

Trudy Harrison MP,
Parliamentary Under Secretary of State
Department for Transport
Great Minster House
33 Horseferry Road
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6th December 2021

Dear Minister

I listened to your speech at the *Smart Transport* conference last week and noted that you hope to bring forward legislation for e-scooters soon, once you have reviewed the information from the rental trials. We also look forward to the monitoring report.

If use of private e-scooters is to be legalised, there will need to be regulations for construction and use. It will not be possible to apply the sophisticated rental scooter technologies and management systems (eg, user registration, geo-fencing, three-strikes and out) to private e-scooters. As such, we believe it is essential to set the construction and use regulations based on safety principles.

Our recommendations are:

Primary Recommendations

Safe Speeds

- Maximum possible top speed of between 10mph-12.5mph (16-20km/h)
- Maximum continuous rated motor power 250 W
- Anti-tampering mechanisms should be included in construction. Tampering should be prohibited by law

Safe Vehicle Design

- Maximum unladen weight of 20kg
- Minimum front wheel size of 12 inches (30.5cm) and minimum rear wheel size of 10 inches (25.5cm)
- Two independently controlled braking devices, one acting on the front wheel and one acting on the rear wheel
- Lighting to be mandatory at all times
- An audible warning device to be mandatory

Safe User Behaviour

- Helmet wearing to be mandatory
- Rider age limit of at least 16 years
- Riding on the footway (pavement) or footpath to be prohibited
- Carrying of a passenger to be prohibited
- Drink driving, dangerous or careless riding, and mobile phone use to be prohibited
- In-person rider training is recommended

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Secondary Recommendations

Current road traffic law regarding drink driving, dangerous or careless riding, and mobile phone use should continue to apply to private e-scooters. This could be enforced through regulating e-scooters as motor vehicles, therefore enabling enforcement to be under the existing legislation. (If not, these extensive provisions would need to be written into new laws.)

Our secondary recommendations are therefore:

- e-scooters should be regulated as motor vehicles
- Public liability insurance for riders is recommended
- The rider should inform the police if there is a collision involving an injury

The DfT will need to decide how much regulation and cost can be realistically imposed.

Research

We also recommend three pieces of urgent research.

- begins immediately to gather data on private e-scooter use to enable a broader understanding, including casualty rates, and commits to publishing data alongside the evaluations of the rental trials,
- carries out an in-depth study of the causes of the fatal and most serious casualty collisions involving all e-scooters to date and commits to publishing the findings and,
- captures, in STATS19 data collection, how many users of e-scooters, and other PPTDs, were wearing head protection.

I attach these recommendations in detail and the research that supports them. Our research continues into 2022 and it is possible that we may revise these recommendations if new evidence come to light. I suspect, however, that they will not alter significantly.

Finally, thank you for your reply, received today, to my letter of 29th November. I will carefully consider what you say.

Yours sincerely



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