# Future of Transport Regulatory Review

## RoSPA's Response to the Department for Transport's Call for Evidence

Date: May 2020

Response to Department for Transport's Call for Evidence: Future of Transport Regulatory Review

## Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport's call for evidence on future of transport regulatory review. It has been produced following consultation with RoSPA's National Road Safety Committee.

The Department for Transport is asking for information and views on three areas of the 'Future of transport regulatory review'. The three areas are micromobility vehicles, flexible bus services and mobility as a service (MaaS). This call for evidence asks whether certain micromobility vehicles (such as electric scooters) should be permitted on the road, and if so what vehicle and user requirements would be appropriate. It also asks how effective existing rules are around flexible bus services, and which other areas of the bus, taxi and private hire vehicle framework should be considered in this review. Finally, the call for evidence asks what the opportunities and risks of MaaS platforms might be, and what role central and local governments should play in their development.

## About you

### Question 1.1
### Are you responding as an individual or on behalf of an organisation?

#### RoSPA Response

On behalf of an organisation.

### Question 1.2
### If you are responding on behalf of an organisation, what is your organisation's name?

#### RoSPA Response

The Royal Society for the Prevention of Accidents (RoSPA).

### Question 1.3
### Which category best describes your organisation?

#### RoSPA Response

Charity or other Non-Governmental Organisation.

### Question 1.4
### Are you happy for your response to be published?

### RoSPA Response
RoSPA is happy for this response to be published and attributed.

### Question 1.5
### Would you like to be contacted when the consultation response is published?

### RoSPA Response

Yes.

### Question 1.6
### How did you hear about this consultation?

### RoSPA Response

Media reports.

Response to Department for Transport's Call for Evidence: Future of Transport Regulatory Review

# Micromobility

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

### RoSPA Response

RoSPA believe that with the right regulatory framework, some micromobility vehicles such as e-scooters, could offer benefits for individuals and society.

However, as with any new technology, there are potential risks to consider as well. Safety must be a priority. Any vehicle being used on the road presents a risk to the user and to other road users, particularly vulnerable groups such as cyclists and pedestrians. Any regulation must provide suitable protections against these risks. Considerations include whether micromobility vehicles are physically robust and safe by design; whether users have the skills to use them safely; how micromobility vehicles interact with other vehicles, road users and pedestrians; and how liability is handled when collisions occur. These issues must be considered and solutions developed before micromobility devices can be safely used in the UK.

There is a danger of assuming that all micro mobility vehicles are the same and hence should come under the same regulatory framework. For example, some of the vehicles shown in figure B; the self-balancing type and the electric skateboard are very different to an e-scooter, not having a handlebar and RoSPA would not recommend that these be allowed onto the road. Before allowing self-balancing and electric skateboard type vehicles on to the road we would like investigation into their handling to see whether their current design standard is appropriate for mixing with traffic.

RoSPA does not consider the method of braking and propulsion of an electric skateboard to be suitable for use on the road, this is via a hand held device. The user requires a high level of competence to safely control the vehicle making novice riders particularly susceptible to fall off injuries.

E-bikes are referred to as Electrically Assisted Pedal Cycles (EAPCs) in UK legislation. One way to differentiate micromobility vehicles would be by creating a new category analogous to EAPCs which are not treated as motor vehicles in the RTA 1984, class 140. For example, this could be called 'Electrically Powered Standing Scooter' EPSS, defined as: 'scooter with two wheels in line, propelled by an electric motor, designed to be ridden by a single rider in a standing position, with braking and propulsion controls fitted to a handlebar in front of the rider'. This would therefore, exclude segways, electric skateboards and self-balancing vehicles as shown in figure B from use on the road. It would also allow e-scooters to be regulated at a slower speed than permitted for an e-bike.

RoSPA is happy that legislation is beginning to catch up to the modernisation of our roads, but it is important that this is done in a properly-regulated way with appropriate measures to ensure that users of micromobility vehicles and other road users are safe, and sufficiently integration into the existing transport infrastructure.

## Question 2.2
## If you can, please provide evidence to demonstrate the potential benefits and risks.

### RoSPA Response

Micromobility vehicles offer a new way of moving around. They can make journeys quicker and easier, particularly where there are limited public transport alternatives. They could provide a substitute to making short journeys by car. However, RoSPA are concerned that people may choose micromobility vehicles such as electric scooters over more active modes of travel, such as cycling and walking. There is currently little evidence from countries where e-scooters are allowed to show a modal shift either away from motorised transport or away from walking or cycling. If the regulations are changed to allow the use of e-scooters on the road, RoSPA would like further research to show whether there is a positive benefit.

If journeys by micromobility vehicles replace those that would otherwise be made by car, this could help reduce carbon emissions from road transport and improve air quality in towns and cities. Traditional motor vehicles are inherently inefficient due to the fact they use lots of energy in order to pull their own weight – one kilowatt hour (kWh) of energy allows a petrol-powered car to travel less than a mile. For example, when using an electric scooter, one kWh provides 80 miles of travel. Coupled with their reduced usage outputs due to an electric motor, they are much more energy efficient and environmentally friendly to use. When the inefficiencies of motor vehicles are paired with congestion, a problem that is rife in cities, there is a huge environmental impact. The Royal College of Physicians estimate that deaths due to exposure to air pollution result in a social cost of £20 billion per year[1], and 80% of the concentration of nitrogen oxides (significant environmental pollutants) at the roadside are caused by road transport[2].

As well as being cheaper to purchase than traditional motor vehicles, micromobility devices do not depend on traditional fuels, allowing them to have much lower running costs. Therefore, they result in affordable travel, meaning more members of the population can access transport[3] – a large scale survey in the US found that lower-income groups were more supportive of electric scooter sharing services than the rest of the population[4]. Micromobility vehicles are also more accessible in terms of the fact a license is not typically required to use them.

[1] Royal College of Physicians. Every breath we take: the lifelong impact of air pollution. https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution Updated February 2016.
[2] Gov.uk. Air quality plan for nitrogen dioxide (NO2) in UK (2017). https://www.gov.uk/government/publications/airquality-plan-for-nitrogen-dioxide-no2-in-uk-2017. Updated October 2018. Cited by: Department for Transport. Future of Mobility: Urban Strategy.
[3] Department for Transport. Future of Mobility: Urban Strategy. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/786654/future-ofmobility-strategy.pdf Updated March 2019.
[4] Clewlow R. The Micro-Mobility Revolution: The Introduction and Adoption of Electric Scooters in the United States. Transportation Research Board. 2018;1(1):1

As they are smaller than conventional vehicles, they may also reduce congestion. Motor vehicles, particularly cars, are incredibly popular in cities. With 74% of adults possessing a driving licence, and 87% of UK motorists agreeing that their current lifestyle requires a car[5], congestion is becoming a huge problem. As well as the serious environmental impact congestion is having, there is also an impact on the economy – the time lost due to congestion costs the UK economy approximately £2 billion every year[6]. The 2017 British Social Attitudes Survey found that 56% of respondents perceived congestion in towns and cities to be a serious or very serious problem[7]. The use of micromobility vehicles could make a significant difference to city congestion, particularly when used for the last part of an individual's commute: 46% of US car traffic is caused by individuals on journeys less than 3 miles long[8].

Micromobility vehicles can also provide new transport choices for some disabled or older people, for example, for those who are less able to walk medium to long distances and otherwise may use a car. However, this needs to be balanced against concerns about the possible negative impact of micromobility vehicles on older or disabled people. There are apprehensions about those riding on the pavement causing problems for these groups, and about the risk of obstruction and littering from poorly parked micromobility vehicles, such as hired electric scooters. Drawing on experience of other cities with dockless hire schemes for electric scooters, there have been discarded electric scooters across pavements and paths as they can be left anywhere. This clearly poses a trip hazard and presents challenges for pedestrians especially those with visual impairment.

There are also concerns that the same design that makes electric scooters and other micromobility vehicles portable, light and efficient means they offer less protection to the user. For example, electric scooters consist of a thin piece of metal between two small wheels with the user being just inches from the road surface, which could result in a significant risk of traumatic injury on the road[9]. Electric scooters are small, quiet and relatively quick (20km/h typically)), meaning they present unique safety challenges, particularly when being considered for use on UK roads. Many come with 100-110mm wheels which not appropriate for tackling pot holes, posing discomfort to the rider if not a major safety risk. Between 2007 and March 2018, 400 cyclists were killed or seriously injured in the UK due to poorly maintained roads[10]. A similar picture may emerge if electric scooters

[5] Gov.uk. (2018) Transport and transport technology: public attitudes tracker. https://www.gov.uk/government/publications/transport-and-transport-technology-public-attitudes-tracker.

[6] Department for Transport. Road Investment Strategy: Overview. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/382808/dft-risoverview.pdf Updated December 2014.

[7] Gov.uk. British social attitudes survey (ATT03). https://www.gov.uk/government/statistical-data-sets/att03-attitudesand-behaviour-towards-roads-and-road-travel#congestion-car-driving-and-the-environment Updated July 2018.

[8] Ajao A. Electric Scooters and Micro-Mobility: Here's Everything You Need to Know.

https://www.forbes.com/sites/adeyemiajao/2019/02/01/everything-you-want-to-know-about-scooters-and-micromobility/#43777d565de6 Updated February 2019.

[9] Choron R, Sakran J. The Integration of Electric Scooters: Useful Technology or Public Health Problem? American Journal of Public Health. 2019;109(4):555.

[10] CoMoUK. Two Wheels Good? CoMoUK E-Scooter Position Paper. https://como.org.uk/wp-content/uploads/2018/11/CoMoUK-E-Scooter-position-paper-Nov-2018.pdf Updated November 2018.

were to be allowed on UK roads with such small wheels. RoSPA would like to see a minimum wheel size of 200mm (8 inches).

Road surface conditions seem to be a significant contributory factor in electric scooter crashes – studies show it to be a factor in up to half of accidents. One report states that future studies should assess how road surface affects cycle accidents and then compare this to electric scooter accidents so the role that road surface condition plays in such accidents can be understood[11].

There have also been a number of fatalities as a result of collisions involving micromobility vehicles. At least 29 people have died in electric scooter accidents since rentable shared scooters became popularised in 2018, according to one analysis of global media reports[12]. Data showed that the majority of the victims were male and were riding the scooter, though a small number of pedestrians also died after being hit by scooters. Rider fatalities often involved a collision with a motor vehicle. 1500 people have been estimated to have sustained an electric scooter related injury[13], and the Austin Public Health Department identified 190 electric scooter rider injuries in their city over a 3-month period. 35% of these people sustained bone fractures, and 80 of the injuries were classified as severe. Only one of the 190 injured riders was wearing a helmet[14]. Rather like cycling there needs to be a sensible balance between safety considerations and mandatory safety equipment, such as the mandatory wearing of helmets, which may put people off from using electric scooters and other micromobility vehicles. RoSPA does not believe that wearing a helmet whilst using a micromobility vehicle should be compulsory, however it should be highly recommended.

The International Transport Forum reported that there is evidence to support the idea that a trip with a Type A micro vehicle (such as an electric scooter) in a city is safer than a trip by a motor vehicle. It also stated that the fatality risk on an electric scooter trip is no different from that on an average bicycle trip[15], however further research is required to evidence this. It should also be noted that the ITF definition of micro mobility is different: 'Personal transportation using devices and vehicles weighing up to 350kg and whose power supply, if any, is gradually reduced and cut off at a given speed limit which is no higher than 45km/h. Micromobility includes the use of exclusively human-powered vehicles, such as bicycles, skates, skateboards and kick-scooters'. Type A vehicles are classified as having a maximum speed of 25 km/h with maximum weight of 35kg.

[11] International Transport Forum. Safe Micromobility. https://www.itf-oecd.org/safe-micromobility. Published February 2020.
[12] Quartz. At least 29 people have died in electric scooter crashes since 2018. https://qz.com/1793164/at-least-29-people-have-died-in-electric-scooter-crashes/ Updated February 2020.
[13] Felton R. E-Scooter Ride Share Industry Leaves Injuries and Angered Cities in its Path. https://www.consumerreports.org/product-safety/e-scooter-ride-share-industry-leaves-injuries-and-angered-cities-in-itspath/ Updated February 2019.
[14] Austin Public Health Department. Dockless Electric Scooter-Related Injuries Study. https://austintexas.gov/sites/default/files/files/Health/Epidemiology/APH_Dockless_Electric_Scooter_Study_5-2-19.pdf Updated April 2019.
[15] International Transport Forum. Safe Micromobility. https://www.itf-oecd.org/safe-micromobility. Published February 2020.

RoSPA would not recommend for example that an e-scooter be allowed to travel more than 20km/h with a maximum weight of 20kg on UK roads unless it affects legislation making it cohesive as a device within the EAPCs regulatory framework.

With the correct regulatory framework in place, micromobility vehicles such as electric scooters have the potential to provide an attractive solution to common urban mobility problems: they are cheap to run, potentially reduce congestion levels and allow us to move away from using traditional fuels which have severe environmental implications. They also allow greater access to transport, especially in cities where it can be expensive and difficult to move around. For these benefits to be achieved the risks must be minimised by strictly regulating the vehicle (type approval), the rider (who can use them) and where they can be used.

## Question 2.3

## RoSPA Response

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

| | Often | Sometimes | Never |
|---|---|---|---|
| Private vehicles | | X | |
| Taxis or private hire vehicles | | X | |
| Public transport | | X | |
| Delivery vehicles | | X | |
| Cycling | | X | |
| Walking | | X | |
| Other | | | |

Micromobility could act as a substitute for less efficient forms of transport, such as cars, taxis and motorcycles. Studies have found that those who are using micromobility vehicles are driving less often. Furthermore, they

could help individuals with mobility issues - studies have found that if an electric scooter wasn't available, many individuals could not have walked or cycled their journey due to poor health[16].

Micromobility vehicles could also be considered an answer to the problem of the "last mile" commute: the final part of a public transport journey from station to destination that road users feel it may be too far to walk. This means they can help people take other forms of public transport, by providing a link between a station or bus stop and a place of work, for instance. Even with their short range, then, they could help reduce the number of longer car journeys.

However, RoSPA are concerned that micromobility vehicles, which offer little to no physical activity benefits could replace some walking or cycling journeys, which have many health benefits for the individual. Researchers in France asked 4,000 users of public electric scooters how they would have travelled if scooters weren't available. Of all the riders interviewed, 44% said they would have gone on foot, 30% would have used public transport and 12% would have cycled. Only 3% of respondents would have used a private car if no electric scooters had been available[17]. This suggests using public electric scooter schemes has little impact on modal shift away from cars. More evidence is required to fully understand the modes of travel these devices are likely to replace.

### Question 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?

### RoSPA Response

RoSPA believe that e-scooters should be permitted on 'lower speed roads' but this is not defined, this clarification would be helpful. Our assumption is lower speed roads have a maximum speed limit of 30 mph.

| | On roads | On lower speed roads | On cycle lanes and cycle tracks |
|---|---|---|---|
| All types | | | |
| Electric scooters | | **x** | **X** |
| Electric skateboards | | | |

[16] International Transport Forum. Safe Micromobility: Corporate Partnership Board Report. https://www.itf-oecd.org/sites/default/files/docs/safe-micromobility_1.pdf. Published February 2020.

[17] 6-t. Uses and users of free-floating e-scooters in France. https://6-t.co/en/free-floating-escooters-france/ June 2019.

| | | | |
|---|---|---|---|
| Self-balancing vehicles | | | |
| Electrically assisted cycle trailer | **X** | | |
| Segway | | | |
| Other | | | |

**Question 2.4b**

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

**RoSPA Response**

RoSPA believe that electric scooters and electrically assisted cycle trailers could be used on lower speed roads. However, we must learn lessons from our European neighbours to ensure that the correct regulatory regime is in place before these vehicles can be safely used.

For example, since the introduction of electric scooter sharing schemes in France in 2018, it has been estimated that 15,000 of them have entered Paris[18]. The French transport minister stated that the introduction of electric scooters to France "happened very fast" and was "anarchic", resulting in pedestrians being scared to walk on the pavements for fear of getting run over. Some countries, including France, are now changing their legislation to include electric scooter rules. Since October 2019, riders are required to be aged 12 or above. Other rules include riding on the pavement being prohibited unless in designated areas, and then at walking speed only, electric scooters being prohibited on country roads, only one rider being allowed per device and riders not being allowed to wear headphones or use mobile phones. Users cannot ride against the traffic flow and must use cycle lanes where they are available. From July 2020, the scooters' top speed will also be capped at 25km/h, much like an electric bike[19]. Similarly, Germany introduced legislation in June 2019 under the small electric vehicle ordinance which stipulated vehicle requirements, including who can ride them and where they can be used. Germany have

[18] Snaith E. France to ban electric scooters from pavements after rise in accidents. https://www.independent.co.uk/news/world/europe/france-electric-scooter-ban-paris-fine-pavement-elisabeth-bornea8900846.html Updated May 2019.

[19] BBC. Electric scooters: France introduces new rules to 'restore tranquillity' https://www.bbc.co.uk/news/world-europe-50189279 Updated October 2019.

introduced a minimum age of 14 for electric scooter use, as well as only permitting them on roads and cycle paths[20].

In the UK, if micromobility vehicles are to be legalised, they are likely to be used in busy town and city centres, where people take lots of short journeys for work, education and leisure. RoSPA believe that if safety provisions are made, electric scooters and electrically assisted cycle trailers may be able to be used on the road, in a similar model to that used for conventional and electrically assisted pedal cycles. However, in the case of electric scooters in particular, it must be considered whether these are appropriate for use on high-speed rural roads, especially those with lots of bends. RoSPA are concerned that if these vehicles were to be legalised, in the early stages, there may be 'sorry mate I didn't see you' type collisions with motorists, who may not expect to see these vehicles on their route. Other countries such as France have prohibited the use of electric scooters on such routes. Due to the speed differentiation and visibility issues, we would not wish to see e-scooter permitted on roads with speeds above 30 mph.

The other vehicles in the above table, including electric skateboards, self-balancing vehicles and segways, in RoSPA's view should not be permitted either on the road or pavement.

### Question 2.4c
### Please explain your choices for using micromobility vehicles (or not) on cycle lanes and tracks, providing evidence where possible.

### RoSPA Response

RoSPA believe that with the correct regulatory framework in place, electric scooters should be permitted to use cycle lanes. Research in Atlanta[21] found that even temporary segregated lanes make people feel safer on a scooter. If legalised for use on cycle lanes, e-scooters should be limited to 20kph, as has been mandated in Paris and in Sweden. It would be inappropriate for e-scooters to have a faster maximum speed than an e-bike if sharing road space with cyclists.

RoSPA National Road Safety Committee discussed in October 2019 e-scooters use, this included where they should be allowed. As evidence is limited on the impact this would have on the existing cycle infrastructure and how e-scooters and cyclists interact in a confined space, we concluded that a number of trials would be beneficial to evaluate the effect of allowing e-scooter use on both cycle ways and the road. However, further research is required to understand whether allowing micromobility vehicle users on cycle lanes and tracks would discourage cyclists from using these facilities.

[20] Bavarian News. Electric scooters: get to know the new regulations. https://www.bavariannews.com/blog/2019/07/19/electric-scooters-get-to-know-the-new-regulations/ Updated July 2019.
[21] Atlanta Curbed. How Midtown's pop-up bike lane could inform the future of Atlanta mobility https://atlanta.curbed.com/2020/1/31/21116662/midtown-atlanta-pop-up-bike-lane-study Updated January 2020.

If micromobility vehicles (e-scooters, cargo bikes and electrically assisted tricycles) were prohibited from cycle paths casualty numbers would be greater and there would be an increased chance of riders using the pavement. This would place pedestrians in danger and have enforcement implications for the police.

In an evaluation of the 2018 electric scooter trial in Portland, Oregon, the Portland Bureau of Transportation found that 83% of e-scooter related injuries were 'minor', but 13% of these resulted from a collision with a motor vehicle. Streets with cycle lanes had the highest levels of electric scooter usage, with riders using the pavement less when the roads had cycle lanes[22].

Much will need to be done to ensure that there are adequate facilities for micromobility vehicles if they are to be used safely, as if there is not safe road space or facilities, users may begin to ride on the pavement, meaning that there could be conflict with vulnerable road users, children, older people and those with disabilities and visual impairment.

### Question 2.4d
### What impact do you think the use of micromobility vehicles on cycle lanes and cycle tracks would have on micromobility vehicle users or other road users?

### RoSPA Response

What the precise implication is where micromobility vehicles allowed to use cycle lanes and tracks is unknown. A rapid increase may result in over capacity and conflict between users vying for limited space. This may have a negative effect making the current cycle provision less appealing.

As above, RoSPA believe that a short trial is required to understand whether allowing micromobility vehicle users on cycle lanes and tracks would discourage cyclists from using these facilities, particularly less confident cyclists.

[22] Taur. Why riding electric scooters in bike lanes makes us all safer. https://www.taur.com/post/riding-electric-scooters-in-bike-lanes-makes-us-all-safer

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

### Should any other micromobility vehicles be permitted to use the pavement or pedestrian areas?

### RoSPA Response

RoSPA would not support a law change to allow micromobility vehicles on the pavement, beyond the current mobility scooters and pedestrian operated street cleaning vehicles. To impose a maximum speed limit for pavement use on an e-scooter as is the case for a class 2 mobility scooter would be impractical and difficult to enforce.

Permitting micromobility vehicles on pavements or in pedestrian areas would deter people from walking, from fear that they may become involved in a conflict with one of these vehicles, thus negating any active travel benefits. A relaxation of the current legislation would affect pedestrians using the pavement, in particular, those with visual impairments, hearing impairments and mobility problems, who rely on the pavement being clear. Evidence is required to understand how these devices might impact those with visual and hearing impairment and those with mobility problems. If these devices were approved to be used on the pavement, considerations such as audible warnings would be required to alert those with visual impairments of their presence. Training would also be required for users of these devices to ensure that they are able to safely share the pavement with pedestrians.

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

### RoSPA Response

All vehicles used on the road must be safe. RoSPA believe that the UK should look to European colleagues for an understanding of what the minimum standards for micromobility vehicles should be. A regulatory framework similar to Germany would seem a sensible approach[23].

RoSPA broadly agrees with the Department for Transport's proposals, but believes that the maximum speed should be 20 km/h not 25 km/h.

RoSPA is not an expert on e-scooter design, but would like to see as a minimum safety specification:

[23] Elitis. E-scooter regulations in Germany and France. https://www.eltis.org/discover/news/e-scooter-regulations-germany-and-france Updated June 2019.

- Maximum speed 20 km/h
- Maximum continuous rated motor power of 250 w
- Minimum wheel size of 200mm (8")
- Maximum weight of 25kg
- Brakes to be fitted on both front and rear wheels.
- At least one braking system to be independent of the vehicle's electrical system
- Braking levers arranged with the front brake(s) operated by the right hand
- Brakes to be in "efficient working order" for legal use
- Mandatory reflectors front, rear, side
- Lights required when used at night only

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

### RoSPA Response

RoSPA is not in a position to comment on standards for self-balancing and electric skateboards but believes that as a minimum, e-scooters, e- cargo bikes and electrically assisted tricycles specifications should enable them to be covered under EAPC's or a separate regulatory framework but of no lesser safety standard.

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

### RoSPA Response

RoSPA are not aware of any further design issues that should be considered.

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

### RoSPA Response

| | Like EAPCs | Like mopeds | Other requirements |
|---|---|---|---|
| Vehicle approval | **X**<br><br>(Technical standards set which manufacturers must comply with, but not subject to vehicle approval before | | |

| | | | |
|---|---|---|---|
| | being used on the road) | | |
| Vehicle taxation and registration | **X**<br><br>(Not required) | | |
| Periodic vehicle testing | **X**<br><br>**(**Not required) | | |
| User driving licence | **X**<br><br>(Training recommended) | | |
| Insurance | **X**<br><br>(Not required but recommend third party/PAI) | | |
| Helmet use | **X**<br><br>(Not required, though helmet use & Hi-Viz clothing recommended) | | |
| Minimum age | **X**<br><br>(Minimum age of 14 years old) | | |
| Speed limits | | | **X** |

**If you selected 'Other requirements', please provide details.**

RoSPA believe that in terms of periodic vehicle testing, a voluntary testing scheme should be available. This could work in a similar way to cycle servicing. There should be guidance available for users to ensure that these vehicles are well-maintained. This will be particularly important for vehicles that are part of any shared rental scheme.

Relating to user licensing and training, as highlighted earlier in our response, a voluntary training scheme equivalent to that of Bikeability for micromobility vehicles could be developed. There should be information on safe use of vehicles for any shared vehicle schemes.

In terms of speed limit, RoSPA believe that e- scooters should have a maximum speed of 20km/h, although this could be higher for cargo bikes and e-trikes which could be in line with current EAPC regulations of up to 25km/h (15mph).

**If you believe regulating micromobility vehicles in the same way as EAPCs or mopeds would be problematic, please explain why.**

RoSPA do not believe that this would be problematic.

## Buses, taxis and private hire vehicles

### Question 3.1
**Should an updated regulatory framework for flexible bus services allow for each category of service to be regulated differently?**

### RoSPA Response

RoSPA is not in a position to comment.

### Question 3.2
**How do you think we should define the area of operation for a flexible bus service?**

### RoSPA Response

RoSPA is not in a position to comment.

### Question 3.3
**In your opinion, does the 20 minute time window to arrive at each passenger pick-up remain appropriate?**

### RoSPA Response

Although a 20 minute window seems feasible, RoSPA is not in a position to comment further.

### Question 3.4
**Do you think operators of flexible bus services should be required to provide real-time progress updates?**

### RoSPA Response

RoSPA believe that if it is possible to provide real-time progress updates to passengers, this should be encouraged. The benefits of this include reduced wait times, as users can check their app and time their walk to their pick-up point and reduced travel time, as people can adjust their trip choices. If passengers can learn about

delays before they arrive at the stop, they can make informed decisions about taking alternative routes or modes. In turn, this may lead to increased use of these services, as users like reduced wait and travel times[24].

A 2012 study of the Chicago Transit Authority bus routes on which real-time passenger information had been added found that the average daily number of users on those routes increased by 2%. Similarly, a 2015 study for New York City's bus system also found that after three years, there was a 2% increase in users attributable to the real time passenger information system[25].

### Question 3.5
### In your opinion, how could the carriage of more ad-hoc bus passengers be encouraged without impacting negatively on the service received by passengers who have booked in advance?

### RoSPA Response

Since flexible bus services could become a mainstream form of public transport in some areas in future, RoSPA recognises that there could be benefits in making it easier for ad-hoc passengers to use them. However, we are not aware of any evidence on how this can be encouraged without negatively impacting on the service received by passengers who have booked in advance.

### Question 3.6
### What sort of fare structure do you think should apply to flexible bus services?

### RoSPA Response

RoSPA is not in a position to comment, although we urge that these services remain affordable as not to disadvantage groups such as those from less affluent backgrounds, those living in rural areas, the young, the elderly and the disabled.

[24] Medium. The real benefits of real-time transit data. https://medium.com/sidewalk-talk/the-real-benefits-of-real-time-transit-data-1fee19988b73. Updated June 2018.

[25] Papercast. 5 biggest benefits of real-time passenger information and digital bus stops https://www.papercast.com/insights/5-biggest-benefits-of-real-time-passenger-information-and-digital-bus-stops/ Updated July 2017.

### Question 3.7a
### Do you think there should there be less rigid registration requirements around notice periods for flexible bus services?

### RoSPA Response

RoSPA is not in a position to comment, although as these services are by nature flexible, it would be advantageous to be able to expand the area in which they operate at less than 70 days' notice.

### Question 3.7b
### Which elements of the registration requirements do you think could be improved to enable flexible bus services?

### RoSPA Response

RoSPA is not in a position to comment.

### Question 3.8
### Do you think the Bus Service Operators Grant (BSOG) should be adjusted to accommodate the development of flexible bus services?

### RoSPA Response

RoSPA is not in a position to comment.

### Question 3.9
### Do you think the record keeping requirements for flexible bus services are still appropriate?

### RoSPA Response

RoSPA is not in a position to comment.

### Question 3.10
### Do you think we could use flexible bus services to improve transport in rural areas?

### RoSPA Response

RoSPA believe that replacing standard, infrequent bus services with a more flexible demand-responsive approach could have benefits for people living in rural areas.

There is a need for transport services for socially disadvantaged groups, such as the elderly, the young and the disabled in rural and remote areas. A well-organised public transport system in these areas can enhance economic growth by improving social inclusion, accessibility and mobility. Traditionally, the characteristics of rural areas have presented barriers to improving public transport. This is because rural homes are often distributed over larger areas, population density is low and therefore potential passenger numbers are limited and the level of demand is unpredictable. As a result, public transport systems in rural areas generally suffer from low and uncertain demand, and service coverage is very limited since the provision of frequent and widespread public transport services is financially unjustifiable for the passenger numbers attainable[26].

Evidence[27] suggests that a well-designed flexible transport system can integrate different modes of transport to provide more user-centric, comfortable, and cost effective transport options by offering desired flexibility in choosing route, time, mode of transport, service provider and payment system.

A feasibility evaluation of flexible transport system[28] showed that flexible transport systems are one of the better solutions for transport problems in remote areas with low demand where conventional public transport systems are not appropriate. It was identified that flexible transport systems can improve mobility for socially disadvantaged users (such as older adults and persons with disabilities) in rural areas. One study[29] reviewed a specific service (Treintaxi services in Netherlands) that connects train stations and surrounding suburban and rural areas and found that Treintaxi services improve connectivity.

In an international review, Enoch et al.[30] found that fixed-route, fixed-schedule public buses are not ideally suited to serving dispersed rural areas with correspondingly low demand for public transport; and substitution of flexible services can replace conventional public transport services. However, there can be problems with lack of operators willing or able to participate in rural areas and in smaller settlements, leading to shortage of vehicles[31].

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[26] Velaga, N. R. et al. The Potential Role of Flexible Transport Services in Enhancing Rural Public Transport Provision, Journal of Public Transportation, Vol. 15, No. 1, 2012 https://scholarcommons.usf.edu/cgi/viewcontent.cgi?article=1099&context=jpt

[27] Nelson and Phonphitakchai cited in Velaga, N. R. et al. The Potential Role of Flexible Transport Services in Enhancing Rural Public Transport Provision, Journal of Public Transportation, Vol. 15, No. 1, 2012 https://scholarcommons.usf.edu/cgi/viewcontent.cgi?article=1099&context=jpt

[28] Takeuchi et al cited in Velaga, N. R. et al. The Potential Role of Flexible Transport Services in Enhancing Rural Public Transport Provision, Journal of Public Transportation, Vol. 15, No. 1, 2012https://scholarcommons.usf.edu/cgi/viewcontent.cgi?article=1099&context=jpt

[29] Scott cited in Velaga, N. R. et al. The Potential Role of Flexible Transport Services in Enhancing Rural Public Transport Provision, Journal of Public Transportation, Vol. 15, No. 1, 2012https://scholarcommons.usf.edu/cgi/viewcontent.cgi?article=1099&context=jpt

[30] Enoch et al cited in Velaga, N. R. et al. The Potential Role of Flexible Transport Services in Enhancing Rural Public Transport Provision, Journal of Public Transportation, Vol. 15, No. 1, 2012https://scholarcommons.usf.edu/cgi/viewcontent.cgi?article=1099&context=jpt

[31] Grosso et al cited in Velaga, N. R. et al. The Potential Role of Flexible Transport Services in Enhancing Rural Public Transport Provision, Journal of Public Transportation, Vol. 15, No. 1, 2012https://scholarcommons.usf.edu/cgi/viewcontent.cgi?article=1099&context=jpt

One possibility is to establish a service based on taxis in remote areas, although this may require considerable effort by local authorities.

Schemes may also be less affordable in rural areas. A review of 48 schemes in England and Wales[32] found that in rural areas, 16 out of 25 schemes require more than £5 subsidy per passenger trip, eight out of 25 schemes require £2–£5 subsidy per passenger trip, and one service is breaking even. Funding remains a key barrier to the introduction of these schemes in rural areas.

### Question 3.11
### What do you think would be the correct requirement for Disclosure and Barring Service (DBS) checks on flexible bus services?

### RoSPA Response

RoSPA is not in a position to comment.

### Question 3.12a
### What areas of the bus, taxi and private hire vehicle (PHV) framework should we consider in future stages of the Future of Transport Regulatory Review?

### RoSPA Response

RoSPA has no further comment.

### Question 3.12b
### How else, in your view, can the Government support innovation in the bus, taxi and PHV sectors?

### RoSPA Response

RoSPA has no further comment.

[32] Laws et al cited in Velaga, N. R. et al. The Potential Role of Flexible Transport Services in Enhancing Rural Public Transport Provision, Journal of Public Transportation, Vol. 15, No. 1,

2012https://scholarcommons.usf.edu/cgi/viewcontent.cgi?article=1099&context=jpt

## Mobility as a Service

### Question 4.1
**In your opinion, in the development of Mobility as a Service platforms, what should be the role of:**

**Local authorities**

**Central government**

**Other transport authorities**

### RoSPA Response

RoSPA supports the principle of MaaS and the potential benefits which could result by increased flexibility in intermodal transport choices. Central government needs to set a regulatory operating framework to ensure security of personal data and safe operating procedures. Local Authorities have a key role to play in ensuring the correct infrastructure is in place; for example safe drop off and collection points, land use planning and local service providers if a tendered or subsidised service.

Autonomous vehicles in the future will undoubtedly influence MaaS and will need to be integrated as it becomes a mobility provider.

### Question 4.2a
**Can you provide evidence for further measures that are required for the standardisation and interoperability of data, for example the routing, ticketing and timetabling data to deliver Mobility as a Service?**

### RoSPA Response

RoSPA is not in a position to comment.

### Question 4.2b
**Who should lead these further measures?**

### RoSPA Response

RoSPA is not in a position to comment.

**Question 4.3**
**In your opinion, is the roll out of the integrated style of ticketing required to facilitate Mobility as a Service prevented by any regulatory and or commercial barriers?**

**RoSPA Response**

RoSPA is not in a position to comment.

**Question 4.4**
**What competition concerns do you think Mobility as a Service might present that could be difficult to address through existing regulations?**

**RoSPA Response**

RoSPA is not in a position to comment.

**Question 4.5**
**In your opinion, does the current framework for consumer protection need to be expanded to include liability for multi-modal journeys?**

**RoSPA Response**

RoSPA is not in a position to comment.

**Question 4.6**
**Could Mobility as a Service present any particular accessibility and/or inclusivity concerns which might be difficult to address through existing regulations?**

**RoSPA Response**

Mobility as a Service business models must promote inclusivity to all sectors of society. If implemented effectively, new mobility services could widen the affordability, availability and accessibility of traditional and emerging types of transport. It could also improve social inclusion, such as reducing loneliness through encouraging the use of public transport and ride sharing. Information on how to book journeys will need to be

available in accessible formats (not just digital) for those with additional transport needs, and as not to deter less confident users from booking journeys.

However, if MaaS is delivered exclusively through a digital interface (e.g. smartphone apps, web-based service) it will prevent some people from accessing the service[33]. MaaS's reliance on registration and digital mobile applications, for example, might further exclude social groups experiencing difficulties in handling new technologies. There is evidence that older age groups are not comfortable with using applications on smartphones, especially taxi-hailing apps, and have anxieties about online transactions[34]. Furthermore there remains a 'capability' question for older age groups in using app-based platforms[35] casting doubt that older age groups would be adopters of MaaS.

There may also be concerns for those such as the disabled who may require extra assistance with their journey, as they will need to be able to declare this when booking their journey to ensure that the appropriate support is available.

### Question 4.7a
### What actions could help to ensure all sectors of the population can access Mobility as a Service applications?

### RoSPA Response

Mobility as a Service platforms must allow users to specify that they are disabled or have any additional transport needs. For example, some users will require wheelchair accessible vehicles or an assistance dog on their journey. Allowing users to communicate this when booking their journey will help to ensure that assistance is available and that the user is able to board an appropriate vehicle. Support will be needed at each stage of the journey.

The service must also ensure older and disabled people can get into and out of the vehicle safely and with reasonable ease and comfort. Accessible information (not just in a digital format) should be provided. Support at points of departure and arrival are also important. It may be daunting for some first-time users of MaaS to know how to organise their journey and pay for a ticket, and so travel training will be especially important. Independent travel training will also be important for those with additional needs to ensure that they can complete their journey safely.

[33] The Institution of Engineering and Technology. Could Mobility as a Service solve our transport problems? https://www.theiet.org/media/3666/mobility-as-a-service-report.pdf

[34] Shirgaokar cited in Pangbourne et al. Questioning mobility as a service: Unanticipated implications for society and governance. Transportation Research Part A: Policy and Practice. Volume 131, January 2020, Pages 35-49.

[35] Fitt cited in Pangbourne et al. Questioning mobility as a service: Unanticipated implications for society and governance. Transportation Research Part A: Policy and Practice. Volume 131, January 2020, Pages 35-49.

### Question 4.7b
### Who do you think should be responsible for delivering these actions?

#### RoSPA Response

Developers of applications for Mobility as a Service schemes will need to build in functionality to allow the user to declare that they have a disability and will require assistance on their journey.

As is the case currently, drivers and staff at transport hubs should be responsible for assisting older or disabled passengers to board and alight the vehicle in relative ease and comfort. Staff at transport hubs will be able to provide information on how to book journeys and convey any information about any changes that may need to be made to the user's journey in the event of a delay or cancellation.

RoSPA believe that Local Authorities and voluntary organisations should continue to deliver independent travel training to those with additional needs. These organisations may need some support to adapt their training programmes to include information on Mobility as a Service.

### Question 4.7c
### What do you think government could do to encourage, incentivise or enforce the delivery of these actions?

#### RoSPA Response

Older people may have a fear of sharing personal data when making travel bookings through MaaS, or have insufficient skills to do this via a digital platform. Local information and advice will be required to ensure that those who would most benefit from this flexibility, especially in rural areas are not excluded. Both central and local government will have a key role to play in its early implementation.

### Question 4.8
### In your opinion, what further action is necessary, if any, to ensure that Mobility as a Service platforms provide safe and appropriate use of data and protection of an individual's information?

#### RoSPA Response

RoSPA is not in a position to comment.

### Question 4.9a
### Can you provide any further evidence of the positive or negative impacts of MaaS on active travel and/or sustainable modes?

### RoSPA Response

New mobility business models will influence consumer travel choices. With intelligent design and incentive structures, MaaS could reduce car ownership and move people towards active and sustainable modes. In turn, this has the potential to reduce carbon and air pollutant emissions and reduce congestion through more efficient use of road space.

However, not all Mobility as a Service providers consistently offer active travel. Where this is the case, a user may choose to take a taxi rather than cycle 5km, as keeping a separate bike-share scheme membership is inconvenient. A key drawback to the absence of active travel in existing packaged MaaS products is the consequent lack of evidence to support the claims that bundling access to transport via MaaS packages improves transport sustainability[36].

The current approach of packaging by the month (as with mobile phone contracts) with the only alternative being pay as you go (which typically have higher unit costs), is poorly designed to support the established knowledge that individuals should undertake a minimum level of physical activity each day or across the week to maintain their physical and mental well-being. Healthier options, such as walking or cycling, are not prominent in MaaS products, which are predicated on modes that cost money. For many people the efficient way to achieve minimum recommended levels of physical activity is to switch some shorter journeys to active travel (walking or cycling). Having a MaaS package might result in a neglect of these minimum amounts of active travel through its door-to-door promise.

Despite this, some studies have shown the intention to walk and cycle did not decrease with a MaaS system. In 2018, Transport for Greater Manchester (TfGM) and Atkins/SNC-Lavalin tested the hypothesis that MaaS could shift commuters out of their cars, either onto public transport or towards active travel options such as walking and cycling to work. 39 Salford workers took part in the live trial. Seven modes of travel were offered in the personalised journey plans: buses, trams, car-share, taxi, bike share, on-demand shared minibus and walking. 26% of participants were more willing to use public transport, and 21% were more willing to cycle and walk. This indicates that MaaS has the potential to create more sustainable travel behaviours (active travel modes and ride-sharing), which can help address the challenges local authorities face in urban areas. Six months following the trial, 82% of participants interviewed wanted MaaS back. One third of car owners wanted to give up their vehicle following the research, and the majority of participants were willing to pay an increase in their monthly travel expenses for MaaS[37].

[36] Pangbourne et al. Questioning mobility as a service: Unanticipated implications for society and governance. Transportation Research Part A: Policy and Practice. Volume 131, January 2020, Pages 35-49.
[37] UITP. Mobility as a Service.

## Question 4.9b
## Can you provide evidence of measures that could be incorporated into MaaS platforms to encourage active travel and/or sustainable modes?

### RoSPA Response

One measure to influence travel choices and encourage people to use more sustainable modes could be to provide users with contextual information about their travel choices. This could include factors such as the carbon impact of different travel options, alongside the estimated journey time and cost of their journey.

Some reports suggest that encouraging active transport within MaaS (e.g. through rewards/incentives) will lead to public health improvements[38].

Nudging and heuristics can have an influence on people's behaviour and perception of having different options available to them. For example, the default settings on many route planners often favour the car, which results in this being the first and most prominent result displayed to people. Instead, by showing sustainable modes first, or by defaulting to a more sustainable mode of travel, it can increase the salience of these options[39].

Gamification and nudging are elements of motivational techniques to be used with rewards as an incentive for recognised good travel behaviour. Further means of stimulating sustainable travel behaviour include bonus schemes, where travellers are rewarded for using shared or eco-friendly modes. For example, in Madrid, users of the MaaS system collect more points for walking, cycling and using public transport than for others mobility options. Rewards must be considered carefully, as different groups may respond to different types of rewards such as free or discounted travel or partner discounts.

A pilot of the Ubigo MaaS scheme in Gothenburg involved 70 paying households under real conditions for six months. The arrangement was that each household paid their transport costs upfront, while earning a bonus for making sustainable choices. These kinds of measures could be used to encourage sustainable travel in the UK. The results of the evaluation showed a shift towards more sustainable transport modes, as private car use reduced by 50%. Walking decreased by 5%, although cycling increased by 35%[40].

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https://www.uitp.org/sites/default/files/cck-focus-papers-files/Report_MaaS_final.pdf. April 2019.

[38] The Institution of Engineering and Technology. Could Mobility as a Service solve our transport problems? https://www.theiet.org/media/3666/mobility-as-a-service-report.pdf

[39] I-MOVE cited in UITP. Mobility as a Service. https://www.uitp.org/sites/default/files/cck-focus-papers-files/Report_MaaS_final.pdf. April 2019.

[40] Bundesamt für Energi cited in UITP. Mobility as a Service. https://www.uitp.org/sites/default/files/cck-focus-papers-files/Report_MaaS_final.pdf. April 2019.

### Question 4.10
### Do you think guidance or a Code of Practice for the Mobility as a Service industry would be useful?

### RoSPA Response

RoSPA believe that a Code of Practice would be beneficial for the Mobility as a Service industry to promote best practice.

We believe that it should cover evidence and best practice on the areas covered in this consultation, such as the importance of data privacy for consumers and how data collected can be used to improve service, consumer protection, accessibility and inclusivity and information on the importance of positive modal shift towards more active and sustainable modes of transport.

## 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?**

### RoSPA Response

RoSPA are not aware of any evidence on this matter.

### 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?**

### RoSPA Response

Access to transport is vital to our health, wellbeing and social cohesion, as well as to a productive economy. Transport can affect our job opportunities, lifestyle, civic participation and social connections, with potential consequences for our physical and mental health. As such, access to transport and socio-economic inequality are often closely linked.

The transport options available to us, and the extent to which we can access them, are different for everyone. Access to transport varies across the UK, and often depends on local geography and population density. It also depends on factors such as our age, health, socio-economic status or physical ability.

For some, these factors can have a disproportionately negative impact on their ability to access transport. Drivers with mobility difficulties make 40% fewer trips than the average driving population, for example, and tend to travel shorter distances. This is likely to be more often out of constraint than by choice.

RoSPA hope for a future in which disabled people have the same access to transport as everyone else. They should be able travel confidently, easily and without extra cost. From staff training which meets the needs of the individual to audio visual travel information, and infrastructure planned and built around the travelling public - a more inclusive transport system will result in more passengers, jobs and customers for all. RoSPA believe that if the principles of the Inclusive Transport Strategy are followed, new forms of mobility should be inclusive for all.

Under a MaaS system, the regulations that apply to buses could help to ensure that this system is inclusive for all. Existing legislation states that buses designed to carry over twenty two passengers on local and scheduled routes must comply with the Public Service Vehicles Accessibility Regulations (PSVAR), and coaches will be required to comply with these Regulations from 2020.

Under the Public Service Vehicles (Conduct of Drivers, Inspectors, Conductors and Passengers) Regulations 1990 (the "Conduct Regulations") drivers of public service vehicles must provide disabled passengers with certain types of assistance. In summary, they must:

- Deploy a boarding ramp or lift when it is required by a wheelchair user to board or alight the vehicle;
- Provide wheelchair users with assistance to board or alight the vehicle if they require it;
- Offer to provide wheelchair users with assistance in using wheelchair user restraint systems on vehicles; and
- Provide disabled passengers, who do not use wheelchairs, with assistance in boarding and alighting the vehicle if they require it.

In addition, bus operators are subject to Section 20 of the Equality Act 2010 which requires service providers to make reasonable adjustments to enable disabled people to access their services.

Disabled passengers also have certain statutory rights under other legislation, including:

- To be charged the same fare as other passengers (except when covered by a concessionary permit);
- Not to be refused carriage or to be sold a ticket, unless it is physically impossible to board the passenger or would be contrary to health and safety legislation;
- For public facing staff, including drivers, to be trained in disability awareness;
- For damaged mobility aids to be replaced or fixed

In terms of taxis and Private Hire Vehicles (PHVs), which will continue to play an essential role in enabling disabled people to complete door-to-door journeys where other forms of transport may not be available or accessible in a MaaS system, vehicles and drivers are licensed by Local Licensing Authorities (LLAs) which have broad powers to shape the service provided within their jurisdiction.

Disabled passengers travelling by taxi or PHV have a number of rights, including:

- Section 20 of the Equality Act 2010, which requires service providers to make reasonable adjustments to enable them to access their services;
- Section 165 of the Equality Act 2010, which requires non-exempt drivers of taxis and PHVs designated as wheelchair accessible to accept the carriage of wheelchair users, to provide them with appropriate assistance, and to refrain from charging them more than other passengers would pay for the same service; and
- Sections 168 and 170 of the Equality Act 2010, which requires non-exempt drivers of taxis and PHVs to accept the carriage of assistance dogs and to refrain from charging extra for them.

There are also other factors at play. If not designed with all user groups in mind, a transport service can be affordable, accessible and reliable, but some users may not feel safe or comfortable using it.

In terms of Ride Share schemes, it could be intimidating for users to share a vehicle with someone they do not know, particularly if they are travelling alone. There are a number of measures that can be taken by the user to make themselves feel more at ease. For example, some members choose to show each other their IDs - e.g.

passports, student cards or driving licences - so they know they're travelling with the right person. As with any activity that involves meeting new people, it's advisable to meet in a public place the first time[41]. Many taxi services also provide the user with the make, model and registration of the vehicle they will be picked up in, allowing the user to check that they are being picked up by the correct person. Some app-based services also have the facility to share the trip, meaning that friends and family of the user can track where they are and have an estimated time of arrival. Many apps also have an 'emergency button' that the user can press if they feel in danger. Some of these principles could be expanded to other forms of mobility.

**Question 5b.1**
**In your opinion, which specific areas of road traffic law might benefit from having a statutory exemption power included to help support safe trials of transport technologies?**

**RoSPA Response**

RoSPA are not opposed in principle exemptions to certain regulations so that certain modes, such as electric scooters, can be lawfully trialled, so long as this does not pose additional risk to road users. However, RoSPA is not in a position to comment on what these exemptions may be.

**Why have you suggested these areas?**

**Question 5b.2**
**In managing the risks of allowing exemptions to transport legislation for trials, what do you believe should be the role of:**
**Local authorities?**

**Combined authorities or the Greater London Authority?**

**National government?**

**Trialling organisations?**

[41] Liftshare. Car share with confidence. https://liftshare.com/uk/trust-and-safety#safe

### RoSPA Response

RoSPA is not in a position to comment.

### Question 5c.1

**With regard to managing new transport technologies and services, are there powers currently held by national government which you think should be devolved to:**

### RoSPA Response

| | Yes | No | Don't know |
|---|---|---|---|
| Local authorities | | | **X** |
| Combined authorities or the Greater London Authority | | | **X** |
| Other | | | **X** |

### Question 5c.2

**Where the local transport authority and the local highway authority are separate local authorities (such as in London, or the combined authority areas), what do you think should be the balance of powers and responsibilities to maximise the benefits of future transport?**

### RoSPA Response

RoSPA is not in a position to comment.

### Question 5c.3

**In this context, what role might sub-national transport bodies most usefully play, in your opinion?**

### RoSPA Response

RoSPA is not in a position to comment.

### Question 5c.4

**In your opinion, could any non-regulatory measures help to empower local authorities, combined authorities or the Greater London Authority to manage transport innovation?**

### RoSPA Response

RoSPA is not in a position to comment.

### Question 5d.1

**Are there any specific, urgent areas of the regulatory framework that you feel we are not addressing through the eight work streams already announced for the Future of Transport Regulatory Review?**

### RoSPA Response

RoSPA is not aware of any urgent areas of the regulatory framework that are not being addressed through the eight work streams already announced.

RoSPA has no further comments to make on the consultation process, other than to thank the Department for Transport for the opportunity to comment. We have no objection to our response being reproduced or attributed.