

On-street micromobility rental framework

Personal details

Q1. What is your name?

Rebecca Fuller

Q2. What is your email?

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Q3. Are you responding on behalf of an organisation?

Yes

Organisation details

Q4. Your organisation's name is?

Urban Transport Group

Q5. Your organisation is best described as:

another type of organisation:
Representative body for the UK's largest urban transport authorities

Proposals

Q11. To what extent do you agree or disagree that the types of operations we expect to be covered by a new framework is appropriate?

Strongly agree

Operations reasoning

Q12. Why?

We broadly agree with the definition. We support the intention to offer flexibility to cover other vehicle types and operations in the future, such as e-scooter rental schemes. That said, exemptions for small rental schemes and those on private land require further consideration given these will still have an impact on highways and street-space.

Micromobility

Q13. What, if any, additional micromobility scheme types do you think should be exempted from in the scope of this policy (limited to 75 words)?

Schemes run by the licensing authority require further consideration as their inclusion may present challenges in future around conflicts of interest, competition or unforeseen costs.

Q14. What, if any, additional micromobility scheme types do you think should be included from in the scope of this policy (limited to 75 words)?

Any micromobility scheme that allows a user to hire a vehicle from, or leave a vehicle on, public land or highway should be included regardless of whether the user pays for period access or on a per-hire basis. A clear definition of 'long-term hire' will be needed. If legalised beyond the current trials, e-scooter rental schemes should be included in the scope of the policy.

Q15. What, if any, additional micromobility vehicle types do you think should be excluded from in the scope of this policy (limited to 75 words)?

There should be a clear line between OSM licensing and licensing for passenger carrying vehicles of any kind, including taxis, private hire vehicles and pedicabs. Further consideration may be needed of how freight-focussed vehicles available for hire interact with this regulation where these utilise public land.

Q16. What, if any, additional micromobility vehicle types do you think should be included from in the scope of this policy (limited to 75 words)?

The framework should be future-proofed to keep pace with market developments and new vehicle types. UTG supports the previously outlined Low-Speed-Zero-Emission Vehicle (LZEV) class and hope that any framework would cover all LZEVs provided for hire on-street. Vehicle types in scope should also include e-scooters, e-cargo bikes and adapted cycles.

The opportunity for on-street micromobility

Q17. To what extent do you agree or disagree that:

	reduce inactivity	create an integrated transport system	create a greener transport network
shared cycles present an opportunity to:	Strongly agree	Strongly agree	Strongly agree
shared e-cycles present an opportunity to:	Strongly agree	Strongly agree	Strongly agree
shared e-scooters present an opportunity to:	Neither agree nor disagree	Strongly agree	Strongly agree

The risks of on-street micromobility schemes

Q18. To what extent do you agree or disagree that:

	obstructive parking	anti-social use
shared cycles present a risk of:	Agree	Neither agree nor disagree
shared e-cycles present a risk of:	Agree	Neither agree nor disagree
shared e-scooters present a risk of:	Agree	Neither agree nor disagree

Q19. What, if any, other significant risks do you believe are presented by on-street micromobility schemes (limited to 75 words)?

Obstructive parking is a risk due to a lack of regulation. Clarity is needed on what is 'anti-social use' - this could cover a range of risks including: inconsiderate parking; dangerous riding; riding in places where such vehicles are not permitted; use of vehicles to assist in crime; and theft or vandalism of vehicles. Any publicly available on-street scheme is at risk from a minority of users who do not use the resource as intended.

Licensing: the preferred approach

Q20. To what extent do you agree or disagree that a licensing framework is an essential part of effectively controlling OSMR schemes?

Strongly agree

Q21. Assuming a licensing framework is implemented, to what extent do you agree or disagree that the 'licensing authority' should sit at the highest level of local government?

Strongly agree

Q22. To what extent do you agree or disagree that it would be beneficial to have minimum standard conditions that would be common to all licences for a given vehicle type (for example e-cycles)?

Strongly agree

Q23. To what extent do you agree or disagree that licensing authorities should be able to set their own bespoke conditions in addition to minimum requirements set centrally?

Strongly agree

Q24. To what extent do you agree or disagree that licensing authorities ability to add bespoke local conditions should be limited to specific aspects of shared scheme operation?

Disagree

Bespoke local condition reasoning

Q25. Why (limited to 75 words)?

Under a devolved approach, prospective licensing authorities should have the power and flexibility to add bespoke local conditions for operation that go above and beyond those set nationally, in line with their local priorities. The market can then decide whether it is able to meet those conditions.

Appeals

Q26. To what extent do you agree or disagree that a dedicated appeals process for on-street micromobility schemes is necessary?

Agree

Managing and allocating parking for OSM schemes

Q27. To what extent do you agree or disagree that a legal duty on local highway authorities with parking powers, would be sufficient to ensure adequate parking for on-street micromobility schemes?

Neither agree nor disagree

Q28. What in your view, if any, are the current barriers to providing adequate parking for on-street micromobility schemes (limited to 150 words)?

A legal duty alone may not be sufficient to ensure adequate parking.
 In busy urban areas there are multiple demands on limited street space. Providing parking that is close enough to both origin and destination points to make ad-hoc trips viable is particularly challenging.
 A lack of funding and proper regulation has prevented authorities from implementing effective parking management systems, resulting in obstructive footway parking that prevents pedestrians and people with mobility issues from travelling safely.
 In London, for example, there are already an estimated 45,000 dockless e-bikes on-street – existing operators have indicated that they will continue to grow their fleets and new e-bike operators are actively exploring entering the London market, with or without permission. Some boroughs have contracts or MoUs with operators but uncontrolled increases in fleet sizes, and a reduction in operator collaboration has undermined these resulting in an oversaturation of poorly parked and deployed bikes.

Q29. What, if any, other essential aspects do you think we will need to consider at the primary legislation stage to ensure a licensing framework will function effectively (limited to 150 words)?

As a minimum, the licensing framework should include options for local areas to: control the selection and number of operators; set fleet size and composition; ensure responsible parking; determine areas of operation; and set additional local conditions (such as maintenance, environmental credentials, training requirements for users).
 Micromobility operators should be required to meet minimum data sharing requirements and provide certain categories of data to licensing authorities in their desired format and level of frequency. This enables the planning of integrated, safe and useful transport networks.
 The framework should also include the ability for licensing authorities to recover reasonable costs from operators who use its roads and infrastructure.
 To function effectively, the licensing framework must be enforceable. Police forces need a common framework and position to support local areas with enforcement and provide clarity for the public.
 The new licensing framework will have a resource impact for the new licensing authorities.