



Response from the British Motorcyclists Federation (BMF) to the 2024/25 Parking Charge Review Consultation Launched by Bath & North East Somerset Council on 11 July 2024

The British Motorcyclists Federation (BMF) welcomes the opportunity to respond to Bath & North East Somerset Council's consultation on whether to introduce emission-based parking charges for motorcycles to all Council managed paid-for parking areas across Bath and North East Somerset. The BMF has no objection to our response being reproduced or attributed.

The BMF, formed in 1960, is one of the largest active motorcycling riders' groups in the world with around 214 affiliated motorcycle clubs giving the BMF a collective membership of over 65,000 riders. The BMF works closely with government Ministers and officials, and with numerous road safety organisations and other motorcycling and road transport organisations, to represent motorcyclists' interests at local, national, and European level. Through its collaboration and joint-working with Government, and through its numerous road safety partnerships, the BMF aims to promote greater awareness of the benefits of motorcycling as an accessible, affordable, cleaner and greener transport option whilst highlighting the significant contribution motorcycling can make to the achievement of Net Zero targets. The BMF also works to ensure that the needs and concerns of the motorcycling community and its 1.4 million riders translates into effective safety improvements for motorcyclists in terms of wider government road policy and highway design.

Bath & North East Somerset Council's proposals, as set out in the public consultation launched on 11 July 2024, are to introduce emission-based parking charges, including charges for motorbikes, to all Council-managed paid-for parking areas in Bath and North East Somerset in order to "encourage a shift to cleaner, more sustainable travel in the area." The Council sets out in its proposals that "higher polluting vehicles will pay more" and that its amongst its key aims under the proposals are to improve air quality through influencing a major shift to sustainable transport and to "reduce air pollution and tackle the climate emergency." The Council further states that the proposals they have put forward align with the Council's wider transport vision set out in its "Journey to Net Zero" transport policy.

The BMF objects to the proposals to charge motorcycles for parking across Bath and North East Somerset on the following grounds:

- The proposed changes are illogical and patently unfair as they would result, in some cases, in small mopeds being charged the same to park as the average family car and motorcycles over 600cc being charged the same parking fee as a 3 litre straight-six diesel Range Rover. The proposals and their consequences are also in direct contravention to the stated aims of the Council that "higher polluting vehicles will pay more" as they fail to take in to account that motorcycles emit far less CO₂ than cars, contributing just 0.46% to the UK's overall domestic transport emissions.
- The proposals, despite the Council's claim that they are based on a desire to "influence people to swap to cleaner vehicles", fail to recognise the important transitional role motorcycles have to play in the UK's wider acceleration to Net Zero, as well as the viable solution motorcycles offer to reducing congestion, and associated pollution issues in Bath & North East Somerset's towns and cities. To propose to charge some motorbikes the same price to park as a 3 litre SUV is illogical, unfair and completely contrary to the stated aim of the Council to make "higher polluting vehicles pay more."

- The claims put forward by the Council that the proposals would “reduce vehicle emissions, improve public safety and tackle the climate emergency” are not supported by any specific data such as, for example, comprehensive, scientific data gleaned from emissions testing across Bath and North East Somerset setting out the likely quantitative and qualitative environmental impacts locally. Government data, however, relating to the carbon footprint of travel per kilometre for different vehicles published by the Department for Energy Security and Net Zero in 2022 sets out a carbon footprint of 171g for diesel cars, 170g for petrol cars and 114g for motorcycles. To charge a motorcycle under the proposed emissions-based parking scheme the same parking charge as a diesel car with a carbon footprint 50% greater than a motorcycle is clearly illogical, unfair and contrary to the Council’s stated proposals as set out in its consultation.

- The proposals are also in direct contravention to the Council’s own Transport Delivery Action Plan 2020-2036, which specifically recognises the critical part low-emission transport options, such as motorcycles, will play in the Council’s plans to reduce congestion and harmful emissions across the region. The parking proposals set out demonstrate no recognition of the benefits motorcycling can bring to significantly reducing congestion and harmful emissions across Bath and North East Somerset, nor the benefits motorcycling offers as an accessible, affordable, cleaner and greener transport option to the development, if properly supported, of a future, sustainable and integrated transport system for Bath and North East Somerset

- The proposals as they stand are flawed as they do not take in to account the fact that motorcycles not only pollute less than other vehicles, but also cause less road wear than cars, with the associated highway repair costs to the Council, take up less road space and parking space than other vehicles and play a positive role in social mobility and quality of life. Motorcycles provide an affordable, low emission and accessible transport solution to many that should be supported by Local Authorities with free parking facilities provided to encourage their use as part of the development of greener and more sustainable transport network options..

- The Equality Impact Assessment (EIA) process carried out by the Council in support of the emissions-based parking proposals is also flawed and therefore open to legal challenge. Specifically:

1. At paragraph 1.1 of the EIA the Council recognises that motorbikes “may be less impactful on congestion but continue to utilise road space and emit pollutants” and “the adoption of the emission-based variable charge for parking and permit parking will continue to incentivise behaviour and improve air quality following successful introduction.” However there is no specific assessment of the pollutant levels of motorcycles, no data on current or projected air quality improvements across the region to support the Council’s assertions and proposals, nor detailed analysis of how the Council’s proposals will in practice incentivise behaviour.

2. There is no assessment of the adverse effect the proposed emission-based parking charges for motorcyclists will have on local residents, and others from outside of the district, who currently use motorcycles for domestic travel and commuting; no assessment of the fact that the proposed costs may make travelling by motorcycle unviable for disabled riders who currently use Powered Light Vehicles (PLVs) for their daily transport needs, nor any assessment regarding the effect on others of limited financial means who may be unable to afford the proposed motorcycle parking charges or the alternative higher costs of public transport.

3. It has been determined (R v the Secretary of State for Business and Skills on the application of Hurley and Moore UK 14.3.2012) that where the Public Sector Equality (PSE) duty is engaged by Public Authorities they must be able to demonstrate that the carrying out of the EIA is “not merely a box ticking exercise; it is rather a matter of substance that must be carried out with rigour.” The BMF’s view is that the EIA carried out by Bath & North East Somerset Council in support of proposals to introduce emission-based car parking charges has not been carried out

with sufficient rigour. Specifically, the EIA has not fully assessed the impact on pollution and congestion levels and the direct impact parking charges will have on motorcyclists, including on their mobility and social needs. Additionally, its findings run contrary to wider Bath & North East Somerset transport policies such as the Council's "Journey to Net Zero" and "Transport Delivery Action Plan 2020-2036."

In conclusion, the BMF strongly objects to the proposals put forward by Bath & North East Somerset Council to implement emission-based car parking charges for motorcycles for the reasons as set out above. The Council's proposals are seriously flawed and fly in the face of the Council's own published wider transport policies, and also fail to take into account the widely recognised benefits of motorcycle use as a means to reduce pollution and congestion levels, in particular across the UK's towns and cities. The BMF urges the Council to revisit and reconsider their proposals and recognise the significant benefits motorcycling offers as an accessible, affordable, cleaner and greener transport option than most other powered modes of transport, which should be actively encouraged by the Council rather than penalized through unfair and poorly thought out parking charges. In so doing, the Council will be able to realise the benefits that motorcycling can bring to a future sustainable, affordable and greener transport solution across Bath and North East Somerset.

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