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**Submission ETRO consultation on e-scooters on public highways in Oxford (trial)**

The Cowley Area Transport Group is not opposed to e-scooters in principle. We do think they should be limited to a speed of 10mph to encourage their users to use bicycles instead, or electric bicycles, if they want to reach their destinations faster. We are concerned about encouraging further use of e-scooters if they are not reduced in speed. At present, e-scooters are used on pavements at 15 mph and frequently illegally on roads. We support the improvement of walking routes and creation of adequate walking networks throughout Oxford and this is not assisted by the use of e-scooters, not least since the users involved seem to be less skilled or aware than either pedestrians or cyclists. This is not surprising. We note that there is no equivalent for e-scooter users to cycling with training in schools to help children, or to Cycling groups for advice. We are not encouraged by the poor behaviour of e-scooter users which we have seen and experienced as frequent cyclists.

We note the hopeless saturation and collapse of the Government-imposed bicycle hire initiatives in Oxford and are concerned we are about to witness another colossal fail if this e-scooter initiative goes ahead.

Whilst we welcome Active Travel initiatives and future adequate funding for them, we do not think the ‘groundwork’ for permitting e-scooters on to roads freely has been done. We are, after all, at an early stage in the evolution and deployment of this technology, which has already had its first fatality.[[1]](#footnote-1) More, and untrained, e-scooter users on roads is to occur when many people are continuing to avoid public transport and are using cars more frequently than before the pandemic started.[[2]](#footnote-2) As regular cyclists in Oxford, we are observing more traffic at all times of the day; more irritation and impatience between drivers and from drivers toward cyclists and pedestrians; and a marked increase in all forms of delivery vehicles since the beginning of the first lockdown. Putting e-scooters into this environment we regard as a risky step that should not be contemplated, without a considerable amount of prior steps – including the return of public transport use to pre-Covid levels.

Concerning the 5 key points of your consultation:

*Support safe commuting to work and education as an alternative whilst social distancing measures are in place,*

Safe commuting includes walking, cycling on safest routes and an environment of mutual respect by all moving about in our City by whatever means. We do not think e-scooters can be classed as ‘safe’ at present – for their own users, or to others, from our observations up to this point.

*Reduce private car use and reduce congestion,*

Promotion of walking and cycling by the adoption of ‘Connecting Oxford Plus’ as developed by Oxfordshire Liveable Streets is a constructive programme of measures to achieve these objectives. We do not see adding untrained e-scooter users into the mix as a positive step unless they are limited to 10 mph.

*Contribute towards the reduction in air pollution and carbon emissions,*

We do not know how many e-scooter users would otherwise use a car, so how would this be measured? Considering research so far: when asked which mode they would have used for their last trip had an e-scooter not been available, approximately 25% of respondents stated that they would have used a car (personal or ride hail/taxi), while 65% stated that they would have walked (57%) or biked (8%).[[3]](#footnote-3)  This is not encouraging as this suggests e-scooters specifically undermine Active Travel. In short, they can be considered detrimental to public health just as excessive car-dependence can be. How the individual e-scooter is charged is also important. We can only judge a contribution to cutting carbon emissions has actually taken place if the electricity used is from a renewable source.

*Test perceptions and attitudes towards new mobility solutions,*

We would rather resources were spent on rolling out Connecting Oxford Plus and LTNs throughout Oxford, both in the short-term and far into the future. Specifically, a City with an expanding population needs *less* mobility by car for all purposes. This is what the County and City should be seeking.

*Deliver a safe and accessible alternative travel mode which complements the public transport offer, but which addresses short term capacity constraints on the network.*

We dispute that this is an automatically safe technology in the hands of those untrained in its use, especially on roads in Oxford’s rush hour/school run traffic. Rising levels of congestion do not appear to make for better driver behaviour, rather the opposite, so we would emphasise that current traffic conditions are hazardous for unwary e-scooter users.

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1. See: <https://www.rac.co.uk/drive/news/motoring-news/electric-scooters-set-to-become-road-legal/> [↑](#footnote-ref-1)
2. See: <https://www.theguardian.com/environment/2020/sep/15/road-congestion-levels-in-outer-london-higher-than-before-lockdown> & <https://www.cyclinguk.org/press-release/britains-cities-danger-being-overrun-traffic-congestion-leading-transport-experts-warn> & <https://airqualitynews.com/2020/09/15/traffic-congestion-is-now-worse-than-2019-levels-new-analysis/> & <https://www.theguardian.com/uk-news/2020/nov/09/covid-set-back-attitudes-to-public-transport-by-two-decades-says-rac> [↑](#footnote-ref-2)
3. <https://www.sciencedirect.com/science/article/pii/S0965856420306522> [↑](#footnote-ref-3)