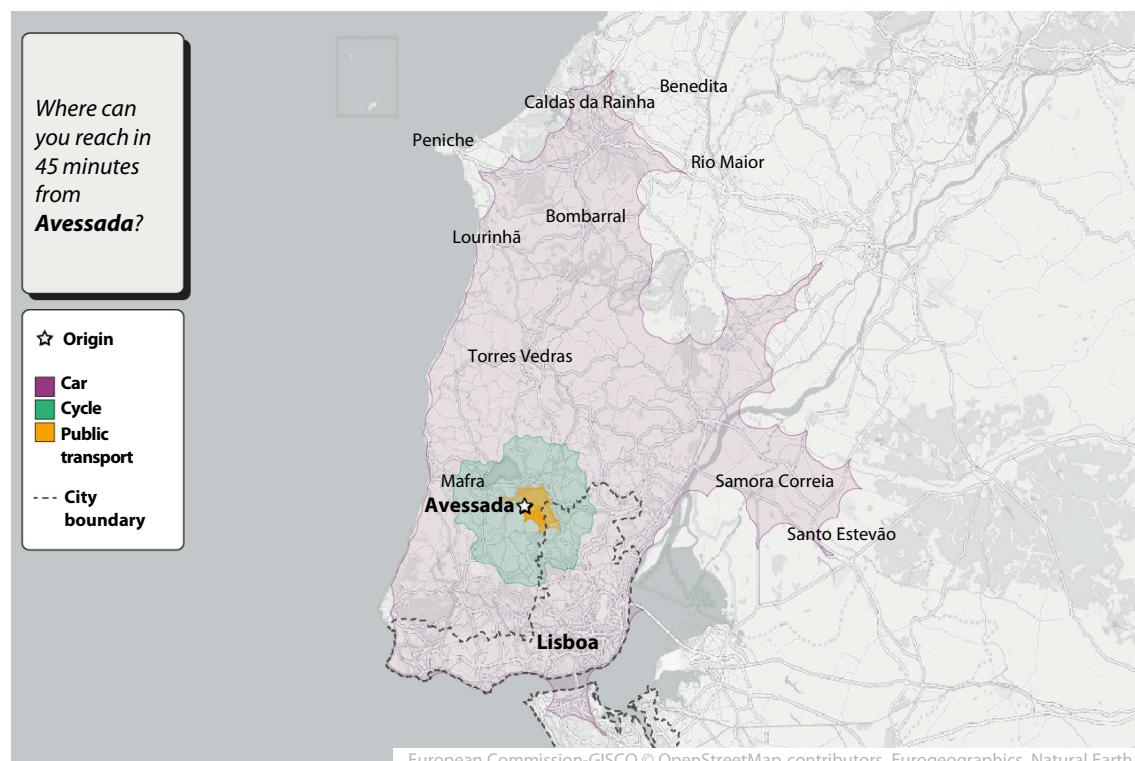
Source: ECA, based on Eurostat's calculations ([GISCO Reference Database](#), [Interactive platform on isochrone maps](#)).

Lille



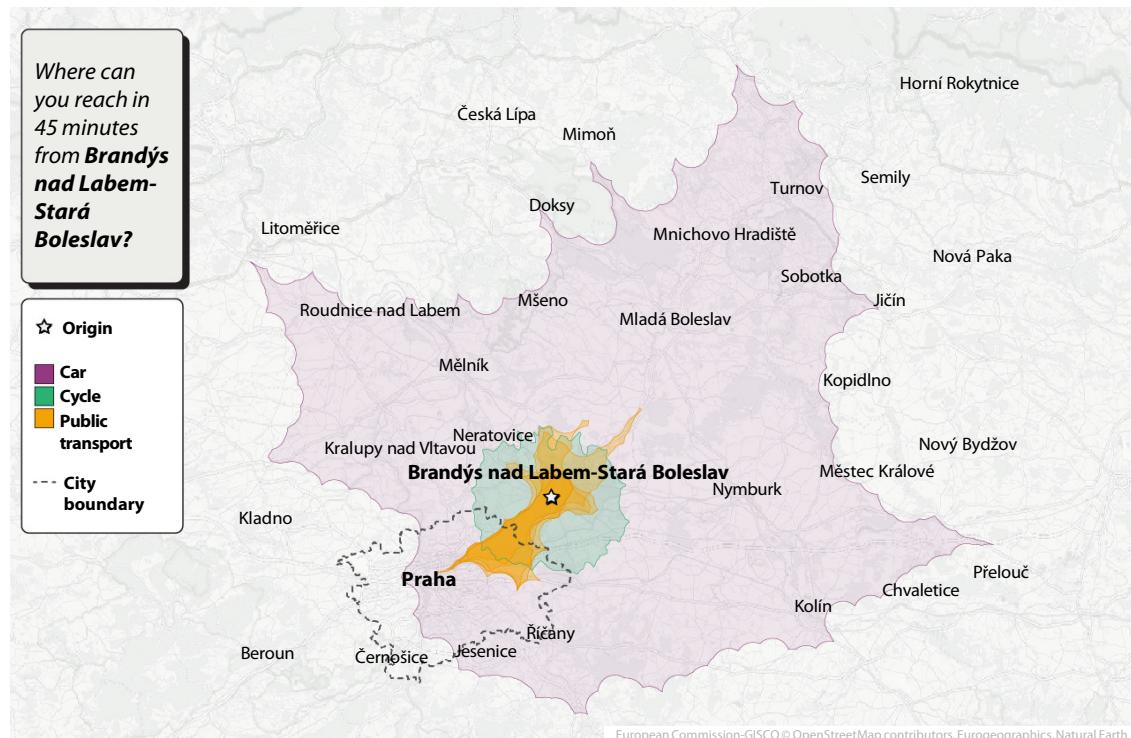
Source: ECA, based on Eurostat's calculations ([GISCO Reference Database, Interactive platform on isochrone maps](#)).

Lisbon



Source: ECA, based on Eurostat's calculations ([GISCO Reference Database, Interactive platform on isochrone maps](#)).

Prague



Source: ECA, based on Eurostat's calculations ([GISCO Reference Database, Interactive platform on isochrone maps](#)).

Seville



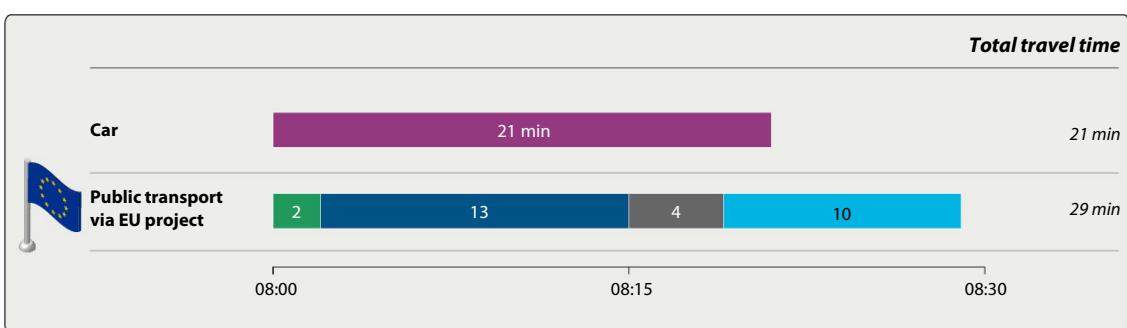
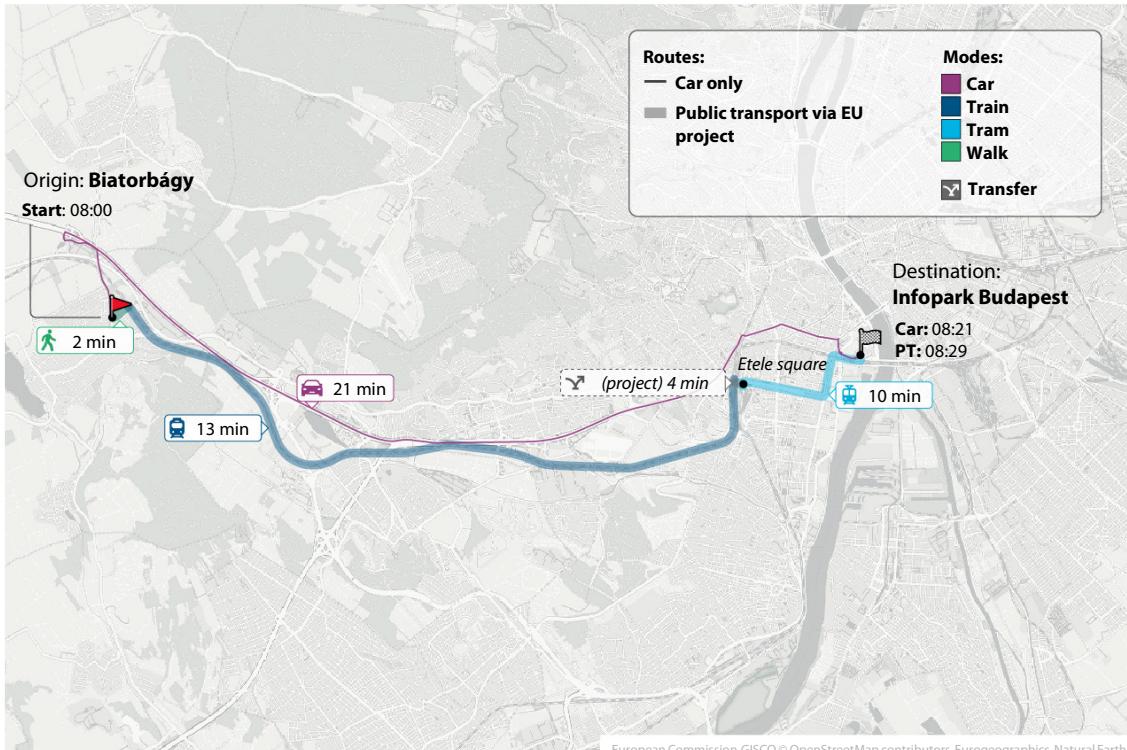
Source: ECA, based on Eurostat calculations ([GISCO Reference Database, Interactive platform on isochrone maps](#)).

Note: The figure for the remaining urban area (Katowice) is included in the main text of the report ([Figure 5](#)).

Annex VIII – Maps on travel time from the suburban areas to a relevant workplace

Example route in Budapest

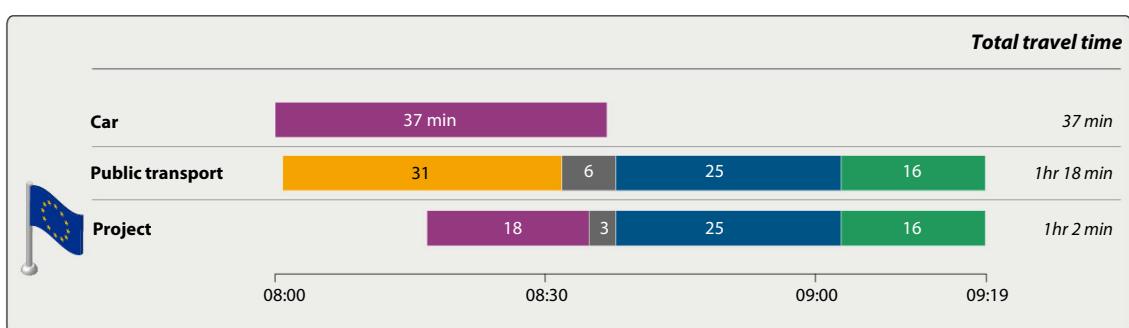
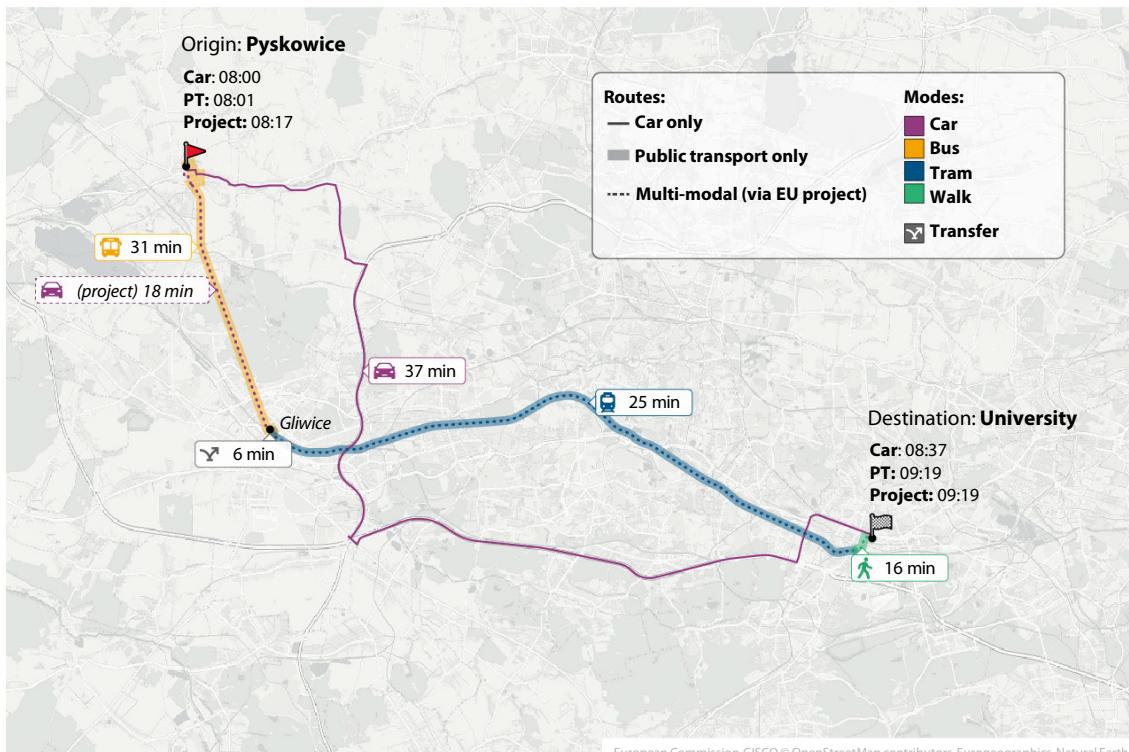
Note: In Budapest we calculated the travel time from a point in Biatorbágy, to an employment area in the city. We compared the time needed by car and by public transport, using the EU co-financed tram extension to Kelenföld/Etele square project.



Source: ECA, based on Eurostat's calculations ([GISCO Reference Database](#), [Interactive platform with route maps](#)).

Example route in
Katowice

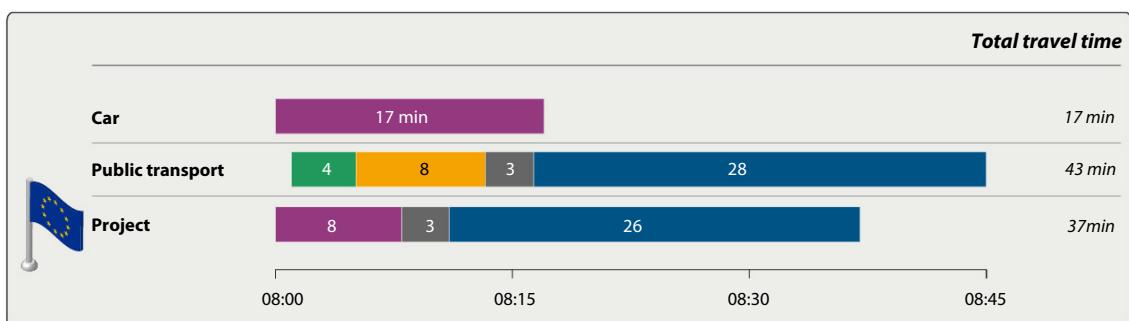
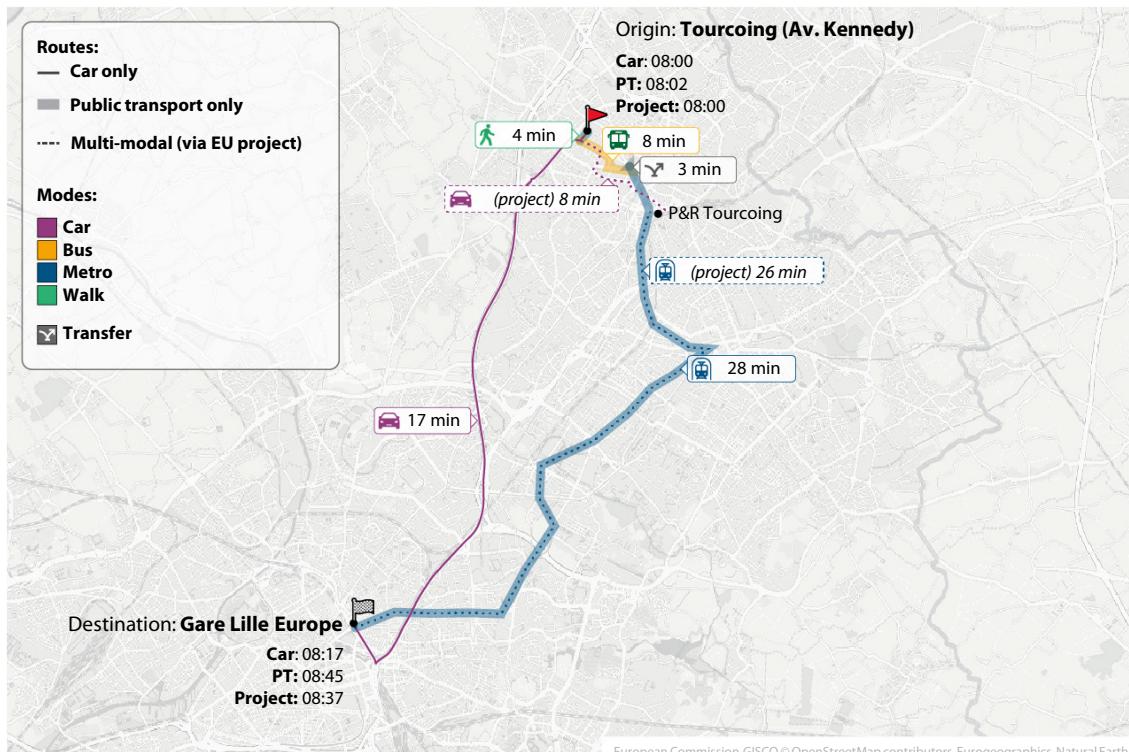
Note: In Katowice we calculated the travel time from a point in Pyskowice, to the Silesian University in the city. We compared the time needed by car, by public transport and the combination of both, using the EU co-financed Gliwice multimodal hub project.



Source: ECA, based on Eurostat's calculations ([GISCO Reference Database](#), [Interactive platform with route maps](#)).

Example route in Lille

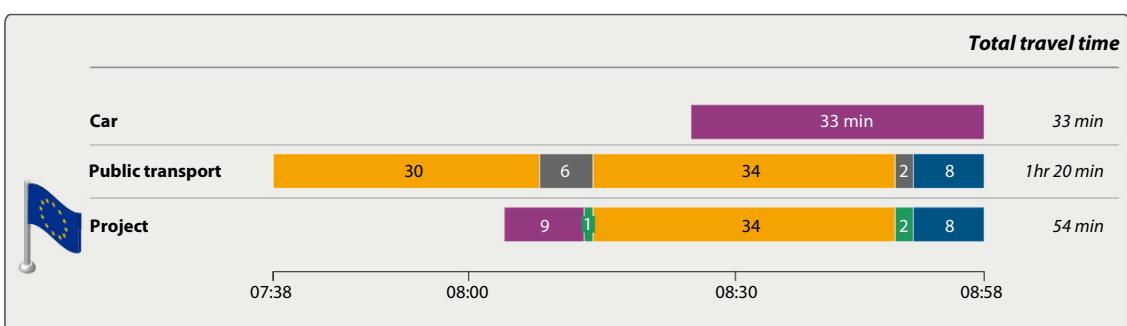
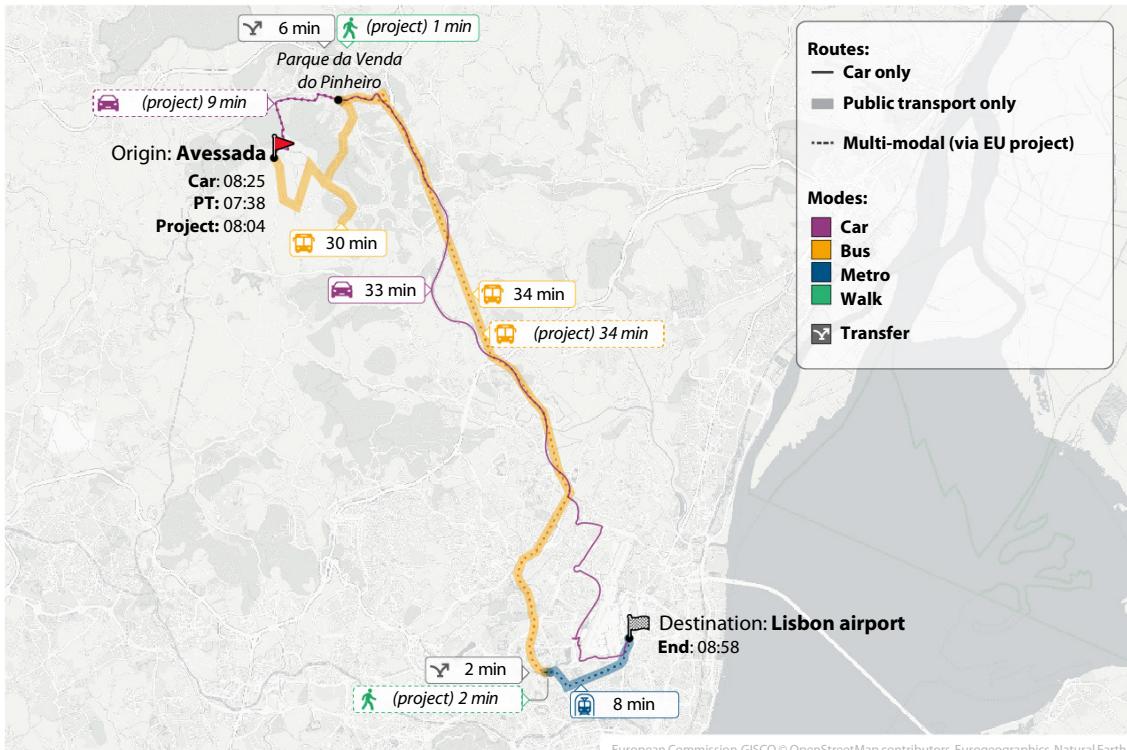
Note: In Lille we calculated the travel time from a point in Tourcoing, to a large employment area in the city, EuraLille quarter. We compared the time needed by car, by public transport and the combination of both, using the EU co-financed P+R project in Tourcoing.



Source: ECA, based on Eurostat's calculations ([GISCO Reference Database, Interactive platform with route maps](#)).

Example route in Lisbon

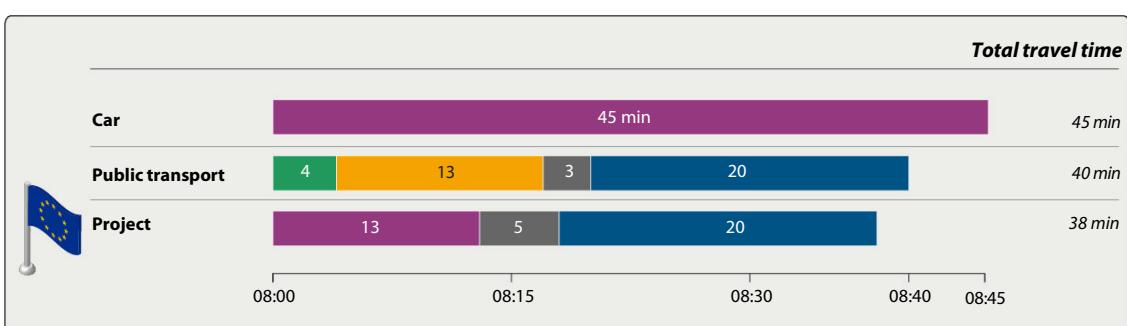
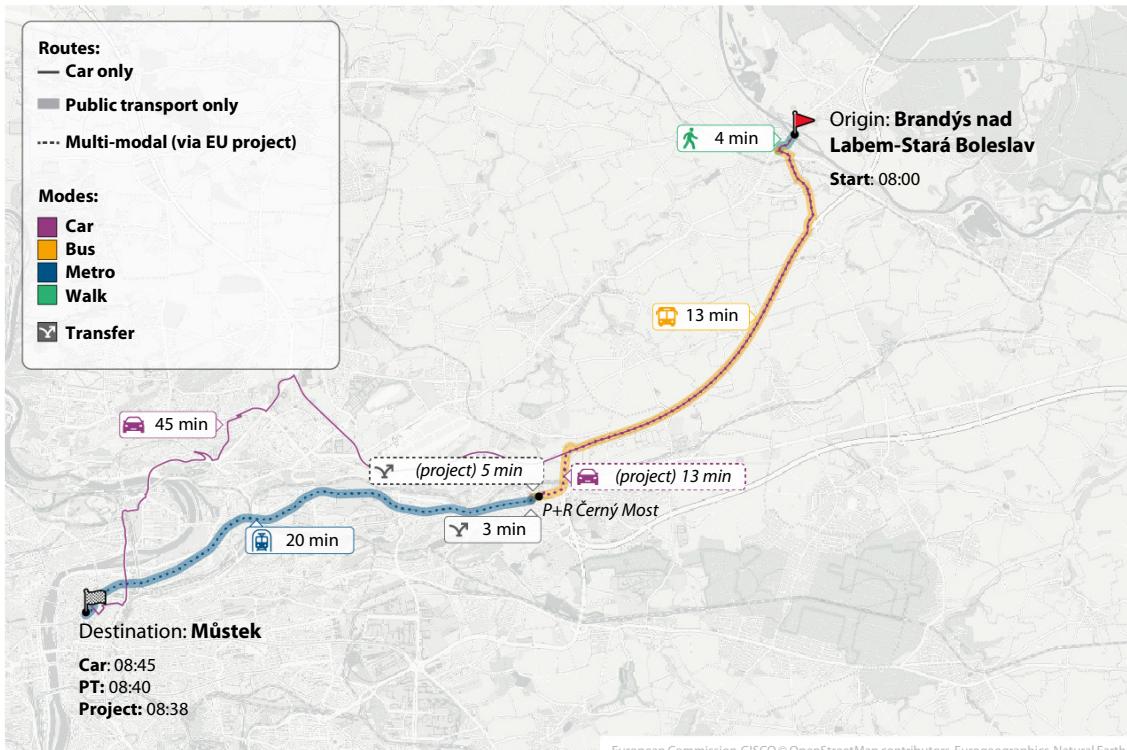
Note: In Lisbon we calculated the travel time from a point in Avessada, to the Lisbon airport area. We compared the time needed by car, by public transport and the combination of both, using the EU co-financed multimodal hub in Venda do Pinheiro.



Source: ECA, based on Eurostat's calculations ([GISCO Reference Database, Interactive platform with route maps](#)).

Example route in Prague

Note: In Prague we calculated the travel time from a point in Brandýs nad Labem-Stará Boleslav, to an employment area in the city centre. We compared the time needed by car, by public transport and the combination of both, using the EU co-financed P+R in Černý Most.



Source: ECA, based on Eurostat's calculations ([GISCO Reference Database](#), [Interactive platform with route maps](#)).

Note: The figure for the remaining urban area (Seville) is included in the main text of the report ([Figure 6](#)).

Abbreviations

| Abbreviation | Definition/Explanation |
|--------------|--|
| GHG | Greenhouse gas |
| OECD | Organisation for Economic Co-operation and Development |
| SUMP | Sustainable urban mobility plan |
| TEN-T | Trans-European transport network |

Glossary

| Term | Definition/Explanation |
|---------------------------------------|--|
| Active mobility | Form of transport that involves physical activity only, such as walking and cycling. |
| Call for evidence | Used by the Commission to define the scope of a sensitive or important new law or policy, or for an evaluation/ fitness check of existing laws or policies. It describes the problem to be tackled and objectives to be met, explains why EU action is needed and outlines policy options. |
| Cohesion policy funds | Four EU funds supporting economic, social and territorial cohesion across the EU. In the 2014-2020 period: the European Regional Development Fund, the European Social Fund and the Cohesion Fund. In the 2021-2027 period: the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund and the Just Transition Fund. |
| Commuter | A person travelling regularly between two places, usually from home to work or school, over a distance. Commuting may involve different modes of transportation, such as cars, buses, trains, or bicycles. |
| Land-use and spatial planning | Practice of guiding the development of the natural environment, infrastructure and the built environment in order to organise available land resources sustainably. |
| Low-emission zones | Area of a city which only vehicles with emissions below a certain level can enter. |
| Managing authority | National, regional or local authority (public or private) designated by a member state to manage an EU-funded programme. |
| Mobility management | A concept to promote sustainable transport and manage the demand for car use by changing travellers' attitudes and behaviour, in particular at the level of companies, organisations and institutions. |
| Modal split/share | Proportion of all journeys in a given area accounted for by different modes of transport, such as walking, cycling, public transport or private car. |
| Multimodal transport | Seamless and complementary combination of various modes of transport |
| Outcome | Immediate or longer-term, intended or unintended, change brought about by a project, such as the benefits resulting from a better-trained workforce. |
| Output | Something produced or achieved by a project, such as delivery of a training course or construction of a road. |
| Partnership agreement | Agreement between the Commission and a member state or one or more non-EU countries in the context of an EU spending programme, setting out, for example, strategic plans, investment priorities or the terms of trade or development aid provision. |
| Programme (in cohesion policy) | Framework for implementing EU-funded operations in line with the priorities and objectives laid down in partnership agreements between the Commission and the member states concerned. |

| Term | Definition/Explanation |
|---|--|
| Recovery and resilience plan | Document setting out a member state's intended reforms and investments under the Recovery and Resilience Facility. |
| Result | Immediate effect of a project or programme upon its completion, such as the improved employability of course participants or improved accessibility following the construction of a new road. |
| Shared mobility | Approach whereby bicycles, scooters, cars or other vehicles are shared or borrowed for point-to-point trips. |
| Trans-European transport network | Set of road, rail, air and water infrastructure development projects implementing the trans-European transport network policy, which includes a high-speed rail network, a satellite navigation system and smart transport management systems. |
| Urban mobility | All aspects of the movement of people and goods within urban areas. |
| Urban node | Urban area where different types of trans-European transport network infrastructure for passengers and freight connect to each other and to regional and local traffic infrastructure. |

Replies of the Commission

<https://www.eca.europa.eu/en/publications/SR-2026-05>

Timeline

<https://www.eca.europa.eu/en/publications/SR-2026-05>

Audit team

The ECA's special reports set out the results of its audits of EU policies and programmes, or of management-related topics from specific budgetary areas. The ECA selects and designs these audit tasks to be of maximum impact by considering the risks to performance or compliance, the level of income or spending involved, forthcoming developments and political and public interest.

This performance audit was carried out by Audit Chamber II – Investment for cohesion, growth and inclusion, headed by ECA Member Annemie Turtelboom. The audit was led by ECA Member Carlo Alberto Manfredi Selvaggi, supported by Daniela Morgante, Head of Private Office and Matteo Tartaggia, Private Office Attaché; Marion Colonerus, Principal Manager; Paloma Muñoz Mula, Head of Task; Karel Meixner, Deputy Head of Task; Guido Fara, Aleksandra Klis-Lemieszonek, Alfredo Ladeira, Derek Meijers, Marion Boulard and Marton Baranyi, Auditors. Anthony Pantelis, Britta Middelberg and Stamatis Kalogirou, provided data analysis support. Istvan Ertl, Marek Říha, Pablo Lledó Callejón, Zuzanna Filipski and Michael Pyper provided linguistic support. Alexandra-Elena Mazilu provided graphical support.



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European Court of Auditors, [special report 05/2026](#): “Sustainable commuting around urban areas – Moving forward, with local action crucial to reach destination”, Publications Office of the European Union, 2026

Three quarters of the EU's population live in urban areas, which attract jobs and economic activity, generating heavy commuting traffic. The EU's urban mobility policy promotes sustainable transport, with legislation, guidance and funding.

The EU's legal framework has been strengthened recently, requiring 431 cities to adopt sustainable urban mobility plans. However, we found shortcomings in the plans we audited, including gaps in their coverage of commuter flows and limited ambition to get commuters out of their cars. Future improvements in urban mobility will depend largely on local action. We recommend enhancing guidance and monitoring, promoting comprehensive coverage of commuter flows in plans, and establishing a methodology to measure changes in greenhouse gas emissions resulting from implemented projects.

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