

MAG submission regarding the New London Plan

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Generated by Colin Brown on behalf of the Motorcycle Action Group (MAG)

Background

MAG is the UK's foremost riders' rights campaigning body (1). We represent the interests of those using scooters and motorcycles, basing our policy recommendations on data, primarily gleaned directly from documents and references available through official channels such as TfL and the Government.

MAG's aim is to responsibly represent its 57,000 members and the c.200,000 'every day' riders, and thousands more occasional riders, in the Capital. We do not seek preferential treatment for riders – simply a level playing field which fairly reflects the contribution Powered Two Wheelers make to help TfL achieve its emissions targets.

Remit of this analysis

MAG's response is confined to comments on Chapter 10 Transport

T1 Strategic approach to transport

MAG contests that the benefit of powered two wheelers as a sustainable form of transport should be fully recognised in the Mayors Transport Strategy. MAG has made submissions to the MTS consultation to that effect, and none of the evidence provided with regards to the positive benefits of PTW's have been challenged.

The recognition and inclusion of this mode of transport to the group of sustainable modes targeted for the 80% goal would make achievement of that goal far more achievable.

MAG would also urge the Mayors Office to recognise that even if PTW's are not formally included in the 80% target, it is far better to maximise the use of PTW's in the remaining 20% of motorised transport trips due to the aforementioned benefits with respect to congestion, environmental and economic advantages.

PTW's should be included in the group of sustainable transport modes. In the absence of this there needs to be an acceptance that motorised personal transport will be an inevitable imperative for the foreseeable future. Minimising the impact of personal motorised transport by promoting the most efficient and sustainable format should therefore be a key objective.

MAG agrees with a shift to more space-efficient travel. Clearly PTW's are a far more space-efficient form of powered transport than any other alternative – including electric cars and taxis. 10.1.2 makes it absolutely clear that the plan needs to embrace the meaningful role that motorcycles and scooters do play and should play in the future.

Inclusion of an ambition for efficient and sustainable essential freight in the plan requires that its implications in terms of PTWs must be recognised. PTW's must be included in this context as, over longer distances, PTWs perform the same role as a bicycle in a way which no other mode of transport can. It is, therefore, logical that the inclusion of PTWs is accepted.

MAG maintains that the MTS document has failed to be holistic as PTW's, as a legitimate and beneficial transport mode, have not been completely considered and embraced.

T2 Healthy Streets

MAG accepts that this ambition is laudable. However, we assert that it is vital to maintain a sense of perspective. Many people depend on powered vehicles, including PTWs, to maintain their quality of life and ability to work. If these are compromised by the exclusion of powered vehicles to an unreasonable extent, then this is counterproductive and conflicts with the aim of providing choice to people and providing them with a sense of safety in getting about.

Journey times must not be massively extended as a result of the healthy streets policy. MAG urges that the relative benefits of this policy are carefully weighed against wider implications for restricted movement due to increased journey time.

T3 Transport capacity, connectivity and safeguarding

MAG would highlight the massive amount of input that we have already made to the proposals, such as ULEZ. We believe that the evidence about PTWs, namely that they assist in delivering much of the ambitions of this policy has been consistently disregarded without counter-evidence being highlighted to refute our claims. We believe this is both discriminatory and self-harming in terms of the stated mission objectives of the plan.

Examples include the congestion and emissions reductions PTWs contribute to, as well as facilitating social mobility in a way no other mode of transport can.

MAG strongly advises against ignoring these benefits of a transport mode used regularly by around 200,000 citizens.

MAG has shown that all road users benefit when there is a modal shift away from other powered transport to PTWs. This is established fact in terms of emissions and congestion. The plan should reflect this reality and embrace the opportunity it presents.

T4 Assessing and mitigating transport impacts

MAG notes a preponderance of concern for mitigating impacts on Walking, Cycling and Public Transport. Again PTW's need to be included as a preferred mode of transport, and mitigation of impacts on this mode of transport must be given equal priority.

PTW's should equally be listed as a mitigation to use of other less efficient forms of motorised personal transport, including electric cars. This is due to the congestion reducing benefits and reduced creation of PM's offered by the transport mode.

As per our submissions on the ULEZ, PTW's have a positive impact on public health in comparison with dual track vehicles, and are proportional in terms of road danger to pedal cycles, and should therefore be highlighted in impact analysis of any development.

T5 Cycling

MAG strongly recommends that an equivalent policy for PTW's that places equal worth on the benefits provided by this mode of transport be included in the London Plan.

The benefits of the mode have been evidenced by MAG in multiple submissions. We do not submit all the evidence again here but would welcome opportunity to discuss the evidence and assist in arriving at an equivalently positive policy for this transport mode.

MAG points out that the evidence previously supplied, much derived from TfL's own data has not been challenged or questioned at any point.

MAG would also point out that the Mayors Transport Plan highlights the growing issue of motorcycle theft and suggests that measures could include "the provision of secure parking both on street and in developments". The London Plan should seek to actively support this element of the MTS.

The Mayors Office has spent valuable resources drafting a best practice guide for design of secure parking bays for PTW's. This work will have been made redundant without an ambition to provide those facilities in any development.

T6 Car parking

MAG notes that again PTW's have been entirely ignored in this policy section. In the absence of an equivalent to policy T5, the omission is shocking and entirely wrong.

As previously stated the provision of secure parking facilities for PTW's should be supportive of the MTS in terms of tackling the growing issue of bike theft, and equally should reflect a positive reinforcement of the benefits of PTW's as a preferred part of the motorised personal transport mix.

T7 Freight and servicing

E Development proposals for new consolidation and distribution facilities should be supported provided that they:

- 1) deliver mode shift from road to rail or water without adversely impacting passenger services (existing or planned) and without generating significant increases in street-based movements
- 2) reduce traffic volumes within London
- 3) reduce emissions from freight and servicing trips
- 4) enable sustainable last-mile movements, including by cycle and electric vehicle.

The above is a quotation from the plan document

PTWs should be referenced on point 4

PTW's are vital to the delivery of goods and always will be. Freight applications are far more credible for PTWs in many circumstances than any other mode of transport. Excluding them from specific references discriminatory.

T9 Funding transport infrastructure through planning

MAG asserts that It is wrong to positively discriminate in favour of cycling at the cost of other, more practical modes of transport. The Plan must be very cautious to enable a credible modal mix, without any risk of prejudicial support for one particular mode without a strong, data-based justification.

MAG has provided an absolute robust case for the support of PTWs but we see no recognition of this in the plan.

MAG urges the Plan to include consideration for funding infrastructure funding for PTW's through planning.

Submitted by

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