



European tourism association

## Rome: 2019 coach access plan for ZTL A, B, C

ETOA is a pan-European trade association founded in 1989 whose 1100+ members include service providers in Rome as well as tourism operators who sell Italy worldwide. It exists to promote a business environment that recognises and supports the interests of communities, visitors and industry so that tourism can play a valuable economic and social role in Europe in the long-term. It has experience of collaboration with major European destinations including Barcelona and Paris to address operational challenges and to develop capacity management strategies.

The City of Rome proposes to introduce a plan whose implementation will, *inter alia*, restrict access for full-size private coaches to zone C, the historic centre frequented by visitors, and significantly increase operational complexity within the *grande raccordo anulare* (GRA).<sup>1</sup> Zone C is also the location of numerous hotels, restaurants and other services catering to visitors.

ETOA respectfully recommends that the plans should be suspended until either a. evidence of sufficient benefit is provided to outweigh the harm their introduction would cause or b. that a more effective solution is developed with demonstrable long-term benefits, environmental and otherwise, for all stakeholders. The current plan is likely to have adverse impacts on the following:

- Air quality and the environment
- Local community
- Traffic congestion
- Public transport system
- Visitor economy and the hospitality industry
- Competition

If the plan is implemented and later revised, the consequent economic harm arising from the interim implementation will be very difficult to repair. It is likely that this will give rise to significant local controversy and further legal challenge at a time when public resources are under great pressure.

Managing traffic and people flow in Europe's key destinations is one of the most important strategic challenges faced by local authorities. Calls for resources for infrastructure investment whose benefit will be appreciated in 20-30 years' time must compete with urgent day-to-day needs.

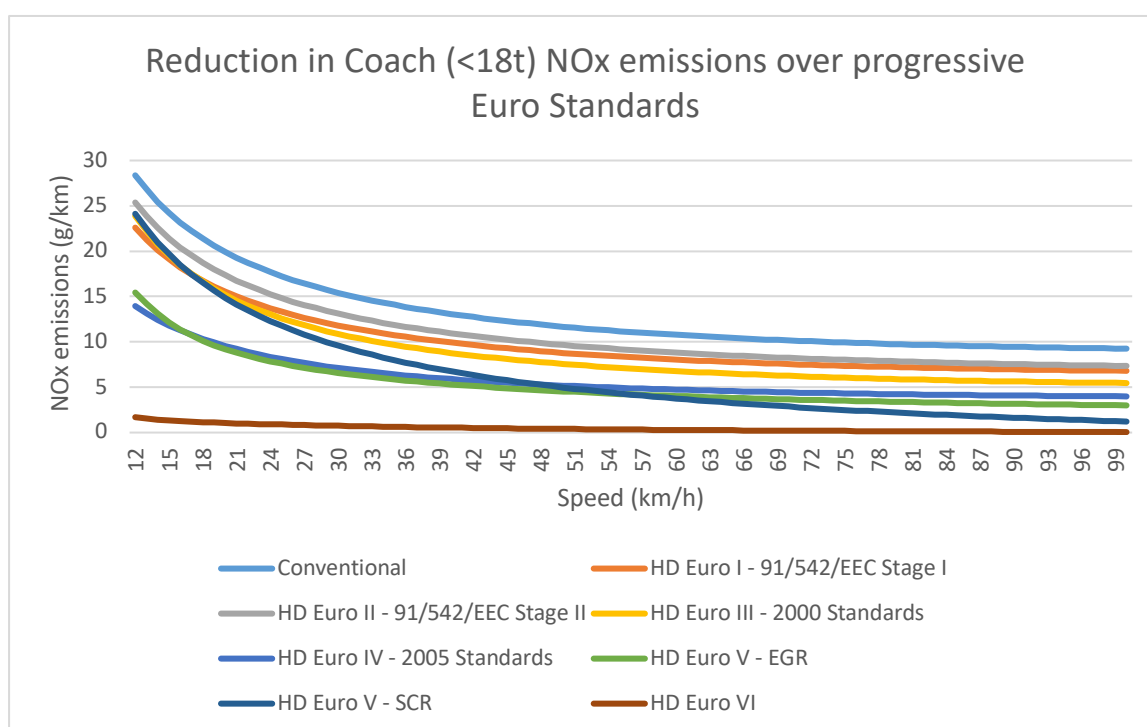
Strategic support at EU and national levels, as well as long-term planning and intelligent local regulation, is needed for Europe's major cities such that they can remain appealing place to live, work and visit. If this is not done, it is certain that the benefit from the visitor economy will decline. This loss may not be recoverable and would have a negative effect on employment.

Tourism is just one part of the visitor economy, which itself is only a part of the overall population depending on urban mobility. Public transport systems' investment programmes can struggle to match demand arising from growth in both population and visitor numbers, and are subject to extreme budgetary uncertainty. A new 9.2km north-south metro line in Amsterdam completed in 2018 took 15 years to build at a cost of €3.1billion, 4.5 x original estimate of €681 million.

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<sup>1</sup> Protocollo RC n. 32393/2017 Deliberazione n. 55, and subsequent.

**Air quality and the environment** These will be adversely affected due to the proposed restriction on access for low-emissions vehicles (classified Euro V or VI, hereafter 5 or 6), and increased congestion through use of more vehicles in total as private transport alternatives to full-size private coaches are used. The graph below indicates the emissions of NOx gases.<sup>2</sup> The Euro rating of private coaches used by visitors is, with few exceptions, 5 or 6. As of March 2017 (the most recent figures seen by ETOA) the average age of ATAC's 2,082 buses (including trams, trolley, buses and electric) was 10.4 years. 1,490 were diesel fuelled. The industry standard 'end of useful life' is 12 years; over half of ATAC's fleet at that time were older. While improvements have been made, e.g. electric fleet up from one to 30-40, the average 'Euro age' of the fleet is believed to be approximately Euro 4, with some vehicles still Euro 3, whose emissions are 10x that of Euro 6. While new vehicles have been commissioned, the cost of upgrading the entire fleet is very significant. For example, London will spend almost €100 million (£86.1 million) on upgrading 5,000 public buses to Euro 6 standard, to be complete by September 2020. Meanwhile, for Rome, it is rational to promote and not deter the use of the lower-emission private coach fleet if air quality is a prime concern.



**Community** The restriction will make the provision of private transport services for the local community more expensive, perhaps prohibitive for smaller businesses unable to meet the significant up-front costs. Services affected will include privately-run school buses.

**Traffic congestion** Private coaches are an efficient use of road space. c. 50 people may be transported using a vehicle that takes the space of, at most, three cars. The need to transport a large group's luggage to and from hotels in Zone C is best met through use of private coaches; alternatives would take up much more road space (e.g. 15-17 taxis with luggage). The private sector has a strong incentive to fill vehicles; the public fleet will often run with low load factors outside peak hours.

**Public transport system** It is accepted that more investment would have been desirable in Rome's public transport infrastructure during the last 10-20 years. While the centre of Rome is relatively well-served it is not feasible for a group of between 30 and 50 people to expect to board a public bus unless it is mostly empty. Outside the city centre the metro and tram network is very limited.

<sup>2</sup> Source: Low Carbon Vehicle Partnership, <https://www.lowcvp.org.uk/>

**Visitor economy and the hospitality industry** Service providers within the zone, including hotels and restaurants, will lose business. The risk is that business to Rome will not only be displaced from central service providers, it will reduce. The plans will affect valuable MICE business (meetings, incentives, conventions and events) as well as group leisure travel; all contribute city taxes. Many operators do not consider there are practicable alternatives to private coach transport.<sup>3</sup>

**Competition** The proposed carnet system and rate increases may require significant up-front investment which favours larger companies with more cash flow and greater capacity to accept high volume of bookings for services within the restricted zones to justify the costs. It will also provide market opportunity for large coach operators based elsewhere in the EU to offer such services. This increase in competition may be welcome; it may also have an impact on local service providers.

**Major system change to traffic management** Preparatory work will typically include careful measurement and analysis of the status quo, resulting statement(s) of the problem(s) and scope of solutions considered; careful widespread consultation; impact assessments, related research and possible options for access, parking, priority, etc. Best practice guidelines have been jointly developed by the IRU and Busworld.<sup>4</sup>

**Operational considerations** There are specific practical concerns arising from the proposed plans:

- Implementation and operation of the new regime: there is significantly increased complexity e.g. over 10 permits instead of one, and strict quotas; operational issues are evident.
- Issues include eligibility and application process for permits; total available, and their duration; inevitable and accidental 'overstay'; how the permits inter-relate.
- Access to attractions in Zone B, including the Vatican and access for the Colosseum in relation to drop-off / pick-up points, including their reconfiguration and new permit system.
- Confusion. From discussion with operators it appears that the following three documents hosted on Roma Mobilità website give rise to conflicting interpretations of, for example, permitted locations of drop-off / pick-up points: DGC istituzione ZTL n. 262; Delibera 55 del 2018; DD 643 del 3.8.2018.<sup>5</sup> There is also widespread uncertainty as to the locations, capacity and cost of new coach parking facilities in Zones A and B. This presents both practical and budgetary challenges.
- Scope for abuse and accidental non-compliance, and difficulties with enforcement.

**Alternative transport options** In order for alternative transport to private coaches, including private taxis, minibuses and public transport, to carry passengers who wish to visit Zone C a variety of practical challenges must be resolved:

- For public transport: ticketing, including points and methods of sale, and information in visitors' languages; customer service more generally.
- Access to public transport nodes from hotels in non-central locations.
- Transporting luggage to and from hotels in Zone C.
- Continued mobility in the event of industrial action affecting public sector provision.
- Accessibility, especially for groups of younger and older visitors, and those for whom walking long distances or going up and down stairs is difficult or impossible.
- Security. Operators have a duty of care to their clients, and must manage risk appropriately. Group travel on Rome's buses and metro can present significant challenges in this respect.

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<sup>3</sup> See ETOA Impact Survey - Proposed Coach Regulation in Rome, ETOA AISBL, October 2018

<sup>4</sup> See <https://www.iru.org/> and <https://www.busworld.org/> and [http://www.busandcoach.travel/en/best\\_practices/for\\_policy\\_makers/infrastructure.htm](http://www.busandcoach.travel/en/best_practices/for_policy_makers/infrastructure.htm)

<sup>5</sup> Source: <https://romamobilita.it/it/servizi/nuovo-piano-bus-turistici>