



Consultation: National Policy Statement for National Networks

Response from the British Motorcyclists Federation (BMF)

The British Motorcyclists Federation (BMF) welcomes the opportunity to respond to this consultation. The BMF is a lobbying group with 64,000 individual and club members that campaigns to pursue, promote and protect the interests of riders. The BMF is also a founding member of the National Motorcyclists Council.

Response submitted by:

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The BMF is not qualified to discuss a number of the questions asked in the consultation, but we must take this opportunity to object strongly to the complete exclusion of motorcycling from this policy statement. **It is not acceptable for government to compromise the safety of motorcyclists with policy that completely ignores their legitimate presence on the road.**

Motorcycle exclusion

There is no mention of motorcycling, at all, anywhere, in this document. At least 3 different forms of 'Active Travel' are mentioned (paragraph 2.6), even horse riding is mentioned, (para. 4.71 and footnote aa), but motorcycling is not mentioned anywhere. It is also the only legitimate form of transport that is left out. This is exceedingly regrettable when motorcycling rather than car-driving can make a positive contribution to several of the issues mentioned in this draft proposal.

e.g.

- Congestion: the use of motorcycles does not increase congestion, modal shift from cars could make a substantial contribution to reducing congestion.
- Emissions: the majority of motorcycles are still powered by internal combustion engines (ICE) but sales of battery electric bikes are increasing, especially of small bikes used in urban environments. Even ICE-powered bikes can make a substantial contribution to the decarbonisation program.
- CO2 emissions: the majority of ICE powered motorcycles powered by internal combustion engines, especially in the urban environment, are small capacity machines, using far less petrol than cars. Proper provision in the charging infrastructure for electric motorcycles will encourage uptake of those machines.
- NOx emissions: motorcycles produce negligible quantities of NOx emissions. (The majority of motorcycles, regardless of age, can be certified for use in the London ULEZ).
- Particulate emissions: motorcycles have only 2 wheels not 4, therefore the quantity of particulate emissions is not more than half that of cars and usually less. We note here that

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while regenerative braking on electric vehicles will substantially reduce braking emissions, electric vehicles are heavier than their fossil-fuelled counterparts which will increase tyre and road abrasion particulates and possibly noise.

Motorcycling can make a real contribution on the route to net zero, particularly if properly considered and provided for in all types of planning.

Road safety: para. 4.55 states 'In developing roads schemes the applicant should have due regard to the needs of drivers and the imperative to ensure driver safety.' An optimist might assume that 'driver' also implies 'rider' or 'motorcyclist' but the BMF is not naturally optimistic and we make no such assumption. It must be made clear that motorcyclists are included.

Similarly, there is a reference to 'other vulnerable road users', (VRUs), on the local transport network (para 2.6) but no definition of who is included besides pedestrians. We would welcome clarity on this point; VRUs should include motorcyclists but omission of motorcycling elsewhere does not inspire confidence that it necessarily does so here.

Elsewhere in the policy statement:

- Transport hubs; if parking is to be provided for bicycles etc. it must also be provided for motorcycles. Ideally with provision for storing riding gear.
- Charging infrastructure must support motorcycles charging as well as cars.

So to answer at least one question, *Q4. In your view does the draft NNNPS provide suitable information to those engaged in the process of submitting, examining and determining applications for development consent for nationally significant infrastructure projects ...*

No, not while it totally ignores one perfectly legitimate mode of transport.

Decarbonisation across transport

The government professes a technology neutral stance on replacement of fossil fuels while actively promoting only electrification. The BMF does not believe that electrification is the necessarily the best solution for every type of vehicle. The National Policy Statement does not in general make this assumption which is good. Para 2.32 does reference the "Take Charge" paper, but of course there is no corresponding paper for non-electrification solutions.

For a general overview of policy supported by the BMF please see the National Motorcyclists Council document:

[Motorcycling and the Future of Transport](#)

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