

# GOVERNMENT CONSULTATION - REVIEWING THE LAW FOR POWERED MOBILITY DEVICES

## DISABLED RAMBLERS' POSITION

February 2026

### Notes:

For simplicity, we use the term 'mobility device' below in the context in which it is used through the consultation.

Statements in *blue italics* relate to our answers to the consultation questions.

## PROPOSAL OBJECTIVES

*Disabled Ramblers strongly agree with the proposed four objectives which are:*

Proposed Objectives

**1. Objective 1 - Allow people who need a mobility device to use it**

Disabled people who clinically need a mobility device should legally be able to use it. These people may not have a choice in the device they can use to aid their mobility, and if they are not able to use it legally on the pavement their independence may be severely affected.

**2. Objective 2 - Allow greater choice**

There are some devices, that if we allow their legal use, will improve disabled people's ability to travel easily and with dignity. Whilst there may not always be an immediate clinical need for such a device, we may be able to facilitate their legal, safe and responsible use on the public highway, which could improve quality of life.

**3. Objective 3 - Protecting people's perceptions of safety**

We must ensure that people feel safe when using the road and pavement, particularly those who are at greater risk, such as those with sight and hearing loss, children and older people.

**4. Objective 4 - Protecting people's safety**

We must ensure that people are safe when using the road and pavement. Therefore, any changes to the legislation governing what powered mobility

devices can be used on the public highway should not adversely introduce new safety risks for device users and the general public.

## **CHANGING THE TERM ‘INVALID CARRIAGE’ / ALTERNATIVE NAME**

*Disabled Ramblers strongly agree that the term ‘invalid carriage’ is no longer appropriate and should be changed.*

*However, we find the question to be too constrained to be able to answer it sensibly. We have had to state we ‘Agree’ when actually we only agree to half of the statement. We strongly agree the term ‘Invalid Carriage’ should be changed, but we do not know if ‘mobility device’ is a suitable replacement because the Government’s intention on what this name is to encompass is unclear. We have provided extensive further comments for consideration.*

### **Disabled Ramblers further comment:**

For the purpose of this consultation we are using the term ‘mobility device’ to describe Classes 1, 2 and 3 mobility devices (ie wheelchairs, mobility scooters and powerchairs and anything else that is included in these classes in the future) but we don’t know if this is the most suitable term.

In the Government’s consultation document, it says

*“To date, there has been no consensus from people impacted by the legislation on a different term for an ‘invalid’ carriage’. Given the broad set of mobility options we are considering could be used in future, we have proposed that they be called ‘mobility devices.’”*

The consultation discusses devices that are also used by able-bodied people (and some disabled people) such as cycles and trikes.

It is unclear if the Government’s suggestion of the term ‘mobility device’ is intended to encompass

- devices which can only be used by disabled people and those in need of assistance, or
- devices which can only be used by only disabled people and those in need of assistance **together with** devices which can be used by anyone, regardless of being able-bodied, disabled or in need of assistance.

Disabled Ramblers consider the term ‘mobility devices’ could describe all devices that mobilise people ie

- devices that are traditionally called ‘mobility aids’ (ie devices only for those in need of assistance who are having trouble walking because of an injury, physical disability or medical condition) such as mobility scooters, rollators, walking sticks, assistance dogs and long canes
- devices that can be used by everyone such as cycles, trikes and 2-wheel eScooters

If the term ‘mobility device’ were to be adopted by the Government, Disabled Ramblers consider the Government would need to define it further to be clear about what it is to encompass because as it stands it is a generalistic term and could be misunderstood.

Whatever term is decided upon, it needs to be understood by the general population when having a general conversation, and by people who don't read the law and who are not well versed in terminology used around disability.

## **WHO CAN USE POWERED MOBILITY DEVICES & ALTERNATIVE DESCRIPTION**

*Disabled Ramblers strongly disagrees that the description of someone who is permitted to use a powered wheelchair or mobility scooter should be changed to 'A disabled person, or a person with reduced mobility'.*

*Our preferred alternative description is 'A person with limited mobility'.*

### **Disabled Ramblers further comment:**

'A person with limited mobility' is our preferred term. It encompasses people who are having trouble walking because of an injury, a physical disability or a medical condition.

The suggested term 'A person with reduced mobility' is not appropriate as it suggests the person previously had better mobility, or that their mobility could potentially be increased. Some people acquire their limited mobility; others have always had limited mobility. Some have temporary limited mobility eg due to a fractured limb or short-term illness and do not consider themselves to be disabled.

## **WHERE CAN MOBILITY DEVICES BE USED**

*Disabled Ramblers strongly agree that the following mobility devices should be entitled to use both **on-road cycle lanes** and **off-road cycle tracks**:*

- *Class 1 mobility devices*
- *Class 2 mobility devices*
- *Class 3 mobility devices*
- *Wheelchair power add-ons*

### **Disabled Ramblers further comment:**

Disabled Ramblers was pleased when the Highway Code introduced the concept of the 'hierarchy of road users'. These rules extend to users of cycle tracks, bridleways and pavements.

Users have a responsibility for their own and other users' safety. Any change to the law must put safety at the forefront and must not further endanger people, especially those who are more vulnerable, including those who cannot walk quickly or easily, and those with visual or hearing impairments.

**Roads.** Roads are dangerous places for mobility devices, especially in busy areas, but Classes 1, 2 and 3 mobility devices (ie wheelchairs, mobility scooters and powerchairs and anything else that is included in these classes in the future) must all be entitled to use them because

- sometimes roads are the only option (eg when there is no pavement)

- sometimes roads are the safer option (eg when the pavement is very crowded or where people are frequently stopping or changing direction, causing a hazard to the device user who cannot change direction quickly and must try to stop suddenly to avoid causing injury by colliding with someone)

but with the following caveat for the safety of users and those around them:

- users of Class 3 mobility devices who are under the age of 14 should only be allowed to use the road where there is no pavement, cycle track, cycle path, or bus lane – this for the safety of themselves and others around them.

(Note - Disabled drivers may not start driving cars until they are 16; most other people must wait until they are at least 17. Electric bikes (RAPCs) can only be ridden by people aged 14 and over.)

**Cycle lanes and bus lanes.** Cyclists are entitled to use cycle lanes and bus lanes because they are safer than using the road. The current regulations entitle Class 3 mobility devices to use the road at 8mph, but never to use a cycle lane or a bus lane. As the road is more dangerous than a cycle lane or a bus lane this is illogical and should be addressed. Disabled Ramblers believes Classes 1, 2 and 3 mobility devices (ie wheelchairs, mobility scooters and powerchairs and anything else that is included in these classes in the future) should be able to use cycle lanes and bus lanes

- because sometimes they are safer than the pavement.
- because Category 3 mobility device users may wish to travel at 8mph

**Cycle tracks.** Class 2 and Class 3 mobility devices are already entitled to use cycle tracks. Class 1 mobility devices are not but Disabled Ramblers think they should be entitled to do so.

**Pavements, footpaths and shared use routes.** All Class 1, Class 2 and Class 3 mobility devices (ie wheelchairs, mobility scooters and powerchairs, wheelchairs with handcycle attachments) should be entitled to use pavements, footpaths and shared use routes but at no more than 4mph.

## **DEVICE WEIGHT**

*We strongly agree that the current maximum weight limit of a powered mobility device (200kg) reflects the needs of users.*

*We do not think there should be any restrictions on how increased weight is specified.*

### **Disabled Ramblers further comment:**

We recognise that medical organisations and government bodies may be better positioned to suggest a more suitable figure.

All powered mobility devices, whatever their size, and especially heavier ones, have the potential to cause considerable harm to any other users of a space. Walkers, including those who cannot walk quickly or easily, and those with visual or hearing impairments are especially vulnerable when in the same space as mobility devices.

Speed and weight are interlinked with regard to safety, but even very light mobility devices have the potential to cause harm. The heavier the weight, the greater the risks to safety will be, and the greater the need for associated regulation.

Class 2 and Class 3 should have the same maximum weight – there is no benefit to Class 2 having a lower maximum weight, and increasing the limit to that of Class 3 allows more people to be able to choose to use a Class 2 mobility scooter or powerchair.

## **SPEED**

*We strongly disagree that any powered mobility device (mobility scooters and powerchairs and anything else that is included in these classes in the future) should be allowed to go faster than 8mph on roads or on cycle lanes.*

*We prefer to keep speed limits as they are, however, whether they are raised or not, we would like advanced driver-assistance systems (ADAS) to be required of all micromobility devices and devices travelling over 8mph as provided in modern cars etc. These detect objects that are too near for the closing speed and apply brakes.*

### **Disabled Ramblers further comment:**

Speed and weight are interlinked, but even very light mobility devices travelling at 8mph have the potential to cause considerable harm to another user of a space.

Collisions can happen when the device is being used at any speed, but the injuries caused may be less if speeds are lower.

Mobility devices must not go faster than 4mph on pavements or in pedestrian areas, and not faster than 8mph on road. There is currently no speed limit for them on cycle tracks, and a speed limit will need to be set for use in cycle lanes and bus lanes. We consider that where use is permitted anywhere other than on pavements and in pedestrian areas, it should be the same as that for use by each Class of mobility devices on roads.

## **MINIMUM AGE**

*We strongly agree that users of mobility devices on the road should be at least 14 years old, with the caveat that*

- *those who are under the age of 14 should be entitled to use the road, but only where there is no pavement, cycle track, cycle path, or bus lane nearby. This is for the safety of themselves and others around them.*

### **Disabled Ramblers further comment:**

Disabled drivers may not start driving cars until they are 16; most other people must wait until they are at least 17. Electric bikes (RAPCs) can only be ridden by people aged 14 and over. These age restrictions are there for safety reasons and we agree with them.

## **ALTERNATIVE AGE**

*We think that children under the age of 14 should be entitled to use a Class 1 or Class 2 mobility device (ie with max speed limit of 4mph).*

*We think that users aged 14 and above should continue to be entitled to use Class 3 mobility devices.*

*We think there should not be a minimum age for users of mobility devices but the build of devices used by those under the age of 14 must be appropriate to their age.*

### **Disabled Ramblers further comment:**

Children under the age of 14 should only use the pavement, pedestrian areas or shared use routes, but not cycle tracks, bus lanes, cycle lanes or the road unless of necessity because there is no pavement or dedicated pedestrian area nearby.

## **CARRYING OTHERS/ ADDITIONAL PASSENGER/ PASSENGER AGE**

*We strongly agree that an additional passenger should be allowed to be carried on a mobility device.*

*Additional passengers should have a seat, and the seat and device should be specifically built for this purpose.*

*An additional passenger could be anywhere upward of age 0, ie a from a baby to an adult.*

### **Disabled Ramblers further comment:**

Securing anybody in position on a mobility device should be an available option, not a regulation.

Either the 'driver' must be disabled, or the driver must be necessary to facilitate the mobility of the passenger.

A passenger may be of any age from a baby upwards.

The driver must be at least 14 years old.

Disabled people do not live in isolation. Regulations should recognise that they may very well have responsibilities and links to other people just as able-bodied people do, for example

- They may be a disabled parent or disabled carer or disabled older sibling wanting to go out with young children.
- They may be a disabled parent or disabled carer wanting to take a baby with them.
- They may be a disabled person wanting to take their disabled child or disabled parent out.
- They may be able-bodied and want to take their disabled child, or disabled partner, or disabled parent or disabled friend out without having to resort to a car

Users of mobility devices who are parents and carers should be able to carry their babies in conventional baby carriers strapped to the front of their bodies, just as able-bodied parents and carers do.

Mobility devices carrying passengers should be specifically designed to carry more than one person – this may just mean being designed with specific fixtures to secure a purpose made add on to carry a baby, or the whole device may be purpose designed to seat more than one person.

Weight is likely to become an issue, and some mobility devices may become heavier than the standard 200k thus removing the mobility device from the class. Rather than extend the standard weight limit, there should be a specific class for multi-user mobility devices that are heavier than the standard mobility devices. This specific class of device should stipulate an appropriate weight limit for the device and an appropriate total users weight limit.

## **OBSERVATIONS ON POWERED MOBILITY DEVICES**

*Safety of the mobility device user and those who may be in the same space must be at the forefront of any law or regulation concerning powered mobility devices.*

*All users of powered mobility equipment must have 3rd party insurance*

*All powered mobility equipment must be serviced each year by a competent person including wheelchairs with power add-on attachments.*

## **WHEELCHAIR WITH POWER ADD-ON ATTACHMENTS AS MOBILITY DEVICES / RESTRICTION CHOICES**

*We strongly agree that wheelchair with power add-on attachments should have the same rights and restrictions in law as a Class 3 powered mobility device.*

*The questions do not allow for any consideration of what those restrictions should be, so we have included these under the Final Comments question at the end of the questionnaire.*

### **Disabled Ramblers further comment:**

A wheelchair used with power add-on attachment does not constitute a purpose-built mobility device. The wheelchair element will have been built in adherence to wheelchair regulations and will not have been designed to be attached to a power add on. The wheelchair is liable to become unstable at speeds higher than those for which it was designed.

The restrictions we would like to see for wheelchairs with power add-on attachments are:

- Wheelchairs with power add-on attachments should be either Class 2 (max 4 mph) or Class 3 (max 8 mph), according to the power add-on attachment. They should not exceed 8 mph.
- A person under 14 years old may only use a wheelchair with a power add-on attachment with a maximum speed of not more than 4 mph (ie Class 2), on the pavement, in pedestrian areas and on shared use routes, and not on cycle tracks, bus lanes, cycle lanes or the road (unless of necessity because there is no pavement or pedestrian area).

- A wheelchair with a power add-on attachment with a maximum speed of 8 mph (ie Class 3) may be used by a person over 14 years old provided that it
  - is registered with DVLA
  - their use should be insured
  - is restricted to max 4mph on pavement or other pedestrian areas and that it is fitted with a device which is capable of limiting the maximum speed to 4mph and which can be put into operation by the user
  - has an audible horn
  - has a rear-view mirror
  - has front and rear lights and reflectors
  - has direction indicators
- Power add-on attachments should be serviced every year by a competent person.

## **WHEELCHAIR WITH HANDCYCLE OR E-HANDCYCLE ATTACHMENTS AS MOBILITY DEVICES / RESTRICTIONS**

*We disagree that a wheelchair with a handcycle or an e-hand cycle attachment should have the same rights and restrictions in law as a Class 3 powered mobility device.*

*Wheelchairs with **handcycle attachments** should be considered to be cycles, except they should be entitled to use the pavement and pedestrian areas, but only at a walking pace.*

*Wheelchairs with **e-handcycles attachments** should be considered to be either Class 2 (not exceed 4 mph) or Class 3 (not exceed 8 mph) mobility devices and have the same rights but there should be fewer restrictions ie*

- *they should not be required to have direction indicators*
- *they should not be required to have a rearview mirror*
- *they should have a lower maximum weight limit*

*E-handcycle attachments should be serviced every year by a competent person.*

*A person under 14 years old*

- *must not use a Class 3 e-handcycle attachment*
- *may only use a wheelchair with a handcycle attachment at walking pace, or a wheelchair with a Class 2 e-handcycle attachment up to 4mph*
- *may only be entitled to use the pavement, pedestrian areas and shared use routes, and must not use cycle tracks, bus lanes, cycle lanes or the road (unless of necessity because there is no pavement or pedestrian area).*