



accidents don't have to happen

# Legalising rental e-scooter trials

RoSPA's Response to the Department for Transport's Open Consultation

Date: May 2020



Response to Department for Transport's Open Consultation; Legalising rental e-scooter trial

## Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport's consultation on legalising rental e-scooter trial. It has been produced following consultation with RoSPA's National Road Safety Committee.

This response should be read in conjunction with RoSPA's response to the Future of Transport Regulatory Review.

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

### RoSPA Response

On behalf of an organisation.

## 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).

## Which category best describes your organisation?

### RoSPA Response

Charity or other Non-Governmental Organisation.

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

### RoSPA Response

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



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## **E-Scooter Trial**

### **E-Scooter Definition**

#### **RoSPA Response**

Due to the similarities of e-scooters to e-bikes and pedal cycles RoSPA is happy for the period of the trial that they are regulated in line with EAPC. It would not be appropriate for them to comply with motorcycle regulations which were not designed for e-scooter use, for example wearing motorcycle helmets. This would restrict e-scooter use and have a negative effect on trial results.

### **Maximum Speed**

#### **Response**

RoSPA believes that for the trial, e-scooter speed should be capped to a maximum of 12.5 mph as is the case in many other European countries. E-scooters have smaller wheels than cycles which makes them more unstable when travelling over poor road surfaces and pot holes, so it is logical that they be regulated at a slower speed than an e-bike.

### **Maximum Power**

#### **RoSPA Response**

RoSPA believe that for the trial period, e-scooters should be limited to 250 watts as this covers most rental hire scooters currently on the market. However, in the future it may be necessary to increase this to 350 watts if a higher vehicle specification is applied, for example minimum 200 mm (8 inch wheel size).

### **Regulatory Changes**

**To what extent do you agree or disagree that, for the trials, we should change the regulatory requirements to:**

#### **1. Allow e-scooters to be used by any full licence holder?**

RoSPA is happy for the trial that e-scooter riders must hold a full licence. In practical terms, this will mean that riders will already have a high degree of road awareness and being aged 17 and over are more likely to have a bank account allowing them access to a rental scooter.



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## **2. Allow e-scooters to be used by any provisional licence holder?**

RoSPA is happy for the trial that provisional licence holders will be able to ride an e-scooter. This will increase the inclusivity of the trial and make it easier for those in the population aged 16 and over without a full licence to participate. In countries such as Germany which has legalised the use of e-scooters, the minimum age to ride one is 14. If in the future this is replicated in the UK the trial will not have an evidence base on how younger riders handle and perform when interacting with traffic. This will make it more difficult when deciding on a suitable minimum age after the trial.

## **3. Remove the requirement for a motorcycle helmet and instead recommending cycle helmets?**

RoSPA is fully supportive of this proposal as making motorcycle helmets mandatory would severely limit the number of people participating in the trial and may make it economically unviable for a hire company to participate without financial support. It would also have a measure of parity with the EAPC regulations. Although not supporting mandatory use of cycle helmets either, we would strongly recommend that a cycle helmet be worn, but recognise that this is more practical in a non-hire setting.

## **4. Allow e-scooters on roads (except motorways)?**

RoSPA agrees that e-scooters should be prohibited from motorways, but believe that they should also only be allowed on roads with a maximum speed of 30mph unless there is a facility in place which segregates the traffic. Trials are likely to be carried out within urban areas so it is unlikely that use will extend to country roads with higher speeds. However, if e-scooter use is legalised we would not wish to see use permitted on higher speed country roads.

## **5. Allow e-scooters in cycle lanes and tracks?**

RoSPA believes that e-scooters should be permitted to use cycle lanes. Research in Atlanta<sup>1</sup> found that even temporary segregated lanes made people feel safer on a scooter. If e-scooters were prohibited from cycle paths, collisions with vehicles on the carriageway 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<sup>2</sup>.

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<sup>1</sup> 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.

<sup>2</sup> Taur. Why riding electric scooters in bike lanes makes us all safer.



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## **6. Exempt trial e-scooters from vehicle registration?**

RoSPA is supportive of this proposal as it is in line with EAPC regulations and would be disproportionate and an unnecessary requirement for the trial which will involve hire vehicles.

## **7. Exempt trial e-scooters from vehicle licensing?**

RoSPA is supportive of this proposal for the trial.

## **8. Exempt trial e-scooter from vehicle type approval requirements?**

RoSPA is supportive of the proposal for the trial that e-scooters be exempt from type approval requirements of the Road Traffic Act 1988 as the primary objective of the trial must be to assess whether it is safe to allow e-scooters on to the highway and what the implications are for both pedestrians and cyclists.

However, RoSPA would call for further work to be undertaken specifically on type approval to ensure that e-scooter design maximises their safety in the event that they are legalised in the future.

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<https://www.taur.com/post/riding-electric-scooters-in-bike-lanes-makes-us-all-safer>

