



EDF analysis of the Commission Communication on the New Urban Mobility Framework (COM (2021) 811 final)

15 February 2022

Contents

EDF analysis of the Commission Communication on the New Urban Mobility Framework (COM (2021) 811 final)	1
Introduction	1
Why is the Urban Mobility Framework relevant for persons with disabilities?	2
Analysis of the Commission proposal	2
Relevant points in the Communication:	3
Concrete proposals of relevance for persons with disabilities:	3
Conclusion	4
Reference documents	4
Contact.....	5

Introduction

On 14 December 2021, the European Commission published its Communication on the New Urban Mobility Framework. We, EDF, had already given input to the previous Roadmap in May 2021 and the subsequent public consultation in September 2021. Now we would like to present our analysis of the final text.

Why is the Urban Mobility Framework relevant for persons with disabilities?

As it was mentioned in the evaluation of the 2013 Urban Mobility Package (UMP) published on 24 February 2021, the ageing population coincides with an increase of the number of persons with disabilities in the coming years. It is also estimated that over 60 % of EU citizens live in urban areas of over 10 000 inhabitants¹. Therefore, accessibility of public transport and the urban environment is one of the key issues to address in the revision of the Urban Mobility Package, affecting a majority of the EU population.

We would like to underline the importance of an inclusive and accessible urban transport system for persons with disabilities to achieve the climate goals set out in the EU Green Deal and to allow for a just transition, leaving no one behind. At the moment, there is EU legislation on Passengers' Rights covering most transport mode except urban transport. Likewise, there is a gap in the European Accessibility Act: it only covers websites, mobile applications, and ticketing machines of transport providers but not the vehicles or infrastructure of urban transport. Accessibility of urban transport should be considered within a broader urban accessibility framework, because an accessible bus will be of no use for persons with disabilities if barriers on the way from home to bus stop prevent them from reaching the stop (e.g. lack of curb-cuts, tactile pavement markings, audible traffic lights, etc.).

Therefore, it is crucial to use this opportunity now to improve the legislation to create resilient and future-proof transport networks that will serve all passengers.

Analysis of the Commission proposal

The text published by the Commission on 14 December 2021 is in the form of a Communication, which is not legally binding. It explains what initiatives the Commission will take to improve urban mobility, including possible legislative actions.

"Inclusiveness" is not mentioned explicitly in the Communication, but it is mentioned in accompanying Staff Working Document, including accessibility for persons with disabilities (reference to Passengers' Rights Regulations and EN 17210). Out of a total of 40 proposed initiatives, only 1 mentions persons with disabilities explicitly.

Most of them are "soft" measures (recommendations, guidance, studies...) but the one on disability will be a legislative proposal on the provision and use of commercially sensitive data for multimodal digital mobility services, also improving accessibility for people with reduced mobility.

Sustainable Urban Mobility Plans (SUMP) are a vital part of the Package, linking with the TEN-T urban nodes but accessibility is not mentioned as one of the

¹ https://ec.europa.eu/transport/themes/urban/urban_mobility_en

indicators/criteria, as we had demanded in our advocacy. However, we will focus on this also in our advocacy on the revision of the TEN-T Guidelines which is happening at the same time.

Funding for the initiatives mentioned above is promised via a variety of Commission funding programmes, such as Horizon Europe (research), the Structural Funds (regional policy), and the COVID-19 Resilience and Recovery Fund. This will have to be monitored more closely as it is difficult to say exactly how much funding is available and how it will be allocated since there is not a single dedicated funding programme available.

Relevant points in the Communication:

- Paragraph 12: “More suitable infrastructure is needed to increase the share of public transport. This means, for example, multimodal hubs with stations/stops that are effectively interconnected with urban rail, metro, tram, bus, coaches, shared mobility services and better and bigger park and ride facilities, and that are better equipped with appropriate bike parks and publicly accessible recharging and refuelling points for low- and zero-emission vehicles. Designing all these facilities also requires an increased focus on persons with disabilities.”
- Accessibility for persons with disabilities mentioned in paragraphs 30 - 32: “...But more needs to be done to increase its quality, accessibility for persons with disabilities and ensure better integration between public transport and shared mobility services and active mobility, including micro-mobility services in order to cover the last mile where access points are far or frequency of public transport is low.”
- Paragraph 35 mentions digital accessibility and compliance with the EAA: “Moreover, it is important to make sure that providers of urban transport services provide accessible information to make their websites, mobile apps, electronic ticketing services, real-time travel information services, ticketing and check-in machines compliant with EU wide accessibility requirements.”
- Paragraph 69 mentions the Access City Awards

Concrete proposals of relevance for persons with disabilities:

1. Under the TEN-T Regulation, require the development of multimodal passenger hubs, including park and ride facilities, to improve first and last mile connections and to enhance the necessary capacities for long-distance connectivity in and between urban nodes;
2. On SUMP: publish, by the end of 2022, a Commission Recommendation to Member States on the national programme to support regions and cities in the roll-out of effective sustainable urban mobility plans. This will include an upgraded SUMP concept, setting clear priorities to favour sustainable solutions including active,

collective and public transport and shared mobility (including for urban-rural linkages), fully integrating resilience aspects as well as Sustainable Urban Logistics Plans (SULP), based on zero-emission vehicles and solutions; (p. 5)

3. Commission will by the end of 2022, improve and streamline the set of 19 sustainable urban mobility indicators already identified as well as the related benchmarking tool;
4. Commission will in 2023, launch a programme support action under the Connecting Europe Facility to Member States for the collection of data for harmonised mobility indicators in order to monitor the progress achieved by TEN-T urban nodes towards sustainable urban mobility. (p. 6)
5. Commission will reinforce its funding (see section 5) and policy support (e.g. reinforced SUMP concept) for public transport and will work with national and local administrations and all stakeholders to ensure that this form of transport remains the backbone of urban mobility and to tackle inequalities in accessing the public transport network, including improving access to train stations; (p. 9) → See also funding under RRF dedicated to train stations and transport mentioned in SWP!
6. provide, by the end of 2022, guidance on quality infrastructure requirements for vulnerable road users in the initial audit of the design phase under Directive 2008/96/EC34 on road infrastructure safety management. (p. 11)
7. propose a legislative initiative by 2022 on the provision and use of commercially sensitive data for multimodal digital mobility services, also improving accessibility for people with reduced mobility; (p. 15)
8. launch a dedicated study in 2022, which will map and clarify which digital and technical solutions would be available to enable more effective and user-friendly Urban Vehicle Access Regulations (UVAR), while respecting the principle of subsidiarity; (p. 15)

Conclusion

Persons with disabilities are mentioned but accessibility and inclusiveness are not sufficiently taken into account, especially considering the lack of current legislation on urban transport. The Communication takes stock of the current issues but it does not recognize the need for binding EU laws in this area, which is a missed opportunity.

Reference documents

- Full text of the [Commission Communication \(2021\) 811 Final](#)
- [EDF reply to the Commission consultation on the Urban Mobility Framework, September 2021](#)
- [EDF feedback to the Commission Roadmap on the Urban Mobility Package, May 2021](#)

Contact

Marie Denninghaus | EDF Policy Coordinator | marie.denninghaus@edf-feph.org