

Written evidence submitted by Dott

1. Executive summary

- 1.1. Our key recommendations are:
 - 1.1.1. Shared E-scooters should be legalised for use on UK roads.
 - 1.1.2. E-scooters should be utilised for providing complimentary transportation capacity while social distancing and limitations to public transport capacity are in place.
 - 1.1.3. Vehicle classification of e-scooters should align as closely as possible to Electrically Power Assisted Cycles (e-bikes).

2. About Dott

- 2.1. Dott is a European scooter and e-bike operator, currently working across Europe, including Paris, Rome and Munich.
- 2.2. Dott's founding team is made up of veterans of the micromobility industry and is using this collective experience to build responsible and sustainable operations. Our focus is on launching cities in a considered way and prioritising long term relationships with municipalities and local authorities over unsustainable growth. Our expansion motto is "one city at a time".
- 2.3. Dott is presently working with a number of UK authorities and is in the process of prioritising which to partner with for a UK scooter trial, as part of the DfT and government scooter pilot scheme.

3. Current scooter legislation

- 3.1. The electric scooter industry has grown from nothing into a real alternative mode to more traditional transport options, in less than two years. At the current time, as cities try to recover from Covid-19, scooter sharing has shown itself as an even stronger transport option that should be considered in the transport mix of any town or city.
- 3.2. It is clear to us that legislative amendments are required in the UK, in order to permit the use of e-scooters on UK roads. However, we see a huge opportunity to implement these changes with a great deal of care, looking to other European countries as well as setting a very high bar for hardware and software capabilities.
- 3.3. As scooters should be used primarily on the carriageway, ideally in cycle lanes (where available), we would position scooters as closely aligned to electric bikes (EPAC) as possible. This includes setting the same maximum speed - 15.5mph, making the use of a helmet recommended - but not mandatory and not requiring a driving licence to operate. Any changes to EPAC regulations should be mirrored by scooters.
- 3.4. We recommend that scooters are designated into their own vehicle class, as this will allow for strict control over hardware and software standards that will be bespoke to scooters. However, again, any instances where regulation may be shared between EPACs and scooters we strongly recommend that they are kept closely aligned.

4. Benefits of e-scooters

- 4.1. A clear and highly relevant benefit of scooters is that by their very nature they comply with social distancing requirements to avoid the spread of Covid-19. The benefit of this is too early to measure empirically, but with public transport restrictions limiting bus, metro and trains to only 10-20% of capacity it is clear that an alternative option is required.
- 4.2. We have launched 2 cities since the reduction in restrictions in Europe, which have all seen strong initial usage. Our existing cities are also now all above pre-covid trip levels by more than 40%.
- 4.3. In normal operating conditions the benefit of scooters can also be measured by looking at the type of trip taken. In Paris, 32% of trips are to/from home, demonstrating that first and last mile trips are a core benefit of scooters. Our Paris survey also showed that 27% of trips were intermodal - 65% of those being with mass transport and 15% walking.
- 4.4. Scooters also provide a fast and reliable means of getting around cities. 62% of our riders cite time saving as one of the main reasons for using a scooter and 40% say getting from door to door was a major benefit.

5. Respecting the Urban Realm

- 5.1. We've seen from dockless bike share in the UK that making sure that authorities have sufficient powers over operators is vital to striking the right balance between availability and accessibility.
- 5.2. While complaints of dockless bikes are actually very low per '000 trips, there is a desire from responsible scooter operators to avoid attracting the negative sentiment that was sometimes felt towards dockless bikes.
- 5.3. To ensure scooters are managed well it is important that operational standards are kept as high as possible. We recommend the following points be considered as part of the legalisation of scooters.

- 5.3.1. **No parking zones** - There are areas where leaving scooters is not appropriate. Operators should be bound to agree with Local Authorities where these are and designate as no parking zones. Journeys may not be ended in these areas.
 - 5.3.2. **Slow zones** - There are areas where scooters should not be permitted to travel much above walking pace to minimise conflict between riders, pedestrians and other vulnerable road users. Operators should be bound to implement these zones where appropriate.
 - 5.3.3. **Parking hubs** - Some city centre areas or high footfall areas are not appropriate for scooters to be parked without being left in designated parking areas. We do not recommend docking points, but designated parking areas, delineated with lining and identifiable with signs is highly recommended. Ideally these locations should be positioned in the carriageway. Where pavement locations are required, we recommend operators follow Traffic Signs Regulations and General Directions (TSRGD) and any specific guidance issued by local authorities to ensure minimal impact on visually impaired and other vulnerable road users.
- 5.4. We believe scooters should be ridden primarily in cycle lanes and where cycle lanes are not available they should be permitted in the carriageway. Scooters should not be permitted for use on motorways or pavements (unless designated as shared use - where it will be likely a slow zone is appropriate). These restrictions are desirable to minimise conflict between riders and pedestrians.
 - 5.5. Using a scooter on the footway should remain illegal and strict police enforcement is recommended, especially immediately after launching scooters in a city. User education should be a prerequisite for operators and we recommend guidance be prepared relating to required content and frequency of communications, for consistency across all operators.

6. Safety equipment

- 6.1. We recommend that guidance on safety equipment should be in line with cycle and EPACs, where the use of a helmet is recommended but not

mandatory. Rider safety is of paramount importance to us, we know from other countries (namely Australia) that mandating helmets for micromobility will limit individual take up and negatively impact the macro benefits of greener travel and getting people out of cars.

- 6.2. To ensure the safest experience possible, we recommend regulating hardware and software as the preferred mechanism.
 - 6.2.1. Wheels should be a minimum of 10 inches to minimise impact from uneven road surfaces.
 - 6.2.2. Decks should be sufficiently wide to allow for riders to stand comfortably and safely.
 - 6.2.3. Batteries should be positioned low down in the scooter to lower the centre of gravity and maximise stability.
 - 6.2.4. Acceleration should be controlled by onboard software and maximum speeds should be implemented.
 - 6.2.5. Braking systems should have a minimum of two hand-operated levers and ideally a complimentary engine braking system.
 - 6.2.6. Reliance on foot braking on the mud guard should not qualify as a braking system.
 - 6.2.7. Lighting should be in line with e-bike standards for the UK
- 6.3. This list is far from exhaustive, but should provide some indication of the kind of considerations that can be made to maintain high safety standards.

7. Sustainability

- 7.1. As the scooter industry matures, scooter innovation and improvements should be encouraged. Scooters should be robust and built to last for a minimum of 3 years. To enable this, it is important that any weight limit restrictions are sufficient to allow for more robust vehicles.
- 7.2. Similarly, increased battery capacity should be considered. Larger batteries mean fewer operations vehicles are required as a scooter's on-street charge

cycle is longer. Again, weight must be considered when increasing battery capacity. We recommend a limit no less than 50kg (ex. rider).

- 7.3. Operators should be strongly encouraged, if not required, to operate their fleets using electric cargo bikes or electric vans. There is little reason to use diesel powered vehicles when managing a fleet of scooters.
- 7.4. Operators should be encouraged to use 100% renewable energy tariffs for charging their fleets and operational vehicles. Scooters should be a truly environmentally friendly way of traveling.

8. European experience

- 8.1. Our experience of operating in Europe, where scooters are legal, is vastly positive. We focus our attention on providing a reliable service, ensuring our scooters are distributed and rebalanced according to demand and data. Using parking hubs has been very successful and we see 95% of trips ending in the correct locations - helped by cities providing on street signage.
- 8.2. In order to get the best out of shared scooter services we recommend cities undertake a selection/tender process and limit the number of approved operators (exact numbers depend on size of city). Having a fully open market approach leads to unsustainable operations and a greater chance of operators having to withdraw, impacting user confidence. A more collaborative partnership approach is preferable and will provide the best level of service for residents and visitors of a city.

9. Summary

- 9.1. We are excited to see the legalisation of scooters on UK roads and are confident that the trials this year will provide solid evidence that making permanent changes to the law should be done.
- 9.2. Having learned from the dockless bike share experience, we are confident that we can provide well managed and sustainable scooter share to the UK.
- 9.3. We are at your disposal, if you have any other questions or require sample scooters or recommendations from any of our city partners.

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