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Online submission via: <https://comdigital.wufoo.com/forms/rly4bj60tdagsg/>

Response to “Transport Strategy Refresh” Report by  
EY Sweeney for Dec 11<sup>th</sup> City Of Melbourne Council  
Meeting.

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Victorian Motorcycle Council Submission  
December 2018

## About this submission:

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The Victorian Motorcycle Council welcomes the opportunity to present a short response for consideration of the City of Melbourne Council.

The submission is in regards to the Motor vehicles section of the “Transport Strategy Refresh – Participate Melbourne Community Engagement Analysis” report by EY Sweeney December 2018, with specific reference to motorcycles / powered two wheelers (PTW’s).

The Victorian Motorcycle Council was created to represent the interests of all motorcyclists, motorcycling organisations and relevant stakeholders in Victoria. The Victorian Motorcycle Council is represented on the Australian Motorcycle Council, the peak motorcycle representative body in Australia.

The information included in this submission is for all intents and purposes, factual, correct, accurate and relevant. The VMC and/or its associates are available to expand on any of the points contained within this submission.

This submission will be shared to the motorcycling community and to the Victorian Road Transport Ministry.

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## **OPENING STATEMENT/SUMMARY**

The Victorian Motorcycle Council (VMC) understands that the City of Melbourne (CoM) is looking to respond to the significant issues inherent in future population and visitation growth. A uniquely suited congestion beating, space efficient, fuel economic, practical mode of transport such as motorcycles / powered two wheelers (PTW), would have been thought to have been a favoured and positively promoted response to such considerations. That is certainly not the sense one obtains from the “participate” documents and analysis.

This submission highlights some surprising outcomes and flaws in relation to the PTW aspects of the analysis performed by EY Sweeney and some concerns about the “Participate Melbourne” process. As a result of which, we ask that City of Melbourne consults directly with motorcycle and riding subject matter experts in regards to strategic PTW traffic considerations.

## **DISCUSSION**

### **Participation/Engagement:**

The EY Sweeney document indicates that the participate process had on average 14 engagements per day, over three submission options, over three months. Given that these are matters with far reaching consequences to the fabric of the City of Melbourne, an obvious question arises as to whether this is a sufficient level of engagement and sufficient response from which to draw strategic traffic policy.

### **Bias:**

In relation to PTW’s, there was a detectable bias evident in the wording used in the discussion documents. Not surprisingly, the “participate” engagement process may have produced results that are negative towards PTW’s, despite PTW’s uniquely suited advantages. By way of some examples - PTW’s were described as “cluttering” the pavement, an increase in ridership had an interpretably negative overtone, and a focus was made on the minority of surveyed PTW’s having parked inappropriately. In these and other cases, readers were pushed towards a particular conclusion despite it being evident to riders that other conclusions could easily have been drawn. This was further amplified by the majority of participants not themselves being riders and therefore not understanding the riding task.

### **Motorcycle Plan 2015-2018 Missing in Action**

It is disappointing to say the least, that the Transport Strategy Refresh report does not reference the excellent document that the City of Melbourne prepared in conjunction with its Motorcycles in City of Melbourne Committee (MiCOM)– known as the *City of Melbourne Motorcycle Plan 2015-2018*<sup>1</sup> and that EY Sweeney did not reference that same committee on matters of PTW’s at any point in its analysis report.

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<sup>1</sup> <https://www.melbourne.vic.gov.au/parking-and-transport/transport-planning-projects/Pages/motorcycle-plan.aspx>

### Motorcycle Foot Path Parking

Motorcycle pavement, aka footpath parking, is allowed for in the Victorian Road Safety Road Rules, and has worked well for decades without significant complaint. It has been well supported by successive CoM councils and departments and naturally by riders. It promotes access to the CBD via a highly efficient transport mode which is one of the key objectives of the transport strategy.

CoM engineers in 2017 conducted a survey as part of MiCOM activities, in response to a councillor's perception of footpath parking as an obstruction and found no genuine concerns or a need to install further "no motorcycle parking" signage. There's no reference to this in the documents.

The "Participate Melbourne" documents instead made a show of representing such parking as counter to pedestrian flow and that it would lead to cluttering paths, and proposed dedicated on road parking instead. The documents also made a show of a minority of bikes that didn't park considerately rather than recognising that the vast majority of riders did the right thing and with a little encouragement, education and enforcement, this good result could be leveraged into an outcome consistent with the strategy's goals. The bias is clear and highlights short sightedness in three key areas.

A) In the time frame being considered, the motorcycle fleet will almost certainly skew towards electrically powered PTW's, thus bringing with them even greater environmental benefits for the CBD area. Removal of footpath parking would be a disincentive to using such a transport mode.

B) Should pavement areas be expanded for greater pedestrian use, presumably at a loss of road surface area (which therefore provides a disincentive to vehicular traffic), the increased area would provide even more parking opportunity for PTW's with an even further reduced likelihood of pedestrian / PTW interaction, and

C) While the provision of on street dedicated parking appears at first as an intuitively reasonable alternative, it represents a largely backward step if made in conjunction with a ban on pavement parking. It is an approach that provides a fixed allocation of parking infrastructure that is unable to flex to meet discretionary peak demands. One need only look to Brisbane and Sydney to see the downside of such an approach with riders regularly reporting nowhere to park and being discouraged from using their efficient mode of transport. The VMC strongly supports more on street parking as an adjunct to pavement parking.

### **KEY POINTS AND OBSERVATIONS ABOUT THE EY SWEENEY REPORT**

1. The Transport Strategy should treat Powered Two Wheelers, i.e., motorcycles, scooters and electric bikes, as a separate discussion point, not 'lumped in' with all Motor Vehicles.
2. PTWs are a solution to traffic congestion and commuting, not the problem.

3. PTWs excel for flexible personal commuting out to a 50-60km distance, unlike bicycles (10-15km max), or private vehicles (primary congestion creators), or rail/bus transport with restricted travel times and departure/destination hubs.
4. PTWs take far less pavement space than restaurant tables, bicycle parking hoops, hire bicycle bays and general street furniture.
5. PTWs have their own CoM committee - Motorcycles in the City of Melbourne committee (MICoM) which should have been better consulted during the period of the Transport Strategy development.
6. The existing Transport Strategy has a well-planned *City of Melbourne Motorcycle Plan 2015-2018* which can and should be continued in the new CoM Transport Strategy.
7. Motorcycling is the most vulnerable of the three Vulnerable Road User groups, given the now extensive protection and treatments enjoyed by the other two VRUs: pedestrians and cyclists. PTWs must be given equal protection and consideration in the CoM Transport Strategy: increasing the safety of any road user group at the increased risk to the safety of another group is not acceptable in any road planning strategy.
8. PTWs should be allowed dedicated parking areas with secure storage for rider's gear, in the same way that cyclists are allowed. This should be complementary to, not instead of, pavement parking
9. Pavement parking is a State Road Rule, not a City of Melbourne rule and must be recognised as such.
10. As (frequently) raised by the MICoM panel, education of how to pavement park responsibly by riders is imperative and long overdue. The plague of Uber delivery and similar scooter riders, often on international licences, concerns the VMC with their increasingly unsuitable pavement parking: this needs a concerted enforcement by both CoM and Victoria Police on a continuing basis.
11. The VMC stands ready as always to work with the CoM to promote and encourage PTW use to the benefit of all road users, but not at the expense of restricting footpath parking.
12. Only 5% of respondents were in favour of removing motorcycles AND pushbikes from the pavement (EY Sweeney page 34).
13. No respondents raised concerns about PTW pavement parking in EY Sweeney Walking Report.
14. No reference to PTWs was made in the EY Sweeney Emerging Technologies Report.
15. No consideration was given to Single Track Vehicle designation (cycles, scooters, electric bikes and motorcycles) as equally deserving of protection and priority in the EY Sweeney Cycling Report.
16. No reference to PTWs was made in the EY Sweeney Car Parking Report, despite a current CoM policy to convert car parking spots to free motorcycle (PTW) parking with 7 PTWs able to fit into a space taken by two adjacent car parks.
17. The EY Sweeney Motor Vehicles Report contains some positive PTW comments, which are unique in being dismissed by the author as being a small proportion of overall

- comments. Nowhere else in the Report is such a dismissal encountered: 5% is the referenced response dismissed, yet 5% is also the return on the "Dangerous, Limited Alternative Routes", light signals ignore, and police enforcement reports all found on page 83, all of which are reported without disparaging comment. This indicates an underlining bias by the author(s) of the report.
18. It would seem from the numerous pro-cycling responses throughout the Report that there has been a concerted campaign by the cycling lobby: good for them but a biased overall report has thus ensued.
  19. Page 85 has 6% of respondents supporting pavement parking and use of PTWs in the City.
  20. Page 91 has a 12% response to keeping footpath parking; which was the same proportion that responded positively to making the city more pedestrian friendly, but their relative positioning in the subsequent list portrays a bias.
  21. There is no mention of PTW pavement parking as an issue in the EW Sweeney "Ideas Forum", "Walking – Other Comments", and only a minor 3% response against pavement parking in "City Space". Also no mention of a negative response to pavement parking in "Public Transport", "Cycling – Other Comments", "Car Parking – Other Comments", or "Motor Vehicles – Other Comments" - however in the latter there was a 3% response recorded against "*Do not reduce motorcycle parking!*"

**RECOMMENDATION:**

The Victorian Motorcycle Council strongly suggests that EY Sweeney works with subject matter experts in the area of motorcycles / PTW's for a fair and engaged analysis of motorcycling issues and topics. The Motorcycles in the City of Melbourne Committee would be an appropriate subject matter expert panel.