

## **Response to position of The Applicant towards Powered Two Wheelers:**

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This summarises some additional comments in relation to The Applicant's written commentary following the meeting between MAG and The Applicant on 3<sup>rd</sup> April 2017: submission received by MAG on 6<sup>th</sup> April entitled: '8.112 Applicant's Response to Action Point 1 from the OFH on 28 March 2017 TR010021.'

### **Background**

MAG has already covered most of the points included in the submission by The Applicant. We don't think it constructive to repeat what we have already said.

We also include some comments from others who have fed into MAG's work. To be honest, there is no way MAG can possibly employ the number of people which The Applicant has at their disposal. One staff member has primarily contended, on his own, with all the points which have been made over the entire consultation process and this has proved quite challenging. Yet MAG can confirm, in the crushingly short time available to it, organisations like the Motor Cycle Industry Association, and ordinary riders who simply are not political enough to look after their own interests, are desperate to appeal to The Applicant to resist making a user-charging call that harms a huge number of individuals – and the objectives of the scheme. MAG has had as large amount of input to support the position we have taken, but given the intensely short timetable from now till the end of the entire written submission process, we offer – in good faith - the commitment to prove anything we say.

### **A further example of inconsistency**

Let's look at one single additional example – the only one which MAG has not entirely addressed to this point.

In 1.1.6 The Applicant claims that 'motorcycles are themselves a contributor to congestion – albeit it acknowledges that individually, a motorcycle contributes less to congestion than a car.' MAG has covered this point in our submission of 5<sup>th</sup> April 2017 highlighting the fact that the evidence they use is being inappropriately interpreted. Dr Leon Mannings has submitted his perspective on this issue and MAG is more than happy to supply this information on request.

In 1.1.7, The Applicant states 'Although MAG itself very reasonably acknowledges the limited relevance of the evidence it submitted in relation to motorcycle use in Vietnam, (REP4- 067) the data in that report in fact implicitly supports the Applicant's position on this issue, given that despite the very high PTW mode share in the Vietnamese cities studies, there is still said to be a substantial level of congestion there.' However, there is a substantial misunderstanding here. In response to what MAG regarded as an unsubstantiated claim by The Applicant in relation to congestion, MAG sought the most extreme case possible. We

determined to find the worst-case scenario for riding, and concluded that every motorcycle, even in a situation where there are three per SECOND, reduces congestion. To be specific about the Vietnam case, The Applicant seems to have failed to understand that the example works in favour of an exemption for user charging for PTWs, not for it.

### **A final look at other matters**

MAG has covered the incoherence of the PCU value ascribed to PTWs which The Applicant proposes is 0.55 - despite all the data. It is simply a wrong claim. We repeat our arguments: TfL have not offered any coherent reason to charge PTWs, and not to charge other congestion causing vehicles, the most obvious of which are electric cars – a point exhaustively covered in previous submissions.

A further piece of data shows that the average occupancy of a car is irrelevant:

<http://content.tfl.gov.uk/technical-note-14-who-travels-by-car-in-london.pdf>

59% of cars, according to TfL's own data, in London are single occupancy. MAG never suggested that ALL journeys should or could be made by motorcycle. But given the other evidence of the attractions for modal shift from car to bike in terms of reducing congestion, it defeats The Applicant's own targets to disincentivise this shift. Any charge will effectively do that. The average occupancy used by TfL is irrelevant. If all the single occupancy drivers shifted their mode of travel to PTWs, there would be no congestion in London. Every car which shifts to a PTW typically reduces that user's emissions footprint by over 80%. If half of single occupancy car journeys were taken on PTWs, that would reduce the total emissions of single occupancy journeys around 50%.

Two further comments: The Applicant has made a number of suggestions regarding the data which actually works against their own case. For instance, they say emissions from a motorcycle range between ~25-110% of that of a car. Yet looking at the data a bike creates less than 18% of the emissions of a single occupancy car like for like. Note that the 110% estimate does not appear to accord with either common sense or the laws of physics, given the vastly lighter mass and air resistance of a PTW versus any car. Furthermore, the 110% figure, even in The Applicant's own calculations, seems to refer to a PTW which is being compared to a car at about 115Km/h. To the best of MAG's knowledge, the tunnel scheme does not include any plans to have a 115km/h speed limit. If one compares a motorbike with a car at realistic speeds and also taking into account the accepted faster commuting velocities of a PTW, the motorcycle has a far lower emissions footprint. In addition, the data provided by The Applicant seems to ignore that fact that the maximum speed of a typical commuting motorcycle, such as a 125cc Honda, is 105km/h. Thus even if a rider wanted to go through the tunnel at 115km/h, they couldn't. Again, MAG is happy to share the workings of this data.

Regarding the claimed social profile of riders, The Applicant has presented some data claiming that riders are as wealthy or wealthier than the general

population. This is simply wrong. MAG has obtained an assessment of riders' social groupings according to data collected through the profiles of those purchasing motorcycle insurance – which, we suggest, has no logical bias within it. This indicates that, using employment as a guide to socio-demographic profile as collected by Bikesure, the following is the case:

A = 5%

B = 7%

C1 = 23%

C2 = 12%

D = 41%

E = 3%

Retired/not advised = 2%

Students = 7%

This means that 79% of riders insuring with this firm are C/D/E. This does not suggest particular wealth or opulence on the part of the riding community. Again, these are real figures from the insurance marketplace and MAG is happy to provide all references.

Finally, given the limited time available, MAG turned to the question of precedent. We quote: 'The Applicant acknowledges that motorcycles are exempted from charges in a number of other user charging Schemes, including the central London Congestion Charging scheme. However, the Applicant considers that each of these schemes has its own set of objectives, circumstances, and practical and technological constraints, and that the decision to charge or exempt motorcycles naturally reflects these in each case. In the case of the Silvertown Tunnel scheme, the Applicant considers that the objectives around congestion, resilience, impacts on health, safety and the environment.' Yet The Applicant has failed to provide a reasonable evidence base on any grounds for the charge. Across the entire country these considerations have generally been regarded as reasonable grounds for an exemption for PTWs from such charges.

MAG suggests that in ALL of these cases charging motorcycles and scooters contradicts the intentions of the scheme. We are more than willing – indeed eager – to provide our data, face to face in any further meeting The Applicant is willing to have, to justify our case for an exemption for Powered Two Wheelers.

## **Conclusion**

In truth, it seems to MAG that The Applicant has sustained their intention to charge motorcycles as 'an end in itself,' rather than a conclusion drawn logically from the data which is available to them from independent and third party sources, just as it is to MAG and everyone else. Each time we have sought to clarify the reality in terms of the claims made, we have received increasingly outlandish responses. These relate emissions to speeds of 115km/h - which can't be achieved on a typical commuter motorcycle or scooter in any circumstances, let alone in the tunnel - road damage which doesn't happen as set out by The Applicant, misuse of data on congestion and assumptions involving

the *average* occupancy of a vehicle whilst ignoring the fact that six out of 10 car journeys involve a single occupant.

In the absence of a change of heart by The Applicant up to this point, MAG hopes that the Panel will take the view that no case has been made to impose a charge on a mode of transport which actually contributes to the objectives as defined by The Applicant, as opposed to contributing to the problems as incorrectly claimed.

***Lembit Õpik***

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