Integrating Safety into the EU’s Urban Transport Policy
ETSC’s Response to the EC’s Urban Mobility Package

April 2014

Part 1

1.1 Introduction

The European Commission adopted its urban mobility package on the 17th of December 2013. With 11,000 deaths on the road in urban areas across the EU in 2012, improving road safety in cities has been recognised as a political priority. The new Eurobarometer survey also shows that a large majority of European citizens (73%) considers road safety to be a serious problem in cities1. The EU set a goal in the Transport White Paper to: “move towards the target of zero fatalities in road transport by 2050 and reduce by half the number of road deaths by 2020.”2 A recent report concluded that although the EU is a long way from achieving ‘Vision Zero’ in built-up areas, new analysis shows that Vision Zero is possible in urban areas and is even a reality3.

ETSC welcomes the renewed push of the European Commission to share good practice and further encouragement for local governments to make road safety a key component of their mobility plans. However, the soft measures included in the package need to be further strengthened to have a strong and long lasting impact. This short briefing lays out ETSC’s response to the Urban Mobility Package and key recommendations for its improvement in implementation4.

1.2 Transport Safety; a Horizontal Issue in Sustainable Urban Mobility Plans

ETSC welcomes the new initiative on Sustainable Urban Mobility Plans (SUMPs) and the encouragement of their uptake through a number of measures including both financing and the setting up of a new platform to exchange best practice. It is an important development that safety has been recognised an essential component of sustainable urban mobility and has been included in the proposal for a ‘Concept for Sustainable Urban Mobility Plans’5 as a horizontal issue. Moreover, the specific EC document on road safety further outlines that SUMPs should address issues such as ‘safe urban infrastructure, especially for vulnerable road users, the use of modern technology for enhanced urban road safety, traffic rule enforcement and road safety improvements’.

3 The Report discovered that of 967 cities in 17 states studied with a total of more than 50,000 inhabitants over half (462) had no fatalities in at least one year. DEKRA (2014) European Road Safety Report, 2014 Urban Mobility, http://www.dekra.de/en/verkehrssicherheitsreport-2014
All of these are priorities for urban safety which ETSC can fully endorse. It is however regrettable that there is no obligation to develop SUMPs.

ETSC also welcomes the setting up of a European Platform on Sustainable Urban Mobility Plans and would request the inclusion of road safety urban mobility expertise in this platform. ETSC also welcomes the proposed support of the EC to national, regional and local authorities to develop and implement SUMPs through funding instruments.

**ETSC Recommendations to the EU**

- Integrate safety into Urban Mobility Audits and reflect it in common targets in the European Urban Mobility Performance Scoreboard.
- Include road safety experts in the newly proposed Member State Expert Group on Urban Mobility.
- Create a specific Working Group on Urban Road Safety under the Member State Expert Group on Urban Mobility.
- Set up a mechanism to monitor and promote best practice in take up of road safety as a horizontal issue within SUMPs.

**1.3 Tackling Serious Injury: a Priority in Urban Areas**

A larger proportion of serious road traffic injuries occur in urban areas and involve vulnerable road users. For every road death in the EU, at least 44 road injuries are recorded, of which 10 are categorised as “serious”\(^8\). Vulnerable road users, for example pedestrians, cyclists, motorcyclists or users in certain age groups – notably the elderly – are especially affected by serious road injury. In March 2013 the European Commission adopted its *‘First Milestone towards a Serious Injury Strategy’*\(^9\); this paper was notable for adopting a common definition of serious injury, a methodology for collecting data and possible actions. ETSC is expecting a concrete strategy of action and a new target to be set in 2015 as outlined in full in its Response to the *‘First Milestone towards a Serious Injury Strategy’*\(^10\). The specific EC document in the urban package on road safety\(^11\) mentions the plan to analyse measures in 2014-2015 for reducing the number of serious road traffic injuries in urban areas, but does not go into any detail (see section 1.5).

**1.4 Prioritising Road Safety in Funds for Urban Mobility**

---


\(^8\) M. Mackay (2005) “Quirks of Mass Accident Data Bases”.


ETSC argues that the principle of conditionality with road safety infrastructure legislation that has been adopted in the new TEN-T Guidelines on road safety, should be extended to the urban realm. This should lever additional funds to support road safety within SUMP projects at city level. Promoting walking and cycling is one of the priorities of the Transport White Paper within urban areas and the European Commission argues that they “could readily substitute the large share of trips which cover less than 5km”. The TEN-T urban infrastructure nodes should reinforce this new commitment by encouraging safe and sustainable integrated transport options especially for the last kilometer. An opportunity has been missed to encourage the take up of SUMPs through introducing conditionality linked to their existence to the use of EU funds.

**ETSC Recommendations to the EU**

- Apply conditionality for compliance with road safety infrastructure legislation for use of all EU funds.
- Channel funds for urban mobility to support the safety of pedestrians and cyclists as a priority.

**1.5 Targeted Action on Urban Road Safety**

The specific Staff Working Document on urban road safety\(^\text{12}\) outlines some of the key challenges in reducing road deaths in urban areas.

However, the overview of what specific targeted action the EU can take is lacking and must be introduced. The Road Safety Working Document also includes:

- gathering and disseminating good practice examples for road safety planning.
- analysing measures for reducing the number of serious road traffic injuries in urban areas.

Although welcome these measures do not include anything new nor particularly detailed in terms of what to do to concretely reduce road death and serious injury in urban areas.

Beyond these actions the EC also mentions the need to\(^\text{13}\):

- Improve infrastructure safety design for VRU, especially at junctions,
- Tackle dangerous traffic offences such as speeding, driving under the influence of drugs or alcohol and non wearing of seat belts.
- Improve vehicle safety, especially PTWs and HGVs.
- Improve emergency response.

Regrettably, none of these highly relevant identified problem areas come with any concrete recommendations for action from the EC.

---

\(^{12}\) ibid

\(^{13}\) European Commission (2013) Staff Working Document: Targeted Action on Urban Road Safety
Part 2 Top Six Areas for Action to Improve Road Safety in Urban Areas

2.1 Tackling Speed in Urban Areas

Excessive and inappropriate speed is the number one road safety problem\(^{14}\). Speeding is a primary factor in about one third of fatal accidents and an aggravating factor in all collisions\(^{15}\). Exceeding the speed limits is widespread. In countries where data are available, in free-flowing traffic, up to 60% of drivers exceed speed limits in urban areas\(^{16}\). Addressing illegal speeding therefore requires a large number of non-compliers to change their behaviour. Experience shows that there is not one single measure to reduce speed. It takes a combination of measures including credible speed limits, enforcement and education, combined with ‘self-explaining’ roads and vehicles\(^{17}\).

ETSC is also keen to promote the uptake of Intelligent Speed Assistance in urban areas. The EC Staff Working Document “Mobilising ITS for EU cities\(^{18}\)” notes the benefit of deploying cooperative systems for road safety including “vehicle to infrastructure communication”. The document also refers to the preparation of specifications on “real-time traffic information services” which should also include speed limit data and which would be essential in enabling ISA deployment\(^{19}\). It also references “speed reduction” and “infrastructure to vehicle communication” in the ITS tool box section on road safety in the annexed Guidelines for ITS Deployment\(^{20}\).

**ETSC Recommendations to the EU**

- Encourage Member States to adopt speed limits of maximum 30km/h in residential areas and areas with high levels of pedestrians and cyclists and maximum 50km/h in urban areas.
- Encourage Member States to increase enforcement of speed limits, especially in areas where there are high numbers of pedestrians and cyclists.
- Support the introduction of Intelligent Speed Assistance (ISA) which, in restricting speed, has the potential to also reduce risks to pedestrians and cyclists.
- Include, under the ITS Directive, specifications on real time traffic information and the collection and maintenance of speed limit data.
- Prepare guidelines to support Member States in undertaking speed map collection work which builds on the existing best practice.

2.2 Infrastructure Safety

---


\(^{15}\) OECD/ECMT (2006) Speed Management.

\(^{16}\) ETSC (2014) PIN Flash - Ranking EU progress on car occupant safety - forthcoming. etsc.eu/pin


\(^{19}\) European Commission (2013) EC Consultation on Real Time Traffic Information Services.

Infrastructure can play a key role in reducing death and the severity of injury when collisions occur. Building on its ‘Policy Orientations on Road Safety 2011-2020’ the European Commission’s new document on Serious Injury proposes application of the instruments included in the Infrastructure Safety Directive to the secondary road network and, for the first time, extending them also to the urban environment. ETSC believes that this measure should also have been mentioned in the “Urban Road Safety” document.

The need to improve infrastructure safety, especially for VRUs, is mentioned in the document but without any proposed action. ETSC would also like to see the development of guidelines on traffic calming which would also benefit road users in urban areas, especially the unprotected ones. Additionally, land use plans should adopt a clear hierarchy of transport users, with pedestrians, cyclists and public transport users at the top of the hierarchy.

**ETSC Recommendations to the EU**

- Draft guidelines for promoting best practice in traffic calming measures, based upon physical measures such as roundabouts, road narrowing, chicanes, road humps and techniques of space-sharing. These measures should be introduced as an integral part of setting up speed limit zones of 30km/h in urban areas.
- Develop a policy of modal priority for road users, particularly in urban environments: the hierarchy being based on safety, vulnerability, and sustainability. Pedestrians should be at the top of the hierarchy, followed by cycling and public transport.

**2.3 Walking and Cycling in Urban Areas**

Deaths among pedestrians and cyclists decreased by 34% between 2001 and 2009, compared with 39% for car drivers. More than half of the people seriously injured in an urban area are pedestrians or other vulnerable road users. ETSC therefore welcomes that the European Commission prioritises reducing injuries among these groups and in urban areas.

It is often claimed that cycling or walking should not be encouraged as they are less safe transport modes than cars. The European Commission’s document recognises that ‘greater physical activity levels as a result of increased participation in cycling and walking, through leisure time or through active commuting, may also lead to improvement in population health beyond those directly attributable to reductions in road accidents’.

---

including the ‘use of available protection devices such as bike helmets for cyclists or increased visibility for pedestrians’\(^{24}\).

Increasing numbers of pedestrians and cyclists can result in ‘safety in numbers’ reducing overall risk as well as risk for individuals. There are a whole range of measures that can be taken to improve vulnerable road user safety and address other elements of the integrated approach (user behaviour and infrastructure) and are covered in more detail in ETSC’s Position on ‘Integrating Safety into the EU’s Urban Transport Policy\(^{25}\), in ETSC’s Review on Vulnerable Road Users\(^{26}\) and in ETSC’s recent Review of Cycling Safety Policy\(^{27}\).

2.4 HGVs and VRUs in Urban Areas

In the European Union 4,254 people lost their lives in collisions involving heavy goods vehicles (HGVs) in 2011\(^{28}\). In spring 2013, the European Commission proposed new rules to allow manufacturers to develop more aerodynamic lorries and alter the design of cabins to introduce an energy-absorbing deformable vehicle front. The EC’s Staff Working Document on Urban Road Safety points to that: “cities might also pay special attention to heavy vehicles that, in the case of a crash, will cause severe injuries to affected VRUs\(^{29}\)”. Yet, no concrete recommendations are elaborated.

ETSC’s position on the revision of the Weights and Dimensions legislation presents recommendations as to how to improve vehicle safety within the truck redesign covering aspects of vision, crumple zone and underrun protection\(^{30}\). Such proposals would enhance the safety of vulnerable road users.

2.5 Road Charging and Road Safety

The urban mobility package also included two EC Staff Working Documents on “road user charging”. Recent research indicates that transport pricing reforms can significantly increase traffic safety. However, these impacts are often overlooked, both when evaluating pricing reform benefits and when searching for traffic safety strategies\(^{31}\). Other measures, such as route planning\(^{32}\) to avoid urban areas at certain peak times when there are high numbers of pedestrians and cyclists and schemes to insert HGV safety into public procurement contracts should also be promoted\(^{33}\).

ETSC Recommendations to the EU

\(^{24}\) ibid
\(^{28}\) ETSC (2012) A challenging start towards the EU 2020 Road Safety Target, 6\(^{th}\) PIN Report.
\(^{30}\) ETSC (2013) Position on Revision of Weights and Dimensions 96/53
• Recognise the positive impact that urban access regulations can have to increase traffic safety.
• Integrate route planning in the interests of safety within the context of the new EC initiatives on urban logistics and HGV vehicle access to cities.

2.6 Mopeds in Urban Areas

Another priority is increasing the safety of moped riders in urban areas. Mopeds are used for shorter trips compared to motorcycles. Mopeds are relatively small, which makes them attractive in areas with dense or congested traffic. Mopeds, with their small engine and low top speed, have lower death rates than motorcycles but higher accident rates when less severe injuries are included. Driving a moped with no driving licence as used to be permitted in many Member States until recently, has been no longer possible since 2013. The EU Directive 2006/126/EEC on Driving Licence introduced a new category AM and a mandatory theory driving test for moped riders. The minimum age for riding a moped is 16 years but Member States may lower this age as far as 14 years or raise it to 18.

Fig. 1: Moped rider deaths as a percentage of total PTW rider deaths. 2007-2009 average.

Fig. 1 shows how the proportion of PTW riders killed who were moped riders differed among 22 countries over a recent 3-year period. This proportion is the lowest in the Czech Republic, GB and Luxembourg and the highest in Romania, Denmark, Estonia and the Netherlands. In other countries, moped rider deaths are between about 8%

---

34 A moped is defined as a PTW with an engine size below 50cc and design speed up to 50 km/h.
35 ERSO (2008) 
http://ec.europa.eu/transport/wcm/road_safety/erso/knowledge/Content/45_poweredtwowheelers/powered_two_wheelers.htm
and 35% of all PTW deaths. The PIN comparison of the proportion of moped rider deaths in the total number of PTW rider deaths can help countries to identify and prioritise safety measures for mopeds.\footnote{ETSC (2011) PIN Annual Report}

The power and speed of mopeds is often tampered with.\footnote{The “Handbook of road safety measures” (Elvik et al. 2009) refers to a Norwegian study in which the relative rate for injury crashes was found to be about 50% higher for tampered mopeds.} Measures including regular technical checks aimed at reducing tampering are important. ETSC had fought for the inclusion of PTWs in regular technical checks and deeply regretted that the recent agreement on the Roadworthiness package\footnote{ETSC (2013) ETSC Position on the Roadworthiness Package} excluded PTWs in regular technical checks.\footnote{http://register.consilium.europa.eu/content/out?lang=EN&typ=SET&i=SMPL&ROWSPP=25&RESULTSET=1&NRROWS=500&DOC_LANG=EN&ORDERBY=DOC_DATE+DESC&DOC_ID=&DOC_TITLE=roadworthiness&CONTENTS=&DOC_SUBJECT=&MEET_DATE=&single_comparator=&single_date=&from_date=&to_date=}

Education and access is another important area for improvement and reducing risk. The minimum age for learning to ride a moped should be 16, the new Driving Licence Directive allows Member States to set the age between 14 and 18. Based on the results of a study on the effects of moped rider training\footnote{Goldenbeld et al., 2004} a licensing system for moped riders should start with a compulsory training programme, followed by a period with a provisional license and ending with a practical training programme/test.\footnote{DaCoTA (2012) Powered Two Wheelers, Deliverable 4.8n of the EC FP7 project DaCoTA}

**ETSC Recommendations**

- Enforce the compulsory wearing of helmets and number plate visibility.
- Provide consumer information regarding helmet safety and educate riders regarding the importance of proper fastening.
- Develop minimum standards regarding protective clothing and educate riders about the safety benefits of wearing it.
- Improve rider and driver training. Rider training should focus on hazard recognition and risk assessment as well as vehicle control skills.
- Ensure that driver training teaches candidates to understand the vulnerability of unprotected road users and “look for them” when driving.
- Introduce mandatory regular technical checks for mopeds aimed at reducing tampering.

**For further information**

Ellen Townsend, Policy Director
ellen.townsend@etsc.eu +32 2 230 41 06

The European Transport Safety Council (ETSC) is an independent, non-profit organisation dedicated to reducing the numbers of deaths and injuries in transport across Europe.
Background

Fig. 2 Percentage share of road deaths by road user group inside and outside urban areas in the EU. * Others include HGVs, agricultural tractors, bus and coaches, other vehicles and unknown.

Fig. 3: Reductions in road deaths inside and outside urban areas by road user group between 2001 and 2009 for the EU as a whole.