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Submitted to **Future of Transport Regulatory Review: Call for Evidence**
Submitted on **2020-07-03 20:20:47**

About you

What is your name?

What is your name?:
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Are you responding as:

On behalf of an organisation?

If you selected 'Other', please provide details.:

If you are responding on behalf of an organisation, what is your organisation's name?

What is the name of your organisation?:
Parliamentary Advisory Council for Transport Safety (PACTS)

Which category best describes your organisation?

Charity or other Non-Governmental Organisation

Are you happy for your response to be published?

Yes, but without identifying information

Would you like to be contacted when the consultation response is published?

Yes

How did you hear about this consultation?

Where did you hear about this consultation?:
GOV.UK alert

Other (please specify):

Part 2 - Micromobility

Opportunities and risks of micromobility vehicles

2.1 Do you think micromobility vehicles should be permitted on the road?

Yes, but only some

Please explain why.:
Micromobility is a broad and loose term. It is important to distinguish the different types. Some are safer and more useful as transport than others. we support use of pedal-cycles and electrically- assisted pedal cycles (EAPCs)
We do not believe any of the devices in figure B should be permitted for use except the e-cargo bikes and electrically assisted tricycle. (And the Segway is no longer produced.) Those "vehicles" without handle bars, brakes and lights should definitely not be permitted.
We recognise that the Government has approved e-scooter hire-scheme trials and seems minded to permit private use too. We have serious concerns about their safety. However, where authorised, they should be on the road, not on the footway.

2.2 If you can, please provide evidence to demonstrate the potential:

Benefits of micromobility vehicle use on roads:
Pedal-cycles, EAPCs, and e-cargo bikes have well-evidenced value for transport, health and the environment. The other micromobility vehicles shown have little or no transport, health or environmental benefit. e-scooters are the only one of these vehicles in widespread use. Studies show clearly that e-scooter trips were mostly short trips made previously on foot. In Europe, few trips are transferred from car/taxi. (In Paris it was 8-10%). e-scooter trips may save time for the user but they provide no active travel health benefit.

We set out our position here: http://www.pacts.org.uk/wp-content/uploads/sites/2/e-scooters-PACTS-position-v2.pdf

Risks of micromobility vehicle use on roads:
Micromobility vehicles are significantly more dangerous than excluding pedal cycles. This is due to the construction of the vehicle - very small wheels, inadequate brakes, rider standing upright, inability to signal (on e-scooters), etc. The rider is pitched forward in a collision or (more likely) when its very small wheels hit a pothole. The Denmark Government has reported in February 2020 that head injury rates to e-scooter riders are 8 times greater than for pedal cyclists. They intend to make helmet wearing mandatory on e-scooters.
https://www.trm.dk/nyheder/2020/evalueringen-af-de-smaa-motoriserede-koeretoejer-er-nu-offentliggjort/
Although the Government has stated that e-scooters are and will continue to be banned from the footway, experience to date in UK and in other countries has shown that e-scooters are a hazard for pedestrians, particularly the more vulnerable (elderly, partially sighted etc). E-scooters are often used on the footway (pavement) and in other pedestrian areas – legally in some countries, illegally in others. We see this already in the UK, despite their illegality here. Regardless of the law, if e-scooters are legalised for use in the UK, some people will use them on footways, for convenience or personal safety. The police will be largely unable to prevent this – they do not have the resources and they have enough other priorities. It is also not unusual to see e-scooter riders carrying child or adult passengers, or other items. Longer running boards and bigger motors make this easier.

Use of e-scooters is currently illegal in public places in the UK, unlike in almost all other countries. Despite this, e-scooters are being sold and increasingly used. We support a review of legislation. This should be based on a proper examination of the evidence, taking into account the impacts of e-scooters on health, safety and the environment. It should not be rushed or driven by vested interests.
We understand why the government is going ahead with trials of e-scooters. At first glance, e-scooters appear to meet a number of the government's Future of Mobility: Urban Strategy objectives: digitally-enabled, low/zero carbon, non-polluting and serving last-mile travel needs. They are also privately provided, widely available to purchase and popular with some users – even promoted as a fashion accessory.
However, from evidence and experience around the world, it is clear that the public benefits are largely illusory and the disbenefits substantial, at least in a European context. As such, e-scooters will work against many of the government's objectives.

2.3 If micromobility vehicles were permitted on roads, would you expect them to be used instead of:

Micromobility used instead of - Private vehicles:
Sometimes

Micromobility used instead of - Taxi or private hire vehicles:
Sometimes

Micromobility used instead of - Public transport:
Sometimes

Micromobility used instead of - Delivery vehicles:
Never

Micromobility used instead of - Cycling:
Never

Micromobility used instead of - Walking:
Often

Micromobility used instead of - Other (please specify below):

If you selected 'Other', please specify here. :

Please provide evidence.:
A 2019 study of responses from 4,382 users of free-floating e-scooters in Paris, Lyon and Marseille found that 44% would otherwise have walked and 30% taken public transport; few would have cycled. Some 10% were for fun - "scooter strolls". The transfer from car seems negligible. This may be explained as the median trip is only 11 minutes.

Use on the road, cycle lanes and cycle tracks

2.4a In your opinion, which of the following micromobility vehicles should be permitted, if any, on roads, only lower speed roads, and/or cycle lanes and cycle tracks?

Micromobility vehicles on parts of the road - All types:

Micromobility vehicles on parts of the road - Electric scooters:
On lower speed roads, On cycle lanes and cycle tracks

Micromobility vehicles on parts of the road - Electric skateboards:

Micromobility vehicles on parts of the road - Self-balancing vehicles:

Micromobility vehicles on parts of the road - Electrically assisted cycle trailer:
On roads, On lower speed roads, On cycle lanes and cycle tracks

Micromobility vehicles on parts of the road - Segway:

Micromobility vehicles on parts of the road - Other (please specify below):

Other (please specify):

Please explain your choices for using micromobility vehicles (or not) on roads and/or only lower speed roads:
we have explained our concerns above. Vehicles without handle bars, brakes etc should not be permitted on any type of public highway. If sensible construction and use regulations are introduced for e-scooters, they should be used as above.

Please explain your choices for using micromobility vehicles (or not) on cycle lanes and tracks, providing evidence where possible:
if the speeds, acceleration and weight are kept in line with ordinary bicycles and cycle use, it should be possible for them to mix reasonably safely on cycle lanes etc.

What impact do you think the use of micromobility vehicles on cycle lines and cycle tracks would have on micromobility vehicle users or other road users? :
we are concerned about the risks to pedestrians, particularly the elderly and visually impaired if e-scooters are used on shared-use cycle tracks/paths.

Use on pavements

2.5 Mobility scooters and pedestrian operated street cleaning vehicles are already permitted on the footway.

No

Please provide evidence. If you selected 'Yes', which types of devices should be permitted and in what circumstances?:
There is plenty of evidence of serious injuries to pedestrians from e-scooter riders on pavements in may cities around the world.
In the UK the situation is also developing. The Metropolitan Police was informed of 4 injury collisions involving e-scooters in 2018 and 32 in 2019, including one fatality; one third involved injury to pedestrians.

Vehicle requirements

2.6a What do you think the minimum standards for micromobility vehicles should be?

What do you think the minimum standards for micromobility vehicles should be?:
For e-scooters specifically:
E-scooters should be limited to 12.5mph (20kph) for reasons of user safety and safety of others, including cyclists and pedestrians. 12.5mph is about the speed of a typical urban cyclists.
E-scooters should have a maximum motor power of 250 Watts. The maximum motor power affects the acceleration ability of e-scooters. This is as much a safety concern as the maximum speed limit. Unlike EAPCs, e-scooters do not require human power to make set off or accelerate. Rapid acceleration combined with the high manoeuvrability of e-scooters increases the risk to the rider and other road users nearby. A higher motor power will also make it easier to carry a passenger. This is potentially very dangerous.
The maximum weight should be 20kg - to reduce injury to the rider and pedestrians. also, heavy scooters will be difficult for pedestrians to move if left obstructing the footway.
E-scooters should be fitted with sufficiently large wheels to ensure safety - we recommend a minimum of 10 inches to have a chance of safely negotiating the ruts, potholes, uneven surfaces etc of many urban streets. (The minimum wheel size for a bicycle is 16 inches; 26-27 inches is normal.)
E-scooters should be fitted with lights if used at night. Some e-scooters are currently fitted with lights. However, the rear light is positioned just above the rear wheel, only a few inches from the ground and less visible than a bicycle light. This is unsatisfactory.

Helmet use should be mandatory.
Dockless hire schemes should not be permitted.

2.6b Should different standards be set for different types of micromobility vehicle?

Yes

Please provide evidence.:
Most should not be permitted on roads; EAPCs and cargo bikes etc should conform to bicycle construction and use regs. e-scooters are inhertetly differeny but should conform to as many of these safely standards as possible. Due to the higher head-injury risk (and the lack of health benefits), helmet wearing should be mandatory on e-scooters,

2.7 Are there other vehicle design issues for micromobility that you think we should be considering?

No

If you selected 'Yes', please provide examples.:
already covered above

User requirements

2.8 In your opinion, what should the requirements be for micromobility users, with regard to:

How should micromobility vehicles be regulated? - Vehicle Approval:
Like EAPCs

How should micromobility vehicles be regulated? - Vehicle Registration and Taxation:
Like EAPCs

How should micromobility vehicles be regulated? - Periodic Vehicle Testing:
Like EAPCs

How should micromobility vehicles be regulated? - User Driving Licence:
Like EAPCs

How should micromobility vehicles be regulated? - Insurance:
Other requirements

How should micromobility vehicles be regulated? - Helmet Use:
Like mopeds

How should micromobility vehicles be regulated? - Minimum Age:
Like mopeds

How should micromobility vehicles be regulated? - Speed Limits:
Other requirements

If you selected 'Other requirements', please provide details.:
Bicycle helmets should be mandatory.
Max speed of 12.5mph - due to inferior safety of the vehicle and (illegal) use on footways. Also, faster may attract more people from healthy, active travel modes.

If you believe regulating micromobility vehicles in the same way as EAPCs or mopeds would be problematic, please explain why.:
yes, if regulations are designed for the specific characteristics of the vehicle and safety.

Next steps