

# NMC response to the Transport For London Consultation on Improving air quality and Londoners' health, tackling climate change and reducing congestion

## Introduction

The National Motorcyclists Council (NMC) welcomes the opportunity to respond to the Transport for London Consultation on Improving air quality and Londoners' health, tackling climate change and reducing congestion.

The NMC draws together the UK's motorcyclists' representative national organisations, which covers a wide spectrum of motorcycle use from road riding, green road riding, heritage motorcycling, motorcycle sport, motorcycle safety, the motorcycle trade and the service sector. The collective membership of these organisations and its numerous affiliates, approaches 100,000 individual motorcyclists. The NMC's mission is to work together to help assure a positive and sustainable future for motorcycling.

Motorcycling is a dynamic part of society and transport. It is a transport alternative and source of leisure and lifestyle which is enjoyed by over a million people today. It makes a positive contribution to society's vitality, the environment and the economy. Powered Two Wheelers (PTW) of all ages already contribute to a low carbon future. PTW use reduces traffic congestion. Safety has significantly improved over the last 20 years, with more progress possible if motorcycling's benefits are recognised by Government and public authorities.

## Summary of NMC Position.

- **PTWs should be exempt** - Regardless of whether the ULEZ is expanded, PTWs should be fully exempt from ULEZ charges, as is the case across Scotland and in other Low Emission Zone areas.
- The majority of PTWs, regardless of their size and age, can be shown to emit negligible levels of NOx. Therefore, given the benefits that PTW offer, it is unreasonable that they should be charged at all, much less at the same rate as cars.
- PTWs offer notable benefits in terms of emissions and reducing congestion. They should be considered as part of the solution on the route to net zero. On average, PTWs have much lower CO2 emissions than cars
  - <https://www.acem.eu/vision2030>
  - [https://acem.eu/images/publiq/2021/Oxford\\_Economics\\_-\\_The\\_economic\\_importance\\_of\\_motorcycle\\_to\\_Europe.pdf](https://acem.eu/images/publiq/2021/Oxford_Economics_-_The_economic_importance_of_motorcycle_to_Europe.pdf)
- PTWs produce lower lifetime greenhouse gas emissions compared to passenger cars and vans
  - [https://www.zemo.org.uk/assets/reports/Zemo\\_PLV\\_Life\\_Cycle\\_Analysis\\_Study\\_2021.pdf](https://www.zemo.org.uk/assets/reports/Zemo_PLV_Life_Cycle_Analysis_Study_2021.pdf)
- **The Mayor's Bus Lane Pledge** - Motorcycling offers a form of transport which reduces congestion. This benefit would be further recognised if PTWs were given access to all bus lanes and we call on the Mayor to fulfil his pre-election pledge to standardise bus lane access across London. This will enable shorter journeys and reduced emissions.

- **Characteristics of the Expanded Zone** - The proposed ULEZ expansion zone has different characteristics compared to the existing ULEZ area. For example, in the expanded zone public transport offers limited routes; the Tube and railway lines offer primarily radial routes to central London and buses offer, in the main, radial routes to specific commercial centres only. It can be difficult to make even short journeys which do not exactly fit the public transport routes. This is where private powered transport remains key, especially PTWs which are used by many young people and those with lower disposable incomes. PTWs offer a great alternative where public transport and walking/cycling is not appropriate, for example those who cannot walk far, or are carrying loads or tools for work.
- **Scrappage** - In principle the NMC does not support scrappage schemes which enable the destruction of vehicles which are in good condition; this is wasteful and can be highly environmentally damaging. <https://www.hotcars.com/1000s-of-rare-classics-found-rotting-in-uk-scrappage-scheme-graveyard/>
- Replacement of non-ULEZ-compliant vehicles with new vehicles may marginally decrease emissions in London but can create greater levels of pollution at a global level.
- **Case for Delay** - The current economic climate, the cost of living crisis, combined with problems in the supply of new vehicles which is pushing up the prices of second-hand vehicles, will create great difficulty for those who would need to replace a non-compliant vehicle. If current conditions prevail it is reasonable to suggest that the expansion of the ULEZ should be delayed.
- **Future road charging** - The NMC welcomes proposed discussions on future road charging in the future to help explore the factors on which it may be based, for example levels of vehicle pollution and congestion. Advantages of motorcycling in these areas must be considered in order for the scheme to be fair.
- **Heritage ULEZ and Congestion Charging** – The NMC welcomes the proposal to retain exemptions for vehicles in the historic taxation class. This exemption is a ‘rolling’ one as vehicles which reach a 40th anniversary of their first registration, become eligible on application to DVLA to be reclassified as historic. This is sensible given that such machines are used mainly by their owners for occasional recreational purposes rather than as daily transport. It has come to NMC's attention however that when such motorcycles become exempt from ULEZ charging by being reclassified as an historic vehicle, they immediately become subject to congestion charging - even though nothing physically has changed to enhance their potential to cause congestion; they are still PTWs. This is an administrative anomaly that needs to be rectified.
- **Looking Forward** - The NMC seeks proper recognition of the value that PTWs add to the transport mix, which London can benefit from via exempting them from ULEZ charges. There must be a discussion into the role that motorcycling can play in reducing emissions and congestion in London.

## General Remarks

Powered Two Wheelers are a notable component of the UK transport system, occupying between one and three percent of road transport depending on relative traffic density in various locations.

Approaching 1.3million PTWs are currently in use in the UK. DfT have estimated that over half of motorcycle travel is undertaken for commuting or business purposes, with a further proportion for access to education, shopping, or personal business. Therefore, in terms of day-to-day riding, PTWs are predominantly a practical transport mode. This is particularly the case in London. Premium models are also a key component of the market which underpins its wide practical element. This sector has significant economic impact which reaches beyond riding into the wider local and national economy (£7.2billion in 2015 -MCIA). Additionally, historic motorcycling is an increasingly important sector in economic terms and green roads riding is a notable fitness and mental wellbeing activity.

In general terms, PTWs as a whole contribute very little to overall emissions from vehicles, as was noted by DEFRA in the 2017 draft air quality control plan. This means that PTWs offer part of the 'pathway' towards a cleaner environment. It is also notable that older machines with often low fuel consumption, particularly in the commuter segment, can be part of the 'drive' to reduce Co2 emissions. The zero contribution of PTWs towards road congestion also helps towards this end, as PTWs spend less time on the road during a given commuter journey.

Motorcycling is therefore a dynamic part of society and transport. It makes a positive contribution to society's vitality, the environment and the economy. Given the lower fuel consumption and lower polluting qualities of commuter motorcycling in particular, PTWs already contribute to a low carbon future and should feature as a positive part in the Mayor's Transport Plan.

The NMC is dismayed that the consultation and supporting documents refers to PTWs largely in the context of being classed alongside cars. Despite significant work being done as part of Jacob's Integrated Impact Assessment, motorcycling barely gets a mention. Cars and PTWs are both entirely different types of transport, with completely different dynamic and emissions profiles within traffic. It is essential that TfL start recognising this.

This is sadly part of a continuing behavioural pattern among various public authorities – a refusal to accept or recognise the positive contribution of PTWs to transport future – despite the benefits of their use in traffic systems being very clear. The NMC urges a rethink.

The NMC recognises the safety issues that surround PTW use – issues and vulnerabilities that are broadly similar to those faced by cyclists. The Council once again urges TfL to recognise that positive safety outcomes can result from both a recognition of PTWs as a transport mode and the resulting vulnerability reduction that will come from the provision of support to those who ride once this recognition is in place. This includes measures to increase accessibility/reduce vulnerability for PTW users through access to bus lanes, greater parking provision and better investment in programmes and initiatives to improve riding standards and safety.

The NMC therefore urges TfL to engage a renewed discussion about the role of motorcycling in future transport. This is outlined in the NMC's document 'Motorcycling and the Future of Transport Policy'. This is attached to this submission and can also be found here: [https://assets.website-files.com/60364ce44148d168e4193d50/62160210b1212f9bce90ddd7\\_NMC-Motorcycling%20and%20the%20Future%20of%20Transport%20Policy%202022.pdf](https://assets.website-files.com/60364ce44148d168e4193d50/62160210b1212f9bce90ddd7_NMC-Motorcycling%20and%20the%20Future%20of%20Transport%20Policy%202022.pdf)

With regard to wider issues in relation to the proposed expansion, the NMC feels that TfL will need to approach the expansion with a more nuanced view of expected outcomes. Recent data revealed by the Evening Standard <https://www.standard.co.uk/news/london/ulez-expansion-london-air-pollution-levels-today-sadiq-khan-b1013242.html> suggests that the 'law of diminishing returns' may be in play as the ULEZ zone expands. Data analysis suggests the current ULEZ expansion has had a limited impact on roadside emissions to date, with the bulk of the benefits being attributable to the original central London zone.

### **Effect of ULEZ Charges on PTWs.**

Charging non-compliant PTWs and at the same rate as non-compliant cars to enter the ULEZ is wrong. This is because, as outlined above, a PTW is not a car – it is a very different vehicle with dynamics more related to cycling. It is also wrong because it greatly increases the daily commuting costs of those who use already low polluting pre Euro3 PTWs to get to work. Many machines used this way are smaller capacity machines, with very good fuel mileage.

The adoption of a flat rate charge is socially regressive since smaller PTWs are often used by lower income groups. For the rider of a non-compliant 125cc PTW, their annual commuting costs can increase by around £2,750 per year, which low income groups will find difficult to afford – particularly during the ongoing cost of living crisis. If they wish to trade their machine in to buy a Euro3 or later compliant PTW, they will find that the trade in value of their old model will have dropped well below its present second-hand value. TfL have not covered this adequately in their impact assessments.

Given the blanket exemption for PTWs in Scottish LEZs, the NMC urges that TfL follows this policy by introducing a similar exemption for the ULEZ extension.

<https://www.glasgow.gov.uk/LEZ#:~:text=Glasgow's%20LEZ%20was%20approved%20by,start%20on%201%20June%202024>

Cities like Birmingham and Nottingham have also agreed to exempt all powered two wheelers from environmental charging, recognising the positive role they play in easing road congestion and parking problems.

In summary, TfL's insistence on charging non-ULEZ compliant machines is not sufficiently evidence based and is disproportionate, given that the costs (economic and social) of this policy outweigh any putative contribution which it might make to the environment and public health benefits.

Page 102 reveals that motorcycle flows were derived from the average Motorcycles/Cars ratio from DfT ATC data, as traffic data from TfL's transport model (LoHAM) does not include motorcycles. The fact that TfL seems to have little information about the usage and dynamics of motorcycling in London is a matter of considerable concern and offers some insight as to why PTW use is largely absent from TfL's thinking. This is a serious matter which will need to be addressed as part of the dialogue proposed in this response.

National Motorcyclists Council July 2022.

## About the National Motorcyclists Council

The National Motorcyclists Council (NMC) is a coalition of motorcycling representative organisations, which works together on commonly held positions about issues where motorcyclists seek to change or influence government policy. It also researches issues to both inform campaigning and support the individual work of its members.

### The NMC's mission:

*'Working together to help assure a positive and sustainable future for motorcycling'*

The NMC brings together a broad spectrum of representative national motorcyclists organisations. These range from riders campaign groups, to motorcycle sport representatives, off road and green roads interests, motorcycle dealerships and road safety experts.

National Motorcyclists Council members are: The Auto Cycle Union, BikeTrac, the British Motorcyclists Federation, IAM RoadSmart, the National Motorcycle Dealers Association, Plantec Assist, the Trail Riders Fellowship and the Vintage Motor Cycle Club



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