

Written evidence submitted by the John Lewis Partnership

Response to the consultation

The John Lewis Partnership welcomes the opportunity to respond to this consultation, and It is hoped that the Department For Transport will be open to additional feedback on the proposals and further discussion and open dialogue will be offered.

Introduction

The John Lewis Partnership including Waitrose Ltd operate extensive retail and home delivery operations in and around Greater and Central London to include:

- Over 150 primary distribution/store deliveries per day by large goods vehicles
- Over 1500 home/other deliveries per day by van and light commercial vehicles.
- Operation of deliveries on a 24/7 basis.

Comments & Views on the consultation

The John Lewis Partnership Logistics operation has encountered unprecedented increases in both footfall into our stores and online shopping/home delivery operations, and we feel this has most certainly played a vital role in supporting the capital through the Covid-19 crisis.

A large number of Partnership deliveries are performed at the kerbside, this could be in the form of household items, for example large white electrical goods, wardrobes and furniture, or food: fresh, frozen and ambient in bags or crates, and the same but on a larger scale in cages.

Whilst these deliveries are taking place, we need to ensure not only the safety of our Partners, but also the general public and at the same time ensuring noise levels are kept to a minimum by making the delivery as close to the location as possible.

This operation involves both interaction on the public roads and pavements, and we are not able to cordon off or segregate delivery areas, however we must ensure these areas are safe.

Feedback from Partners suggests journey times due to congestion and other factors such as kerbside cycle lanes are increasing this in turn requires more vehicles as a direct result.

The cycle lanes can increase delivery times by up to 40%, due to the points previously listed re safety and delivery location, if e-scooters become the norm and are allowed to use the footway to move around urban areas this issue will certainly increase and cause a number of additional problems.

E-scooters can exceed 30mph and could pose a real safety threat to not only our Partners, but the general public walking near the point of delivery especially where a

caged goods delivery is taking place as they move almost silently at speed, they would also be a safety issue for other users, for example the partially sighted.

At the present time, there appears to be no formal training available in the safe operation of the E Scooter, and perhaps something could be based around the current cycling proficiency scheme with elements of the highway code to provide this ?

There also appears to be no method to formally identify a rider, so in the event of an incident or collision this would not be acceptable should the rider not choose to stop, therefore there should be an identification process for example fitted number plates or similar.

It must be mandatory for any E-Scooter user to be covered by motor insurance as with any other motorised road user, they should also be required to pay road tax, at a reduced rate.

There is also the question of maintenance and realistically safety/service schedules should be set by the DfT by the number of hours the scooter has been used, hence some form of meter/ recording device will need to be fitted.

A standard must also be set for safety clothing with safety helmets and high visibility jackets, how would the DfT legislate for offences such as drink/drug use whilst in charge of an E Scooter? would there be imposed fines and if the rider held a valid car licence would points and a fine be added to this ?

It is clear that where E scooters are used in a number of other countries, there are concerns around not only their usage, but the safety element as well, either issuing fines or banning the riding of these on public pavements, some even issuing jail sentences , by inviting the trail and use of E Scooters in the UK, are not a series of of new problems going to be generated ?

It is very important that lessons are learnt from the outcomes and experience of E Scooters used in other countries, including the way that many pedestrians feel very uneasy this is not ideal when authorities in London and other locations are introducing walking and pedestrian urban spaces.

In conclusion, there is a place for the use of E Scooters, but in a very much controlled and fully regulated way, where vehicle and pedestrian segregation is of the utmost importance, and where The Partnership for example is able to carry out its kerbside deliveries safely and quickly without fear of additional hazards

It is worthy of note that John Lewis ceased the sale of E Scooters due to not only confusing messages regarding their use, but also the lack of clear legislation.

Before the UK takes the decision to introduce E-Scooters to our pavements and streets the above mentioned points and comments should be fully considered.

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