

<b>Committee(s)</b>	<b>Dated:</b>
Planning and Transportation Committee	<b>12 December 2019</b>
<b>Subject:</b> Dockless cycle hire trial outcomes and next steps	<b>Public</b>
<b>Report of:</b> Director of the Built Environment	<b>For Decision</b>
<b>Report author:</b> Giacomo Vecia, Department of the Built Environment	

### Summary

In March 2019 Members agreed to a six-month trial of a new approach to managing dockless cycle hire. Two operators – Freebike and Beryl – were selected to take part in the trial, which launched in June 2019. The trial sought to assess the effectiveness of designating parking locations for dockless cycles, particularly in terms of user compliance and how operators respond to bikes left outside those locations.

Beryl and Freebike's parking compliance, average response time, number of complaints received, and ridership figures indicate the trial was successful in reducing the number of inappropriately parked bikes.

An interim arrangement for dockless cycle hire in the Square Mile is needed while TfL and London Councils finalise the pan-London byelaw, which is expected to be adopted and implemented mid-2020.

Officers have considered three options for the management of dockless cycles in the City until the byelaw is made:

- Option A: reverting to our previous policy
- Option B: continuing the current approach with Beryl and Freebike
- Option C: Continuing the parking requirements as trialled and approving additional operators

Option C is recommended. This option provides users with more choice, creates a more coherent approach, continues to provide control over the areas where bikes are parked and ensures that operators maintain certain quality standards. This option also moves the City Corporation further towards the arrangements that are likely to come into effect under the byelaw.

### Recommendation(s)

Members are asked to:

- Agree Option C: Continue the parking arrangements as trialled and approve additional operators.
- Agree the extension of the current trial until 31 March 2020, allowing Beryl and Freebike to continue operating as-is while preparations are made to accommodate additional operators.

## **Main Report**

### **Background**

1. 'Dockless cycle hire' is a generic term for a short-term cycle hire scheme, similar to Santander Cycles, but with no on-street docking infrastructure. Dockless cycle hire has been operating in London since autumn 2017.
2. The fact that no on-street docking infrastructure is required offers users more flexibility and avoids the risk of not being able to end a ride due to a docking station being full. It also represents a challenge, as users of dockless cycle hire can leave bikes anywhere, potentially obstructing pavements.
3. Dockless cycle hire schemes fall outside the existing legislative framework and the City Corporation does not have powers to prevent dockless cycle hire schemes from operating in the City.
4. In October 2017, Members of the Planning & Transportation Committee adopted a policy on dockless cycle hire operations within the Square Mile (Appendix 1). The policy allowed dockless cycle hire to operate on City streets subject to conditions. These included adherence to TfL's Dockless bike share code of practice and a requirement that operators do not deploy bikes within the Square Mile.
5. The challenge of managing dockless schemes in the City under this policy led to the trialling of a new approach to managing dockless cycle hire as agreed by this Committee in March 2019. Members agreed to a six-month dockless scheme trial with two operators – Freebike and Beryl – who were invited to take part in the trial following a selection exercise in April. The trial launched in June.
6. The trial sought to assess the effectiveness of designating parking locations for dockless cycles, particularly in terms of user compliance and how operators respond to bikes left outside those locations. It was proposed that the success of the trial be determined by tracking parking compliance, response times for inappropriately parked bikes, number of complaints raised and received regarding dockless, and total trial scheme ridership.
7. All other operators were asked to exclude the Square Mile within their operating areas while the trial was underway. However, as dockless cycle hire schemes do not require the express consent of the City Corporation to operate, Lime and Mobike continued to operate in the City for the duration of the trial, with Lime taking some steps to discourage people from ending hires in the City.

### **Byelaw update**

8. TfL and London Councils have continued their work on the proposed pan-London byelaw. The draft byelaw text includes requiring all dockless bikes to be left (whether by dockless operators or their customers) only in places agreed by the relevant local authority, and makes it an offence for dockless operators to place or allow their bikes to be parked anywhere other than at a location agreed by the local authority.
9. The making of the pan-London byelaw requires each of the 33 London local authorities to delegate the exercise of additional functions to the London Councils

Transport and Environment Committee (TEC). This requires the TEC constitution (Governing Agreement, dated 13 December 2001 (as amended)) to be varied.

10. London Councils requested that all boroughs delegate the authority to make this byelaw by December 2019. A majority of boroughs and the City of London have made this delegation already and London Councils are working with the remaining boroughs to secure delegations as soon as possible.
11. TfL and London Councils believe the byelaw is still on track to be adopted and implemented mid-2020.

### **Trial success metrics and criteria**

12. The success of the trial has been assessed using the following metrics:
  - a. Parking compliance: the percentage of rides that end with a bike parked outside of bays
  - b. Response time: the average amount of time the operator took to respond to an inappropriately parked bike
  - c. Number of complaints: the total number of Beryl and Freebike complaints over the course of the trial
  - d. Total ridership: the total number of Beryl and Freebike rides over the course of the trial
13. Overall the data suggests the trial was successful in minimising the number of inappropriately parked bikes in the City. On average, 89% and 87% of Beryl and Freebike users respectively ending their hires in a parking bay. Parking compliance also improved slightly over the trial period for both schemes.
14. It has been observed that users of other operators also left bikes in dockless parking bays. This suggests that users are becoming familiar with the use of designated parking areas.
15. Average response time was approximately 40 minutes for Beryl and Freebike operations teams, which was well within the 90 minutes set out in the terms of the trial.
16. Beryl and Freebike received ten requests and complaints from the City Corporation and members of the public regarding inappropriately parked bikes.
17. The City Corporation also received two complaints regarding a bay on Bartholomew Close. Residents noted that bikes often weren't parked directly inside the bay, leading to the narrow pavement adjacent to the bay to become obstructed. As there was a disabled resident in the Close, it was deemed necessary to remove the bay.
18. Seven other comments and complaints from the public were received through the City Corporation's Contact Centre, with five expressing general opposition to dockless operations in the City and two in support of expanding the trial to include other operators.
19. The total number of hires under both schemes was over 18,000. Given that for most of the trial both operators have only operated within the Square Mile this

suggests a significant amount of dockless bike share activity has taken place over the duration of the trial.

### **Future Options**

20. Officers have considered three options for the management of dockless cycles in the City until the byelaw is made:

- A. Revert to our previous policy
- B. Continue the current arrangement with Beryl and Freebike
- C. Continue the parking requirements as trialled and approve additional operators

21. Each option is described further below. Option C is recommended.

### **Option A: Revert to our previous policy**

22. Under this option the Corporation reverts to its original 2017 policy position. This would mean:

- a. Operators who comply with the TfL Code of practice and who engage with the City Corporation would be given consent to operate in the City.
- b. Users of consented operators would be allowed to start and end hires anywhere in the City.
- c. Operators would not deploy bikes within the Square Mile.
- d. There would be no requirement to use parking bays and existing parking bays would likely be removed.
- e. Other operators would be asked to exclude the Square Mile from their operating areas.

23. This option is not recommended. The 2017 policy was not effective in dealing with the issue of bikes obstructing pavements. This approach also diverges from the arrangements that are likely to be in place once the byelaw is made.

24. Given the success of parking bays in minimising the number of inappropriately parked Beryl and Freebike bikes it is likely that more enforcement officer time will be spent dealing with inappropriately parked dockless bikes.

25. This option does not support Proposal 28 of the Transport Strategy and our desire to improve the management of cycle hire in the Square Mile.

### **Option B: Continue the current arrangement with Beryl and Freebike**

26. Under this option the Corporation would extend the current arrangement with Beryl and Freebike until the pan-London byelaw is adopted. All other operators will continue to be asked to not operate in the City.

27. This option is not recommended. Continuing with just two operators reduces choice for users, limits the ability of dockless cycle hire to enable more people to

choose to cycle to and within the Square Mile and leads to user confusion regarding operating areas.

28. This option also limits our ability to further align with the arrangements that are likely to be in place once the byelaw is made. Transport for London and London Councils has indicated that Local Authorities in London will not have the powers necessary to selectively allow or prohibit individual operators from operating in their jurisdictions.
29. Other operators, including those who currently exclude the City from their operating areas, may also decide to begin operating in the City regardless of our agreed approach.

**Option C: Continue the parking arrangements as trialled and approve additional operators to operate in the City**

30. Under this option the use of designated parking bays would continue and all operators who meet the requirements below would be given approval to operate in the Square Mile. This arrangement would remain in place until the pan-London byelaw is adopted
31. This option is recommended. It provides users with more choice, creates a more coherent approach, continues to provide control over the areas where bikes are parked and ensures that operators maintain certain quality standards while operating in the Square Mile. This option also moves the City Corporation further towards the arrangements that are likely to come into effect when the byelaw is made.
32. New operators will be approved to operate in the City if they:
  - a. Meet the criteria and terms set out in Appendix 3 (these are consistent with the terms of the current trial)
  - b. Can demonstrate that enough additional parking capacity can be found and delivered on-street to accommodate additional parking demand
  - c. Cover the cost of any new parking infrastructure required to accommodate additional parking demand
  - d. Are operating in at least one neighbouring borough
33. Operators who do not meet our requirements will continue to be asked to exclude the City from their operations. We will continue to report inappropriately parked bikes to them and remove any bikes posing long-term obstructions or immediate dangers in accordance with our existing enforcement policies.
34. At the time of writing, this option would likely mean that Lime and Jump would operate alongside Beryl and Freebike.
35. If Members agree Option C, then it is proposed to extend the current trial with Freebike and Beryl until 31 March 2020 while we prepare for allowing more operators in the City. This provides time to:
  - a. Confirm our new arrangement with existing and new operators in London
  - b. Work with current and potential operators to identify additional parking capacity (with a first preference for on-carriageway)

- c. Install any additional parking infrastructure
- d. Any new operators will be expected to cover the cost of installing additional parking areas contribute.

### **Ongoing management of dockless bike schemes**

- 36. From 1 April the number of bikes in the City will be determined by the capacity of parking bays. All operators will be expected to manage the number of bikes in the City amongst themselves in accordance with available parking space.
- 37. All operators will be expected to contribute to the ongoing cost of the management of their bikes and the cost of bay maintenance and upkeep. We will work with TfL to set appropriate fees and mechanisms to recover these costs.
- 38. Should an operator wish to expand their operators in the City they will need to demonstrate that there is sufficient space for additional parking capacity and cover the costs of any new parking infrastructure accordingly.
- 39. Our Data Sharing Agreement will be updated to include a requirement that all operators provide us real-time location data of all dockless bikes via an API. We will work with TfL, London Councils and the London Office of Technology and Innovation to explore ways to better use real-time dockless bike API data to manage and enforce against inappropriately parked bikes.
- 40. Officers will also look to begin phasing out out-of-bay parking to continue transitioning towards alignment with the draft pan-London byelaw.
- 41. The City Corporation's SEOs will continue to report and where necessary remove any dockless cycle hire cycles – whether the operator is part of the trial or not – that are deemed to be causing a nuisance, obstruction or danger. A maximum of £235 will be charged per bike to the relevant operator for dealing with an obstruction. This will ensure the full costs of removing and storing bikes are covered.
- 42. Officers will continue to work with TfL and London Councils to support the development of the London-wide byelaw to regulate dockless cycle hire operations.

### **Corporate & Strategic Implications**

- 43. The proposals support the Corporate Plan aims to contribute to a flourishing society, particularly promoting good health and wellbeing, and to shape outstanding environments, by enhancing the physical connectivity of the City.
- 44. The City of London Transport Strategy (Proposal 28) sets out our approach to improving cycle hire in the Square Mile. This includes ensuring that dockless cycle operators restrict their users from parking outside designated areas and quickly remove cycles that are not parked in these areas. The need for designated parking areas is also included in Proposal 17: Keep pavements free of obstructions.
- 45. There is a possible reputational risk to the City Corporation if innovative approaches to enable more cycling and increasing sustainable and healthy transport modes are not carefully considered. There are also possible

reputational risks if potential adverse impacts of dockless cycle hire operations are not carefully managed.

### **Legal implications**

46. The City Corporation has no powers to remove bikes that are parked on City streets unless they are causing an obstruction, nuisance or danger to the public, and operators do not require consent or a licence from the local authority for its users to cycle within the City.
47. However, in terms of proactively authorising the placing of cycles for hire on the highway by operators, the City as highway authority can only act if it has a statutory power to do so. Section 115E of the Highways Act 1980 empowers the authority to grant a person permission to provide services for the benefit of the public on the highway. Where this is for a purpose which results in the production of income consent from frontagers is required. Permission may be subject to such reasonable terms and conditions as the authority thinks fit. All other legal implications regarding dockless cycles remain as previously reported.

### **Financial implications**

48. The recommended option will ensure that operators will help meet any costs for additional infrastructure required to facilitate dockless operations in the City.
49. In addition, operators will begin to contribute to the ongoing maintenance of parking bays and management of dockless cycles. The costs responding to reports of bikes causing an obstruction or danger has previously been absorbed by our SEO team, having a direct impact on their operational capacity.
50. Costs will continue to be incurred if the City Corporation has to remove bikes deemed to be causing a danger from the streets in default of the operator removing them. Removal and storage costs would be incurred in these circumstances and will be recovered through the proposed increase in recovery fees.

### **Health Implications**

51. Well managed dockless cycle hire has the potential to encourage active travel within central London, and potentially shift journeys from short taxi, private hire and public transport trips, with associated benefits to air quality and public health.

### **Equality Implications**

52. The proposals to improve the management of dockless cycle hire and to encourage considerate use/parking of bikes will help mitigate adverse impacts for vulnerable road users (e.g. visually impaired, wheelchair users). This is consistent with the public sector equality duty.

## **Conclusion**

53. After six months, data suggests the trial was successful in minimising the number of inappropriately parked bikes in the Square Mile. As a result, it is recommended to continue the parking arrangements as trialled and approve additional operators to operate in the Square Mile.
54. This option provides users with more choice, creates a more coherent approach, continues to provide control over the areas where bikes are parked and ensures that operators maintain certain quality standards while operating in the Square Mile.
55. This option also moves the City Corporation further towards the arrangements that are likely to come into effect when the byelaw is made.
56. Further updates will be brought to Committee as soon as we have clarity on the timing of the byelaw. In the meantime, we will continue to monitor relevant dockless operations to help inform us of our future position.

## **Appendices**

- Appendix 1 – City of London Dockless Cycle Hire Policy 2017
- Appendix 2 – Legal implications: Advice from the Comptroller and City Solicitor
- Appendix 3 – City of London Corporation Dockless Cycle Hire Trial criteria and terms

## **Background Papers**

Dockless Vehicle Hire Trial Outcomes, Planning and Transportation Committee, 3 October 2019

Dockless Cycle Hire, Planning & Transportation Committee, 18 March 2019

Dockless Cycle Hire Review, Planning & Transportation Committee, 21 May 2018

Dockless Cycle Hire Review, Planning & Transportation Committee, 11 September 2018

TfL Dockless bike share code of practice <http://content.tfl.gov.uk/dockless-bike-share-code-of-practice.pdf>

## **Giacomo Vecia**

Strategic Transport Officer (City Transportation)

Department of the Built Environment

T: 020 7332 1489

E: [giacomo.vecia@cityoflondon.gov.uk](mailto:giacomo.vecia@cityoflondon.gov.uk)



## **Appendix 1 – City of London Dockless Cycle Hire Policy 2017**

As adopted by the Planning & Transportation Committee on 3 October 2017.

The City of London Corporation recognises the role that well-organised dockless cycle hire schemes can play in providing low-cost public access to cycles for short urban journeys and endorses the Dockless bike share code of practice (“the Code”).

Operators are expected to follow the requirements and recommendations of the Code.

While the City of London is likely to be a popular destination for trips undertaken by dockless cycle hire, the street layout and extremely high footfall in the City means that highway in the City is an unsuitable location for dockless cycle hire operations to be based. This means that no operator should directly place cycles on City Corporation highway. Cycles should not be placed on any other land in the City without the consent of the property owner. The City Corporation should be informed in advance of any proposals to base cycles on private property within the City.

The City Corporation will engage with operators wishing to operate dockless cycle hire schemes, and users of the schemes may leave the cycles in appropriate locations on City streets, with these cycles then available for public hire, subject to cycle hire operators’ compliance with the Code and the City Corporation Policy Statement.

Cycles belonging to operators not complying with the Code and causing danger, obstruction or nuisance will be removed by the City Corporation and operators will be liable for costs as set out in the Code.

Operators wishing to run a dockless cycle hire scheme in the City of London should contact the Strategic Transportation team to discuss their proposals.

## **Appendix 2 – Legal implications: Advice from the Comptroller and City Solicitor**

### **Statutory duties**

The City Corporation has a duty under s.130 of the HA 1980 to assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority.

It also has a network management duty under s.16 of the Traffic Management Act 2004. This requires it to manage its road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives:

- a. securing the expeditious movement of traffic on the authority's road network; and
- b. facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.

Under section 122 of the Road Traffic Regulation Act 1984 local authorities are under a duty to exercise functions conferred on them under that Act so far as practicable, having regard to matters specified in subsection (2), to secure the expeditious, safe and convenient movement of traffic (including pedestrians).

The City Corporation is also subject to the public sector equality duty under section 149 of the Equalities Act 2010. This means that in the exercise of its functions it must have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This includes removing or minimising disadvantages suffered by people due to their protected characteristics (such as visual or mobility disabilities).

An unmanaged proliferation of bikes on the highway arising from dockless bike hire schemes may compromise compliance with the above statutory duties.

### **Statutory powers to deal with bikes on highway**

Dockless cycle hire schemes which do not necessitate any infrastructure being placed on the highway fall outside the existing legislative framework and do not need the City Corporation's consent to operate in the City. However, there are some existing statutory powers available where bikes are left so as to cause an obstruction, nuisance or danger.

1. Section 137 HA 1980 – If a person, without lawful authority or excuse, in any way wilfully obstructs the free passage along a highway he is guilty of an offence and liable to a fine not exceeding Level 3 on the standard scale (currently up to £1000.00.)
2. Section 148(c) HA 1980– if, without lawful authority or excuse a person deposits anything whatsoever on a highway to the interruption of any user of

the highway he is guilty of an offence and liable to a fine not exceeding Level 3 on the standard scale.

3. Section 149 HA 1980 – if anything is so deposited on a highway as to constitute a nuisance, the highway authority for the highway may by notice require the person who deposited there to remove it forthwith. In the event of non-compliance, a court order may be obtained authorising the removal and disposal of the offending item. If the highway authority has reasonable grounds for considering the item constitutes a danger (including a danger caused by obstructing the view) to users of the highway and ought to be removed without the delay of seeking a court order it can remove the item forthwith and, ultimately, seek a court order for its disposal.

### **Street trading and ‘waste’**

Consideration has been given to whether the provision of dockless cycles for hire is caught by local legislation which makes it unlawful for any person to engage in unauthorised street trading in the City. “Street trading” is defined in the City of London (Various Powers) Act 1987 to mean the selling or exposing or offering for sale of any article or thing in a street. However, dockless cycle hire schemes involve bikes being available on the highway (or on private land with the consent of the owner) for temporary hire by members of the public, with payment being made via an App, and no person in the street engaged in the hiring out of the bikes. As the 1987 Act prohibits a person from selling etc. items in the street, not the temporary hiring of bikes in the way proposed which is more in the nature of a service (and not dissimilar to the existing Santander cycle hire scheme except that there are no docking stations), the activity would not amount to unauthorised street trading.

Consideration has been given to whether definitions of “waste” or “litter” in legislation apply. It is considered that these terms are not intended to cover bicycles left temporarily on the highway and which are in use for the benefit of the operators and their customers and officers are not aware of any decisions on this point. It is not considered that this adds significantly to the City’s statutory powers to deal with bikes on the highway.

### **Regulation by making byelaws**

Government guidance states that byelaws are considered measures of last resort after a local council has tried to address the local issue the byelaw applies to through other means. A byelaw cannot be made where alternative legislative measures already exist that could be used to address the problem. Byelaws should always be proportionate and reasonable.

It follows that there is a risk that the case for making a byelaw to regulate dockless bike hire could be undermined if all bikes on City streets were to be classed as obstructions and removed under existing powers. This would not prevent the application of the Street Obstructions Policy as proposed.

In relation to the activities of other local authorities in this area, it is understood by City officers that action is proposed to be pursued through a proposed London-wide byelaw.

TfL and London Councils have proposed establishing a regulatory framework for dockless bike hire schemes by way of a London-wide byelaw as the Boroughs have power to make byelaws for good rule and government under section 235 of the Local Government Act 1972. This would necessitate each authority delegating their byelaw-making powers to London Councils' TEC. The byelaw would then be made by way of the new simplified procedure introduced by Regulations which replaced the requirement for Government confirmation of the byelaw.

(However, the City Corporation has a different power to make byelaws for good rule and government contained in the City of London (Various Powers) Act 1961 to which the new simplified procedure does not apply. The City Corporation's participation in London-wide byelaw arrangements may therefore require a separate byelaw (which would need to be confirmed by the relevant Secretary of State) to interface with the TEC byelaw as part of the London-wide controls).

## **Liabilities**

In the event of loss, injury or damage being caused by the cycles, the person responsible would depend on the circumstances of each case. For example, if a cycle had remained in a dangerous position for days without the highway authority taking steps despite complaints, some liability would be likely to rest with the highway authority. If an accident occurred a few moments after the cycle was left in a dangerous position and the highway authority had no reasonable opportunity to identify and remedy the danger, it is unlikely any liability would rest with the highway authority, and therefore would be more likely to rest with the user and/or operator. In addition, the steps proposed to secure the co-operation of operators in ensuring safe practises would help demonstrate that the City is taking reasonable measures consistent with its responsibilities.

### **Appendix 3 – City of London Corporation Dockless Cycle Hire terms for operational approval**

The City Corporation is looking to approve and support dockless hire schemes who adhere to the following criteria and terms:

1. Operators must be able to accurately locate their bicycles and have redistribution processes in place to move or remove inappropriately parked bicycles within:
  - a. 90 minutes on Mondays to Fridays between 06:00 and 21:00
  - b. 4 hours at any other time

Operators must also be able to remove their bicycles for security reasons at the request of the City Corporation at any time within 90 minutes.

2. Operators must manage operations in a way that minimises traffic impacts and emissions from any operational vehicles. Compliance with FORS accreditation will contribute to this. It is also recommended that Operators comply with ISO 14001:2015.
3. Operators must make their users aware of agreed parking locations and have appropriate means of requiring users to comply with parking requirements and encourage good parking behaviours.
4. Operators must design their bicycles to reduce the risk of vandalism and theft of the bike and of the bicycle falling over.
5. Operators must be committed to encouraging safer behaviours and enabling a more diverse range of people to cycle.
6. Operators must ensure the design of their cycles achieve and maintain ISO 4210:2014 standards for bicycles in the UK, especially regarding part quality and sustainability, safety and engine specifications, including:
  - a. Providing hand-operated brakes arranged left-hand rear and right-hand front
  - b. Providing 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
  - c. Providing a rear red reflector and amber/yellow reflectors on the front and rear of each pedal
  - d. Making sure all bicycles have an individually identifiable asset number.

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

7. Operators must ensure their bicycles are always well maintained and safe to ride and have a mechanism to disable any bicycles that are broken or damaged. Operators must also have a Sustainability Policy, including details on reusing and recycling their assets.

8. Operators must have an easy to use reporting mechanism that allows the public and the City Corporation to report bicycles that are damaged, vandalised, or inappropriately parked.
9. Operators must offer 24-hour communication channels. This includes a telephone number that is clearly advertised on their bicycles, website and mobile apps.
10. Operators must not operate in neighbouring boroughs without agreement and promptly remove any bicycles left in those boroughs within a fixed time period as determined by the borough and the City Corporation.
11. Operators must share at least the following data with the City Corporation on a monthly or better basis:
  - a. Origins and destinations of all trips that start or finish in the Square Mile by month in GIS format
  - b. The number of trips per street by month in GIS format
  - c. The number of hires by hour in tabular format
  - d. The number of times bike journeys have been paused or stopped outside of agreed parking areas by month in tabular format
  - e. The number of requests they received from the City Corporation, public, and any other groups to move a cycle
  - f. The number of their cycles parked in the City by hour for the previous week in tabular format
1. Operators must provide us real-time location data of all dockless bikes via an API.
12. Operators must have levels of insurance coverage that meet or exceed the minimum requirements as determined by the City Corporation.
13. The City Corporation may change the maximum number of Bicycles permitted in the Square Mile and close or update approved parking locations at any time.
14. Operators must only deploy bicycles at locations specified by the City Corporation, in numbers for that location determined by the City Corporation, and on dates and at times agreed with the City Corporation
15. Operators must not deploy more than their allocated number of bicycles parked in the Square Mile at any time and remove or redistribute any excess bicycles from our streets within:
  - a. 90 minutes on Mondays to Fridays between 06:00 and 21:00
  - b. 4 hours at any other time
16. Operators must contact neighbouring boroughs and agree with them how they will manage any bikes that are left in their borough.

17. The cost of any additional signage, markings, or infrastructure needed to facilitate Dockless Bicycle Schemes will be borne by the Operator.
18. Operators must not use any City Corporation logos or branding in any way without written permission from the City Corporation.
19. Operators must agree any marketing or public communications with the City Corporation prior to publication.
20. Operators must be accredited with CoMoUK.
21. Operators must be accredited as a London Living Wage employer.
22. Operators must comply with the TfL Code of Conduct and any details of Proposal 28 of the draft City of London Transport Strategy not covered by any other criteria or term
23. The City Corporation may rescind operational approval at any time for failing to reasonably meet any of the listed operational terms. If an Operator has their approval rescinded, they will have 48 hours from the time of our suspension instruction to remove all their bicycles from the City.