

Department of Transport Future of Mobility Consultation Response, July 2020

Question 2.1 Do you think micro-mobility vehicles (such as those in Figure B i.e. e-scooters, e-skateboards, e-assist trike, segway) should be permitted on the road? Please explain why.

All legalised micro-mobility vehicles should be permitted to be ridden/used on the carriageway on the same basis as cycles, i.e. they should be permitted on roads and on cycle infrastructure, but not permitted on pavements/footways except when used as a mobility aid by or carrying a Disabled person to/from a destination across the pavement.

Establishing parity between cycles and other micro-mobility vehicles reduces confusion and reinforces the principle that anyone wishing to move at speeds above a pedestrian's pace is expected to use the carriageway/cycleways. This will safeguard pedestrians from the inconvenience and potential threat caused by passing micro-mobility vehicles (particularly pedestrians with impaired mobility or balance, anyone with visual or hearing impairments, pedestrians with dementia, neurodiverse pedestrians etc.). We believe it is helpful to clarify that micro-mobility vehicles are 'road vehicles'.

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

a. Benefits of micro-mobility vehicle use.

Our [research](#) demonstrates that cycles substantially benefit the physical and mental health of Disabled people. Our research also demonstrates that 21% of Disabled cyclists use e-cycles. New micro-mobility vehicles, if designed with Disabled users in mind (eg: option to add a seat to an e-scooter / ability to operate controls with either right or left hand etc.), will widen the choice and price range for equipment which enables access to the outdoors and provides independent and minimally polluting travel.

b. Risks of micro-mobility vehicle use.

We do not support the general legalisation of the use of micro-mobility vehicles on pavement.

We do however support legalisation of use of micro-mobility vehicles where they are used as a mobility aid/mode of door to door transport for a Disabled person. It should expressly be permitted for micro-mobility vehicles to be used in such limited cases. However, as with mobility scooters, speeds above 4mph should be outlawed in all cases on the footway.

Question 2.4

a. In your opinion, which of the following micro-mobility vehicles should be permitted, if any, on roads, lower speed roads, and/or cycle lanes and cycle tracks? • All types • Electric scooters • Electric skateboards • Self-balancing vehicles • Electrically assisted cycle trailer • Segway • Other (please specify)

We recommend that the following vehicles be permitted on all roads and on cycle lanes and cycle tracks/cycleways with the same regulation as standard and e-assist bicycles and that they be included within the definition of micro-mobility:

- class 2 and class 3 "invalid carriages" ie: powered wheelchairs and mobility scooters
- wheelchairs enhanced with clip-on handcycle attachments (whether hand powered, hybrid or fully electric)

- cycles and e-cycles of all kinds including trikes & e-trikes, tandems including wheelchair tandems and side-by-side tandems/ trishaws and pedicabs & e-trishaws and pedicabs
- cargo-cycles and e-cargo-cycles
- all new micro-mobility vehicles mentioned in the question above.

b. Please explain your choices for using micro-mobility vehicles (or not) on roads and/or only lower speed roads, providing evidence where possible.

Micro-mobility provides an invaluable option for many who cannot drive/choose not to drive, to access their community. Our [survey of Disabled cyclists](#) shows that cycling is easier than walking (therefore is an aid to mobility) for three quarters of respondents. The legalisation of new micro-mobilities accompanied by a widened definition of micro-mobility vehicles (see list in 2.4.a) has the potential to enable many more Disabled people to become mobile and reduce their reliance on motor transport through hire (MaaS) of a wider variety of micro-mobility vehicles and/or the purchase of newly legalised options.

Allowing all micro-mobility vehicles including class 2 and 3 “invalid carriages” on cycling infrastructure and on roads will ensure users benefit from the generally superior wheeling conditions which cycling infrastructure and the carriageway provide, in comparison to footways (which tend to provide uneven surfaces, cluttered environments and inconsistency of dropped-curbs).

As part of ensuring footways remain safe for pedestrians including Disabled & older pedestrians, we call for cycle infrastructure being renamed ‘micro-mobility lanes’. This would highlight that they are the correct places on which to use the wide range of wheeled mobility vehicles.

To this end cycle infrastructure also needs to be designed so it is accessible and safe for all users and all types of Micro-mobility vehicles. This must go hand in hand with prioritising the provision of consistently safe, accessible micro-mobility lanes.

c. Please explain your choices for using micro-mobility vehicles (or not) on cycle lanes and tracks, providing evidence where possible.

See above.

d. What impact do you think the use of micro-mobility vehicles on cycle lanes and cycle tracks would have on micro-mobility vehicle users or other road users?

An increase in the volume and variety of vehicles using existing cycle lanes may lead to congestion if cycle lanes are too narrow to allow vehicles of differing widths and going at differing speeds to pass each other safely. Some micro-mobility vehicles would not currently be able to use cycle lanes which have been designed around the ‘standard two-wheeled cycles’; this may cause difficulties for some micro-mobility vehicle users if they are unable to use cycle lanes which are too narrow or have an inappropriate camber. However, this issue is not exclusive to new forms of micro-mobility vehicles: many ‘cycle lanes’ are not accessible for non-standard cycles (e.g. trikes, cargo bikes). Local authorities should be given the necessary financial and guidance support to improve and maintain cycles/Micro-mobility infrastructure to a fully accessible standard (esp. addressing width / turning circles / camber / surface quality etc. entry and exit points etc.). Please refer to our [Guide to Inclusive Cycling](#).

Wheels for Wellbeing has contributed to the review of LTN02/08. Although we have not seen the final draft, based on an earlier draft we call for urgent publication of the reviewed guidance.

We also call for all publicly funded carriageway schemes to be legally required to build in safe and accessible micro-mobility (including cycling) infrastructure and that any central Government funding be made contingent on the reviewed guidance being followed.

Question 2.5 Mobility scooters and pedestrian operated street cleaning vehicles are already permitted on the footway. Should any other micro-mobility vehicles be permitted to use the pavement or pedestrian areas? If so, which types of devices should be permitted and in what circumstances?

Micro-mobility vehicles, if used as a mobility aid by a Disabled person, must be permitted on footways. This will ensure full accessibility of micro-mobility/active travel for Disabled people, with subsequent socio-economic/wellbeing benefits. The definition of a 'mobility scooter'/'invalid carriage' should be expanded to include all forms of micro-mobility vehicles when being used as a mobility aid by a Disabled person (including non-electric cycles).

An appropriate speed limit on footways (as currently applied to mobility scooters) will safeguard vulnerable pedestrians. Unless used as mobility aids by Disabled people, micro-mobility vehicles should not be permitted in non-shared pedestrianised areas, in order to safeguard pedestrians (esp. those walking at a slower than average pedestrian speed or unable to see/hear other footway users eg: people walking with little children; people with Visual impairments of all ages; pedestrians with balance issues; people using walking aids such as sticks, crutches, rollators; pedestrians with hearing loss, etc...).

Question 2.7 Are there other vehicle design issues for micro-mobility that you think we should be considering? Please provide examples.

We call for any width limit to be set at no less than 1.1m for all micro-mobility vehicles. All cycling and micro-mobility infrastructure (including parking facilities) should be designed to be accessible by all users of all types of micro-mobility vehicles (following inclusive design principles laid out in our [Guide to Inclusive Cycling](#)).

Section 4: Mobility as a Service

Question 4.7

a. What actions could help to ensure all sectors of the population can access Mobility as a Service applications?

Route planning apps:

To ensure that all sectors of the population can benefit from Mobility as a Service applications, route planning apps should provide detailed and accurate end to end journey accessibility information. For example, applications should have a "step-free" setting, which indicates not only whether a station has step-free access, but also whether the selected route to and from the station (for example, along a cycle-lane, or on a bus) has the same degree of accessibility (i.e. does not include sections where a cyclist must dismount, or whether cycles used as a mobility aid may be taken on a bus). It should also include detailed information regarding the facilities provided for Disabled people, for example the dimensions of lifts, dimensions and availability of designated spaces for mobility aids on trains/buses,

availability of ramps, assistance from staff at station/on transport; and should provide a means of requesting access to these facilities where necessary (e.g. request for ramp to be provided; reserving a space for a non-standard cycle on a train). This will mean that Disabled people can be confident that the route they select using a MaaS application will be fully accessible to them from start to finish. This requires all transport providers to make accessibility data available and app developers to integrate them into their journey planning apps. Any public funding of such app should be contingent on these features being at the heart of the app.

Cycle hire fleets (docked and dockless):

As part of their duties under the Equality Act 2010, any micro-mobility vehicle hire fleet should include as many accessibility features as possible on the standard issue vehicle, complemented by availability of adaptive on request versions. Non-standard versions should be made available through a booking / delivery /pick system to complement mainstream, on-street fleets. Disabled people and Disability organisations must be consulted in the development, testing and provision of accessibility features on vehicles and apps.

b. Who do you think should be responsible for delivering these actions (e.g. central government, local government, industry, or other)? Please explain why.

Transport providers and local authorities responsible for infrastructure should be responsible for ensuring that transport infrastructure is accessible and for making information about the status of accessibility features (available/out of order) available, accurately and in real time (on-site and online) eg: lifts/ramps/micro-mobility parking hubs etc.

MaaS application service providers should be responsible for integrating such accessibility information in their application.

Public funding of on-street docked/dockless fleets should be contingent on the whole hire scheme being accessible (including accessibility features on app and on mainstream fleet, complemented by parallel booking/delivery/pickup services of more specialised vehicles) and responsibly run (eg: actively discouraging pavement use/pavement parking through the use of technology, user education, fines etc.). .

c. What do you think the government could do to encourage, incentivise or enforce the delivery of these actions?

Approval and funding for Transport providers and local authorities responsible for infrastructure should be contingent on them ensuring that the transport or infrastructure is accessible in practice and on them making information about the status of accessibility features (available/out of order) available and accurate in real time (on-site and online) eg: lifts/ramps/micro-mobility parking hubs etc. as part of their duties under the Equality Act 2020. The MaaS application service provider should only be allowed to operate if they have integrated such accessibility information in their application as part of their duties under the Equality Act 2020.

Question 4.9

a. Can you provide any further evidence of the positive or negative impacts of MaaS on active travel and/or sustainable modes? Please provide examples.

In our latest survey of the experience of Disabled cyclists (soon to be published on our website), a fifth of respondents stated being refused access to a train with their cycle. There is demand from Disabled cyclists for multi-modal journeys but, combined with the absence of inclusive cycle hire options, the current situation limits Disabled people's choices. A wider

choice of legal, micro-mobility vehicles and an increase in accessible MaaS options (accessible way-finding apps / accessible cycle or e-scooter hire etc.) could dramatically increase the ability of Disabled people to travel actively and sustainably.

Question 4.10

Do you think guidance or a Code of Practice for the Mobility as a Service industry would be useful? If so, what content do you believe would be beneficial to include in a Code of Practice?

We think an enforceable Code of Practice for the Mobility as a Service industry would be useful.

This should include:

- Requirement for providing equipment which includes accessibility features as standard plus on request higher accessibility features (eg: e-scooters might have left or right hand controls as standard / adjustable handlebar height but the option of adding a seat as an “on request” feature). Public funding to MaaS companies (including dockless bikes providers should be contingent on minimum accessibility standards. Wheels for Wellbeing would be pleased to help develop such standards.
- As part of ensuring accessibility for all, it is crucial that any providers of dockless micro-mobility vehicle hire services take on responsibility for ensuring that vehicles are parked responsibly when not in use so as not to impede the mobility of Disabled pedestrians. Hire service providers should include clear guidance on parking dockless vehicles for users (on the vehicles and associated apps), and take on responsibility for removing any inappropriately parked vehicles and issuing fines for service providers and/or riders for non-compliance. For example, riders could be required to register a credit/debit card or pay a deposit when hiring a vehicle, and a fine deducted if the vehicle is found subsequently irresponsibly parked. Space should be reallocated, on carriageway, for dockless micro-mobility parking, using current car-parking spaces. A public education campaign on the importance of parking dockless micro-mobility vehicles responsibly in designated areas is also necessary.
- MaaS companies found not to abide by the code of conduct should be fined/their contracts should be terminated.

Section 5: Wider Issues

Question 5a.1 Can you provide evidence of how regulatory frameworks outside of the UK have explicitly sought to improve access to transport for people with protected characteristics?

Numerous urban authorities outside the UK have sought to use inclusive design principles in public transport and urban infrastructure to enable greater active travel by those with accessibility needs; enabling active travel becomes the first step to increasing it. Inclusive design is frequently introduced as part of a wider programme to improve urban transportation. Examples include:

- Ensuring accessibility of public transport for those using wheeled mobility aids and/or wish to take cycles onboard. Many municipalities have required public transport to have ‘low floor level’ access between pavements/stops and vehicles (e.g. Kaunas, Lithuania <https://www.eltis.org/resources/case-studies/ramping-infrastructure-walking-and-cycling-kaunas>; Lyon, France <https://www.eltis.org/discover/case-studies/lyon-putting-accessibility-heart-city-life>;

- Providing detailed, accurate, and real-time information on public transport in multiple formats, with specific services to provide information on door-to-door travel plans for those with accessibility needs (e.g. Lyon, France <https://www.eltis.org/discover/case-studies/lyon-putting-accessibility-heart-city-life>;) This often results in a greater uptake of public transport by the whole population.
- Improving pedestrian infrastructure to ensure that there are accessible pedestrianised routes to and from public transport stops (removing barriers, upgrading ramps, tactile surfaces at road crossings), in addition to ensuring that stops and the boarding of public transport are fully accessible to those with reduced mobility (e.g. Goteborg, Sweden <https://www.eltis.org/discover/case-studies/improving-accessibility-transport-goteborg-sweden>)
- Providing non-standard cycles for those with different mobility needs, both as part of public hire schemes (Warsaw, Poland <https://www.eltis.org/discover/case-studies/handbike-rental-warsaw-poland>; Nantes, France <https://www.bicloo.nantesmetropole.fr/assets/pdf/bikesVLD.pdf>) and as mobility aids as part of national health and social care provision (Norway, Denmark, Finland)
- This Dutch legislation, <https://wetten.overheid.nl/BWBR0029974/2015-01-01>, which translates as “Decision on Accessibility of Public Transport” is responsible for two major changes in the accessibility of Dutch railway stations. The first is all stations being accessible to the visually impaired, achieved in October 2017 (<https://www.iamexpat.nl/expat-info/dutch-expat-news/all-dutch-train-stations-now-accessible-visually-impaired>) and the second is an ongoing program to make all stations “independently accessible” to wheelchair users by 2030 (<https://www.prorail.nl/nieuws/zo-maken-we-stations-toegankelijk-voor-iedereen>).

Long-term, ambitious schemes commonly benefit from regular contact with and input from all stakeholders: the continuous and open exchange of information between all levels of government and non-governmental organisations, and a clear ‘road-map’ with well defined interim targets are key to the successful implementation and effectiveness of projects, especially when multiple modes of transport are involved. They are usually needs-based in their approach, and commonly show an awareness of how different aims intersect, for example the interaction of increasing accessible active travel, improving air quality, and improving the physical and mental health of communities.

Question 5a. 2 In your opinion, how can regulation of future transport technologies and services secure equitable access to transport for people with protected characteristics? Please provide examples.

The regulation of micro-mobility vehicles creates the opportunity to recognise the status of cycles and other micro-mobility vehicles as mobility aids for Disabled people and to legalise their considerate use on footways and in pedestrianised areas, establishing parity with other mobility aids such as mobility scooters.

This could lead to micro-mobility vehicles being added to the list of mobility aids which Train Operating Companies must be able to carry as part of their responsibilities towards Disabled travellers, making sustainable and active travel a realistic options for many more Disabled people.

Appropriate regulation of the use of micro-mobility vehicles on pavements (i.e. limited to when used by Disabled people) will ensure that the needs of other vulnerable groups are protected.

Transport technologies such as Mobility as a Service platforms offer the opportunity to encourage Disabled people to travel actively over longer distances, if they provide accurate information on the accessibility of different transport modes/routes which might form part of a multi-stage journey.

Given the fact that COST is a huge issue for Disabled when looking to acquire adaptive active travel equipment, we also call for a root and branch review of VAT around micro-mobility vehicles when used by Disabled people. Wheels for Wellbeing received large numbers of calls around this issue. The current situation is extremely confusing for end users and retailers alike.