Greater Cambridge Partnership
Making Connections 2022 survey

Response by the Motorcycle Action Group

2022 12 09

Introduction

The Motorcycle Action Group (MAG) is the leading riders' rights organisation in the UK. MAG membership consists of over 8,000 full members and 150,000 affiliates and associates. MAG is a founder member of the Federation of European Motorcycle Associations (FEMA).

The views of members on this particular subject have been gathered by discussion and debate within MAG's membership and engagement and discussion with the wider riding community, other organisations and the industry.

Bus Improvements

MAG fully supports improved and extended bus services. We do not comment on specific plans for achieving bus improvements beyond any specific impact that plans may have on motorcyclists.

Motorcyclists benefit from reduced congestion just as all other road users.

We were particularly disappointed that the Cambridge trial for motorcycle access in bus lanes ended in a decision not to continue with the policy. The trial combined both motorcycle and EV access. We felt that the decision was taken purely on the merits and basis of the electric vehicle access. Thus, the wrong decision was made for motorcycles, and we would urge the decision for motorcycle access to be re-visited.

Cycling, walking and other improvements

MAG is supportive of the principle of the schemes proposed but would urge that the range of schemes on offer is reconsidered. Modal shift from cars to motorcycles can be shown to reduce air pollutant and CO2 emissions as well as reducing congestion and reducing spatial requirements for parking, whilst being a relatively cheap and accessible transport choice. As such we promote motorcycling as a sustainable transport mode and would urge the GCP to include projects that will encourage modal shift from cars to motorcycles.

Projects could include bus lane access, increased secure parking and active promotion of the benefits of switching from car to motorcycle.

MAG is not supportive of the premise stated in the survey that "These improvements would only be possible with lower traffic levels and funding created by the proposed Sustainable Travel Zone." We take the position that the benefits of the proposals will be enjoyed by all and the funding costs should therefore be borne fairly by all. Placing the funding burden purely on motorised transport users is unfair and regressive, particularly in the case of motorcycles which should be included as a sustainable transport mode receiving promotional policy, not restrictions and additional taxation.

We would also urge the GCP to reconsider segregation of road space within the STZ if it is to go ahead. If policy can successfully reduce car use and redress the balance of vehicle classes in the zone, there must be a case for a reduction in the need for segregation. MAG promotes the design of road space that is safe and fit for all road users. Roads should be a shared space for all wheeled traffic and the premise of segregation is only necessary due to poor road design choices, speed differentials and congestion. Segregation of road space has increasingly reduced road space available for motorcyclists. Motorcyclists are a vulnerable road user group and should not be forced into closer proximity of larger vehicles. The principle of separation is applied for cycling, but entirely ignored for motorcyclists. MAG does not accept this relative lack of consideration for the needs of one VRU group compared to the other VRU groups.

Sustainable Travel Zone

As discussed above, MAG is opposed to the premise of the proposed Sustainable Travel Zone. The designation is used purely to form a bounded area in which motorised transport becomes a revenue source. The proposals for improving sustainable transport, which should include motorcycling, are not predicated on a defined area, but can and should be applied throughout the GCP area.

Despite the name, this is a congestion charging zone, and if the GCP feel the need to impose it, the principles should in our view match those of the London Congestion Charging Zone, which exempts motorcycles from any charge. This is a logical outcome because on all measures of success, motorcycles contribute to solving congestion and related issues of air quality and CO2 emissions.

MAG has produced two reports covering air quality and carbon emissions from motorcycles. We would urge the GCP to fully review the evidence contained in these reports that back the above claims on air quality and CO2 emissions benefits derived from modal shift from cars to motorcycles.

Air Quality:

https://wiki.mag-uk.org/images/c/cf/Promoting_Modal_Shift_to_PTWs_August_2018_%282%29.pdf

CO2 emissions:

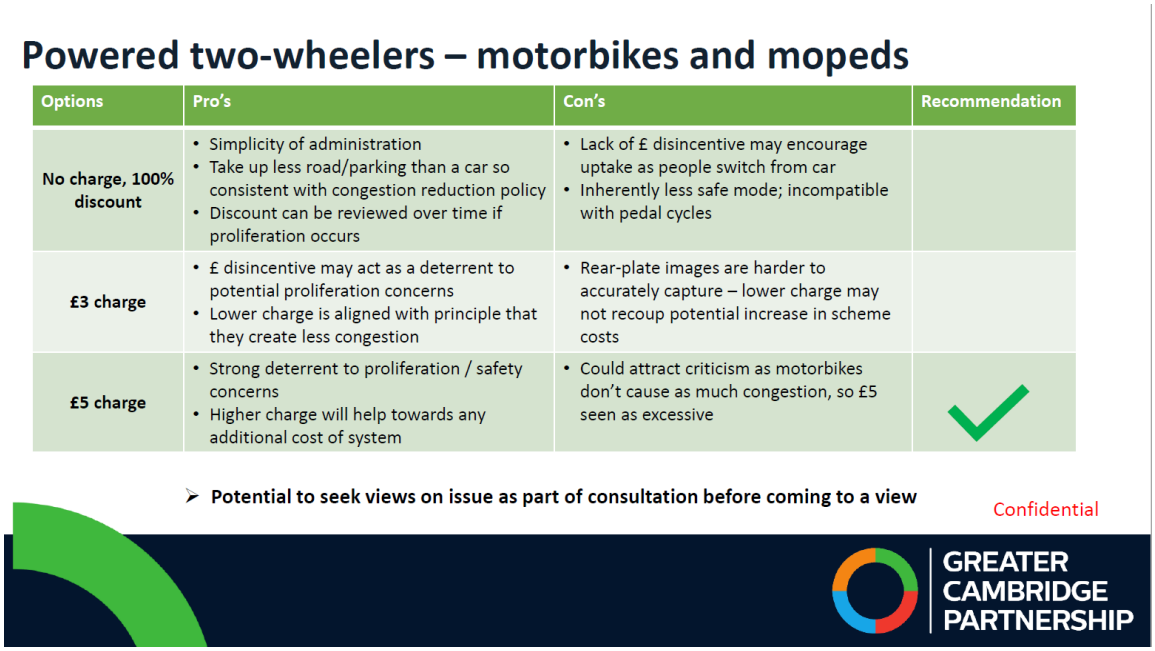
https://wiki.mag-uk.org/images/3/39/Motorcycle_Carbon_Emissions_v1.pdf

For the congestion-busting benefits of modal shift from cars to motorcycles, we would also urge GCP to review the below modelling study which showed a 10% modal shift from cars to motorcycles produces a 40% reduction in congestion.

https://wiki.mag-uk.org/images/1/15/TM_Leuven_Report.pdf

MAG has obtained evidence that reveals the thought process used to justify the proposed charges for motorcycles in the STZ. We would like to specifically address this evidence.

Firstly, the below slide was delivered in presentations to councillors and decision makers:



Powered two-wheelers – motorbikes and mopeds

Options	Pro's	Con's	Recommendation
No charge, 100% discount	• Simplicity of administration • Take up less road/parking than a car so consistent with congestion reduction policy • Discount can be reviewed over time if proliferation occurs	• Lack of £ disincentive may encourage uptake as people switch from car • Inherently less safe mode; incompatible with pedal cycles	
£3 charge	• £ disincentive may act as a deterrent to potential proliferation concerns • Lower charge is aligned with principle that they create less congestion	• Rear-plate images are harder to accurately capture – lower charge may not recoup potential increase in scheme costs	
£5 charge	• Strong deterrent to proliferation / safety concerns • Higher charge will help towards any additional cost of system	• Could attract criticism as motorbikes don't cause as much congestion, so £5 seen as excessive	✓

➢ **Potential to seek views on issue as part of consultation before coming to a view**

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The slide lists Pro's and Con's for various charge levels of no charge, £3 and £5

For no charge:

Under Pro's we see:

1. **Simplicity of administration** – we agree
2. **Take up less road/parking than a car so consistent with congestion reduction policy** – we agree
3. **Discount can be reviewed over time if proliferation occurs** – We disagree with this statement being classed as a pro. The use of the term proliferation betrays bias and is illogical. Why would you need to review the proliferation of a mode that is accepted at point 1 as consistent with congestion reduction policy?

Under Con's we see:

1. **Lack of £ disincentive may encourage uptake as people switch from car** – We disagree strongly – modal shift from car to motorcycle is a pro as already established by point 1 in Pro's
2. **Inherently less safe mode, incompatible with pedal cycles** – Again we strongly disagree. The casualty statistics for motorcycles in an urban environment are exactly the same if not slightly lower than for pedal cycles (see data presented below). Furthermore, incompatibility with cycles is a biased opinion that refuses to accept the role of poor road design.

We would contend that there are many pro's that have been ignored, including that no charge will help to maintain the accessibility and affordability of a beneficial transport mode, modal shift to motorcycles is consistent with air quality improvements, modal shift to motorcycles will improve CO2 emissions, greater prevalence of motorcycles will likely improve motorcycle safety as clearly demonstrated by TfL's analysis of the impacts of the London Congestion Charging Zone (see below)

We see absolutely no genuine evidence of a Con for no charge.

For £3 charge:

Under Pro's we see:

1. **£ disincentive may act as deterrent to proliferation concerns** – we strongly disagree with the premise that 'proliferation' is a problem
2. **Lower charge is aligned with principle that they create less congestion** – we agree – indeed this makes our point that 'proliferation' is a pro

Under Con's we see:

1. **Rear-plate images are harder to accurately capture – lower charge may not recoup potential increase in scheme costs** – We strongly disagree. Firstly, the suggestion that rear plates are harder to capture is baseless. If it were true, then why is it not listed as a Con for the £5 charge? Secondly if there really is an increased cost to capture rear plates that cannot be recouped, then it should be listed as a net pro for no charge.

Again, we see a bias in failure to list the following con's for the £3 charge: reduced charge differential is not consistent with congestion reduction policy, not consistent with air quality improvements and not consistent with CO2 reduction policy.

For £5 charge:

Under Pro's we see:

1. **Strong deterrent to proliferation/safety concerns** – We strongly disagree. As previously discussed the 'proliferation' argument is biased and factually unfounded. The safety concerns are entirely unfounded (see below)
2. **Higher charge will help towards any additional cost of system** – We disagree. As previously discussed we do not believe there is any evidence to support the claim around rear plates, and the cost if it does exist should not be incurred since the proposal to charge motorcycles is illogical.

Under Con's we see:

1. **Could attract criticism as motorbikes don't cause as much congestion, so £5 seen as excessive** – We agree any charge is excessive and counterproductive in terms of all stated goals with the exception of revenue generation.

Again, we see a bias in failure to list the following con's for the £5 charge: reduced charge differential is not consistent with congestion reduction policy, not consistent with air quality improvements and not consistent with CO2 reduction policy.

Overall this slide shows a completely illogical and internally inconsistent understanding of motorcycles and the role they play in helping to achieve the aims of the overall policy. This exposes the justification of applying STZ charges to motorcycles as nothing more than a revenue generation scheme unfairly placing a burden of cost on a road user group that should be promoted under the policy. What is more, the revenue generation potential from a tiny minority transport mode is unlikely to have a noticeable effect on the overall viability of the scheme.

We re-state at this point that we do not support the congestion charging model to unfairly and regressively fund a benefit that is delivered equally to all citizens.

We would also like to refer to the Technical Note: Discounts, Exemptions, Reimbursements and Charge Levels dated 26th August 2022 (https://wiki.mag-uk.org/images/d/d4/FOI_Response_-_1948095_-_160922_GCP_Making_Connections_Discounts_Exemptions_and_Charge_levels_Technical_Note_Accessible_redacted.pdf)

This document concludes (p19) in its overall assessment of motorised two-wheeled vehicles (motorbikes and mopeds) registered with DVLA: "No discount or exemption: no significant impact on congestion reduction, sustainable travel or air quality and safety benefits"

Aside from being poorly worded the conclusion is entirely factually inaccurate as demonstrated by the evidence supplied in this response.

We also note that the Cambridge City Council 2022 Air Quality Annual Status Report specifically refers to "projects across the city to improve infrastructure enabling a modal shift away from private cars to alternative modes of transport." This does not state any need for modal shift away from motorcycles, so we must assume that modal shift from cars to motorcycles entirely aligns with the stated policy of the City Council.

Safety

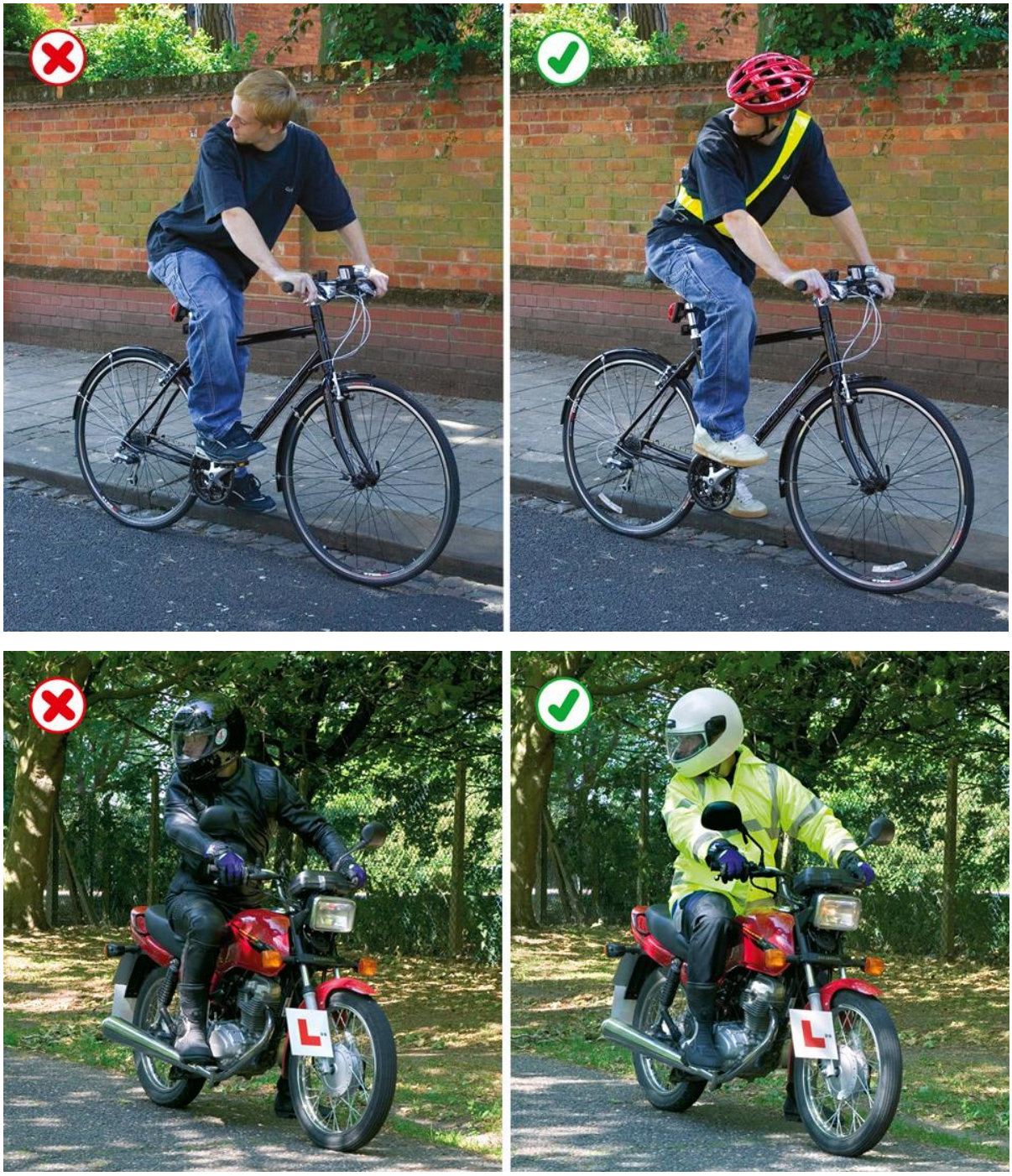
In a meeting with Greater Cambridge Partnership's Transport Director, Peter Blake, and Director of City Access, Lynne Miles, it was revealed to representatives of MAG that the basis of safety arguments about motorcycling in the above evidence and reports was merely headline DfT data for motorcycle fatality rates. This is an extremely ineffective and misleading representation of the facts around road safety of motorcycles within the area of the proposed STZ.

The STZ is unquestionably an urban area, so we have researched the road safety statistics on urban roads in Cambridgeshire for the last five years (2017 – 2021). The full data set is appended to this response, and is drawn directly from public domain STATS 19 data freely available via the DfT website.

Our research shows that over the five-year period there were a total of 5 pedal cycle fatalities, and 250 serious injuries on urban roads. By comparison there were 2 fatalities and 78 serious injuries for motorcyclists. So motorcycling casualties are around one third of motorcycling casualties on urban roads in Cambridgeshire.

We naturally have to look closely at the numbers of trips and miles travelled to compensate for the popularity of the modes. Sadly, it is not possible to get vehicle miles data down to the local transport level, but looking at traffic count data it would suggest that the ratio is about 3:1 cycling to motorcycling in Cambridgeshire. It is therefore entirely unreasonable to say that motorcycling is inherently more dangerous than cycling as in broad terms the casualty rates are equal in an urban environment.

In the wider context it is entirely accurate to say that motorcycle casualty severity is higher for motorcycling than cycling, and this of course is due to speed, but in the urban environment we would argue that motorcycling may be slightly safer than cycling as the legal requirement for crash helmets and expectation and uptake of full protective riding gear is far higher for motorcyclists than for cyclists. Compare the images below from the Highway Code. In a RTC at 20mph which rider is most likely to suffer the higher severity injury?



If the statistical evidence shows a higher KSI rate for motorcyclists than cyclists in an urban environment it is almost certainly going to be down to the lack of consideration to the principle of separation applied to motorcyclists compared to cyclists. Motorcyclists are not afforded access to bus lanes, advanced stop lines or cycle lanes, and are thus far more exposed to cars vans and lorries than cyclists.

With regard to the incompatibility argument, statistics released by the DfT show that motorcyclists were the other vehicle causing harm in 16 out of 904 other road user fatalities.

https://www.gov.uk/government/statistics/reported-road-casualties-great-britain-road-user-risk-2021/reported-road-casualties-great-britain-road-user-risk-2021-data (Chart 4: Other road users killed by vehicle or road user in collision (where known), Great Britain 2021)

Thus, motorcycles are likely to account for just 1.77% of all cycling fatalities where another vehicle was involved. If we apply this to the figures for Cambridgeshire and assume that all cyclist fatalities are caused by other vehicles, a motorcycle is likely to be involved in one cyclist fatality every 56 years. Of course, STATS 19 shows that there are a significant number of cycling fatalities occurring in single vehicle incidents, so the motorcycle incompatibility factor is more likely a once in a century event in Cambridge.

Finally, we would also like to refer to research carried out by TfL on the impact of the London Congestion Charging Zone.

In January 2005 a TfL Central London Congestion Charging Scheme impact monitoring report stated:

"The numbers of powered two-wheelers and pedal cycles involved in accidents have decreased, by 8 percent and 7 percent respectively, despite a combined increase of 15 percent in numbers of these entering the zone since charging. Similarly, there has been a decrease in the number of pedestrian casualties involved in accidents."
https://content.tfl.gov.uk/impacts-monitoring-report-january-2005.pdf

The full Third Annual Report published later in 2005 confirmed:

"Most noticeable was the decrease in the involvement of pedal cycles and powered two-wheelers despite the significant increase in the numbers of these observed in traffic counts. Further analysis indicates that the reduction in involvement of powered two-wheelers and chargeable vehicles (including cars, lorries and vans) after the introduction of the scheme was significantly greater within the charging zone than across the rest of London."
https://content.tfl.gov.uk/central-london-congestion-charging-impacts-monitoring-third-annual-report.pdf

Conclusion

We contend that there is no evidence base whatsoever to justify the charging of motorcycles to enter the proposed Sustainable Travel Zone. MAG is opposed in principle to the introduction of the revenue generation scheme described as the Sustainable Travel Zone, but should GCP decide to proceed with the proposal, then the only logical outcome is for motorcycles to be exempt from all charges.

MAG believes that modal shift from cars to motorcycles should be positively promoted in the overall sustainable transport policies adopted by GCP and are willing and able to help GCP formulate sensible policies to achieve this.