

## Legalising e-scooter rental trials: consultation response from CoMoUK

Collaborative Mobility UK (CoMoUK) is a charity for the public benefit of shared transport, formed in 1999. It conducts research among car club and bike share users and accredits operators in those sub-sectors. It advocates for the responsible deployment of shared transport and the positive impacts this brings.

CoMoUK welcomes the introduction of shared e-scooter trials in the UK. These schemes hold the opportunity to support more sustainable and cleaner cities. Building upon experience in other areas of shared mobility, CoMoUK has created a set of recommendations for trials as part of its consultation response. We believe following this statement will help to ensure that trials are optimised, work to public benefit and are sustainable for the long term. The recommendations have been shaped by two webinars we have held with the Department for Transport and stakeholders across public and private sectors (with 100 attendees on each), and in direct consultation with 11 shared e-scooter operators.

### CoMoUK e-scooter trial high-level principles

#### Recommendations for e-scooter operators

- **Business models:** Provide clear and accurate information about financial stability, experience and ability to deliver in an area.
- **Permissions:** Only operate in areas where written permissions have been obtained and ensure operational plans are in place to manage e-scooters which go out of area.
- **Street parking:** Develop parking strategies and user training campaigns to ensure e-scooters are only parked in safe or allocated space and don't cause trip hazards.
- **E-scooter safety:** Ensure each e-scooter meets high safety standards and incorporates the best features for safety in terms of wheel size, brakes and lights. Put in place a user-friendly process for reporting faults which takes scooters off hire as well as proactive and reactive maintenance plans.
- **Training:** Work with the city to provide a range of user-friendly safety training, e.g. face to face, online and on-scooter user information.
- **Customer care:** Commit to highest standards of customer care with user-friendly systems and fast responses.
- **Data sharing:** Support data sharing requests from the local authority and the sharing of anonymised amalgamated data with DfT and partners for wider sector learning.
- **Pricing:** Ensure fair pricing for all users and consult with local authorities on any significant increases
- **Environmental and ethical management:** Commit to minimising environmental impact through redistribution and management of e-scooters and batteries.

- **Continuation of service:** In the case of withdraw of services, commit to providing notice to the authority and customers, then safely remove, sell or recycle unwanted e-scooters.

### Recommendations for local, regional and national authorities

- **Open and transparent selection processes:** Ensure all eligible operators have a chance bid for opportunities on the same terms. Consideration should be given to the officer time needed across every aspect of managing a successful trial.
- **Scale and density:** Trial areas need to have sufficient e-scooter density to make them a convenient and attractive mode for users and ensure current and future viability whilst managing limited street space, where possible authorities should let operators present a strategy for a city and allow this to be reviewed regularly.
- **Specification:** This should be flexible, and outcome focused except for core non-negotiable factors. This allows operators to develop strategies in consultation with authorities which they believe can be successful and sustainable.
- **Funding:** Other than developing parking and riding infrastructure, public sector support may not be required by e-scooter operators for city centre schemes. However, there may be a need for subsidies if there are restrictions on scale and locations or if there is a requirement to serve less profitable areas.
- **Promotion:** Authorities should support operators in promoting the trial through existing public and business networks and integrate expansion into wider sustainable transport strategies including approaches to private car ownership and use.
- **Integration with other modes:** Seek opportunities to integrate trials with other public and shared modes whilst ensuring the whole sustainable transport ecosystem is equally supported.
- **Space for parking and riding e-scooters:** Authorities work with operators to create a parking strategy to ensure there is sufficient pavement or road space available for this, including consideration for designated parking areas. In addition, there is a need to develop a network of well-maintained road and segregated lanes with clear information on their use by all forms of micro-mobility.
- **Training:** Work with the operator to provide a range of user-friendly safety training, e.g. face to face, online and on-scooter user information.
- **Data sharing requests:** Coordinate data sharing requests to ensure consistency across all trials/operators to support wider learning.
- **Criminal damage:** Work with the operators, police and community groups to create a partnership approach to minimising criminal damage.
- **Continuation of service:** If the current operator leaves the area, open the opportunity to another supplier. In addition, work with the operator to ensure a continuation of service between trial and longer-term deployment where possible.
- **London Boroughs:** Where scooters are deployed are in London Boroughs it would be preferable for them to be a coordinated approach within regions of the capital in order to allow users to travel over boundaries.