



NEWS UPDATE : 9 September 2023

Westminster City Council is able to take action if an abandoned electric hire bike or e-scooter is causing an immediate danger to road users. It has also provided the contact details for the companies operating them if the abandoned electric hire bike or e-scooter is causing a nuisance to road users. **The link to the City Council's web page is as follows:** <https://www.westminster.gov.uk/report-it/abandoned-electric-hire-bike-or-e-scooter>

ST. JAMES'S CONSERVATION TRUST E-scooter and dockless bike hire consultation response

7 AUGUST 2023

Why St. James's is not the right place for these “Active Travel” proposals?

Atkins Trust Advisor Peter Heath and Trustee Martin Low

Report for The St. James's Conservation Trust

- **Introduction** to new “Active Travel” issues
- **Background** of the St. James's Trust concerns and experience
- **Evidence** of issues based on monitoring period/s
- **Conclusions**
- **Recommendations**
- **Next steps**
- **Appendices – statistics etc.**

The St James's Conservation Trust

1. This paper comments on the proposals that Westminster City Council is consulting upon through an experimental traffic regulation order due to be made under section 9 of the Road Traffic Regulation Act 1984 to introduce New E-Scooter and Dockless Cycle Hire Bays.
 2. The St James's Conservation Trust has an interest in eight of the proposed sites: 43, 79, 80, 121, 147, 153, 254 and 255 and objects to all of them.
 3. The delegated authority report considered by the Transport Officer, City Highways, City Management and Air Quality and the Head of Parking, City Highways, City Management and Air Quality and agreed by them both on 21 July 2023 makes no reference to any road safety audits having been done or to be undertaken or to the Dockless bike share code of practice For Operators in London published by Transport for London in September 2018 or to a detailed operations plan specifying how the scheme will comply with all of the requirements contained in the code of practice.
 4. Martin Low requested a copy of the road safety audits that he assumed would have been undertaken as a normal requirement of all highway authorities. These have not been provided and it is essential that they are undertaken before the experimental traffic order is made if they have not been undertaken already and that the designer for each site considers any comments or recommendations made by the road safety auditor. Hopefully that process will result in a revised set of proposals.
 5. The St James's Conservation Trust would like to see a copy of the detailed operations plan for each operator specifying how their schemes will comply with all of the requirements contained in the code of practice.
- Dockless bike share code of practice For Operators in London September 2018**
6. The introduction to the code of practice published by Transport for London makes it clear that safety is an important consideration.



Site 80 Carlton House Terrace



Site 79 St. James's Square



Site 43 Charles II Street



Site 153 St. James's Street (south)



Site 121 Piccadilly (east)



Site 254 St. James's Street (east/mid)



Site 147 Piccadilly (west)



Site 255 St. James's Street (north)

7. Paragraph 1.3 states:
"Alongside this, streets must be made more accessible for those who prefer to walk, especially children and older and disabled Londoners. Safety remains our primary objective and it is our duty to protect the rights of the public to use and enjoy the Capital's highways and footways. **Dockless Bicycle share schemes must work for everyone without impacting, or causing a Danger to, other road users."**
8. **The St James's Conservation Trust considers that some of the proposed sites will have an adverse impact on pedestrians.** In the area of direct interest to The St James's Conservation Trust there are eight sites:

Ward	Road	Zone	Footway/Carriageway	Site ID	Drawing No.
St. James's	Carlton House Terrace	E	Carriageway	80	8010/E/080
St. James's	Charles II Street	E	Carriageway	43	8010/E/043
St. James's	Piccadilly*	E	Footway	121	8010/E/121
St. James's	Piccadilly*	E	Footway	147	8010/E/147
St. James's	St. James's Square	E	Carriageway	79	8010/E/079
St. James's	St. James's Street	E	Footway	153	8010/E/153
St. James's	St. James's Street	E	Carriageway	254	8010/E/254
St. James's	St. James's Street	E	Footway	255	8010/E/255

* On the boundary of the area of interest

9. The drawings are appended to this note with comments on these eight sites and pictures taken by Google and my colleague Peter Heath.
10. Section 3 of the code of practice provides some definitions.
11. Paragraph 3.8 defines Nuisance as follows:
12. "Nuisance means an act, omission, situation or practice that materially affects the reasonable comfort and convenience of the public."

13. Paragraph 3.9 defines Obstruction as follows: "Obstruction means a situation arising from the deposit of a bike or bikes (whether by reason of its or their position, their number, or otherwise) so as to adversely affect the free use of a highway (including a footway or a carriageway), or adversely affect the free use of any other public or private land (including river, canal and park environments (excluding the Royal Parks, where different restrictions apply)) which is not specifically assigned for the purposes of dockless bikes, without lawful authority or excuse."
14. **The St James's Conservation Trust considers that the sites put forward in its area will cause both Nuisance and Obstruction as defined in the code of practice.**
15. Section 5 of the code of practice covers Engagement. Paragraph 5.1 sets out the engagement required with highway authorities. It includes the following:
16. "5.1. Engagement with Highway Authorities includes (without limitation):Agreeing a detailed operations plan specifying how the scheme will comply with all of the requirements contained in this Code, in particular the provision and application of: – Effective Geographic Controls – Parking infrastructure and control including on private land, (non-Royal) parks, river and canal environments not directly owned or managed by the Borough or Highway Authority. Agreeing detailed plans outlining where and when the Operator plans to introduce a scheme, the number of cycles and the extent to which the Operator expects the volume of bikes to grow and be managed;... and providing operational plans as to how the Operator intends to deal with pre-defined nogo areas, areas of high footfall and private land, including how Dockless Bike share scheme users will be discouraged or prevented from ending their journeys in these areas and how they will remove them if they are left in such locations. The Operator must also agree to any additional terms required by the relevant Highway Authorities to supplement this Code."

17. **The St James's Conservation Trust considers that to ensure the safety of all road users it is essential that the detailed operations plan prepared by the operators contains the results of full road safety audits to be undertaken for each site to be considered and that the designer's response to the stage 1, stage 2, stage 3 and stage 4 road safety audits has been agreed by the relevant highway authority prior to any site becoming operational. The stages are as follows:**
 - Stage 1 – Completion of Preliminary Design
 - Stage 2 – Completion of Detailed Design
 - Stage 3 – Completion of Construction
 - Stage 4 – Post opening monitoring
18. Section 6 of the Code of Practice focusses on Safety and maintenance. The code of practice states: "**The safety of Londoners is a primary concern and increases in the number of people cycling must be achieved safely, minimising Danger to the public. Without limitation, Operators must meet the standards set out below.**"
19. Paragraph 6.2 states:

"6.2. Operators must also comply with all applicable health and safety legislation. This includes (without limitation) setting out how they will report the number of staff and customers killed or seriously injured (if any) while working for, or using, the scheme."
20. Section 7 of the Code of Practice focusses on Operations. It states: "**Dockless bike share schemes must be operated so as not to cause disruption. The deposit or use of shared dockless bikes (individually or collectively) must not cause Nuisance or Obstruction and must not restrict or affect the use or enjoyment of property on Public Roads, the premises of any Highway Authority, or private land.** The Highways Act 1980 and relevant Highway Authority byelaws provide powers to remove unlawfully deposited bicycles. A Highway Authority may consider giving a warning or taking enforcement action such as issuing Fixed Penalty Notices (FPNs) or prosecuting, where this is required. Operators will be treated as responsible for the use (including the deposit) of any bike they own or manage."

21. **The St James's Conservation Trust considers that it would be helpful if the operators had a website that enabled reporting of bikes or e-scooters that were in positions contravening the operational plan and that the operator reported on action taken to ensure compliance. There are potentially at least four operators at each site. This makes it vital that each operator is readily identifiable and the identifier for each dockless bike or e-scooter is easy to read in a busy urban environment.**
22. Paragraph 7.8 states: "Operators must make sure that an Obstruction does not arise because of the deposit of Dockless Bikes, and that such bikes are not deposited in predesignated no-go areas such as around fire escapes or on private land (in the absence of agreement with the private landowner) (e.g. through using Geo-fencing where the user will receive, for example, a text or push notification). This should be detailed in the Operator's plans and provided to the relevant Highway Authorities."
23. **The St James's Conservation Trust strongly supports this action that should be incorporated into the operational plan.**
24. **The City Council is proposing sites to be shared by both Dockless Bikes and e-scooters and this is likely to cause confusion unless there is a single operator responsible for each site.**
25. Paragraph 7.10 states: "Operators must have the capability to manage the removal and redistribution of bicycles including when required by a Highway Authority or the Police and (without limitation):
- When clustering of bikes occurs, for example around transport interchanges during peak times and at large stadia and other important venues;
 - If there has been a major incident and the emergency services have requested the immediate removal of all bikes;
 - When cycle journeys have ended in a Non-participating Borough or on non-Highway Authority land or premises;
 - In preparation for planned events as instructed by Highway Authorities or emergency services; and
 - If requested to cease all operations.

Service level agreements addressing these situations must be agreed with the relevant Highway Authorities."

26. **The St James's Conservation Trust strongly supports this action that should be incorporated into the operational plan for each operator.**
27. Section 8 of the code of practice provides requirements on Parking. It states: "Dockless Bike share schemes must not cause Obstructions or Danger and must not restrict or affect the use or enjoyment of footways or other public spaces in London. Safe and effective parking guidelines are essential to ensuring the schemes work for all Londoners."
28. **The St James's Conservation Trust strongly supports this requirement and considers that this should be incorporated into the operational plan for each operator.**
29. Section 9 of the code of practice provides requirements on Customer experience and education. Paragraph 9.1 states: "Operators must offer 24-hour communication channels. This includes a telephone number that is clearly advertised on their website, mobile apps and Dockless Bicycles. Customer enquiries made during business hours should go direct to the Operator. An afterhours phone menu should be available for queries outside business hours, where not direct to the Operator."
30. Paragraph 9.2 includes the following requirements: "The Operator must make sure the terms and conditions of use for their scheme/s are easily available to customers, via their website and mobile apps. They must:
- Require all customers to accept their scheme's terms and conditions that includes clear guidelines on where the scheme operates and where bicycles can and cannot be parked
 - Highlight important components of their terms and conditions including parking restrictions, incentives for good behaviour and penalties for non-compliance
 - Provide highly visible cycling safety tips and general advice on their mobile application as part of the sign-up process that promotes safe and lawful bicycle use in London. This should include, but is not limited to, guidance on:
 - Staying back from heavy goods vehicles;
 - Not cycling on pavements;
 - **Staying away from parked cars;**
 - Stopping at red lights;

- Staying central on narrow roads;
 - Hand signals for safe turning;
 - Cycling slowly and considerately in places shared with pedestrians and others, for example on canal towpaths;
 - Provide links within their mobile application and on their website to Transport for London's Cycle Skills webpage to provide consistent advice about the safe use of bicycles on London's road network; and
 - Provide a 'frequently asked questions' page on their website and mobile app
31. **The St James's Conservation Trust strongly supports the requirements set out in section 9 of Dockless bike share code of practice For Operators in London published by Transport for London in September 2018 on Customer experience and education and considers that they should be incorporated into the operational plan for each operator. Paragraph 9.2 requires the operators to issue guidance to users on "Staying away from parked cars". This will be difficult to comply with at those sites next to parking bays. It applies to sites 43, 79, 80 and 254 and is further justification for abandoning them.**
32. Section 10 of the code of practice provides requirements on Data requirements. Paragraph 10.2 states: "It is recommended that Operators share data with Participating Boroughs and TfL via portals or dashboards to allow access to operational reporting as and when required. Data should include as a minimum:
- The number of bikes deployed as well as the number available to hire indicating the number of stolen and damaged bikes
 - Number of hires per bike per day indicating the utilisation rate of the scheme"
33. **The St James's Conservation Trust considers that some of that information should be placed on the operators' websites.**
34. Section 11 of the code of practice provides requirements on The environment.
35. **The St James's Conservation Trust considers that all these requirements are reasonable.**
36. Section 12 of the code of practice provides requirements on Accessibility requirements. It states:
 "TfL and the Boroughs continue to improve the Capital's urban realm, decluttering streets and making public spaces more pleasant and easier for people to use, particularly older and disabled people and those travelling with children. To safeguard this, it is essential that Operators in London follow this Code and, in particular, the parking guidelines set out in section 8 which are intended to ensure safe and accessible Public Roads and spaces.
 12.1. Operators should recognise TfL's equality and inclusion guidelines and must be committed to improving transport in London by making it more accessible, safe and reliable."
37. **The St James's Conservation Trust welcomes these requirements.**
38. Section 13 of the code of practice provides requirements on Future considerations. It states: "TfL, in partnership with the Boroughs, remains open to innovative new services that could help achieve the Mayor's goals for cycling, provided they are safe and effectively managed. The introduction of Dockless Bike sharing will be closely monitored as appropriate governance and regulatory controls are explored to make sure it works for everyone in the Capital."

39. The St James's Conservation Trust considers that Westminster City Council should discuss the following with operators of the E-Scooter and Dockless Cycle Hire Schemes:

Each operator must publish a copy of its operational plan on its website and keep it up to date;

That each operational management plan must incorporate the requirements contained in the Dockless bike share code of practice For Operators in London published by Transport for London in September 2018;

That each operator should appoint a designer for those sites that they want to use; arrange for that designer to liaise with other operators' designers; appoint a road safety auditor either separately or jointly with other operators to review the proposed layout and arrange for Stage 1, Stage 2. Stage 3 and Stage 4 road safety audits to be undertaken; instruct the designer to consider the results of each of the road safety audits and submit a report to the relevant highway authority (Westminster City Council or Transport for London) setting out their proposed response to the road safety audit, so that the highway authority determines whether the site is retained as an operational location for that operator and whether amendments are made to it to ensure the safety of all road users.

That sites are not allowed on central traffic islands or within 10 metres of a junction or stop lines of traffic signal controlled junctions or adjacent to the zig zag markings at zebra pedestrian crossings.”

Martin Low
Director, St James's Conservation Trust
6 August 2023



E-SCOOTER AND CYCLE HIRE BAYS
ST JAMES'S STREET (SITE 254)
 PROPOSED LAYOUT

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SCALE	1 : 500
DATE	29/06/2023
DRAWING No.	8010/E/254
DRAWN BY	LH
APPROVED BY	PJ

The St James's Conservation Trust

Site 254 east side of St James's Street just north of its junction with Ryder Street

Proposal:

New E-Scooter and Cycle Hire Bay on east side of St James's Street, replacing 5 metres of e-scooter parking.

Comments:

Simply providing a road marking to show the limits of the E-Scooter and Dockless Cycle Hire Bay is likely to result in a risk of vehicles hitting any E-Scooters or Dockless Cycles parked in the bay.

With potentially four operators sharing the E-Scooter and Dockless Cycle Hire Bay, there is a strong likelihood that vehicles will be parked outside the the E-Scooter and Dockless Cycle Hire Bay and causing a Nuisance and Obstruction as defined in paragraphs 3.8 and 3.9 on page 4 of the Dockless bike share code of practice For Operators in London published by TfL in September 2018.

The St James's Conservation Trust therefore strongly objects on the strong likelihood of the site causing Nuisance and Obstruction.

The St James's Conservation Trust strongly supports the requirements set out in section 9 of Dockless bike share code of practice For Operators in London published by Transport for London in September 2018 on Customer experience and education and considers that they should be incorporated into the operational plan for each operator. Paragraph 9.2 requires the operators to issue guidance to users on "Staying away from parked cars". This will be difficult to comply with at those sites next to parking bays. It applies to sites 43, 79, 80 and 254 and is further justification for abandoning them.

12 AUGUST 2021 :

St. James's Street

Existing Site 254

THE TRUST OBJECTED :

NOT ACCEPTABLE!

ROUTING, PARKING/PICK UP

ON & THROUGH ST. JAMES'S

HISTORIC NARROW AND MAIN

WIDE ROADS A SIGNIFICANT

SAFETY HAZARD.

FROM DAY ONE ONLY

INITIALLY ORDERLY

EXISTING TRIAL SITE

ADJACENT LISTED BOODLES

CLUB, MONITORED BY TRUST :

A BUSY STREET AND TAXI

STANDING ON CENTRAL

CARRIAGEWAY BAYS.

RESTRICTED LOCATION – WITH

A STEEP SLOPE WHICH RISKED

E-SCOOTER AND DOCKLESS

BIKE HIRE COLLAPSES.



2 MARCH 2022
St. James's Street
Existing Site 254

THE DAILY REALITY :
DISORDERLY
AND
UNACCEPTABLE!

FOOTWAY CLUTTERING OF
DOCKLESS BIKE HIRE CYCLES,
DUMPED AT A NARROW
LOCATION, DURING THE
TRIAL, BEFORE THE NEW
PROPOSED SHARED BAYS FOR
E-SCOOTERS AND DOCKLESS
BIKE HIRES.

THIS IS NOT AN ATTRACTIVE
FOREGROUND SETTING FOR
THE VISTA OF
ST. JAMES'S FAMOUS TUDOR
GATEWAY OF THE PALACE.





14 AUGUST 2021
St. James's Street
Existing Site 254

ORDERLY IN PART :

◀ BUT ALREADY ONE
LOST BOLLARD.

1 MARCH 2023

DISORDERLY ▶
AND
UNACCEPTABLE!

LITTER AND
FOOTWAY
CLUTTERING AT A
NARROW
LOCATION WITH
IMPORTANT VIEW
OF LISTED
BOODLES CLUB.



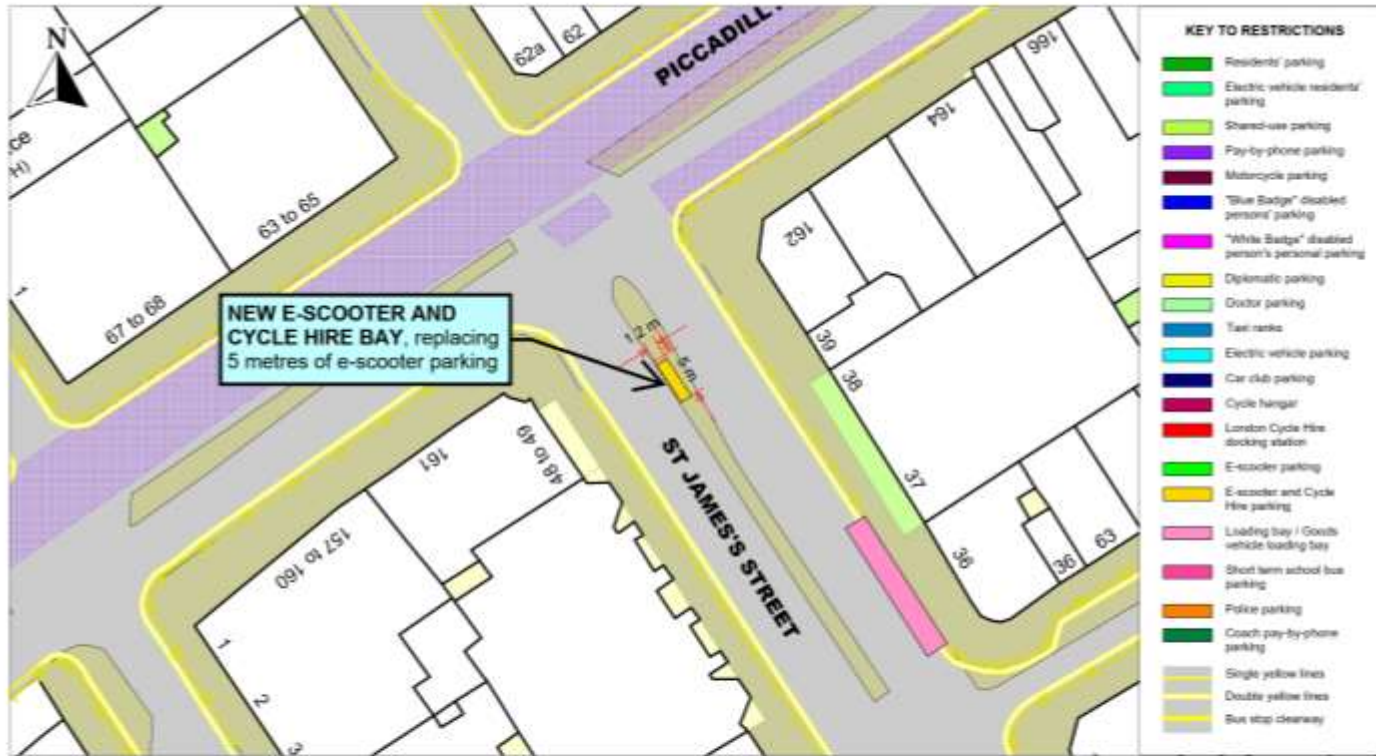
1 MARCH 2023
St. James's Street
Existing Site 254

DISORDERLY :

UNACCEPTABLE!

FOOTWAY INCREASINGLY
DOCKLESS BIKE HIRE
CLUTTERING WTH
EXISTING DESIGNATED
E-SCOOTERS AT A NARROW
LOCATION WITH IMPORTANT
VIEW TO ST. JAMES'S PALACE.





E-SCOOTER AND CYCLE HIRE BAYS
ST JAMES'S STREET (SITE 255)
 PROPOSED LAYOUT

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SCALE	1 : 500
DATE	20/07/2023
DRAWING No.	8010/E/255
DRAWN BY	PJ
APPROVED BY	LH

The St James's Conservation Trust

Site 255 St James's Street west side of central island just south of Piccadilly

Proposal:

New E-Scooter and Cycle Hire Bay on west side of the central traffic island 5 metres long by 1.2 metres wide replacing 5 metres of e-scooter parking.

Comments:

The proposal compromises the safety of all road users.

The E-Scooter and Dockless Cycle Hire Bay is provided close to the traffic signalled controlled pedestrian crossing.

Road users' attention should focus on pedestrians using the traffic signalled controlled crossing, but they might get distracted by those parking or collecting E-Scooters and Dockless Cycles.

The central traffic island was installed in partnership with The Crown Estate to provide pedestrians with a perch point to enable them to cross St James's Street informally.

By providing the E-Scooter and Dockless Cycle Hire Bay on the central traffic island, pedestrians will be obstructed and they may step out into the carriageway with their backs to oncoming traffic.

The St James's Conservation Trust strongly objects on road safety grounds.



12 AUGUST 2021 St. James's Street Existing Site 255
THE TRUST OBJECTED AS NOT ACCEPTABLE!
INITIALLY UNDERUSED AND ORDERLY ST. JAMES'S STREET SITE :
A POTENTIALLY DANGEROUS SLOPING ISLAND LOCATION
WITH BUSY MULTIPLE LANES OF CARRIAGEWAY ON BOTH SIDES.

2 MARCH 2022
St. James's Street
Existing Site 255

DISORDERLY
AND
UNACCEPTABLE!

SPREADING BEYOND BAY
DEMARKATION.
EAST SIDE FOOTWAY ALSO
HAS PEDESTRIAN CROSSING
BARRIER OF STATIC
CONVENTIONAL CYCLE
STANDS.

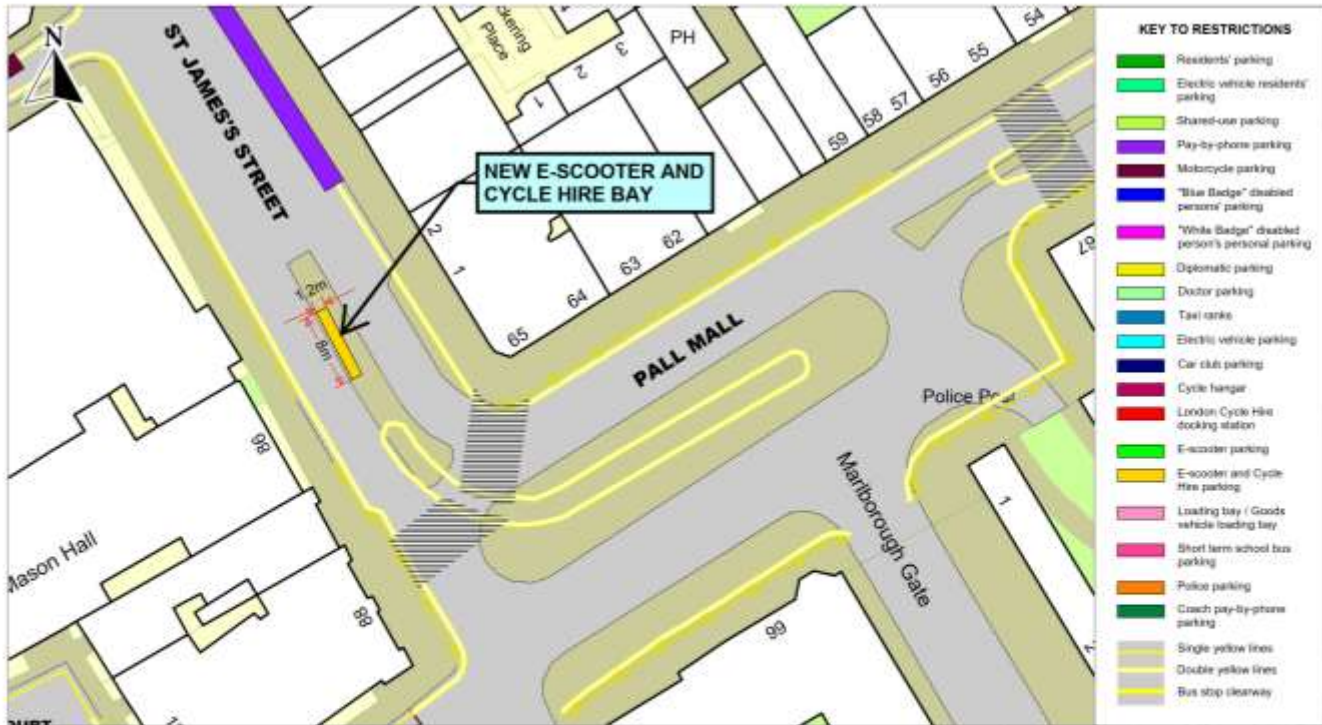


1 MARCH 2023
St. James's Street
Existing Site 255

DISORDERLY
AND
UNACCEPTABLE!

THE EXISTING E-SCOOTER
MEDIAN STRIP ON THE SLOPE
AT CENTRE OF CARRIAGEWAY.
SITE AND FOOTWAY
CLUTTERING AT A NARROW
PEDESTRIAN CROSSING
LOCATION AND RISK OF
PROGRESSIVE COLLAPSE
DOWN THE SLOPE.





E-SCOOTER AND CYCLE HIRE BAYS
ST JAMES'S STREET (SITE 153)
 PROPOSED LAYOUT

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SCALE	1 : 500
DATE	04/07/2023
DRAWING No.	8010/E/153
DRAWN BY	KB
APPROVED BY	PJ

The St James's Conservation Trust

Site 153 St James's Street central island north of Pall Mall

Proposal:

New E-Scooter and Cycle Hire Bay on west side of the central traffic island 8 metres long by 1.2 metres wide.

Comments:

The proposal compromises the safety of all road users.

The E-Scooter and Dockless Cycle Hire Bay is provided within the zig zag markings of the zebra crossing.

Road users' attention should focus on pedestrians using the zebra crossing, but will get distracted by those parking or collecting E-Scooters and Dockless Cycles.

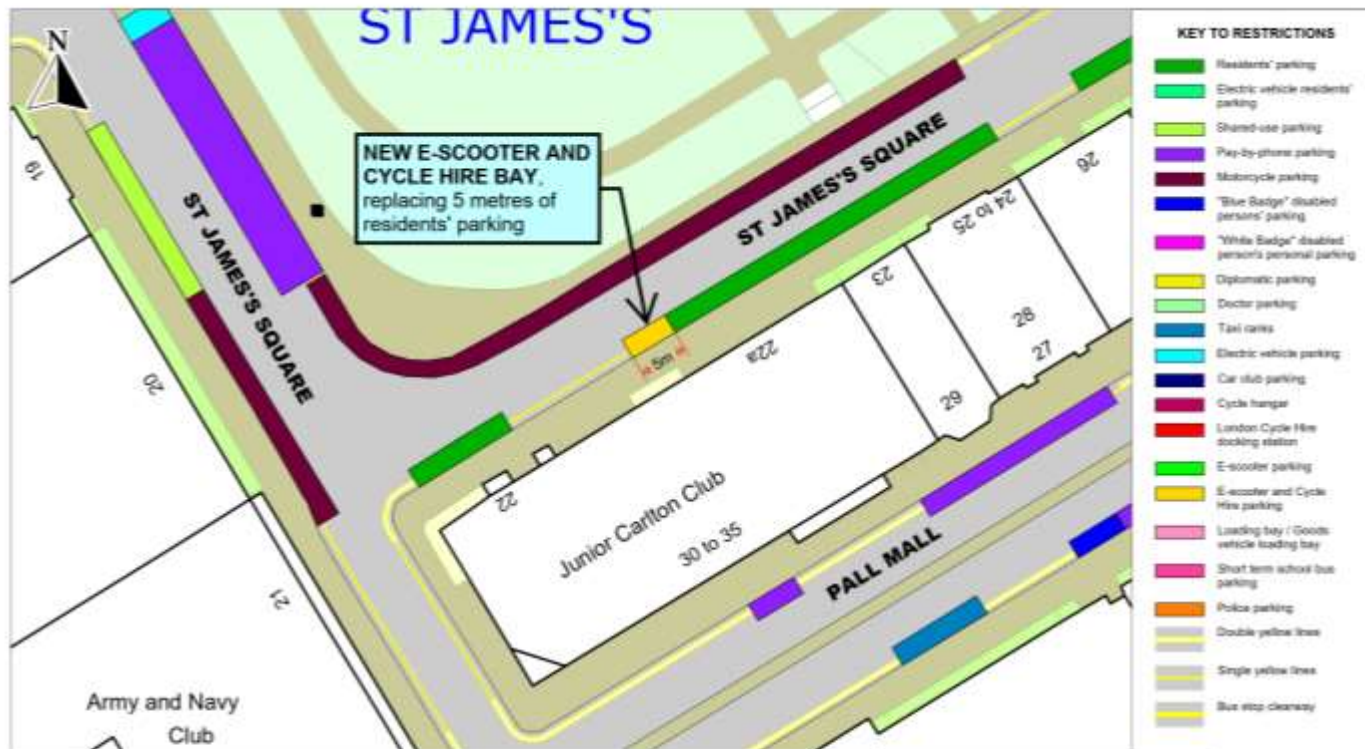
The St James's Conservation Trust strongly objects on road safety grounds.

ST. JAMES'S STREET
Site 153
PROPOSED NEW LOCATION
FOR
E-SCOOTER AND DOCKLESS
BIKE HIRE :

UNACCEPTABLE!

ON MEDIAN STRIP JUST
NORTH OF THE ZEBRA
CROSSING – WITH BUSY
NORTHBOUND TRAFFIC AND
WIDE SOUTHBOUND
CARRIAGEWAY
ON THE AXIAL SETTING OF
LISTED ST. JAMES'S PALACE
AND ADJACENT BUILDINGS.





E-SCOOTER AND CYCLE HIRE BAYS
ST. JAMES'S SQUARE (SITE 79)
 PROPOSED LAYOUT

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SCALE	1 : 500
DATE	20/07/2023
DRAWING No.	8010/E/079
DRAWN BY	PJ
APPROVED BY	LH

The St James's Conservation Trust

Site 79 south west corner of St James's Square

Proposal:

New E-Scooter and Cycle Hire Bay on south side of southern arm of St James's Square near its south west corner, replacing 5 metres of residents' parking.

Comments:

The route to be taken from the E-Scooter and Dockless Cycle Hire Bay is constrained to travelling around St James's Square in a clockwise direction as each arm is one way and turning into one of the following streets in the following order: King Street on the western arm; Duke of York Street on the northern arm; Charles II Street on the eastern arm; or St James's Square on the south east corner of St James's Square.

Simply providing a road marking to show the limits of the E-Scooter and Dockless Cycle Hire Bay is likely to result in a risk of vehicles hitting any E-Scooters or Dockless Cycles parked in the bay.

The St James's Conservation Trust strongly objects on the grounds that the proposal is likely to adversely effect road safety and cause additional street clutter in a Conservation area.

The St James's Conservation Trust strongly supports the requirements set out in section 9 of Dockless bike share code of practice For Operators in London published by Transport for London in September 2018 on Customer experience and education and considers that they should be incorporated into the operational plan for each operator. Paragraph 9.2 requires the operators to issue guidance to users on "Staying away from parked cars". This will be difficult to comply with at those sites next to parking bays. It applies to sites 43, 79, 80 and 254 and is further justification for abandoning them.

ST JAME'S SQUARE, Site 79
SOUTH SIDE CARRIAGEWAY
PROPOSED DOCKLESS BIKE
HIRE :

UNACCEPTABLE!

NEAR A PRIVATE RESIDENTIAL
MIXED USE BLOCK AND
BUILDING ACCESSES
OF THE ONE-WAY GYRATORY
OF THE BUSY ISLAND SQUARE.





E-SCOOTER AND CYCLE HIRE BAYS
CHARLES II STREET (SITE 43)
 PROPOSED LAYOUT

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SCALE	1 : 500
DATE	20/06/2023
DRAWING No.	8010/E/043
DRAWN BY	KB
APPROVED BY	LH

The St James's Conservation Trust

Site 43 Charles II Street north side just west of its junction with Regent Street St James's

Proposal:
 New E-Scooter and Cycle Hire Bay, replacing 5 metres of pay-by-phone parking.

Comments:
 Regent Street St James's is one way northbound and any E-Scooters or Dockless Cycles using the proposed E-Scooter and Cycle Hire Bay in Charles II Street would have to either turn left into Regent Street St James's or travel west to St James's Square.

There were temporary cycle stands placed in the carriageway with black and white cylinders. These looked awful. Simply providing a road marking is likely to result in a risk of vehicles hitting any E-Scooters or Dockless Cycles parked in the bay.

The St James's Conservation Trust strongly objects on obstruction and associated road safety grounds.

The St James's Conservation Trust strongly supports the requirements set out in section 9 of Dockless bike share code of practice For Operators in London published by Transport for London in September 2018 on Customer experience and education and considers that they should be incorporated into the operational plan for each operator. Paragraph 9.2 requires the operators to issue guidance to users on "Staying away from parked cars". This will be difficult to comply with at those sites next to parking bays. It applies to sites 43, 79, 80 and 254 and is further justification for abandoning them.

12 AUGUST 2021

Site 43

DOCKLESS BIKE HIRE NEAR
PRIVATE BUILDING ACCESS
STEPS.

CHARLES II STREET NEAR
PROPOSED NEW LOCATION

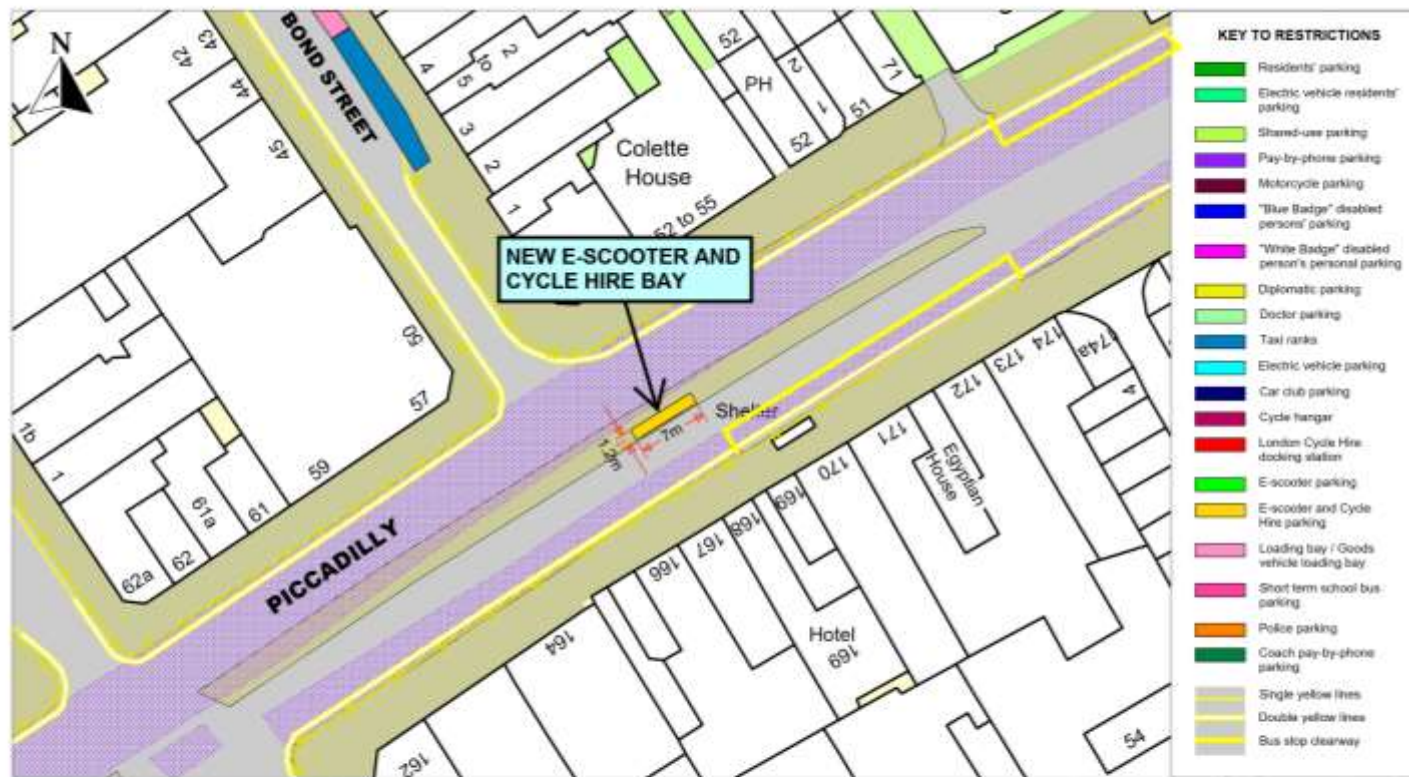
FOR :

SHARED E-SCOOTERS AND
DOCKLESS BIKE HIRE ON
NORTH CORNER
CARRIAGEWAY.

UNACCEPTABLE!

INCREASE IN CLUTTER ON THE
JOHN NASH AXIS VIEW OF THE
THEATRE ROYAL, HAYMARKET.





- KEY TO RESTRICTIONS**
- Residents' parking
 - Electric vehicle residents' parking
 - Shared-use parking
 - Pay-by-phone parking
 - Motorcycle parking
 - "Blue Badge" disabled persons' parking
 - "White Badge" disabled person's personal parking
 - Diplomatic parking
 - Doctor parking
 - Taxi ranks
 - Electric vehicle parking
 - Car club parking
 - Cycle hangar
 - London Cycle Hire docking station
 - E-scooter parking
 - E-scooter and Cycle Hire parking
 - Loading bay / Goods vehicle loading bay
 - Short term school bus parking
 - Police parking
 - Coach pay-by-phone parking
 - Single yellow lines
 - Double yellow lines
 - Bus stop clearway



E-SCOOTER AND CYCLE HIRE BAYS
PICCADILLY (SITE 121)
 PROPOSED LAYOUT

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SCALE	1 : 500
DATE	20/06/2023
DRAWING No.	8010/E/121
DRAWN BY	KB
APPROVED BY	PJ

The St James's Conservation Trust

Site 80 Carlton House Terrace on its north side just west of its junction with Waterloo Place

Proposal:
 New E-Scooter and Cycle Hire Bay, replacing 4.8 metres of shared-use parking (two bays)

Comments:
 The proposal is likely to result in a large number of E-Scooter and Dockless Cycles being left by those visiting St James's Park or watching the changing of the Guard at Horse Guards Parade, Buckingham Palace or St James's Palace. This is because of the close proximity of the Duke of York Steps and that E-Scooters and Dockless Cycles are not allowed to be ridden or parked within The Royal Parks as set out in paragraph 8.2 of the code of practice.

The St James's Conservation Trust strongly objects on grounds of the expected obstruction caused by a large number of E-Scooter and Dockless Cycles being left by those visiting St James's Park. This may result in both Nuisance and have an adverse impact on Road Safety.

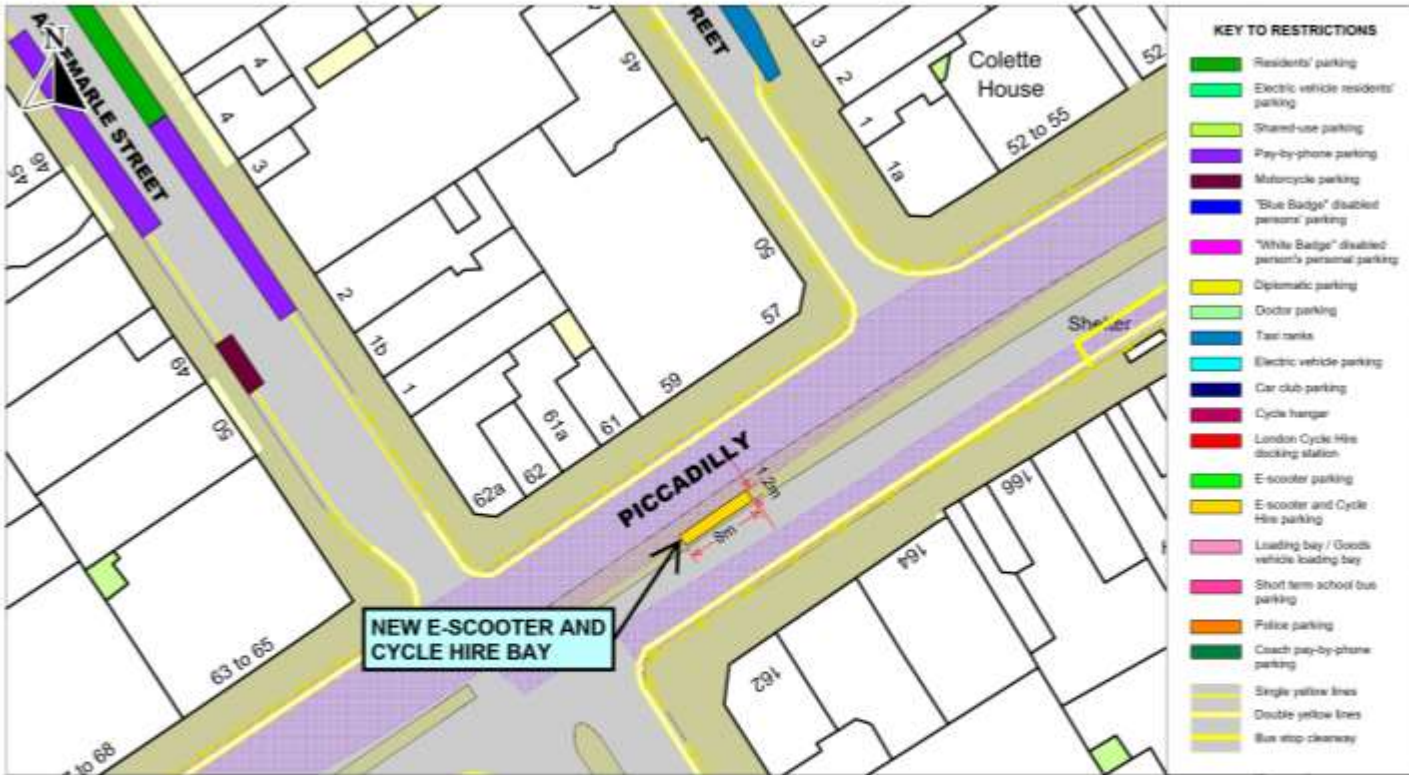
The St James's Conservation Trust strongly supports the requirements set out in section 9 of Dockless bike share code of practice For Operators in London published by Transport for London in September 2018 on Customer experience and education and considers that they should be incorporated into the operational plan for each operator. Paragraph 9.2 requires the operators to issue guidance to users on "Staying away from parked cars". This will be difficult to comply with at those sites next to parking bays. It applies to sites 43, 79, 80 and 254 and is further justification for abandoning them.

PROPOSED Site 121
PICCADILLY UNSAFE MEDIAN
STRIP WITH TWO WAY MULTI-
LANE CARRIAGEWAYS.

UNACCEPTABLE!

PROPOSED NEW LOCATION
FOR SHARED E-SCOOTER AND
DOCKLESS BIKE HIRE
OPPOSITE BUS SHELTER ZONE
ON SOUTH SIDE FOOTWAY.





E-SCOOTER AND CYCLE HIRE BAYS
PICCADILLY (SITE 147)
 PROPOSED LAYOUT

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SCALE	1 : 500
DATE	04/07/2023
DRAWING No.	8010/E/147
DRAWN BY	KB
APPROVED BY	PJ

The St James's Conservation Trust

Site 147 Piccadilly central island between its junctions with St James's Street and Old Bond Street

Proposal:

New E-Scooter and Cycle Hire Bay on the north side of the central traffic island 8 metres long by 1.2 metres wide.

Comments:

The proposal compromises the safety of all road users.

The E-Scooter and Dockless Cycle Hire Bay is provided on a central traffic island.

The central traffic island was installed in partnership with The Crown Estate and Transport for London to provide pedestrians with a perch point to enable them to cross Piccadilly informally.

By providing the E-Scooter and Dockless Cycle Hire Bay on the central traffic island, pedestrians will be obstructed and they may step out into the carriageway with their backs to oncoming traffic.

The E-Scooter and Dockless Cycle Hire Bay is provided close to traffic signalled controlled pedestrian crossings.

Road users' attention should focus on pedestrians using the traffic signalled controlled crossings, but they might get distracted by those parking or collecting E-Scooters and Dockless Cycles.

The St James's Conservation Trust therefore strongly objects on road safety grounds.

PROPOSED Site 147

PICCADILLY

UNSAFE MEDIAN STRIP WITH
TWO WAY MULTI-LANE
CARRIAGEWAYS AND SIGNA
CONTROLLED CROSSING
POINTS
(NOT SHOWN ON THE
PLAN DIAGRAM)

UNACCEPTABLE!

PROPOSED MIDDLE OF THE
ROAD NEW LOCATION AT
JUNCTION OF PICCADILLY
ALBERMARLE STREET AND
ST. JAMES'S STREET

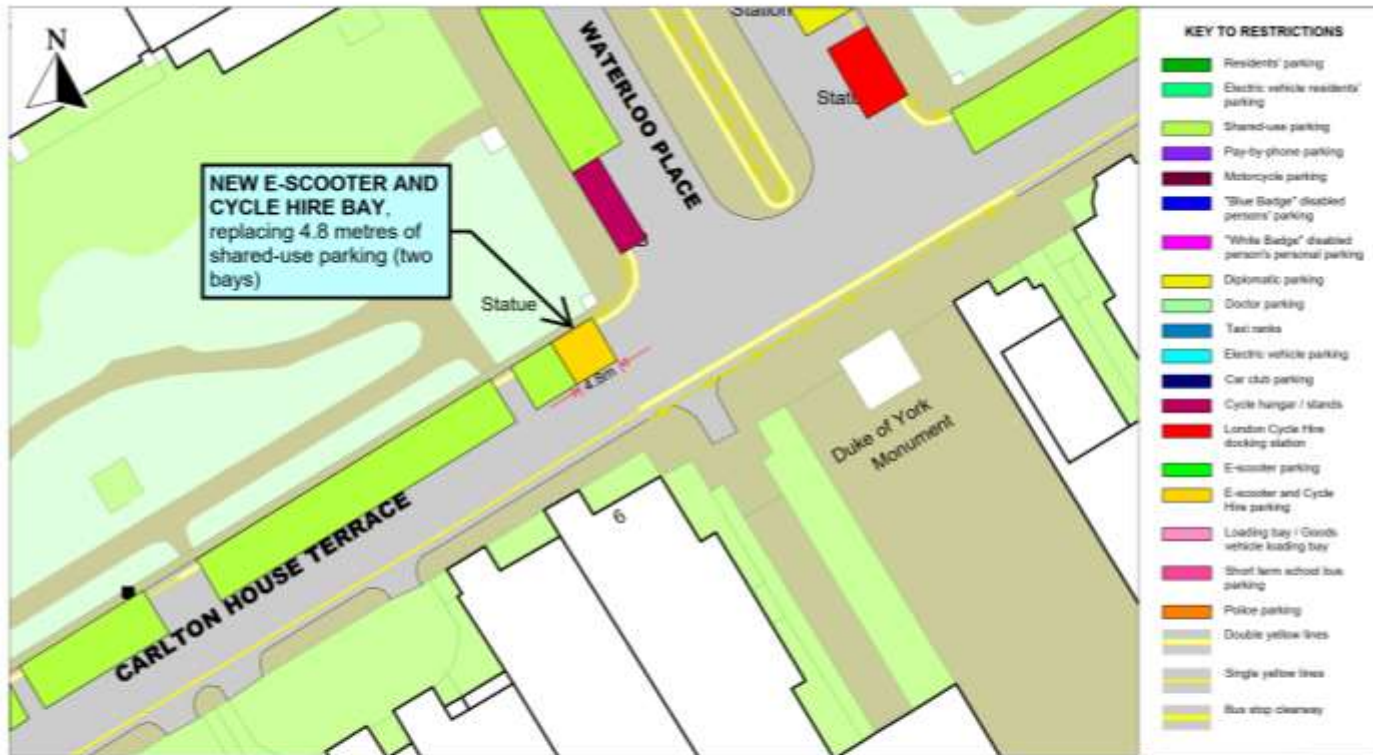
FOR SHARED E-SCOOTER AND
DOCKLESS BIKE HIRE.



BLOCKING PEDESTRIAN
MOVEMENT ALONG AND
INFROMAL CROSSING OF MEDIAN
STRIP
WITH TWO WAY MULTI-LANE
CARRIAGEWAYS.

UNACCEPTABLE!





E-SCOOTER AND CYCLE HIRE BAYS
CARLTON HOUSE TERRACE (SITE 80)
PROPOSED LAYOUT

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SCALE	1 : 500
DATE	29/06/2023
DRAWING No.	8010/E/080
DRAWN BY	LH
APPROVED BY	PJ

The St James's Conservation Trust

Site 43 Charles II Street north side just west of its junction with Regent Street St James's

Proposal:

New E-Scooter and Cycle Hire Bay, replacing 5 metres of pay -by-phone parking.

Comments:

Regent Street St James's is one way northbound and any E-Scooters or Dockless Cycles using the proposed E-Scooter and Cycle Hire Bay in Charles II Street would have to either turn left into Regent Street St James's or travel west to St James's Square.

There were temporary cycle stands placed in the carriageway with black and white cylinders. These looked awful. Simply providing a road marking is likely to result in a risk of vehicles hitting any E-Scooters or Dockless Cycles parked in the bay.

The St James's Conservation Trust strongly objects on obstruction and associated road safety grounds.

The St James's Conservation Trust strongly supports the requirements set out in section 9 of Dockless bike share code of practice For Operators in London published by Transport for London in September 2018 on Customer experience and education and considers that they should be incorporated into the operational plan for each operator. Paragraph 9.2 requires the operators to issue guidance to users on "Staying away from parked cars". This will be difficult to comply with at those sites next to parking bays. It applies to sites 43, 79, 80 and 254 and is further justification for abandoning them.

PROPOSED Site 80
CARLTON HOUSE TERRACE
NEW LOCATION :

UNACCEPTABLE!

FOR SHARED E-SCOOTER AND
DOCKLESS BIKE HIRE ON
NORTH CORNER
CARRIAGEWAY.



THIS SITE IS SURROUNDED BY
LISTED BUILDINGS, CLUBS AND
GARDENS, TOGETHER WITH
THE SETTING OF THE LISTED
STATUE ON THE CORNER,
PARKED AND MANEUVERING
VEHICLES.



27 OCTOBER 2021

DISORDERLY :

DOCKLESS BIKE
HIRE :

UNACCEPTABLE!

POTENTIALLY
UNSAFE ISLAND
CROSSING AND
COLLECTION
LOCATION
SURROUNDED BY
LISTED BUILDINGS
AND ST. JAMES'S
PALACE.



12 AUGUST 2021

DOCKLESS BIKE HIRE AT LEAST
AT A SPACIOUS LOCATION –

BUT NEAR PRIVATE BUILDINGS
AND NEAR A BLIND CORNER :

UNACCEPTABLE!

A PLACE PART PRIVATE AND
SECURITY SENSITIVE (ACCESS
TO MARLBOROUGH HOUSE)
FORECOURTS AND ENTRIES.



27 OCTOBER 2021

DOCKLESS BIKE HIRE ATTRACTS
OTHER USERS AT A LOCATION OF
LISTED BUILDINGS
INCLUDING THE IMPORATNT
SETTING OF
ST JAMES'S PALACE.

UNACCEPTABLE!





12 AUGUST 2021

DOCKLESS BIKE
HIRE NOT
COLLECTED.
AT LEAST LEFT IN
A FOOTWAY
RECESS LOCATION
– BUT NEAR
PRIVATE
BUILDINGS AND
ON PRIVATE
FORECOURT.

12 AUGUST 2021
UNACCEPTABLE!

DOCKLESS BIKE
HIRE ON VERY
NARROW
FOOTWAY.
CORNER OF THE
BUSY JUNCTION
OF ST. JAMES'S
SQUARE.





Dockless bike share code of practice

For Operators in London

September 2018

1. Introduction

- 1.1. Transport for London (TfL) and the Boroughs have a key role in shaping what life is like in London, helping to realise the Mayor's vision for a 'City for All Londoners'. We are committed to creating a fairer, greener, healthier and more prosperous city. The Mayor's Transport Strategy sets a target for 80 per cent of all journeys to be made on foot, by bike or using public transport by 2041. To achieve this, TfL, the Boroughs, other transport providers and key stakeholders such as the Royal Parks and the Canal & River Trust, must work together to make the city a place where people choose to walk and cycle more often.
- 1.2. **The potential to get more people cycling is huge and Dockless Bicycles are a way to make cycling more accessible and will complement London's existing public transport network.**
- 1.3. **Alongside this, streets must be made more accessible for those who prefer to walk, especially children and older and disabled Londoners. Safety remains our primary objective and it is our duty to protect the rights of the public to use and enjoy the Capital's highways and footways. Dockless Bicycle share schemes must work for everyone without impacting, or causing a Danger to, other road users.**
- 1.4. This code of practice (this Code) has been developed in collaboration with London's Boroughs and other key stakeholders. It outlines the requirements and recommendations that Operators are expected to follow as part of delivering safe and effective schemes in the Capital.
- 1.5. **This Code will be reviewed and updated regularly so it continues to reflect best practice and the interests of Londoners.**
- 1.6. **It complements the existing legal and regulatory framework, which Operators must observe and comply with at all times. Failure to follow this Code may be taken into account should any Highway Authority take enforcement action (see Section 7 of this Code) or begin legal proceedings against any Operator.**
- 1.7. Copies of this Code are publicly available, in accordance with the Local Government (Access to Information) Act 1985.

2. Aim and scope

- 2.1. A key aim of this Code is to ensure well-designed, Dockless Bike share schemes that complement London's public transport network and support the Mayor's Transport Strategy.
- 2.2. This Code applies only to Dockless Bike share schemes. However, Transport for London may revise or expand the scope of this Code from time to time.
- 2.3. This Code applies to all Operators and sets out the operational and safety standards that Operators are expected to adhere to.

3. Definitions

3.1. For the purpose of this document the following definitions apply:

Boroughs

3.2. Boroughs mean all of the 32 London boroughs and the City of London.

Danger

3.3. Danger means risk of bodily harm or injury or damage to property.

Dockless Bike or Dockless Bicycle

3.4. Dockless Bike or Dockless Bicycle means an unassisted pedal bicycle or any pedal assisted or electrically assisted bicycle which uses Cloud or smartphone app technology to lock and unlock the bicycle by preventing the wheels from turning or otherwise rendering the bicycle inoperable and which does not depend on any on-street infrastructure to lock or unlock the bicycle.

Geographic Controls or Geo-fencing

3.5. Geographic Controls or Geo-fencing means the use of Global Positioning Systems (GPS) or Radio Frequency Identification Device (RFID) technology to create a virtual geographic fence. When a device moves into (or out of) the space defined by the fence, triggers are sent and the user will receive, for example, a text or push notification.

The technology allows Operators to specify where a bike can be safely parked, or create an exclusion zone that prevents the bike from being manually locked.

Highway Authority

3.6. Highway Authority means a body responsible for the administration of Public Roads including TfL, Highways England and the Boroughs.

Non-participating Borough

3.7. Non-participating Borough means any Borough which is not directly associated with an Operator or any Borough which has entered into an agreement with an Operator which explicitly or implicitly precludes other bike share schemes from operating within the boundary of that Borough. In this instance 'operating' means, proactively placing bikes for hire or allowing bikes that have been parked by customers in a Non-participating Borough to be hired by another customer.

Nuisance

3.8. Nuisance means an act, omission, situation or practice that materially affects the reasonable comfort and convenience of the public.

Obstruction

3.9. Obstruction means a situation arising from the deposit of a bike or bikes (whether by reason of its or their position, their number, or otherwise) so as to adversely affect the free use of a highway (including a footway or a carriageway), or adversely affect the free use of any other public or private land (including river, canal and park environments (excluding the Royal Parks, where different restrictions apply)) which is not specifically assigned for the purposes of dockless bikes, without lawful authority or excuse.

Operator

3.10. Operator means any company running or planning to run a dockless bike share scheme on Public Roads or which may affect any premises or assets of TfL or the Boroughs, other partners or private land owners.

Participating Borough

3.11. Participating Borough means a Borough that has entered into a Memorandum of Understanding (MoU) or other agreement with an Operator to support the operation of a dockless bike share scheme on public roads in that Borough.

Public Road

3.12. Public Road means any highway or other road maintainable at public expense. This does not include private land within Boroughs, which may include park, river and canal environments.

Private Land

3.13. Private Land means any land other than highway land. This includes (but is not limited to) land comprising of railway, bus or other transport premises, Canal & River Trust, Park land, Universities and other private land in London not authorised for dockless bike use.

4. General requirements

- 4.1. Any Operator wishing to run a Dockless Bike share scheme within the Capital should be an accredited London Living Wage Employer. It must also:
- Comply with all applicable laws, codes of practice and standards; and
 - Take out and maintain appropriate insurances, for itself and users of the scheme, as well as appropriate public liability insurance.

5. Engagement

London Boroughs are the Highway Authorities for the majority of the roads within their respective Borough boundary. Transport for London is the Highway Authority for the major arterial routes throughout the Greater London Authority area. Therefore, prior to launching a Dockless Bike share scheme, Operators must engage with the relevant London Borough, TfL and all other relevant Authorities responsible for the roads or premises the scheme is proposed to operate or whose roads or premises may be affected by such scheme.

5.1. Engagement with Highway Authorities includes (without limitation):

- Agreeing a detailed operations plan specifying how the scheme will comply with all of the requirements contained in this Code, in particular the provision and application of:
 - Effective Geographic Controls
 - Parking infrastructure and control including on private land, (non Royal) parks, river and canal environments not directly owned or managed by the Borough or Highway Authority.
- Agreeing detailed plans outlining where and when the Operator plans to introduce a scheme, the number of cycles and the extent to which the Operator expects the volume of bikes to grow and be managed;
- Providing evidence the Operator has engaged with Highway Authorities and other private land owners such as park, river and canal owners/authorities likely to be affected by the scheme in the Participating Borough (i.e. all neighbouring Boroughs); and
- Providing operational plans as to how the Operator intends to deal with pre-defined no-go areas, areas of high footfall and private land, including how Dockless Bike share scheme users will be discouraged or prevented from ending their journeys in these areas and how they will remove them if they are left in such locations.

The Operator must also agree to any additional terms required by the relevant Highway Authorities to supplement this Code.

- 5.2. If Operators are proposing to use private land to deposit Dockless Bicycles, Operators are required to fully engage with the Highway Authority in the area in which the private land is located and seek the prior written agreement of the relevant Highway Authority to operate. Failure to do so may result in the Highway Authorities taking appropriate action as stated in Section 7.
- 5.3. Under no circumstances will any memorandum of understanding (MOU) or other agreement between an Operator and Borough be interpreted as permission to use TfL land within the Participating Borough, or other areas of London, for Dockless Bicycle parking.

- 5.4. As well as adhering to this Code, it is recommended that Operators establish an appropriate form of agreement with Participating Borough(s). It must be noted, however, that any such agreement is without prejudice to the requirement for Operators to comply with all applicable laws including those governing interference with free passage on Public Roads.
- 5.5. Boroughs may wish to introduce Dockless Bike share schemes initially on a trial basis. Parameters should be set with Participating Boroughs specifying, as a minimum, the number of bikes to be deployed, when the trial will take place, how long it will last and reporting on the performance and impact of the trial scheme.
- 5.6. Operators must agree to cease operations and remove all Dockless Bicycles if instructed to do so by the relevant Highway Authority. Ceasing operations and removal of Dockless Bicycles should take no longer than four (4) weeks from and including the date of the relevant Highway Authority's instruction or, if shorter, the period stated in any MOU or other agreement between the Operator and the relevant Highway Authority.
- 5.7. It is highly recommended that Operators undertake wider engagement at the proposal stage and during operation with the public, private landowners, and other stakeholders likely to be impacted by the scheme. This should include (without limitation):
- Communicating the general nature of the scheme including approval to operate from the relevant Borough(s)
 - Explaining the scope, for instance the number of bicycles involved and the geographical area in which they may be used
 - Agreeing arrangements for the collection of Dockless Bicycles found on non-Highway Authority land and agreeing measures to prevent Dockless Bicycles being hired or locked on non-Highway Authority land; and
 - Providing reassurance and addressing any concerns that the public and local stakeholders may have. Particular consideration should be given to vulnerable road users such as pedestrians, disabled people and those who are visually or hearing impaired

6. Safety and maintenance

The safety of Londoners is a primary concern and increases in the number of people cycling must be achieved safely, minimising Danger to the public. Without limitation, Operators must meet the standards set out below.

- 6.1. Operators must achieve and maintain ISO 4210:2014 standards for bicycles in the UK and it is always their responsibility to ensure this. They must have robust maintenance and servicing regimes in place so bicycles continue to meet applicable laws and standards. As a minimum, bicycles should be given a full service annually, with formal checks and repairs taking place regularly throughout the year.

It is, at the time of publication, a legal requirement to:

- Provide hand-operated brakes arranged left-hand rear and right-hand front;
- Provide front and back lights on the bike so it can operate safely in low light conditions
 - BS EN ISO 4210:1-9 The Pedal Bicycles (Safety) Regulations 2010 and Road Vehicle Lighting Regulations 1989;

- Provide a rear red reflector and amber/yellow reflectors on the front and rear of each pedal; and
- Make sure all bicycles have an individually identifiable asset number.

This is not a list of all legal requirements. It is the Operators' responsibility to make sure they comply with all applicable laws and standards for bicycles in the UK.

- 6.2. Operators must also comply with all applicable health and safety legislation. This includes (without limitation) setting out how they will report the number of staff and customers killed or seriously injured (if any) while working for, or using, the scheme.
- 6.3. They must have operational processes in place to enable customers and members of the public to easily report unsafe or damaged bicycles (see Section 9 (Customer experience and education)). It is the responsibility of the Operator to make sure these bicycles are no longer available for hire, and are recovered within the following service response times:
- **Where a bicycle is considered to be causing a Danger or Obstruction**, the bicycle should be removed within two hours, or within the Highway Authority's emergency response time, whichever is the quickest. If bicycles are causing an immediate Danger, the relevant Highway Authority may remove them without prior notice. The Operator will be liable for all associated costs; and
 - **Where a bicycle is reported to be causing a Nuisance**, a maximum response time of 24 hours will be required.
- 6.4. Operators must make sure the bicycles are cleaned frequently and within suitable timeframes as agreed with the relevant Highway Authorities. This will include, but is not limited to, removing offensive graffiti and biohazardous material proactively or when directed by the Highway Authorities.
- 6.5. TfL encourages Operators to achieve the Fleet Operator Recognition Scheme (FORS) bronze accreditation to demonstrate their business is being run safely, efficiently and in an environmentally sound manner. FORS aims to ensure:
- **Safer operations** – Operators meet accreditation standards and report, investigate and analyse incidents;
 - **Safer drivers** – approved training is available to drivers to increase their awareness of vulnerable road users' safety; and
 - **Safer vehicles** – those over 3.5 tonnes are fitted with specified safety equipment.
- 6.6. The minimum age recommended for a registered user of any scheme will be 18. If accompanied by an adult, users must be at least 14-years-old. This will be explained both in the user terms and conditions and on the bicycle.

7. Operations

Dockless bike share schemes must be operated so as not to cause disruption. The deposit or use of shared dockless bikes (individually or collectively) must not cause Nuisance or Obstruction, and must not restrict or affect the use or enjoyment of property on Public Roads, the premises of any Highway Authority, or private land. The Highways Act 1980 and relevant Highway Authority byelaws provide powers to remove unlawfully deposited bicycles. A Highway Authority may consider giving a warning or taking enforcement action such as issuing Fixed Penalty Notices (FPNs) or prosecuting, where this is required. Operators will be treated as responsible for the use (including the deposit) of any bike they own or manage.

- 7.1. Where an Obstruction occurs, the Dockless Bike or Bikes involved must be moved to a compliant parking space within the timescales set out in Section 6.3. Failure to comply may result in removal, a formal warning, FPN or prosecution.
- 7.2. In certain circumstances where Dockless Bikes are deposited on the highway so as to cause a danger to other highway users, the relevant Highway Authority has reasonable grounds to remove the bike(s) including if they are obstructing the view to users of the highway.
- 7.3. What constitutes a Danger is considered on the facts of each case, but large number of Dockless Bikes left and likely to fall across the footway so as to cause a trip hazard may be considered a Danger. Large scale obstruction may also be considered a danger where a substantial part of the footway is blocked. The decision to remove bikes for reasons of Danger may be taken for location specific reasons; such as a high level of footfall in an area or the level of security concern.
- 7.4. The highway authority may seek to limit or control the number of Dockless Bikes allowed in specific areas due to the likely impact on other highway users and on any other reasonable grounds.
- 7.5. Where Dockless Bikes have been removed either by a Highway Authority or emergency services, the Operator will be liable to pay all associated reasonable costs. On the TLRN, the cost of a bike being removed could be up to £235.
- 7.6. Any specific infrastructure requirements that are considered necessary to support the proposed scheme, for instance demarcation, additional parking areas and Sheffield bike stands, will be agreed with the relevant Highway Authorities. Relevant charges may be imposed.
- 7.7. Highway Authorities retain the right to request a financial endowment to cover all associated reasonable costs in the event that an Operator is no longer present to remove the Dockless Bicycles. On the TLRN, the cost of a bike being removed could be up to £235. Relevant charges may be imposed.
- 7.8. Operators must make sure that an Obstruction does not arise because of the deposit of Dockless Bikes, and that such bikes are not deposited in predesignated no-go areas such as around fire escapes or on private land (in the absence of agreement with the private landowner) (e.g. through using Geo-fencing where the user will receive, for example, a text or push notification). This should be detailed in the Operator's plans and provided to the relevant Highway Authorities.
- 7.9. Operators must also be able to monitor and report the location of all their Dockless Bikes in real time. It is recommended that they can identify any Dockless Bikes that have fallen over or have been deposited anywhere, and so pose a safety risk, and therefore are liable to be removed.
- 7.10. Operators must have the capability to manage the removal and redistribution of bicycles including when required by a Highway Authority or the Police and (without limitation):
- When clustering of bikes occurs, for example around transport interchanges during peak times and at large stadia and other important venues;
 - If there has been a major incident and the emergency services have requested the immediate removal of all bikes;

- When cycle journeys have ended in a Non-participating Borough or on non-Highway Authority land or premises;
- In preparation for planned events as instructed by Highway Authorities or emergency services; and
- If requested to cease all operations.

Service level agreements addressing these situations must be agreed with the relevant Highway Authorities.

- 7.11. The Operator must ensure the safe and lawful loading and unloading of bicycles by properly trained individuals with suitable training records kept and available for inspection. Obstruction must be avoided.
- 7.12. Operators' staff must be properly trained as to where bikes may and may not be deployed with suitable training records kept and available for inspection.
- 7.13. Operators must provide the Highway Authorities and other relevant landowners (including but not limited to Network Rail, Royal Parks, Canal and River Trust) with a telephone number and details of a named person or persons who can be contacted directly and immediately, at any time of day, on any day, and who will have the authority and resources available to them in order to rectify any foreseeable problems or take any other appropriate action.

8. Parking

Dockless Bike share schemes must not cause Obstructions or Danger and must not restrict or affect the use or enjoyment of footways or other public spaces in London. Safe and effective parking guidelines are essential to ensuring the schemes work for all Londoners.

- 8.1. Operators must engage with the relevant Highway Authority, organisations such as Network Rail and any other land owners to establish guidelines for where Dockless Bikes can and cannot be parked. This will include general parking rules and details of specific areas where parking is prohibited and Operators should ensure that customers trying to end their hires in these locations understand clearly what is permitted and the sanctions for non-compliance. Operators must have the ability to incentivise customers not to deposit Dockless Bicycles in areas such as the Royal Parks and other no-parking zones where parking is prohibited.
- 8.2. Restrictions applicable to eligible bicycle parking zones on the footway includes, without limitation:
- Dockless bicycles shall not be parked within 2 meters (m) of a junction;
 - Dockless bicycles shall not be parked on a footway where the effective distance between the building line and the kerb is less than 2m wide. This is in addition to a 60cm parking provision for Dockless Bicycles; and
 - Dockless bicycles shall not be ridden or parked within Royal Park premises.
- 8.3. Dockless Bicycles must not be available to hire on Canal and River Trust land including canal towpaths, access points, around locks or docks (and should not be parked in these locations by customers) without permission from the Canal & River Trust. Highway Authorities reserve the right to determine certain footways where Dockless Bicycle parking is prohibited.

- 8.4. The London Cycling Design Standards is recommended for further guidance to Operators and Boroughs on space requirements for Dockless Bicycle parking.
- 8.5. Operators are encouraged to adopt safe and effective parking guidelines on private land as well.
- 8.6. Operators must inform customers how and where to park a Dockless Bicycle properly in their mobile application visually. It is recommended using best practice/ poor parking images and maps, and ensuring that the customer agrees with these in order to unlock the bicycle and is made aware of any sanctions associated with non-compliance. Examples of where not to park include, without limitation, fire escapes, emergency exits, lifts, accessibility infrastructure (wheelchair lifts or ramps) and TfL cycle hire docking stations.
- 8.7. Operators also need to comply with TfL byelaws, these can be found on the TfL website <https://tfl.gov.uk/corporate/terms-and-conditions/byelaws>.

9. Customer experience and education

- 9.1. Operators must offer 24-hour communication channels. This includes a telephone number that is clearly advertised on their website, mobile apps and Dockless Bicycles.
- Customer enquiries made during business hours should go direct to the Operator. An after-hours phone menu should be available for queries outside business hours, where not direct to the Operator.
- 9.2. The Operator must make sure the terms and conditions of use for their scheme/s are easily available to customers, via their website and mobile apps. They must:
- Require all customers to accept their scheme's terms and conditions that includes clear guidelines on where the scheme operates and where bicycles can and cannot be parked
 - Highlight important components of their terms and conditions including parking restrictions, incentives for good behaviour and penalties for non-compliance
 - Provide highly visible cycling safety tips and general advice on their mobile application as part of the sign-up process that promotes safe and lawful bicycle use in London. This should include, but is not limited to, guidance on:
 - Staying back from heavy goods vehicles;
 - Not cycling on pavements;
 - Staying away from parked cars;
 - Stopping at red lights;
 - Staying central on narrow roads;
 - Hand signals for safe turning;
 - Cycling slowly and considerately in places shared with pedestrians and others, for example on canal towpaths;
 - Provide links within their mobile application and on their website to Transport for London's Cycle Skills webpage to provide consistent advice about the safe use of bicycles on London's road network; and
 - Provide a 'frequently asked questions' page on their website and mobile app.

9.3. All Operators' deposit and payments policy must be in accordance with the Payment Card Industry Data Security Standard. It should be transparent, reasonable and clearly communicated to the customer when they sign up to the scheme and when they hire a bike.

9.4. Operators must have a complaints handling procedure. It must be well publicised and clearly communicated on their website and mobile app. It must also:

- Include contact details, and the process, for making a complaint;
- State the timeframes in which the Operator will endeavour to resolve the complaint, including when they are likely to notify the complainant about its progress or resolution; and
- Be accessible so that disabled customers can lodge and progress a complaint.

10. Data requirements

The Mayor's commitment to increasing safe cycling in London requires TfL and the Boroughs to understand patterns of cycle demand and use. Dockless bike sharing provides an opportunity to do this more accurately, which will better inform the Mayor's cycling strategy for London.

10.1. Operators must share anonymised trip data with the relevant Highway Authority and TfL to help enhance the cycling network. The process of anonymization must ensure that individuals cannot be identified. Any transfer of data should be discussed with the relevant Highway Authority before taking place

10.2. It is recommended that Operators share data with Participating Boroughs and TfL via portals or dashboards to allow access to operational reporting as and when required. Data should include as a minimum:

- The number of bikes deployed as well as the number available to hire indicating the number of stolen and damaged bikes
- Number of hires per bike per day indicating the utilisation rate of the scheme

10.3. In some circumstances, disclosures of personal data to the police and other law enforcement agencies are permitted by data protection legislation, if they relate to the prevention or detection of crime and/or the apprehension or prosecution of offenders. Before any such disclosure takes place, the police are required to demonstrate that the personal data concerned will assist them in this respect, to ensure that any disclosure is lawful and in accordance with data protection legislation.

10.4. In the provision of data to Highway Authorities, particular importance should be given to reporting crime to the Police, including vandalism, dumping and theft associated with Dockless Bicycle sharing schemes. All personal data processed by operators must be done so in accordance with data protection legislation (including the General Data Protection Regulation and Data Protection Act 2018). This includes making sure appropriate security measures are taken against unauthorised access to, or alteration, disclosure, accidental loss or destruction of, personal data.

11. The environment

TfL and the Boroughs are determined to reduce the impact of their transport operations on the environment. Measures in the Mayor's clean air strategy will target the most polluting vehicles in London.

11.1. When redistributing bikes, Operators should consider the environmental impact of any vehicles used. Compliance with the FORS bronze accreditation will contribute to this.

11.2. It is recommended that Operators comply with ISO 14001:2015 to minimise negative impacts on the environment.

11.3. Recognising that Dockless Bicycles have a limited useful life, Operators must share their policy for reusing and recycling their assets with TfL and the relevant Boroughs.

12. Accessibility requirements

TfL and the Boroughs continue to improve the Capital's urban realm, decluttering streets and making public spaces more pleasant and easier for people to use, particularly older and disabled people and those travelling with children. To safeguard this, it is essential that Operators in London follow this Code and, in particular, the parking guidelines set out in section 8 which are intended to ensure safe and accessible Public Roads and spaces.

12.1. Operators should recognise TfL's equality and inclusion guidelines and must be committed to improving transport in London by making it more accessible, safe and reliable.

13. Future considerations

TfL, in partnership with the Boroughs, remains open to innovative new services that could help achieve the Mayor's goals for cycling, provided they are safe and effectively managed.

The introduction of Dockless Bike sharing will be closely monitored as appropriate governance and regulatory controls are explored to make sure it works for everyone in the Capital.

WCC/WSP : **“Statement of Reasons”** next 2 pages :
(Underlined for the Trust’s concerns and objections).

Dockless cycle hire bikes and e-scooters can offer a convenient option for those that work, live or visit the city. However, there are significant concerns regarding rider and pedestrian safety and dockless vehicles cluttering footways. Dockless cycle hire bikes can currently be left almost anywhere, obstructing footways and creating potential hazards or obstructions. The introduction of dockless e-scooter / cycle hire bays will improve on-street dockless vehicle parking management and reduce the risk of the unauthorised dockless bikes left around the city’s footways. Improved accessibility to dockless e-scooter and cycle hire schemes will encourage a shift from motor vehicles to cleaner journeys, improving air quality and increase active travel, thereby improving public health. The measures will be introduced on an experimental basis so that their operation and impact on the surrounding area can be monitored and, if necessary, suspended or modified without delay. In due course, the City Council will consider whether to retain the experimental measures on a permanent basis.

BEFORE ►



THE REALITY DURING THE TRAIL & AFTER ▼



WSP is the agent acting on behalf of Westminster City Council for an experimental traffic management scheme which will introduce dockless e-scooter / cycle hire parking places in various locations across the City. This scheme expands upon the e-scooter bays introduced experimentally in 2021, providing new dual use bays in which both e-scooters and hired e-bikes can be left.

The e-scooter / cycle hire parking places can only be used by rental e-scooters provided through the experimental trial being run by Transport for London (TfL), London Councils and participating London Boroughs AND by authorised dockless e-bikes (currently provided and managed by Dott, Lime and TIER).

Details of the locations for the parking places within D, E, F and G Zones, the first of two phases under this scheme...and the drawings which show the new parking layouts at each location.

The scheme will be introduced on a trial basis, by means of Experimental Traffic Orders made under the provisions of the Road Traffic Regulation Act 1984, so that its operation and impact on the surrounding area can be monitored and, if necessary, suspended or modified without delay.

In anticipation of the launch of this new trial, WSP would be pleased to receive any preliminary observations or comments you may wish to make on this first batch of sites, by email, by 8th August 2023, quoting the reference 8010/LH in any response.

Documents for the second phase, covering Zones A, B and C, are expected to be sent out to relevant stakeholders for preliminary comments in mid-September 2023.

The Experimental Traffic Orders are expected to become operational on 29th August 2023 and will continue in force for a maximum period of 18 months. After the changes have been in force for a minimum period of six months without change, the City Council will consider whether the scheme should be retained on a permanent basis, depending on the success of the measures.

We would also be pleased to receive any comments you may wish to make during the first six months of the trial once it is operational. At the end of the six-month evaluation period, all responses received by this date will be forwarded to the City Council for consideration. The City Council will then decide whether to make the scheme permanent or modify or abandon the scheme.

New Recommendations/Requirements) also include the Trust's support and ideas :

- **Physical public highway changes** in areas designated and with better infrastructure for maximum capacity of vehicles/stability, levels etc. in safe and appropriate locations with clear design guidelines of acceptable or unacceptable locations criteria, for example relating to townscape and landscape features and Listed Buildings and furnishings.
- **Document improvements for consultations and approvals**, that show all features on highways in details, including existing signals at all controlled junctions and informal crossings, pedestrian crossings, lamp columns, traffic sign poles, street furnishings, trees etc.
- Applying the existing and evolving codes of practice already required, together with the processes of enforcement records, records of safety issues, maintenance of the sites/quality and improvement of standards etc.
- **Respect for Conservation and Special Policy Areas, Listed Buildings townscape/landscape context**, size of sites, and most importantly, the improved protection boundary of street furnishings paving surfaces, levels etc. in place of white paint highway bays and flimsy, vulnerable bollards.
- **Government** action for possible new E-Scooter and E-Bike and dockless bike hire legislation options and costs : e.g. Road Tax, Insurance, Number plates ID, improved GPS systems, Mandatory Road Safety Training and formal licences for a Certificate of E-vehicle types ("other vehicles" as Police records) of formal, mandatory Driving Tests?

DELEGATED AUTHORITY REPORT 8010

EXPERIMENTAL TRAFFIC ORDERS – MICROMOBILITY BAYS

EXPERIMENTAL INTRODUCTION OF DOCKLESS E-SCOOTER / CYCLE HIRE BAYS

(All Wards)

Background Information

Following on from the rental e-scooter trial introduced in 2021 (extended until May 2024), Transport for London (TfL) and London Councils are developing a plan to provide consistent approaches to managing the dockless market in London to include e-scooters, dockless cycle bikes and other dockless modes which may emerge in the future.

Dockless cycle hire bikes and e-scooters can offer a convenient hire option for those that work, live or visit the city. However, there are significant concerns regarding rider and pedestrian safety, dockless vehicles cluttering footways. Dockless cycle hire bikes can currently be left almost anywhere, obstructing footways and creating potential hazards or obstructions.

The City Council has a duty to protect those using the highway and remove any dockless vehicles that present danger or obstruction. As a result, Council officers have enforced against operators by issuing notices under section 149 of the Highways Act 1980 and seizing any vehicles causing an obstruction. However, this is very resource intensive and not sustainable.

To address the growing issues caused by dockless cycle hire bikes on the footways, a mandatory parking bay model is being proposed across the highway network. The intention of the scheme is to provide at least one dockless e-scooter / cycle hire parking bay in a 300-metre radius, with additional bays implemented in higher demand areas.

The entire city will be designated as a “no parking zone”, except for the dedicated parking bays. Operators will be required to remove the possibility for their users to end trips outside of the designated parking bays. If users abandon their trips, operators will be requested to subject their users to more substantial fines than exist now. This is expected to be policed and regulated by the operators via geofencing technology.

Enforcement action is expected to be low given the implementation of geofencing. However, there will still be a requirement to enforce against operators and seize bikes if they are causing a danger or obstruction should they not be responded to within the time frame by the operator.

The parking bays would be implemented via Experimental Traffic Orders so that the City Council can monitor their impact over a period of at least six months, and make minor modifications or remove the measures should they be unsuccessful. The City Council will then decide whether the experiment should be made permanent, modified or abandoned.

Proposals

It is proposed, on an experimental basis, to introduce 177 dockless e-scooter / cycle hire bays on the carriageway, replacing existing parking facilities or waiting restrictions, and 40 bays on the footway (217 bays total), some of which will replace existing e-scooter footway bays. The proposed bays are listed in the Appendix to this report and details of the locations can be found on the drawings referenced in that Appendix.

Recommendation

It is recommended that Experimental Traffic Orders are made to facilitate the implementation of the measures described above and shown on the enclosed drawings.

Statement of Reasons

Dockless cycle hire bikes and e-scooters can offer a convenient option for those that work, live or visit the city. However, there are significant concerns regarding rider and pedestrian safety and dockless vehicles cluttering footways. Dockless cycle hire bikes can currently be left almost anywhere, obstructing footways and creating potential hazards or obstructions.

The introduction of dockless e-scooter / cycle hire bays will improve on-street dockless vehicle parking management and reduce the risk of the unauthorised dockless bikes left around the city's footways.

Improved accessibility to dockless e-scooter and cycle hire schemes will encourage a shift from motor vehicles to cleaner journeys, improving air quality and increase active travel, thereby improving public health.

The measures will be introduced on an experimental basis so that their operation and impact on the surrounding area can be monitored and, if necessary, suspended or modified without delay.

In due course, the City Council will consider whether to retain the experimental measures on a permanent basis.

I agree / do not agree to the above recommendation and statement of reasons and give the following authorisations:

- (a) that procedural steps be taken with a view to Experimental Traffic Orders being made under section 9 of the Road Traffic Regulation Act 1984;
- (b) that, if considered necessary, the Experimental Traffic Orders be suspended or modified in accordance with section 10(2) of that of 1984;
- (c) that, in the event of responses being received during the first six months from when the Experimental Traffic Orders, or any modification thereof, come into force (the experimental period), they be referred to me for consideration and reported to the Cabinet Member(s) if considered necessary; and
- (d) that, subject to the outcome of the experimental period, the provisions of the Experimental Traffic Orders be continued in force indefinitely, with or without,

modification, by means of permanent Traffic Orders made under sections 6, 45, 46, 49, 63 and 124 of the Act of 1984.

Signed  Date 21/07/2023
Transport Officer
City Highways, City Management and Air
Quality

Signed  Date 21/07/23
Head of Parking
City Highways, City Management and Air
Quality