

**APPG for Cycling and Walking** 

DfT Consultation on Electrically Assisted Pedal Cycles

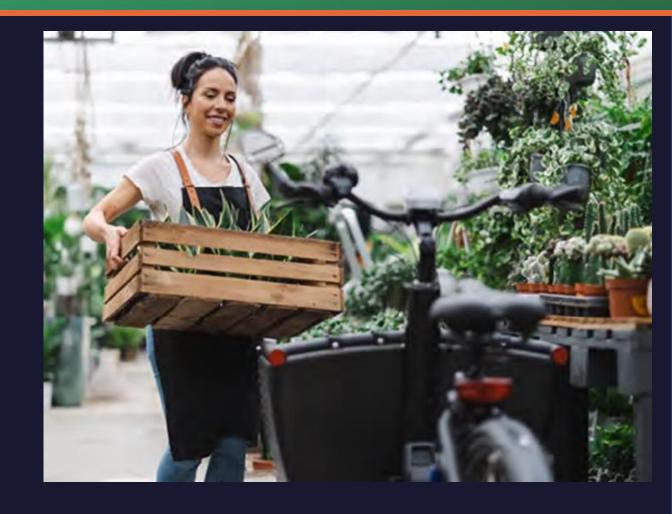
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# The Bicycle Association



- Independent trade body
- Represents the UK cycle industry
- Not: a campaign group
- Provides: technical and regulatory advice.



## Regulation of micro-mobility/LZEVs



Industry is NOT opposed to innovation & change

#### **Benefits for:**

- Non-users of cycles
- Congestion reduction
- Decarbonisation & pollution reduction.

BUT there are established procedures for:

- Testing, approving, certifying, regulating
- Construction and use
- International standards

## **DfT proposals**



#### **Draft Transport Bill 2022**

- New LZEV framework
- New categories within this for each vehicle type
- Avoids future confusion about vehicle legality.

### **EAPC consultation 2024**

#### Current regulations:

 250W, throttle assist to 4 mph, motor cuts out if not pedalling, and at 15.5 mph.

#### Proposed regulations:

 500W, throttle power without pedalling to 15.5 mph.

### Questions to consider



#### Why?

- Who are the proponents?
- Why the urgency?
- Why make 'piecemeal' change?
- Why do it this way?

#### What?

- What evidence is there of the need? Of safety? Of utility?
- What are the benefits?
- What alternatives already exist?
- What are the risks?
- What unintended consequences may arise?

## The principles



**DEFINITION** What is a pedal cycle and what is not?

**FRAMEWORK** What is exempt from type approval?

**STANDARDS** Construction, use, testing, certification?

**PRODUCTS** Which products exist now?

**ENFORCEMENT** Is it enforceable?

**LEGALITY** Is it legal?

### The risks



ACCELERATION	Extra weight =>	greater accident imp	pact
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- cycle lanes

- shared spaces

- (disabled) pedestrians

**FIRE RISK** 

No pedalling => more charging, higher currents,

bigger batteries

No reputable products available

=> more use of conversion kits, tampering

=> more fire risk

### The unintended consequences



**BACKLASH** will lead to demands for mandatory

helmets & insurance (cf mopeds)

**SLIPPERY SLOPE** once these requirements apply to

EAPCs, pedal cycles would be next

**LEGALISES TAMPERING** as it would be legal to convert existing

EAPCs to the new spec

**HIGHER SPEEDS** Surely the next 'popular' change?

**HEALTH DISBENEFIT** Not active travel

### In summary



#### These consultation proposals are:

- Unnecessary
- Risky
- And entirely the wrong approach to the future regulation of micromobility

### The industry would welcome:

- A clear LZEV framework
- Evidence-based regulations for each new vehicle type
- Retain the well proven EAPC regulations

### In summary



A cycle industry product safety expert's reaction is telling:

"Although this proposal has demonstrably been under consideration for several months, it smacks of a fantastical solution to an imaginary problem, that has not been logically thought through.

How are responsible businesses supposed to demonstrate product safety compliance when there is neither a safety standard nor Type Approval process that can be applied to such products?

And do we really believe that allowing 500W twist-and-go multitrack cycles to use cycle lanes will be conducive to increasing cycling and active travel? Can't see it myself."