

Silver Town Tunnel consultation submission by the Motorcycle Action Group

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The Motorcycle Action Group (MAG) makes this further submission to the consultation on the Silver Town Thames Crossing. Specifically, we respond to the points made in the January 2017 hearings in Newham. Our request is that Powered Two Wheelers (PTWs) are exempt from the user charges which have been proposed by the applicant.

Context

MAG is the UK's primary riders' rights organisation. Its remit is to represent the interests of PTW riders and to provide a context for riders in which user-charging is considered in the most informed and rational way. As such, our observations do not relate to the overall merits of constructing an additional Thames crossing. Rather, we comment on the arrangements as they pertain to riders in the context of the stated aims of the project.

In this submission, we set out the arguments supporting our request, and explain how inconsistencies arising from the proposal to charge PTWs, including mopeds and scooters - whilst exempting other vehicles from charges - can be corrected by also exempting powered two wheelers.

It is important to note that our case is founded entirely on provable facts, and also on the *policy aims identified by the applicant* and *not* by MAG. We are therefore not seeking to alter the overarching goals for the proposals; quite the opposite. Our purpose is to make suggestions that enhance the prospects of achieving the applicant's congestion, economic, social and environmental objectives consistently and fairly.

MAG is committed to straightforward, evidence-based contributions. We always strive to engage positively with the consultation process and pursue solutions in an inclusive way.

MAG's recommendation

MAG recommends that PTWs are exempt from user-charging in the Silver Town Tunnel scheme. There are various ways to do this, and we suggested a practical approach in our previous submissions. For brevity we don't repeat the details of that approach here, as the mechanisms are already fully established for other vehicle categories.

Basis for Recommendation

- 1 ***SOME OF THE APPLICANT'S MODELLING DIDN'T TREAT MOTORCYCLES AS MOTORCYCLES AND THEREFORE CANNOT HAVE TAKEN MOTORCYCLES INTO ACCOUNT CORRECTLY***

At an earlier hearing the applicant stated that aspects of the traffic modelling treated PTWs as cars. This inevitably creates flaws in the conclusions. Other policy in London towards PTWs, such as the Congestion Charge for which powered two wheelers are exempt, shows that a radically different outcome is achieved if PTWs are considered as a specific and qualitatively different category of vehicle. Treating them as cars means they have not been properly assessed in terms of the pros and cons of charging this vital congestion-busting mode. Also, the social utility of PTWs for lower paid workers (see below) in the city will have been ignored.

2 ***POLICY CONSISTENCY REQUIRES THE EXEMPTION OF PTWS***

MAG has already referenced, in its previous submission, research carried out by TfL itself into the relative emissions of cars versus PTWs. This conclusively proved two things: PTWs emit significantly lower quantities of emissions than cars; and PTWs use up less time and fuel in real-time journeys. These conclusions have never been disputed or questioned by the applicant.

We remind the inquiry that evidence previously submitted by MAG also demonstrates that modal shift from cars to PTWs reduces congestion and emissions: again, a statement which has not been disputed. As such, motorcycle and scooter usage – and an increase in such usage through modal shift *away* from cars - directly contributes to the objectives of the Silver Town Tunnel scheme.

Note also that, even in a very high-density PTW environment, reducing the use of powered two wheelers is not seen as an attractive option. A relevant example of research into an extreme PTW environment comes from Vietnam, a country with a very high dependence on powered two wheelers. The research concluded that, even with a motorcycle flow of 11,000 units per hour at some junctions, it was still unlikely that a reduction in PTW density would reduce congestion – and that, in fact, such a reduction in PTW usage could actually increase congestion, because of modal shift to other forms of vehicle. Although the circumstances are evidently not identical, there are sufficient similarities to make the report useful to our analysis as it pertains to Silver Town Tunnel – and for that matter, London. The report can be found here:

<http://www.codatu.org/wp-content/uploads/Should-motorcycle-be-blamed-for-traffic-congestion-in-vietnamese-cities-Hien-NGUYEN-Franck-MONTGOMERY-Paul-TIMMS.pdf>

In summary, the considerations raised under this point collectively indicate that dis-incentivising PTW use with user-charging is counterproductive because it works against policy objectives set out

by the applicant. A proposal which dis-incentivises PTW usage therefore embodies an inconsistency versus other key aspects of the applicant's goals and arguments.

3 ***OTHER VEHICLES THAT CONTRIBUTE TO CONGESTION MUCH MORE THAN MOTORCYCLES ARE EXEMPT – A FURTHER INCONSISTENCY***

It is worth noting that electric cars are not zero-emission vehicles. In the current non-zero emissions energy production regime which is set to continue into the long term, they simply shift emissions to the locality of the emissions producing power stations they rely on. Thus, they indirectly generate emissions through the generation of electricity required to power the electric systems – though, of course, this occurs at locations largely remote from London. In fairness, while a 'cradle to grave' analysis would take this into consideration, MAG accepts that the applicant may be choosing to restrict their consideration away from the 'macro' effect on the climate and environment - to a more local interpretation for London alone.

So, on the assumption that the applicant would claim not to have responsibility for remote or 'macro' emissions issues, there are still 'micro' effects which need to be taken into consideration. Electric cars create exactly the same amount of congestion as non-electric cars. Thus, they create *secondary* emissions through the *congestion* they help to create.

It follows that PTWs, which *reduce* congestion and thereby reduce *secondary* emissions, should not be charged if electric vehicles, which *add to* congestion and increase *secondary* emissions, are not charged. Note that this point appears to be accepted by the applicant, who stated that at some density of usage in London they WOULD introduce a user-charge for electric vehicles. This can ONLY mean that the congestion (or possibly, but not probably, the macro environmental impact of electric vehicles) consideration is salient – a point evidently favouring the exemption of PTWs from the user charge. Note that while PTWs do produce some emissions, TfL data shows that PTWs are net reducers of these emissions, and we cover that later in this submission.

4 ***MOTORCYCLISTS WILL NOT USE THE CROSSING (FOR ECONOMIC REASONS) IF A PTW USER-CHARGE IS INTRODUCED***

The M6 Toll road was cited by the applicant as an example of where user-charging for powered two wheelers is in place. MAG investigated this example after the applicant raised it and discovered that powered two wheeler traffic constitutes approximately 0% of M6 toll traffic. This strongly indicates that user-charging for PTWs in the Silver Tunnel project would simply re-route almost all PTW traffic to other crossings, as the negative of longer journeys would be outweighed by

the financial saving to the rider. This displacement contradicts environmental objectives for the scheme because longer journeys, even on PTWs, create a small amount of extra emissions, so the detours are not 'zero sum' in terms of the emissions calculation. We will explain later in this submission that the revenue uplift for this negative effect will be very small.

5 ***IT IS INCONSISTENT TO PROMOTE MOTORCYCLES IN BUS LANES AND THEN CHARGE THEM FOR CROSSING THE THAMES***

Senior politicians in the city and in the country have been persuaded by the benefits of motorcycles in bus lanes – and we return to this in a forthcoming point. This bus lanes policy is contradicted by the imposition of a user charge on PTWs at Silver Town Tunnel. On request, MAG will submit all the data and rationale behind the case for allowing PTWs in bus lanes to illustrate this inconsistency in detail – though recognising that compact, light, low fuel consumption vehicles are more attractive in the transport mix than larger, heavier, higher fuel consumption alternatives is an intuitive point.

6 ***CITING - AS A JUSTIFICATION FOR THE USER CHARGE - PROPOSALS TO INTRODUCE A USER CHARGE FOR PTWs UNDER THE 'ULEZ' PROPOSALS IS A CIRCULAR ARGUMENT***

A defence for charging motorcycles at the Silver Town Tunnel, which cites the proposed charging of some motorcycles under the Ultra Low Emissions Zone scheme, ignores three points.

Firstly, the charging of any motorbikes under this scheme is extremely contentious, partly due to the highly questionable and, MAG would argue, an incomplete analysis put forward in the ULEZ discussions regarding PTW emissions.

Secondly, a large proportion of motorcycles WILL be exempt from the charge: if the applicant in the Silver Town Tunnel project seeks to emulate the ULEZ scheme, then MOST motorcycles still ought to be exempt.

Thirdly, as we have explained, electric cars – which cause more congestion than motorcycles – are exempt from ULEZ, even though they contribute directly to congestion and thus to pollution. Again, we stress this is a point implicitly accepted by the applicant on the basis that they indicated an intention to introduce user-charging for electric cars once usage levels increased to some yet-to-be-defined level. Thus, if electric cars are exempt now, necessarily so must motorcycles be exempt for the congestion and secondary emissions reasons already given.

In the real-life London policy framework today, PTWs are not subject to the Congestion Charge because it seems universally accepted by the authorities that PTWs don't cause congestion, but rather reduce it. To ignore this and say that user-charging for PTWs should occur in the Silver Town Tunnel because it is proposed under ULEZ offers no cogent rationale. It is merely a circular argument based on the empty premise that one proposal to charge motorbikes under ULEZ (which MAG suggests is based on flawed logic that *contradicts* the current congestion charging arrangement) justifies another, equally flawed, proposal at Silver Town Tunnel.

7 ***BEING ABLE TO CHARGE PTWs IS NOT A JUSTIFICATION FOR DOING SO***

An argument was put forward which amounted to saying that the applicant wished to charge PTWs because it can do so easily using modern technology. Again, the idea of charging motorcycles 'just because you can' disregards the need for providing a rationale for doing so. This is self-evident, as everything from an electric car to a bicycle – or for that matter a horse - could also be charged on this basis, 'using modern technology.' MAG observes that technical issues behind not charging motorcycles under the Congestion Charge have never been cited as the core reason for their exemption in the Congestion Zone. This is also the case elsewhere, for example with the exemption at the Dartford Crossing.

8 ***ACCIDENT STATISTICS ARE NOT A REASON TO CHARGE RIDERS***

The applicant cited accident statistics as a reason to charge PTW users, apparently on account of the cost of these accidents to the state. If this is to be considered a serious argument, then the same principle should be applied to the other two main groups of Vulnerable Road Users, namely pedestrians (who suffer a far higher annual mortality figure in London than motorcyclists), and cyclists (who experience a very high mortality rate in terms of miles cycled). Merely charging motorcyclists on this basis would therefore constitute discrimination.

9 ***MOTORCYCLES DO NOT CREATE SIGNIFICANT ROAD DAMAGE***

The applicant cited road damage as a justification for charging motorcycles. In that case it would be inconsistent to charge, say, a 1200cc BMW motorcycle weighing 225kg while NOT charging, for example, a Toyota Prius electric car with a kerb weight of about 1,400kg which, based on the applicant's logic, clearly contributes a great deal more to road deterioration than a motorcycle and therefore should be included in the user-charging.

10 THE MAYOR OF LONDON SADIQ KAHN MADE A POLICY STATEMENT: ITS SPIRIT AND INTENT APPEAR TO CONFLICT WITH PTW USER CHARGING.

The Mayor, in 'The Road' magazine in April 2016 wrote:

'As Mayor, I'll work with the motorcycling community to make sure that riders' rights and interests are taken on board as an integral part of the transport mix in the city. It's clear motorbikes and scooters generate far less pollution, save time and money for the rider - and don't create congestion. It's absolutely right for us to enable powered two wheelers to play their part in delivering a less congested road network... one clear policy area is the case for a more consistent approach to bikes in bus lanes – a scheme which has proved itself effective, without creating undue problems or risks for other road users such as cyclists. But riders can fall foul of regulations because boroughs don't all have the same approach. As Mayor, I'll work to create consistency across the city to make bus lanes open to riders throughout the Capital...I will meet with representatives of riders' rights organisations and learn at first-hand what you need and want....Politics is a dialogue, so that will be the beginning of what I hope turns out to be a very productive relationship between you and the city. From bikes carrying urgent blood supplies, Internet shopping deliveries through to commuters - this city IS big enough for all of us as long as we co-operate together... I'm looking forward to serving London's 130,000 biker riders.'

MAG suggests that it is fully consistent with this commitment to exempt motorcycles from user-charging in the context of the Silver Town Tunnel. To charge powered two wheelers would contradict the Mayor's policy statement. The original and full text is available at:

<http://www.mag-uk.org/en/newsdetail/a7234>

11 THE ECONOMIC IMPACT OF USER-CHARGING FOR PTWs IS REGRESSIVE

The proportionate increase in cost for commuters who use motorcycles as their commuting mode is extremely high. Here is a brief analysis, and MAG is happy to provide more detailed information. We have extensively analysed the financial factors and believe we now possess the most comprehensive comparison currently available based on reasonable assumptions, ONS data and reliable industry sources.

For a driver of, say, a Volvo S60 (and assuming the user must pay a congestion charge and also parking costs), the net increase in commuting costs of the proposed user-charges amounts to 6%-12%, assuming a plausible spread of commuting mileages and some other variables. Under the same assumptions, a typical Toyota Corolla user

will experience an increase on the same terms of 10%-20%. The trend is that the cheaper the car is to run, the higher the percentage increase in cost caused by the user charge.

For comparison, we used a Honda 125, a typical commuter bike, as our working example. As an example of where we took our cost estimates from, please see:

http://hondacg125.awardspace.com/running_costs.htm

On the same assumptions we used for cars, at peak times the overall cost, *including all fixed costs*, of a typical commute on this motorcycle would increase by between 90%-170%.

The variable cost increase is, naturally, even more extreme. Variable costs for a typical commute on a 125cc motorcycle currently amount to around £1.26 per day for an average commute (in London, 11km each way according to the Office of National Statistics). With the peak congestion charge, this rises to £5.26 – an increase of about 340%. For a low-wage employee on £15k per year, this would mean about 7% of their GROSS income would be lost to the user charge.

Qualitative research which MAG has conducted indicates less-well-paid employees often depend on a motorbike or scooter to get to their place of work, as every other conventional means of transport is more expensive – and we explore this further in the next points of our submission. For reference, we are also seeking a quantitative analysis of the situation. Assuming our research is correct, the user charge is therefore a regressive tax on these PTW-using commuters.

12 PUBLIC TRANSPORT IS NOT AN ALTERNATIVE TO A CHEAP MOTORCYCLE FOR LOW PAID WORKERS

If a 125cc commuter on a typical commute shifts to bus travel, this is more than 140% more expensive than a small commuting bike, with a considerable increase in travel times. The Underground is potentially over 500% more expensive. Unless TfL is proposing to reduce the cost of some bus or tube services to around £1.30 RETURN, there is no comparably economical alternative for the low-paid worker who depends on their PTW to get to and from work. For this category of London commuter, this regressive charge for PTW users will cause them to search for either an alternative route, or a different form of transport for their journey. Since in many cases all the practical alternatives will be economically prohibitive, the abandonment of the employment position is also going to be a seriously possibility for some.

13 THE REVENUE BENEFIT IS SMALL COMPARED TO THE SOCIAL COST

As stated above, almost all PTW users will use alternative routes if there is a user-charge at Silver Town Tunnel, even if those routes are slower and longer. Given the relatively small impact on net revenues to the applicant and the existing precedents for exemptions, it should be obvious that the financial return to the applicant from PTW user-charging is dwarfed by the overall additional cost to typical PTW users. There is also a capacity issue on public transport, leading to a more highly subscribed public transport or road network for others who would have to share public transport or road-space with former PTW users who abandon that mode of travel for the alternatives, as some undoubtedly will, based on an economic cost calculation. If the attractions of PTW usage are lost, then there will be a modal shift away from PTWs with all the attendant issues this brings with it.

In addition, Newham and Woolwich, both of which are located at or near the proposed crossing, are amongst the less wealthy areas. Employment data indicates that this category of London worker also has a higher likelihood of being in multiple employment. The applicant has expressed a welcome commitment to ensure there is no detrimental social or economic effect on local people. MAG suggests that this means it is necessary to consider the commuting implications in economic modelling to understand the impact of user-charging upon low-paid workers. A number of these individuals depend on their powered two wheelers to do their jobs.

The social issues are therefore very serious drawbacks and we have explained how lower earners would suffer disproportionately if the charging applies to motorcycles and scooters. The applicant has not offered data to the contrary on either issue or, up to this point disagreed with MAG's commentary about these observations. The case for exemption of powered two wheelers on these grounds is therefore obvious.

Conclusion

MAG is happy to supply all internal calculations underpinning the claims made in this submission for scrutiny. Note that we have based our submission on the statements and intentions put forward by the applicant. Consistency with the applicant's own goals for the scheme, and fairness from a social perspective, dictate the case for exempting powered two wheeler users from the user-charge. MAG welcomes a dialogue regarding any aspect of its submission at any time with the applicant, the inquiry or any third party.

We are available on 01926 844 064 or at:

central-office@mag-uk.org