



## **Improving air quality and Londoner's health, tackling climate change and reducing congestion – Consultation**

### Response from the British Motorcyclists Federation (BMF)

#### **Introduction**

The British Motorcyclists Federation (BMF) welcomes the opportunity to give their views on Transport for London's proposals to improve air quality in London. The BMF is a lobbying group with 64,000 individual and club members that campaigns to pursue, promote and protect the interests of riders.

#### **ULEZ and Motorcycling**

Regardless of whether or not the ULEZ is expanded, motorcycles and powered two-wheelers (PTW) should be fully exempt from ULEZ charges, as is the case across Scotland (Glasgow's Low Emission Zone (LEZ) - Glasgow City Council). The majority of PTW, 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.

Powered two wheelers (PTW) offer huge benefits in terms of emissions and reducing congestion, and should be considered as part of the solution on the route to net zero. On average, PTW have much lower CO2 emissions than cars (ACEM <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)), and PTW produce lower lifetime greenhouse gas emissions compared to passenger cars and vans (MCIA/Zemo [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)). In addition, motorcycling offers a form of transport which drastically reduces congestion. This benefit would be further recognised if PTW were given better access to bus lanes and we would like to see the Mayor encouraging all London boroughs to allow this, enabling shorter journeys and lower emissions.

The proposal to exempt historic vehicles from the ULEZ is welcome but we note that all historic vehicles are currently subject to the congestion charge. In principle any motorcycle is exempt from the congestion charge and that should not change when it becomes historic. The BMF would be happy to discuss ways to remove this anomaly.

#### **Other considerations**

The proposed ULEZ expansion zone has different characteristics compared to the existing ULEZ area. For example, in the expansion 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 surprisingly difficult to make even short journeys which do not exactly fit the public transport routes. This is where private vehicles are key, especially PTW which are used by many young people and those with less disposable income. PTW 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.

In principle the BMF does not approve of scrappage schemes which enable the destruction of vehicles which are in good condition; this is wasteful. Also, replacement of non-ULEZ compliant vehicles with new vehicles may decrease emissions in London a little but creates greater levels of pollution at a global level.

The current economic climate combined with problems in the supply of new vehicles which is pushing up the prices of second-hand vehicles will create great difficulty for some who do need to replace a non-compliant vehicle. If current conditions prevail perhaps the expansion of the ULEZ should be delayed.

### **Future road charging**

The BMF looks forward participating in discussions on 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.

### **Conclusion**

The BMF encourages more recognition of the value that PTW add to the transport mix by exempting them from ULEZ charges, and there must be a discussion into the role that motorcycling can play in reducing emissions and congestion in London.