

## **Motorcycle Action Group response to Motoring Services Strategy Consultation**

***This is the response of the Motorcycle Action Group (MAG) to the questions posed in the Government's Motoring Services Strategy Consultation. We are more than happy to meet with you in person to discuss any and all of our responses directly if that would be helpful.***

### **Background**

MAG is the key campaigning organisation for riders' rights and interests in the United Kingdom. We seek to promote a sensible and evidence led policy approach to motorcycling and riders, balancing the needs of safety, convenience and personal liberty. We work with Government at local, national and international level to achieve this vision.

MAG's response to the Motoring Services Strategy Consultation is constructed in the context of our sphere of influence and concern. As such, we do not respond to every aspect of every question – only to those which have a bearing on our mission.

In the following response, we provide an overview of our position, at a macro level, followed by detailed responses to the questions of relevance to MAG.

### **Overview of MAG's position**

*MAG believes that motorcycling has a significant and positive role in assisting the Government in meeting environmental, pollution and transport efficiency targets. Motorcycles and scooters are also more affordable than four wheeled vehicles, and therefore offer mobility advantages to those with a limited budget. As such, we are eager to ensure that the licencing testing regime, its fee structure and accessibility ought to reflect the benefits of powered two wheelers, while being mindful of maintaining a proportionate approach towards safety. MAG also supports a rational MOT system, and has previously raised concerns about the dangers of extending the regulations towards a 'Super MOT' level of inspection, which we believe is otiose. MAG also supports a greater level of motorcycle awareness training in the driving test regime for car drivers.*

### **MAG's responses to the questions within the consultation**

#### **User experience**

1 As we change the practical driving test to ensure it reflects the modern driving experience, what views do respondents have about how we can maintain standards and give candidates clear information about the competencies tested in the driving test? (para 2.4)

*The question is clearly directed towards car licence acquisition. In this context, MAG proposes a greater emphasis on motorcycle awareness should be included in the syllabus and test. A large number of motorcycle accidents are a direct result of drivers' failure to see motorcycles and scooters – often with life-changing or fatal consequences. A formal module regarding motorcycle awareness training need not take much time, but will, in MAG's view, materially reduce what riders refer to as SMIDSYS (Sorry Mate I Didn't See You). In an ideal world this rider awareness would actually involve*

*experience of driving a motorcycle or pillion riding. However, we recognise the practical obstacles to this, and would propose that direct conversation with an experienced motorcyclist, together with specific direction regarding the challenging of spotting on-coming riders be included in the tuition and test syllabus.*

2 Driving tests might be offered from a wide range of venues. What factors should be considered in deciding on these? (para 2.7)

*From a motorcycling perspective, the fact that motorcycle rider testing is currently only allowed in off road centres and the considerably reduced access to local test centres has increased barriers to securing a motorcycle licence. This also materially increases the distance that unqualified riders must travel for their test, which is counterproductive. We request further review of these problems.*

3 We are interested to hear whether respondents would be willing to pay extra for more flexibility of driving test slots, both in terms of timing and location. (para 2.8)

*Many riders choose powered two wheelers for reasons of economy and a further increase in cost would be counter to that consideration. If the increased flexibility were to be an additional offering, separate to the standard offering of slots, that would not be an issue. However, it is likely that an additional 'Driving Test Extra' service would extend waiting times for those not willing to pay the extra for these slots, and that would be a matter of considerable concern to riders.*

4 What could be done to ensure that candidates are better prepared for their practical test? (para 2.10)

*We are aware that the DfT recognises that Riders have a higher pass rate than motor car drivers, and we feel this is not an issue for government or the powered two wheel community.*

5 What opportunities and risks would respondents see in alternative delivery models for aspects of the practical test? (para 2.12)

*The key opportunity for the Powered Two Wheeler (PTW) test regime is simplification and getting the testing back on public roads - as it is in other EU countries. In essence this hinges on the way UK government has responded to EU Directives. MAG's analysis of the data relating to the current test regime suggests that a safety benefit has not been achieved as a result of taking the test off road, or the increased complexities regarding stepped licencing, age and other qualifications. Specifically, by this we mean that there has been no plausible evidence to show any positive link between recent changes and an improvement in casualty reduction.*

*Thus, in keeping with the demonstrable benefits which PTWs deliver in environmental, congestion and economic terms, we propose a simplification of the motorcycle licence test regime. It is beyond the immediate scope of the current consultation to present such an alternative model. However, MAG proposes that one outcome of the consultation is the recommendation that the current motorcycle licence testing regime be re-evaluated for its effectiveness and comprehensibility to those entering the PTW sector. MAG will be very happy to contribute to any such review.*

6 What factors are likely to attract potential partners to provide a practical driving test

service? (para 2.14)

*This is not directly related to MAG's sphere of activity. However, we would request that all partners are made aware of the need for a motorcycle awareness element in the practical car driving test.*

7 What are the most important linkages we should make to streamlining the LGV driver licensing process, while ensuring standards are maintained? (para 2.17)

*Whilst we generally welcome any proposals for simplifying licencing processes we add that adequate focus must be maintained and enhanced to improve LGV driver awareness and consideration for motorcyclists.*

8 Do respondents believe that the on-road and manoeuvring components of the LGV driving test could be conducted separately and be of benefit to the haulage industry? (para 2.19)

*This is not within MAG's remit, save to observe that however this is conducted, it ought to include a motorcycle awareness element in the testing regime.*

9 We would be interested to hear suggestions on how the Drivers Medical service might resolve cases more quickly. (para 2.23)

*MAG defers to the commercial sector for comment.*

10 What more can we do to meet the needs of users, so that vehicle testing services could continue to meet industry's needs? (para 2.25)

*MAG defers to the vehicle testing sector for comment.*

11 Would an expansion in the number of LGV testers to include private sector testers be welcomed? Does industry have the appetite and capability to provide such an expansion? (para 2.27)

*MAG would request that the involvement of any private sector testers would include a motorcycle awareness testing element within the licence regime.*

12 Is there an appetite amongst LGV/PSV operators to be involved in an 'earned recognition' enforcement scheme? What more do you think DVSA could do to process vehicles more quickly during roadside checks? (para 2.30)

*MAG defers to the commercial sector for comment.*

13 Are there other ways in which DVSA could better target enforcement on non-compliant operators? (para 2.31)

*MAG has been made aware of one key issue regarding PTW safety and commercial vehicles: that of diesel spillage. Such spills can lead to fatal consequences for riders, and we would request that this element of any such inspections be given explicit and greater emphasis in guidelines.*

14 What would be the best way(s) to ensure that commercial users are kept abreast of developments in the agencies? (para 2.33)

*MAG defers to the commercial sector for comment.*

## **Digital**

15 What more could be done to expand and increase the use of digital services offered by the motoring agencies and what should be done for those who cannot or choose not to use a digital service? (para 3.5)

*The on-line services are generally well received by riders. There is no particular variation in their application to PTW users and their machines versus other groups, and as such MAG has no specific recommendations for PTWs. However, a common complaint is the long period of time it is necessary to wait in order to access human assistance, when the on-line services are not sufficient to resolve an issue. We would request a review of the cost-effectiveness of the staffing arrangements in the context of these occasions – a point which will doubtless be supported by other service users.*

16 In the past, services requested by industry groups have often not been used to the level forecast. How can we incorporate their requests into service design? (para 3.6)

*MAG has no specific recommendations on this matter. However, if spare capacity has been identified, perhaps an efficient solution would be to increase the cross-referencing of work at peak periods to this group of service providers, in order to reduce the wait for other users of the non-industry related transport sector, thereby increasing the flexibility of the workforce to go to where the greatest demand is occurring.*

17 In providing assistance to those accessing digital services, are the agencies providing the right kind of assistance? Would web page pop-up assistance be valued? Would guidance for those assisting users (in, say, community centres, council offices or job centres) be more helpful? (para 3.8)

*MAG's view is based on the experiences of members and it is that motorcyclists who experience challenges in accessing on-line services have a strong preference for well informed phone assistance. When considerable delays arise in accessing a 'human,' frustration sets in. This is the point at which waste and rework can enter the system for all concerned. From an administrative perspective, it can mean that incomplete or inaccurate records are not corrected in a timely fashion. For the user, it evokes the stress of potentially failing to comply with regulations, simply because of the barriers caused by the on-line issues they experience.*

*Easy access to phone support seems to be an undervalued key to addressing this problem. Whilst 'pop-up assistance' can help, it frequently fails to deliver the specific resolution required by the user, especially if the medium of on-line services is the underlying issue in the first place.*

18 Is there a demand for developing and publishing an application programming interface (API) for fleet management software developers to build on? If so, which services should it cover? Is there industry appetite to lead this work? (para 3.10)

MAG supports the streamlining of these services on-line. We believe that motorcycle fleet operators - such as the ambulance service, the RAC, blood transportation bikes and police motorcyclists – are au fait with on-line systems. We particularly support the consultation's proposals to introduce systems which require single instead of multiple input of data. This will provide savings for motorcycle fleet operators and also for the authorities, and potentially reduce errors in the data.

19 Would smartphone or tablet applications for drivers and owners be welcomed?  
Would the public sector be best placed to provide such services? (para 3.12)

MAG believes this is an extremely beneficial initiative, because proactive reminders in such a fashion are regarded by existing users of comparable services as a qualitative improvement in the interface between citizen and state. MAG very much supports this technological avenue for individuals as well as for fleet operators. A permanent role for such devices has now been established in our society. This opens the possibility of proactive notifications to individual motorcyclists in a user relevant and accessible way. Smartphone applications appear to be easy for the majority of riders to understand. The relative simplicity of the Vehicle Excise Duty platform does show what can be achieved by the introduction of such methodology.

However, MAG feels we should note the potential that tablets and phones have to create distraction for drivers and the use of such technology when driving – and we strongly recommend that these concerns are given high priority in assessing all proposals for future development.

## Efficiency

20 Are there any social or economic factors which the fees review should consider in proposing either to reduce or to increase fees for these services in the future? (para 4.8)

Two curious anomalies exist in the fees structure. Firstly, some two wheeled vehicles such as bicycles pay no fees at all, yet benefit from public monies to the tune of billions of Pounds per annum. By contrast, most powered two wheelers pay disproportionately high VED rates when compared to fee structures for privately owned cars. For example; if the same scales for VED reductions or exemptions based on emissions that are applied to cars were applied to motorcycles, many riders would pay nothing or a lot less. We can see that this is not an attractive prospect for the treasury, but suggest that refinements to deliver a fairer approach may help encourage the reductions in emissions and congestion that government needs to achieve. On average, motorcycles have an environmental footprint which is six times lighter than the average car. Nevertheless, motorcycle VED is frequently greater than that for cars which conform to a very limited specification of 'environmental' parameters – and even though they have a greater environmental footprint than motorcycles.

MAG believes that the precedent set for bicycles and eco-friendly cars creates a compelling case for a more proportionate VED regime for powered two wheelers. To quote the Government's own guidance: "The standard approach is to set charges to recover full costs. [...] This approach is simply intended to make sure that the government neither profits at the expense of consumers nor makes a loss for taxpayers to subsidise". (Managing Public Money, 6.2.2). If the fees are regarded as reasonable for bicycles and eco-friendly cars, then it must also be the case that a more proportionate fee should be charged for motorcycles too.

*MAG recognises that there are other fees involved in motorised transport, and we do not seek perfection. However, revisiting the VED fees is fairly straightforward and evidently a highly relevant aspect of the Motoring Services Strategy for the future, if part of the strategy is to ensure consistency of fees in the sector as a whole.*

21 Should fees more closely reflect the differential cost of service provision by different channels? (para 4.11)

*MAG believes that the most reasonable methodology to incentivise a shift away from older service channels to more efficient and cheaper digital channels is by offering lower fees for those who make the switch. This would therefore prevent any accusation of a punitive or coercive strategy. The £40 million already saved in the transition to digital channels provides a fund for this approach. We would strongly oppose increasing fees for those who refuse to make the change, as there are practical and personal reasons why some individuals will not feel able to do so. Attempting to force this diminishing group into making a switch they do not wish to make would seem out of proportion with the return to the State - at least for the medium term.*

### **Agency transformation**

22 We would be interested to hear from respondents what operating models for the agencies would best promote ever increasing efficiency, improve user service, maintain standards and deliver accountability to Parliament. (para 5.2)

*The Motorcycle Action Group operates a remarkably lean model, given the thousands of members and 1.3+ million people whose interests it services as registered motorcycle riders. While MAG heavily relies upon a dedicated and reliable volunteer network, we also have a very small team of professionals who are directly accountable to the membership via a clear and transparent system to ensure that principles of democracy and accountability are maintained.*

*The government agencies here are of course run entirely by professionals with a far broader range of responsibilities than MAG. However, there is one aspect of MAG's experience of engaging with these agencies that may be worth consideration to enable improvements in efficiency. The continuity and speed of progress in developing improvements to policy shape and/or delivery can be dramatically inhibited by changes in personnel which are inevitable as individual careers and structures in the agencies evolve.*

*For example; a lot of work was done by MAG with the DfT over an 18 month period to identify significant flaws in the current Road Safety Audit systems that allow elements of road safety schemes to include elements with potential to have adverse impacts on the safety of motorcyclists. Similar work was done in parallel with Transport for London - and that is resulting in new guidance. However, changes in DfT personnel seemed to lead to a situation where some of the vital ground work done to establish the significance of those developments will have to be repeated, in order for further work by MAG to seem like a worthwhile expenditure of the very limited resources it has available.*

*In essence we recognise that there are no simple solutions to such problems. However we suggest that a review of processes for maintaining progress on specific areas of development during periods*

*of change in personnel or departmental structures may deliver improvements in efficiency for the agencies and indeed the organisations they work with.*

*MAG is happy to discuss this with the Consultation team and will welcome any opportunities to do so that may arise.*

23 We would value views from respondents with experience of VCA operations overseas on the value VCA adds to business or the automotive sector through such operations. (para 5.10)

*MAG operates within the framework of a European Umbrella movement, FEMA – or Federation of European Motorcycle Associations. We regularly compare best practice and matters arising from other European Governments. While there are many similarities between these authorities, we propose a consultation in regard to deregulation, based on successful and simpler models abroad.*

*We propose that one specific area for investigation should be a simplification of the motorcycle licence testing regime, in line with less onerous models in operation on the continent of Europe and in developed nations elsewhere.*

24 We welcome views from industry about the services currently provided by VCA in the UK and overseas, its effectiveness in supporting users and growth in the sector and whether the existing operating model should be retained. (para 5.11)

*In this area of governance, MAG is primarily concerned with proposals that could introduce new regulations that are disproportionately punitive for motorcyclists. We also tacitly support the Motorcycle Industry Association's aims to protect the manufacturers and retailers in our sector.*

*A useful example of successful engagement between the relevant agencies and the motorcycle sector was effective resistance by UK government to proposal from the EU Commission for introduction of a new approach to Vehicle Testing – and that would have delivered many disbenefits and no realistic chance of benefits. The way that agencies engaged with interpreting the EU Directives on motorcycle rider testing, and chose not to seek a derogation regarding the difference between urban speed limits in kilometres per hour and miles per hour, were an example engagements and results that still have room for improvement.*

*However the VCA is structured, it needs to be able to ensure logical and just policies underlie its work. The prospects of progress in that direction will in our view be enhanced by focus on improving the efficiency of open minded interactions between the VCA and stakeholders to ensure meaningful feedback at a stage prior to the implementation and monitoring stage.*

## **Deregulation**

25 Are there any other areas of regulation administered or enforced by the motoring agencies, which you consider should be reviewed and potentially be safely reduced during the next four years? (para 6.3)

*MAG is concerned about the possible extension of powers to prohibit vehicles (6.3) without the involvement of the police. We are concerned that this reduces the checks in the system and could*

lead to increased unfairness and potential abuses of 'policing' powers, for example of modified or customised machines, which can only be reasonably assessed by a highly qualified expert in situ. We believe the current arrangements are broadly proportionate and do not need change.

Regarding Paragraph 6.6, MAG very much supports the DVLA's intention to simplify the process for riders and others to notify changes to the information displayed on their record. The use of the digital platform could significantly assist riders when making changes to their information and potentially remove the difficulties faced when delays mean a rider is not in physical possession of their licence for an extended period.

Regarding 6.11, MAG is open to persuasion about the Chancellor of the Exchequer's proposal to change the time of a vehicle's first MOT test to four years after first registration for motorcycles. With modern standards of vehicle production, we see this could be a benefit to riders from a cost and convenience perspective. We will make a contribution to the consultation on this specific issue when it is launched.

On paragraph 6.12, MAG remains committed to supporting sensible deregulation and offers our contribution, on-going, to the discussions as they relate to motorcycles. We entirely support the Department's stated intention to ensure 'other regulations are fit for purpose and proportionate given current and future circumstances.'

Finally, regarding paragraph 6.13, MAG is primarily concerned to ensure that environmental regulations such as ULEZ, vehicle standards regulations are duly proportionate. Specifically, we would welcome reviews on these areas:

- 1) The motorcycle licence testing regime.
- 2) VED and ULEZ charging structures.
- 3) Road Safety Audits; in theory and practice in terms of safety implications on motorcyclists.
- 4) The benefits of revising national guidance on motorcycle access to bus lanes.

### **MAG's offer of partnership**

MAG is always ready, willing and able to work with the Department on all of these matters in a positive, inclusive and objective fashion. Riders' rights, concerns and interests are best served by a collective and inclusive approach, and we are here to contribute in that way as and when this would be helpful to the Department and the interests of the road using community.

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