Motorcycle Action Group

Submission to Silvertown Tunnel consultation

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This provides the Motorcycle Action Group's (MAG) perspective on the Silvertown Tunnel consultation – specifically in terms of the user charging proposals.

Background

MAG's primary purpose is to secure the interests and rights of riders, in order to ensure that motorcycles and scooters are treated proportionately and in the context of the overall transport mix. MAG therefore restricts itself to commenting on those matters which explicitly apply to bikers – and we generally resist offering commentary on those areas not of relevance to powered two wheelers and their usage. As such, our submission is solely focused on one aspect of the tunnel proposals; namely, that of user charging as it pertains to motorcyclists.

MAG was formed in 1973, has 57,000 members and represents the interests of the United Kingdom's 1.5 million regular and active riders, and the millions more who ride occasionally and hold a full motorcycle licence (1).

Our submission is directly related to the oral evidence offered by Lembit Öpik, MAG's Director of Communications and Public Affairs, at the hearings in the Excel premises in October 2016.

Recommendation

MAG proposes that Powered Two Wheelers (PTWs) - specifically, motorcycles and scooters - are exempt from user charging in the Silvertown tunnel scheme, as are other modes that help reduce emissions and congestion-related problems. Specifically, we suggest this is done by applying a 100% discount for powered two wheelers, as with other vehicles which are being allowed uncharged usage of the tunnel.

Rationale

1 Motorcycles and scooters contribute directly to the Project Objectives of the tunnel scheme.

Motorcycles directly contribute to reduced congestion. Research by Transport & Mobility Leuven confirmed that in a congested environment, a 10% shift from four wheels to powered two wheelers can measurably reduce congestion by 40% (2). Motorcycles are an excellent method of reducing queuing time and the stationary generation of emissions on

account of a motorcycle's ability to overtake or filter past stationary or slow moving traffic, thereby taking up no queuing space.

The average bike engine size is far smaller that that of an average private car, and this is also significant in terms of emissions. Powered two wheelers therefore help achieve some of the key Project Objectives as outlined in the consultation documents by speeding up all traffic, as the evidence shows. A charge discourages powered two wheeler use – even though these help reduce congestion.

2 Powered two wheelers ease the pressure on the existing overcrowded public transport facilities.

At critical times of the day, the underground network and prime bus services and the DLR are full to capacity, with queuing a regular feature of peak time travel. If new charges for powered two wheeler use are introduced, especially on such a key route as a river crossing, a proportion of individuals who would have used small, efficient and cheap motorcycles and scooters for reasons of financial economy are likely to add new demands on the already overloaded public transport alternatives.

Exemption from charges for these vehicles duly reflects their role as a more sustainable mode of commuting transport than cars or vans. This is especially important for those with lower than average disposable income. It is also attractive because it enables more modal shift from cars and vans to powered two wheelers, which helps to reduce pressure on oversubscribed parts of the transport network.

3 Motorcycles and scooters fulfil the same criteria as other vehicles which are to be allowed free use of the tunnel

As stated from 4.11.4 of the consultation document, part of the rationale for giving buses, coaches and minibuses a 100 per cent user-charging discount includes:

'the important role they play in sustainable transport and helping to reduce the need for car use. In addition these forms of transport have an important social function in providing a generally cheaper form of transport than rail or private car use. As already stated in 4.6.7, London has an excellent track record in achieving a fall in car mode share… Coaches also (improve) journey times and journey time reliability… The discount policy complements this approach.'

Every single one of these points also applies to motorcycles and scooters, which play an important role in sustainable transport. Bikes and scooters are a net reducer of congestion, pollution, fuel consumption and journey times. They are on average far cheaper than rail or private car use and require no subsidies. They can also contribute to a further fall in car

mode share. They improve journey times and journey time reliability, with riders experiencing significantly reduced travel duration, without contributing to the burden on the road network. If the discount policy is to be applied to 'compliment this approach' then it is clear that powered two wheelers should be included in the discount category.

Note also the relevance of the point regarding 'an important social function.' The charges will act as a regressive tax for those who have chosen powered two wheelers as a result of being relatively low earners. Such a regressive tax is entirely counter to the stated social agenda of the current Mayor of London – who himself has made commitments in writing in support of powered two wheelers as a vital element in the modal mix of vehicles.

4 Motorcycles and scooters are, in real-time journeys, low emissions vehicles and as such should be given a discount from the user charge.

Here is an analysis of the phrasing of the consultation rationale in the context of powered two wheelers.

From 4.11.9, the document states:

'Project Objective 5 states that TfL will seek to minimise adverse impacts on the environment. Incentivising the use of low emission vehicles is in line with this objective. The benefits of reduced pollution from these vehicles are spread more widely than the immediate vicinity of the Blackwall and Silvertown Tunnels as they will be used for journeys more generally.'

Evidence from TfL's Study: Evaluation of Journey Times and Emissions of PTWs in Bus Lanes (January 2011) (4) clearly shows that powered two wheelers are, on average, far preferable to four wheelers in terms of impact on the environment, fuel consumption and journey times – and as such are evidently low emissions vehicles. A modal shift towards powered two wheelers from all types of twin tracked vehicles such as cars and vans will improve air quality in London, and that is an immensely attractive benefit.

In addition, they demonstrably reduce congestion as opposed to contributing to it. By contrast, even electric cars contribute to congestion, and therefore are a contributory cause of emissions generated by others which are stationary in the same congestion. It is therefore inconsistent to charge motorcycles which don't cause traffic problems (and in fact reduce them), while not charging other vehicles which add to the congestion, regardless of their power source.

One further observation should be made at this point: when a 'cradle to grave' analysis is conducted, motorcycles further demonstrate savings. This is due to the comparatively modest environmental footprint of a motorcycle production process compared to that of cars or vans and

including electric cars. It has been suggested that the footprint of a car is greater in terms of its production and disposal than it is in terms of its emissions when operating as a functioning vehicle. (3) As a rough guide, motorcycles weigh approximately one sixth to one tenth of a typical commuter car. Reports conclude that they have one sixth or less of the production footprint of a car. MAG is happy to supply detailed analysis of these claims on request.

Motorbikes also have a longer life expectancy than most twin tracked vehicles, further reducing their life time footprint. If the project is solely concerned with the local emissions agenda, then it may choose to ignore this strategic point. However, it is self-evident that only a proper cradle to grave analysis and approach will adequately address the interests of the country and the world in environmental terms. MAG therefore suggests that this point should be regarded as salient in the overall assessment of user charging in the context of motorcycles and scooters.

The consultation document goes on to say:

'it is important to set the criteria for this discount at the right level so that the number of eligible vehicles is controlled and other Project Objectives, such as reducing congestion and emissions on the wider road network, are not undermined.'

Once again, powered two wheelers are more effective at achieving the goal of reduced congestion than any other powered device. This is the case for conventionally powered bikes as well as electric motorcycles and scooters. In terms of emissions, Transport for London's own research (Emissions Study, 2011) proves this is true for PTWs versus, for example, cars. (4)

This research was conducted with police motorcycles which have a much larger physical presence than the average commuter powered two wheeler. Thus, again, from TfL's own research and findings, the stated Project Objectives are supported by motorcycles and scooters, to the point that the more of these there are, the more the traffic problem is reduced. To charge motorcycles and scooters for use of the tunnel is thus actually counterproductive. Indeed, MAG believes that such charging may be legally challenged as discrimination.

The consultation document also says:

'It is also helpful to retain consistency with the Ultra Low Emission Discount (ULED) which is currently available for the Congestion Charge (CC). This makes it easier for users to understand and provides a clear message on what constitutes this type of vehicle… It is likely that the (ULEZ) discount for the Blackwall and Silvertown tunnels will reflect whatever the current CC (ULEZ) discount is.'

The Motorcycle Action Group is actively engaged with assessing the net implications of possible charging regimes regarding ULEZ, and negotiating with the authorities on these. Currently, motorcycles are quite rightly exempt from the Congestion Charge, specifically because they are a key element in the mix of modes that help reduce congestion related problems – and an essential alternative to less desirable forms of road transport.

Regardless of the future of ULEZ, it makes no sense to introduce charging on one crossing, when the precedents have been clearly and consistently set NOT to charge powered two wheelers on all the other crossings and in the Congestion Charging zone. To do otherwise would be to ignore the sound reasons for that policy and arrangements that have been successfully operated for many years. The proposers of charging would need to show why motorbikes should be charged at Silvertown despite all previous precedents.

Note that the arguments for free crossing at, for example, Dartford were logically constructed and accepted without any significant conflict. MAG would hope that the same logic and conclusions are seen as pertinent here as well.

The M6 Toll case

The proposers of the charging scheme raised the example of user charging on the M6 Toll. MAG has investigated this example. It is true that motorcycles pay a charge to use this toll road while the existing M6 is free to motorcycles (as it is for all normal traffic). Powered two wheelers represent close to 0% of traffic on the M6 toll at any time of day or night. (5) The M6 Toll example therefore strongly support the claims by MAG about the likely displacement of virtually all powered two wheeler traffic to nearby alternative routes if any sort of charge is introduced for motorcycles and scooters. Such displacement serves no useful purpose from any perspective in terms of the Project Objectives – and especially given that one key objective is to reduce traffic flows in the Blackwall Tunnel. The M6 experience shows that motorcyclists are unlikely to use the Silvertown crossing if charged to do so, thereby contradicting this goal.

TfL's emissions and travel data

Transport for London's own research and findings clearly show that thanks to the efficiency with which powered two wheeler users are able to move through congested traffic, including the use of bus lanes on all TfL Controlled routes since 2009, the emissions of all categories of pollutants are significantly lower than for cars and vans.

Again, the only consistent approach here is to provide a 100% discount for powered two wheelers. The London Assembly and Mayor of London

have supported the idea of extending TfL's long standing policy of allowing motorcycle access to all with-flow bus lanes by encouraging all London Boroughs to add coherence to the measure by following suit on all Borough managed bus lanes. It is entirely consistent to allow free passage to motorcycles and scooters in a new tunnel as part of the emissions-reducing and time-saving strategy.

Conclusion

MAG is NOT seeking special favours for motorcyclists and those using scooters as their means of transport around London. Quite the opposite. Riders are merely seeking to be judged objectively and fairly and in accord with the criteria specified in the Project Objectives of the scheme. For the reasons outlined here, users of this congestion-busting mode of transport should not be subject to charges for use of the Silvertown tunnel.

While this exemption from charges will assist in achieving the objectives set out by the proposers of the scheme, the alternative, namely charging bikers for using the tunnel, will have the opposite effect – and out of step with the existing charging schemes.

There could be other adverse consequences – such as forcing the authorities to charge electric vehicles as they create as much congestion as fossil fuelled vehicles. There could also be a test in court of whether charging motorcycles might amount to unfair discrimination as it contradicts Transport for London's own data and rationale. Any such court case is something MAG is very keen to avoid, and we presume the same is true for the Mayor and TfL.

The Motorcycle Action Group is more than willing to share and discuss the technical analysis of the environmental impact of motorcycles compared to other modes of transport, both in terms of operational environments and also in terms of 'cradle to grave' analysis – including in regard to electric cars. These calculations are fairly complex, but they emphatically support the need for consistency by not charging powered two wheelers if electric vehicles and other low emissions users of twin tracked vehicles are not charged.

In essence, this is a simple situation: if the scheme is to be consistent in terms of the current rationale and precedents set in London, riders of should not be charged for using the Silvertown tunnel.

We are happy to provide any further information on request at any time.

Lembit Öpik
Director of Communications & Public Affairs, Motorcycle Action Group

1 http://www.mag-uk.org/

2 http://www.tmleuven.com/project/motorcyclesandcommuting/home.htm

3 https://www.theguardian.com/environment/green-living-blog/2010/sep/23/carbon-footprint-new-car

4 http://content.tfl.gov.uk/pt-emissions-study.pdf

5 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/194001/utilisation-surveys-summary.pdf