

# **Mobility devices consultation presentation script**

V03 02/02/2026

## **Slide 1. Title: Mobility Justice**

Thanks everyone for coming today. I'm Kate. I'm a Campaigns and Policy Lead at Wheels for Wellbeing, and my colleague Ben is hosting the meeting and will be handling questions.

We've set up these webinars to talk about the government's consultation on regulations for mobility devices.

We're looking at how new regulations can provide equal mobility rights for all.

This is a whistle-stop tour of a complex area. There are loads more resources about this on our website, and a recording, transcript and the slides for this webinar are going to go up online.

On this slide there are drawings of people using different mobility devices. We're going to see all of these people again so we'll talk more detail about the devices they're using and how regulations treat each as we go through.

## **Slide 2. Housekeeping**

A bit of housekeeping first:

Chat is going to host only to avoid disrupting peoples access software.

Please put questions in via chat – we'll answer them after the presentation.

As there are aren't too many people in this meeting, we can open for spoken questions at the end too.

The webinar is being recorded - please switch your camera off if you don't want to be recorded and please say in text questions if you don't want your questions shared publicly including on any uploaded video of this webinar.

The webinar is one hour. The presentation will be around 40 minutes, which leaves about about 15-20 minutes for questions.

If there are a lot of questions we can extend the webinar for up to 30 minutes for anyone who wants to stay.

## **Slide 3. Contents**

Right, what are we going to cover today?

We'll start with what we need: Equal access to pedestrian and cycling or cycling-equivalent mobility for everyone.

Then some context: Where are we now, and how did we get here?

We'll look at factors needed for least restrictive, future-proof regulation to give everyone safe, equitable mobility options.

Then lastly, we'll link into the government's mobility devices consultation itself.

On the right of this slide we've again got people using different mobility aids, from a manual wheelchair user using a long cane to people using a rollator and assisting children.

#### **Slide 4. The right to be a pedestrian**

Equal mobility aid regulations need to recognise two key rights.

First, everyone needs the right to move as a pedestrian.

Disabled people must be regarded in law as pedestrians while we're using mobility aids at pedestrian speeds in all pedestrian spaces.

Thinking about safety: we already have regulations that prohibit dangerous or antisocial behaviour by pedestrians, which apply equally to people using mobility aids.

What would equal pedestrian rights mean?

They'd provide the right to use aids that:

Enable us to move independently indoors and outdoors, on a wide range of surfaces;

To support friends and family who needs help moving around. Disabled people are often carers;

To keep up with people we're with, especially with children and adults we're caring for;

To transport our children, our shopping, our luggage, any equipment we need;

To hurry away from danger, and to keep people safe;

We need to be able to make trip at the same sorts of speeds that non-disabled pedestrians can.

On the right of this slide there's a powerchair user pulling wheely luggage behind them. That's illegal – trailers on "invalid carriages" are presently forbidden.

There's someone using a manual wheelchair with a front power attachment, accompanying a child using a scooter.

Somebody who's walking using an e-assist rollator,

And someone who's using a recumbent tricycle, which takes us onto:

## Slide 5. The right to cycling and cycling-equivalent mobility

Second, we need the right to cycling and cycling equivalent mobility.

This is similar to the right to pedestrian mobility, but it's important to separate the two because in spaces reserved for pedestrians, only pedestrian-speed mobility should be allowed, whatever devices we're using.

So, Disabled people must have the right to use our mobility aids at cycling or cycling-equivalent speeds in all cycle permitted spaces.

That doesn't mean every aid will be able to go at cycling-equivalent speeds, but we need to be legally able to choose higher speeds when we have suitable aids, in spaces where cycling is legally permitted.

Again, laws against dangerous or antisocial behaviour apply equally to mobility aid users.

The rights we need for cycling spaces are basically the same as for pedestrian spaces – emphasising that we need to be allowed to move through pedestrian spaces at pedestrian speeds on all mobility aids that are capable of higher speeds: If we can't dismount and push our mobility aid, we need to be able stay using it slowly through pedestrian spaces, otherwise we can't make journeys at all.

On the right of this slide there are drawings of three older children, using a power chair, a manual wheelchair with a power attachment and a bicycle. They all look early secondary school age, when most children can make trips independently – but children who need powered aids can't legally go above 4mph in public spaces until they're 14.

Below the children there are two people using an in-line tandem mobility scooter – also illegal in public spaces.

We'll talk more about these restrictions later. But first, a look at how we got here:

## Slide 6. A bit of history – 1930

In 1896, motor cars were first allowed to go faster than walking speed.

30 years later, 5000 or so people per year were dying in crashes.

There were tens of thousands of Disabled ex-service personnel needing mobility aids after World War One – some formed the Disabled Drivers Motoring Association which campaigned for driving access and rights – and simultaneously, some people were campaigning for all Disabled people to be banned from all driving.

So. In 1930, the Road Traffic Act removed all car speed limits.

Driving tests were introduced, but only for Disabled people,

And the "invalid carriage" was defined in law.

“Invalid carriages” were given a 20mph speed limit, users had to be at least 16 and have a driving licence.

This was the first time any vehicles were explicitly restricted to Disabled people only – the “invalid carriage” definition is almost unchanged today:

“Invalid carriages are mechanically propelled vehicle vehicles the weight of which unladen does not exceed five hundredweight - that’s about a 254kg - and which are especially designed and constructed, and not merely adapted, for the use of persons suffering from some physical defect or disability and are used solely by such persons.”

Notice that word “persons” – which implies you could have multi-person aids.

Now, we’re not talking about wheelchairs or mobility scooters here.

We’ve got three pictures below of the popular Argson invalid trike. As the advert bottom right says, this was available in hand, motor and electric versions. It looks like a big motorbike with three wheels and an arm chair on top. It’s got a number plate, a huge cartoonish front lamp, and lever controls.

Motor “invalid trikes” didn’t have speed restrictors. They could go well above 30mph. Modernised versions of these – “invacars” – were in use into the 1990s - these motor vehicles are what our “invalid carriages” laws were designed for.

### **Slide 7. A bit of history – 1948**

Now we’ll skip after the Second World War to 1948. War, industrial injuries and polio epidemics meant thousands of newly Disabled people needed and were campaigning for mobility options. The government was already providing a lot of these invalid trikes, largely to try and get Disabled people into work.

Then in 1948, the NHS was founded – the government took on even more responsibility for providing people with mobility aids.

### **Slide 8. A bit of history - 1960**

There was a lot more campaigning through the 1950s especially by people needing multi-person devices – “I need to transport my children”, “I need to transport my assistant”, “I need to take my spouse with me”.

And in the late 1950s, small powered wheelchairs we’d recognise today were invented.

And so, in 1960 the new Road Traffic Act changed the definition of an “invalid carriage”.

The word “persons” was changed to “a person”.

After all that campaigning for multi-person vehicles, the option for multi-person devices was carefully removed.

## Slide 9. A bit of history – 1970

So, more campaigning! – on all sorts of topics, like housing, healthcare, employment and education as well as mobility.

The 1970 Chronically Sick and Disabled Persons Act covered a huge range of provisions for Disabled people.

It led to the Motability scheme a few years later, and brought in Disabled parking badges – Disabled people were getting relatively equal access to motor vehicle mobility, at least on paper.

Section 20 of the Act covered personal mobility, paired with the 1970 Use of Invalid Carriages on Highways regulations.

These laws started the “invalid carriage” regulations we’d recognise today.

Use of unpowered wheelchairs was now restricted to Disabled people only – that wasn’t the case before 1970.

And these laws introduced the first powered vehicle category which could be used without a driving licence, with 4mph maximum speed.

Before these laws, we didn’t even necessarily have the right to use an unpowered wheelchair on a pavement, but now, Disabled people had the right to use single-person, powered and unpowered low-speed aids on pavements, footpaths and bridleways as well as on roads.

## Slide 10. A bit of history – 1983

Bear with me here, because we’re going to look at cycling regulations.

In 1983, the Electrically Assisted Pedal Cycles Regulations were introduced. This law legalised powered mobility devices which could have any number of wheels, carry any number of people, have trailers, and be powered at speeds up to 15mph by people without a driving licence on roads, cycle tracks and bridleways.

## Slide 11. A bit of history – 1988

Right. 1988 and it’s the new Use of Invalid Carriages on Highways Regulations.

This is still law today.

It defined unpowered wheelchairs as class 1;

Powered aids with maximum speed 4mph as class 2;

And introduced the class 3 category, which people aged over 14 could use on roads at up to 8mph without a driving licence.

There are a lot of restrictions on class 3 devices. But for now – these regulations didn't come close to giving Disabled people needing powered aids the same mobility as non-disabled people using e-cycles.

### **Slide 12. A bit of history – 1995**

Seven years on, the Disability Discrimination Act was passed, again after massive campaigns by Disabled people.

This was a hugely important law.

Then the Public Service Vehicles Accessibility Regulations in 2000 gave a right of access to buses for smaller mobility devices – government-commissioned research from 2022 found only about half of all wheelchairs and mobility scooters fit public transport size requirements.

### **Slide 13. A bit of history - 2010**

In 2010 the Equality Act and the Rail Vehicle Accessibility Regulations were passed.

We gained the same access rights for trains as we'd gained a decade earlier for buses and coaches.

A small alteration to "invalid carriages" rules in 2015 allows for necessary user equipment up to an unladen total device weight of 200 kg just for class 3 in England and Scotland, and for all devices in Wales.

That's an important change for people with complex health needs – and means children in Wales are better able to access legal aids that meet their needs than children in England or Scotland.

### **Slide 14. A bit of history – 2026**

So now to 2026.

This is the first real reconsideration of mobility aid laws in half a century, and the first since we gained equality and discrimination laws.

Current mobility aid laws are denying Disabled people equal access to pedestrian cycling and cycling-equivalent mobility. We simply don't have the same rights that non-disabled people do to move about.

And this is a chance to transform things for the better.

### **Slide 15. New rules – same old inequality?**

What has the government has promised to do?

Under the Equality Act, the government are required to make all reasonable adjustments to achieve equality of access for disabled people.

This is an anticipatory duty. It has to be done before anyone experiences discrimination, and it requires all reasonable physical changes and changes to rules, policies and procedures to be made to facilitate equal access for Disabled people

The Public Sector Equality Duty goes further. The government are required to have due regard to the need to advance equality of opportunity for Disabled people – really promoting access for Disabled people.

The United Nations Convention on the Rights of Persons with Disabilities says:

“states party shall take effective measures to ensure personal mobility with the greatest possible independence for persons with disabilities, including by facilitating the personal mobility of persons with disabilities in the manner and at the time of their choice, and at affordable cost;

and by facilitating access by persons with disabilities to quality mobility aids, devices, assistive technologies and forms of live assistance and intermediaries including by making them available at affordable cost”

We're not close to meeting these requirements with current regulations.

We need new mobility aid regulations, and they must be made to meet the requirements of the Equality Act and the United Nations Convention on the Rights of Persons with Disabilities.

## Slide 16. Grey areas, misunderstandings and bans

Now we'll consider grey areas in rules, misunderstandings and bans.

When we're talking about the need for better regulations, people often say, “well, nobody's going to enforce that rule – just do it anyway”, or “I don't think that's the rules – I think this is the rules”, or “aren't there more important things to work on?”

We need to make it really clear that unclear laws, discriminatory bans and misunderstandings harm people.

On the right, a graphic says “Careless Laws Cost Rights”: that's what unclear, discriminatory laws do. The graphic has people using different mobility aids coming out through prohibition signs like the Ghostbusters logo.

What harms are happening? Let's have a couple of examples.

In government guidance, it says class 2 powered aids can't be used on road if there's a pavement. The Highway Code disagrees, and we're pretty it's not right either – but mobility aid users have told us they have to use the pavement, even when the pavement is dangerously broken, steep or obstructed – and next to an empty, smooth carriageway.

Other people believe their powered aids are “class 1” – but that's unpowered devices only. People are understandably confusing medical device categories with “invalid carriage” categories, so some people with high-speed-capable devices are using

them – in ways that we think should be legal – in public spaces, and not realising they're putting themselves at risk of legal action and confiscation of mobility aids.

Discrimination is happening: people with safe, legal devices are being refused access into public transport, services and even into their own homes.

Risk of enforcement and discrimination makes getting around much more difficult.

And lack of safe products forces people to take risks – at the moment there aren't commercially available devices to carry children on or attached to mobility aids. We know one organisation think there's enough of a grey area that if you attach a pushchair to the front of a wheelchair it's neither a trailer nor a two-person device, but leaving the law worded like this is dangerous and discriminatory.

Our current regulations need sorting out.

### **Slide 17. Mobility for all – risks vs benefits**

Let's look a bit more closely at risks.

Sometimes people say, "I don't think that should be allowed, because I would feel unsafe doing it", or "I don't think that should be allowed, the person doing it might get hurt", or "if Disabled people are allowed to do that, someone else might get hurt".

Let's think about those points.

First – Rights aren't requirements. You don't have to use rights, but you don't have a right to ban other people from things just because you don't want to do something, or even to keep those people safe.

We know many people choose not to cycle because of safety concerns. That's completely reasonable, and doesn't affect what anyone else can choose to do.

Then, we often celebrate and incentivise individual risk-taking – we fund high-level sports despite knowing athletes get injured, and celebrate people doing extreme adventuring like crossing the Antarctic. We don't ban these activities. We also shouldn't be banning people from using mobility aids that would let them go to the supermarket with their partner and grandchildren in a misguided attempt to protect people.

And lastly, we need to remember that both direct and indirect risks matter.

Here we've got a picture of somebody who's using mobility scooter with a child trailer towed behind it, shown as an alternative to the same people using a car for their trip.

If more people use mobility devices, then more incidents involving mobility devices are likely to happen.

But what about the risks that are reduced at the same time? Better mobility is likely to help more people live healthier lives, support their families, make community connections. This benefits everyone – including people who don't use mobility devices, especially where having suitable mobility devices enables people to use

small, lightweight, low speed, zero-emission devices instead of using cars and SUVs for trips. Better mobility aid options can help people stop or reduce driving, especially older people who are losing the capacity to drive safely.

We need to both mitigate risk from use of mobility devices and recognise the huge harms caused by preventing people from having access to suitable pedestrian and cycling-equivalent mobility options.

Risk assessment starts with presuming we all have capacity to make reasonable decisions.

### **Slide 18. Mobility for all – presumption of capacity**

In decision-making involving Disabled people, there's often an assumption that Disabled people need to be prevented from hurting ourselves or others, in a way that doesn't happen when decisions are being made about activities that are expected to be mostly carried out by non-disabled people.

So, mobility aid laws have barely changed in half a century, but autonomous vehicles and e-scooters are being legalised at speed.

It's discriminatory to prevent a large number of Disabled people from accessing pedestrian and cycling or cycling-equivalent mobility in order to prevent small number of disabled and non-disabled people from behaving in ways that put others at risk.

By default, all Disabled and non-disabled people have the capacity to make our own decisions.

Parents, carers and relevant professionals judge when a child has capacity to make their own decisions in different areas.

If an adult is thought not to have capacity, professionals assess them, then appointed supporters are responsible for keeping a person who lacks capacity safe, and for ensuring they don't endanger others.

And again, if people who have capacity behave antisocially or dangerously towards others, then they can and should face civil or criminal penalties.

Disabled people are best placed to determine which aids are best for us.

On the right of this slide we've got people using two devices that are legal and a third that is not. Someone is riding a bike with a child seat on the back and a child being towed in a trailer behind. Someone is pushing a double buggy, and our friend from the last slide is using a mobility scooter towing a child trailer behind it. The mobility scooter user is breaking the law.

Our regulations currently treat mobility devices a lot like little motor vehicles – except even motorbikes are allowed trailers. Devices designated for Disabled people are restricted in ways that devices designed primarily for non-disabled people are not.

A default assumption that Disabled people lack capacity to make decisions has led to discriminatory regulations.

## Slide 19. Mobility for all – relevance of impairments

The assumption of capacity is really important, so we'll go into a bit more detail.

On the right, there's a graphic saying "the right to choose mobility aids should be no more controversial than the right to choose shoes". A person is pointing at lots of different shoes and different mobility aids.

With mobility aids, we're mostly talking about pedestrian rights – the right to walking-equivalent mobility. That must not be restricted in law for anyone, whatever our impairments. Requiring tests or excluding any group of Disabled people from powered aid use would exclude some people from all independent movement.

And there are safe, powered and unpowered aids out there for everyone.

There are multi-person aids like tandems, triplets and people or wheelchair-and person transporters. They're brilliant for supporting people who aren't able or don't want to travel independently some or all of the time.

We have supported use aids, so ones where you can connect together in trains or where somebody can help another person use the aid.

And we have collision and hazard avoidance technology, similar to what cars can have, so people with impairments that make it difficult to control an aid fully all the time can't go off a kerb or a steep gradient by mistake, and can't bump into anything or anyone.

There is no reason to legally restrict mobility aid use based on impairments, any more than we legally restrict walking or cycling based on impairments.

## Slide 20. Mobility for all – disability status

But we also restrict "invalid carriages" to Disabled people only – while comparable devices with really similar functions aren't recognised formally as mobility aids.

Looking at the right of the slide, we've got five people using aids:

Top left, using a small mobility scooter, legally a class 2 "invalid carriage", which can be used on pedestrian-permitted spaces and on road at up to 4mph.

Top right, using a manual wheelchair with e-assist hand cycle attachment – which is legally a cycle, not permitted on pavements but permitted on all cycle-permitted spaces at any speed, including cycle tracks, cycle lanes, bus lanes, bridleways and restricted byways.

Bottom left, using an assistant propelled manual wheelchair – legally a class 1 aid, useful, but not good on tricky terrain or for longer distances. The assistant is at risk

of injury especially on uneven pavements or soft ground, and if they are Disabled, as is often the case.

Bottom middle, using a folding bicycle with crutches attached – again, that's legally a cycle.

And bottom right, using a sit on e-scooter very comparable to the class 2 mobility scooter – but this is currently illegal in public spaces.

So, the restriction of “invalid carriages” to Disabled people only and the lack of recognition of more diverse comparable devices as mobility aids is really limiting access to practical, cost-effective mobility, and physical activity for Disabled people.

Using an “invalid carriage” is stigmatised – Surewise have done some great investigation of the harassment and abuse people using mobility scooters face. Many people avoid using devices they need or avoid making journeys because of the risk of harassment and abuse – both when using “invalid carriages” and when using devices that aren't widely recognised as mobility aids.

Non-disabled people who need to use aids are barred from use – which will become more important when multi-person devices are permitted, but really, why are we restricting use of small, low-speed, low-carbon mobility devices that are comparable to cycles and to micromobility, which we understand is soon to be legalised? Couldn't devices like mobility scooters used on roads and cycle infrastructure help more non-disabled people switch trips from driving to safer, more community-scale options?

And so the market for mobility devices is being kept artificially small. That keeps prices high, and stifles innovation, quality and diversity of available devices.

## Slide 21. Mobility for all - age

Now we're going to have a look at some different criteria around device use.

First, age.

Age restrictions come up a lot in the government consultation.

So let's think about what we need mobility devices to enable.

We need young people to be able to play, learn and gain independence; to make journeys with friends, family and alone. Young people need to be able to move on made surfaces and uneven and soft surfaces too, at walking, running and cycling speeds. Remember under-14s who need power to move currently aren't allowed to go at above 4mph in any public spaces.

Then, working-age people often have caring responsibilities for other people of all ages. Working age people often need to trip chain, like in the graphic:

There's a person using a powerchair with a pram attached, assisting a child who's on a balance bike next to them; a person using an e-assist cargo trike with four children in the front compartment, and our friend the person using a mobility scooter with a

child trailer on the back. All these people are saying the sort of thing I'm sure many of us will recognise:

"Nursery drop-off... school... work... prescriptions... pick up kids... visit auntie... home for dinner... swimming... bedtime – no problem!"

We all need to make our journeys in a timely fashion. We need regulations that enable Disabled people to make trips in the same timeframes as non-disabled people.

And we need to ensure older people are considered, people who are often experiencing increasing levels of personal impairments while caring for others of all ages. Older people often need to stop or reduce driving while maintaining independence and function.

How do we ensure Disabled people of all ages have equal mobility options compared to their same-age peers?

We need to remove age, passenger number and towing restrictions from mobility devices, and we need to allow cycling-equivalent powered speeds for mobility devices, in spaces where cycling is permitted.

## **Slide 22. Mobility for all – moving in groups**

We've looked at multi-person aids, but we also need to be able to move in groups using different aids or none, supporting each other.

An accompanied group is where the combined need of group members means the group can't split up safely.

On the right, there are pictures of the same accompanied group walking/wheeling and cycling.

Top right, there's an adult using a mobility scooter, an adult pushing a double buggy with two babies, and a child using a scooter.

The person using the mobility scooter can support the child, for example staying between them drivers, but may need support at junctions, for example maybe they can't judge vehicle speeds.

Bottom left, the same group now has the child cycling and the adult who had the double buggy riding a bike with a baby seat on the back and the other baby towed in a trailer.

The person on the mobility scooter is still supporting the child, and still may need assistance themselves. This group can't split up, whether they're walking/wheeling or cycling.

For mobility equality, we need to move in accompanied groups the same size that could travel in a car – so, anywhere from two to about eight people.

## Slide 23. Mobility for all – public space rules

In public space rules we're bringing some ideas from earlier together.

Disabled people need to be able to complete trips at comparable speeds to non-disabled people.

We need to be able to move at safe speeds for the locations we're in, leave our mobility devices in safe places, and be trusted to use our judgement to keep ourselves and others safe. We already trust mobility aid users to slow to appropriate speeds: On busy pavements, shopping centres, train and bus stations, typical speeds will be 1-2mph, tops – and almost all mobility device users slow down with no problems, just like most pedestrians do.

In some spaces we need to go faster. In the picture on the right there's someone using a manual wheelchair with a power attachment under a street light. It's dark, and a group of people are standing worryingly nearby. It's great there's more talk about safety for women and girls making journeys at all times: Disabled people are at increased risk of assaults, harassment and being hit by drivers – we need to be included in all safety considerations, with running-equivalent and cycling-equivalent options to get away from danger, whatever the cause.

And again, we need to continue to apply the same rules against antisocial and dangerous behaviour in public spaces to everyone.

## Slide 24. Mobility for all – device specifications for access

We've looked at rules – now what about device specifications for accessing different spaces.

Least-restrictive, future-proof regulations need to ensure devices used in public spaces are safe, without unnecessary criteria.

We think it makes sense to have maximum weight limits: Ramps, lifts and vehicles have safe maximum loads, and we need to use standard infrastructure to get around.

Maximum dimensions make sense too.

We think we need more than one device class based on dimensions, because we need different device sizes for different purposes.

So, for example, the smallest class would be devices with dimensions where users have the right to access everywhere.

Then a larger specification for devices which with a right to access public transport and public venues,

And an even bigger outdoor devices category too.

On the right there are pictures along the top of people using small devices which would go into the "right to access everywhere" category – a small mobility scooter, a

folding cycle, a sit on a scooter, a wheelchair with a power attachment and a powerchair.

Then along the bottom, big outdoor devices – a recumbent trike, a side-by-side tandem tricycle and a mobility scooter that has a child trailer attached – that would need just separating to have right of access in small spaces – and a tandem mobility scooter. You'd usually expect to leave devices this big in cycle parking when you get to a destination.

We think it makes sense to set maximum powered speeds for mobility devices, aligning with e-cycles or e-scooter maximum powered speeds,

To have clear braking requirements – like the current e-scooter trials braking requirements,

And lighting requirements at night, just as cycles have now.

## Slide 25. Mobility for all – product safety specifications

Device specifications for access rights are different from product safety regulations, which can be much more detailed and specified differently for different types of devices.

People buying or being provided with devices must be able to check how they should work.

That especially applies to things like electrical safety, so batteries, motors and chargers, to hazard avoidance especially brakes, and stability, and to how features like speed limiters should work.

Putting detailed specifications into public spaces regulations ends up with outdated, unreasonably restrictive requirements.

We need up-to-date safety and performance requirements for certification of different devices to be publicly available, in accessible formats.

In the pictures here, top left we have two people using an e-assist tandem with a detachable wheelchair – that's a Van Raam O-Pair, which is a cycle version of a "train"-type connectable mobility device. And it is, of course, legal to use already. There's a case study of a family using one on our website. And this also shows how a non-disabled person may need to use a mobility device with a Disabled person.

Top right we have an adult and child riding bikes connected with a towbar – again, a legal, separable mobility device which enables travel on roads or for longer journeys until they're somewhere the child can travel independently, when the devices can be separated.

Bottom left we have the person using a powerchair with luggage towed behind – again, at the moment that's illegal.

And bottom right, the person using an e-assist rollator with shopping capacity – another really useful innovation.

We need to ensure regulations don't block safe devices that are enabled by new technologies.

## Slide 26. Consultation – class 3 “invalid carriage” requirements

OK, so we're going to look a bit more directly at the consultation contents.

There's a lot about aligning requirements for power attachments and cycles with class 3 requirements, and we need to make it really clear that that's just not possible or reasonable. For example, devices that can freewheel like cycles and some new e-assist devices, can't have speed restrictors.

As well as 8mph maximum speed and 4mph restrictor switches, class 3 devices must have indicators, hazard warning lights, a rear view mirror, a horn, carry 1 person only, no trailers, fixed front and rear lights, a speedometer, brakes and reflectors. They're restricted to Disabled people aged 14+ only, and require DVLA registration.

Very comparable tricycles require almost none of that – they need working brakes, lights at night, and if they're e-assist have minimum age 14 and maximum powered speed of 15.5mph.

Government guidance says it's not permitted to use class 3 devices on cycle lanes or bus lanes.

Class 3 devices must stay at 4mph or less on other cycle-permitted spaces including cycle tracks, bridleways and restricted byways.

We're putting resources with details on these restrictions on our website soon.

Class 3 regulations are simply not fit for purpose.

## Slide 27. Consultation – achieving positive legal changes

We believe the point of the consultation is to achieve inclusive, equitable, future-proofed mobility aid regulations.

We think this can happen, rapidly.

The upcoming Low Speed Zero Emission Vehicle framework could be used to provide legal recognition for all pedestrian and cycling-equivalent devices as mobility aids when used by a Disabled person to assist with or replace pedestrian movement.

And the framework could implement equal access rights for mobility aid users with non-disabled pedestrians in all pedestrian-access spaces, and with non-disabled cyclists in all cycle-permitted spaces.

Value added tax exemptions for current “invalid carriages” are really important – specialist powerchairs can cost £30,000, and the people who need these generally don't have other mobility options. We think a way to ensure VAT exemptions are retained could be to keep the “invalid carriage” regulations – a name change to

“mobility device” would be nice – and even better, to extend this VAT-exempt category to all mobility devices that are certified as class 1 medical devices, as is the case in many other countries.

## Slide 28. Consultation – questions and topics

The last thing we’re going to do is run through where everything in this presentation fits into the government consultation questions.

This slide is chaos!

That’s because the consultation questions are a bit all over the place, in terms of the concepts they cover.

There are lots of important themes in the consultation, and we have detailed resources on our website to help everyone with responding. We’ll be sharing our fully-referenced, question-by-question consultation response once it’s ready.

So.

Questions 1 to 6 cover issues around defining mobility devices, including problematic ideas about splitting access rights for those with and without judged “clinical need”, as well as looking at changing the term “invalid carriage” and about the Disabled-only restriction of devices.

Then age restrictions appear in questions 8-9, 18-19, 20-23, 24-27 and 28-30 – that’s direct references to restricting by age, but also indirect restrictions via anything to do with class 3 restrictions.

Device specifications are in questions 10-13, 14-17, 20-23, 24-27 and 28-30, considering weight limits, class 3 requirements and access rights to different spaces.

Safe use of spaces and permitted use locations are in questions 1-2, 8-9, 14-17, 24-27 and 28-30, again, looking at access rights and permitted speeds – and needing a focus on presumption of competence.

And risks and benefits of changing mobility regulations are in questions 1-2, 17, 19, 20-23, 24, 27 and 30 – the consultation is skewed to consider device-specific risks, not direct or wider benefits, which are really important.

And the goal here is regulations that allow equal access to mobility for all Disabled people.

## Slide 29. Thanks for listening

So, thanks everyone for listening. We’re putting up lots of resources including details on where everything we’re saying comes from and a lot more background on mobility aid regulations and their effects on our Every Journey Everyone campaign page. The QR code goes to that page.

Now, I'll just stop screen sharing, pop my camera back on, and do we have any questions or comments please?