

## Consultation response form

### CONSULTATION ON PROPOSED CHANGES TO REGULATIONS COVERING POWERED MOBILITY SCOOTERS & POWERED WHEELCHAIRS

#### PART 1 – information about you

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Company Name or Organisation if applicable)	Scottish Accessible Transport Alliance (SATA)

Please tick one box from the list below that best describes you/your company or organisation

<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Small or medium enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input checked="" type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Other (please specify)
<input type="checkbox"/>	Are you a mobility vehicle user?

If you are responding on behalf of an organisation/interest group how many members do you have and how did you obtain the views of your members:

Consultation with 60 member organisations representing transport users with disabilities, planners and operators and with 20 individual disabled members

If you would like your response or personal details to be treated confidentially please explain why (and please see the Freedom of Information advice on page 10 of the

consultation package):

## **PART 2: YOUR VIEWS**

This consultation seeks your views on proposed changes to the legislation covering “invalid carriages”.

### **Section A: Legal classification of vehicles**

Q1. Do you think that the term “invalid carriage” should be replaced with a different term?

Yes

Q2. What term would you suggest?

Mobility vehicle

Q3. Do you think that the terms “Class 2” and “Class 3” should be replaced by more descriptive terms such as “slower speed mobility vehicle” and “faster speed mobility vehicle”?

Yes

If yes, what terms would you suggest?

Mobility Scooters and Powered Wheelchairs

Q4. Do you think the legislation should make a distinction between mobility scooters and powered wheelchairs?

Yes

### **Section B: Design standards for mobility vehicles**

#### ***Maximum speed capability***

Q5. Do you think that Class 3 vehicles should be designed to be capable of travelling at speeds higher than 8mph on the carriageway?

No

Q6. If you think there should be a higher speed capability, what maximum speeds do you suggest, and why?

***Vehicle Weight limits***

Q7. Do you think the current unladen weight limit is still appropriate? (The weight limit for Class 2 vehicles is 113.4kg, and for Class 3 vehicles is 150kg?)

Yes (class 2 vehicles)

Yes (class 3 vehicles)

Q8. If you think the permitted unladen weight should increase, what should it increase to, and why?

Q9. Should some mobility vehicles permit the carriage of a baby or a small child as a passenger?

Yes, if it can be done safely

Q10. If you suggested changes in reply to questions 8 and 9 above, do you have evidence to support your suggestions? If you have evidence what is it? Or do you believe that further research and trialling is needed before a decision is taken?

We have no evidence and suggest further research is needed.

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**Safer vehicle design**

Q11. Do you think that technology is available that could reduce the likelihood and severity of injury caused by a collision with a mobility scooter?
Yes
If yes, what technology do you have in mind?
<p>Scooters should be robust enough if driven on a public road and have greater driving mobility and stopping controls similar to, or better than, those on powered wheelchairs.</p> <p>Measures are needed to ensure the safe carriage of mobility scooters on public transport. We think that DfT should update its guidance on the carriage of mobility scooters on public transport after seeking the views of operators, manufacturers and users.</p>
Q12. Should any increase in weight only be permitted if such technology is used?
Yes

**Conspicuousness**

Q13. Do you think that additional requirements should be imposed to make mobility vehicles more conspicuous to help to improve the safety of the mobility vehicle user and the safety of other road users?
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Yes

Q14. If you do think that additional requirements should be imposed, what do you suggest?

All vehicles to have lights, reflectors, indicators and hazard warnings.  
Probably horns as well.

### **Section C: Users of mobility vehicles**

#### ***Minimum age***

Q15. Do you think that the minimum age of 14 when a person may use a Class 3 vehicle should be kept the same, removed or lowered?

Kept the same

Q16. If you think the minimum age should be lowered, what do you suggest it be lowered to?

#### ***Information, training and fitness to drive***

Q17. What do you think should be done to improve the information and advice that is available to people who want to use a mobility vehicle?

A Government guidance booklet should be given free of charge to the user by the seller on purchase, including information and advice on the use/non-use of the vehicle on various modes of public transport.

<p>Q18. Should all mobility vehicle users be required to undergo compulsory training?</p>
<p>No, but voluntary training schemes should be supported and users encouraged to go on them in their own interests and the interests of others.</p>
<p>Q19. How do you suggest such training might be organised and delivered? How could it be funded (for example through user fees)?</p>
<p>Training should be local authority organised after consultation with user groups.</p> <p>.</p>
<p>Q20. Should all users be required to undergo an assessment of their suitability to drive a mobility vehicle?</p>
<p>Not for all vehicles but a simple fitness-to-drive assessment is needed for those intending to drive vehicles for use on public roads and transport.</p>
<p>Q21. How do you suggest such an assessment might be organised and delivered? How could it be funded (for example through user fees)?</p>
<p>It needs to be assessed to a national standard and can be done by self-assessment backed up by references and independent evaluators and GPs. But it will need public funding with no charge to users.</p>

**Section D: Vehicles in Use**

## **Registration**

Q22. Do you think a mobility vehicle registration scheme is needed?

We think the existing DVLA vehicle registration scheme should continue.

If so, why?

The ability to trace vehicles and their owners is important.

Q23. Do you think the current registration scheme with DVLA should be improved, for example, through better enforcement?

Yes, on enforcement especially for mobility scooters

If yes, how?

Q24. Do you think the current registration scheme should be replaced by a locally run registration scheme? (We would be interested in exploring whether this could be linked to existing schemes, for example the Blue Badge disabled parking scheme.)

No. Some local authorities are now charging 'administration fees' for the issue of Blue Badges and are likely to do the same for any similar registration scheme.

Q25. Do you think it would be better to register users rather than registering vehicles?

No, but the owners would also be known and the names of new owners should be recorded when vehicles are sold or transferred.

If so, how might it work?

Q26. Do you have any other suggestions for how a registration scheme would work?

Q27. Do you think the registration should be required for Class 2 vehicles as well as Class 3 vehicles?

No

If so, why?

**Insurance**

Q28. Do you think that a minimum of third party insurance should be compulsory for users of mobility vehicles?
Yes

**Criminal offences**

Q29. Do you think that the section 35 offence (drivers of carriages injuring persons by furious driving) is adequate?
No
Which driver behaviours do you think are not at present adequately covered by the legislation and should be the subject of further detailed proposals?
Update the language and include dangerous driving which causes damage as well as injury.

**Maximum permitted speed**

Q30. Do you think that a Class 3 vehicle should be permitted to travel faster than the current limit of 8mph on the road?
No.
Q31. What do you see as the potential benefits and risks of an increased speed limit?
Q32. What do you think the new maximum permitted speed should be?

Q33. When the speed limiter is switched off, users of Class 3 vehicles may drive above 4mph provided they are on the carriageway and not on the footway. To aid concordance with this regulation, should mobility vehicles then automatically display a sign on the rear that indicates that they must not be used on the footway?

Yes

Data collection

Q34. What type of data do you think it would be helpful to record and why?

As well as data on the number of Class 2 and Class 3 vehicles in use, it would be instructive to know from manufacturers of mobility scooters and powered wheelchairs how many they produce which are sold as suitable by size and weight for use on public transport (especially buses and trains).

Please send consultation responses to:

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