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DRAFT NEW LONDON PLAN

This is a response from the Motor Cycle Industry Association (MCIA) to the Draft New London Plan produced by the Greater London Authority[i]. The MCIA is the trade body for the supply side of the UK motorcycle industry, representing the manufacturers and importers of powered two-wheeled vehicles (PTWs) and the suppliers of associated goods and services. There are approximately 1.4 million regular motorcycle users in the UK, and the industry contributes in excess of £7 billion to the UK economy, employing over 55,000 people in over 5,000 businesses (Source: 2015 ICF International).

Our response below is focused around those aspects of the Draft New London Plan which relate to transport and infrastructure, and the role of PTWs within them.

SUMMARY

All transport and infrastructure strategies for London should consider PTW users as a distinct client group. The UK's one and a half million regular PTW users are frequently neglected or forgotten when formulating urban planning and transport policy, despite their status as a group affected by these policy areas. PTWs, particularly the growing electric PTW (ePTW) market, can play a significant role in assisting the Greater London Authority to achieve its stated targets for lower-emission vehicles and its ambitions for London in terms of congestion, decarbonization and road safety.

In order to achieve this goal, we seek the following actions:

- PTWs to be recognised along with walking, cycling and public transport as a low-pollution and congestion-busting alternative to car and van use. While an increase in the number of electric cars in London will do nothing to reduce congestion or wear and tear on London's roads and infrastructure, encouraging the use of ePTWs offers an efficient solution to both congestion and air pollution.
- The market for commuter PTWs in London, which has been growing steadily for the last five years, to be supported through acceptance of PTWs into general transport policy, including a further expansion of access to bus lanes at borough level.
- Recognition that a 25% modal shift among commuters from car to PTW use would significantly lower or even eliminate congestion (see point 18 below). This shift would require provision for secure motorcycle and scooter parking in central London to be expanded by 205,000 spaces.
- Since motorcycles contribute extremely little to the amount of air pollution produced by transport, and since newer models will come with lower limits on pollutant emissions, any ULEZ or ZEZ which levies an entry charge on PTWs should offer incentives for newer vehicles, in order to encourage a switch towards these newer low-emission models. These incentives could take the form of a scrappage scheme for older/ICE PTWs, or increased subsidies for those wishing to upgrade their vehicles. These schemes could be funded through a proportionate share of the £13m made available in 2015-2020 through London's Go Ultra Low City Scheme bid to encourage the uptake of ULEVs in London.

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- An on-street scooter-sharing scheme for London to be implemented, based on those successfully developed in other major European cities including Paris and Brussels.
- The recently-launched delivery scheme in the City of London to help businesses tackle air pollution by shifting deliveries from diesel vans to cargo bicycles to consider including ePTWs, which have the same eco-friendly advantages while offering greater speed and carrying capacity.
- TfL's Urban Motorcycle Design Handbook to be used in the development of road safety policy.
- The roll-out of charging points for electric vehicles to include provision for ePTWs at all residential and commercial developments.

INTRODUCTION

1. In general, the MCIA would urge that all transport and infrastructure strategies for London be required to make provision for, or at least consider, PTW users as a distinct client group. The UK's one and a half million regular PTW users are frequently neglected or forgotten when formulating urban planning and transport policy, despite their status as a group affected by these policy areas. The neglect of PTWs also overlooks the potential role PTWs can play in contributing to the Mayor's plans, targets and ambitions for London in terms of congestion, decarbonization and road safety, as outlined in Policy T1 and T2 as well as elsewhere in the Draft New London Plan.

2. The current Draft New London Plan refers to PTWs only in the context of motorcycle parking (p.422), and otherwise omits them entirely. The emphasis placed in the Draft New London Plan, and in the Mayor's Transport Strategy, on rebalancing London's transport system from car use towards walking, cycling and public transport, is admirable but, again, erases or overlooks PTW use.

3. Conversely, the MCIA is keen for PTWs to be recognised as vehicles that can be grouped along with cycling and public transport as a low-pollution and congestion-busting alternative to car and van use – particularly in view of the developing market for electric PTWs.

4. This submission therefore outlines opportunities to constructively integrate PTWs into London's transport and infrastructure policy, and the social, environmental and economic benefits this would generate.

GROWTH AND POTENTIAL OF THE LOW-EMISSION EPTW MARKET

5. The UK market for electrically powered two-wheeled vehicles (ePTWs) has great potential. Although new registrations of road-going machines have been limited by low product availability, major PTW manufacturers are now in the process of announcing new products for market release, which should increase uptake. Research and development on ePTWs is also gaining momentum and is viewed as a key part of the industry's future.

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6. An increase in the proportion of ePTWs within the national fleet would reduce overall emissions in terms of CO2 and other pollutants. In turn, this would help London meet its targets in reducing CO2 emissions and significantly improving air quality.

7. The UK market for commuter PTWs has been growing steadily for the last five years[ii]. ePTWs will form a significant part of this market provided effective support is offered to encourage it to grow, including through making the UK market more attractive to manufacturers. By contrast with the UK electric car market, the ePTW market will need support in order to gain sustained market traction. This in turn will encourage manufacturers to place more quality product at a volume, and therefore price point, comparable to ICE product.

8. This support should include acceptance of the PTW into general transport policy, including a further expansion of access to bus lanes at borough level. Additionally, additional funding could be aimed at ePTW research and development in London to encourage new and innovative two-wheeled product.

9. ePTWs have the advantage of being able to charge via any 3-pin domestic outlet. Increasingly, PTWs are supplied with 'cartridge' style batteries that can be swapped at home or work, which is ideal for those without off street parking or those who live in flats (whilst also increasing the security of the vehicle). This offers significant benefit as charging infrastructure is not a pre-requisite.

10. However, we note the efforts made and the range of grant schemes available to support the installation of charging infrastructure on-street, off-street and at workplaces, and the Chancellor's announcement in Autumn 2017 of a new £400m electric vehicle Charging Infrastructure Investment Fund. We would argue that the roll-out of charging points for electric vehicles should include provision for ePTWs at all residential and commercial developments.

11. We note that the city of Paris, in addition to a subsidy scheme for the purchase of electric motorcycles, is building terminals to recharge these vehicles for free. Many European cities, such as Brussels[iii] and including Paris[iv], have an on-street scooter sharing scheme available for public use.

CHANGING FREIGHT AND DELIVERY LOGISTICS

12. As noted in the Draft New London Plan (p.88, p.100, p.258), the ongoing development and restructuring of London's professional and retail spaces has necessitated changes in the logistics of freight and deliveries, in order to develop more creative solutions for efficient and non-disruptive transport of goods to workplaces, homes and pick-up points.

13. The Draft New London Plan's commitment to working with transport partners to promote "efficient and sustainable essential freight functions, including by road, rail, water and, for shorter distances, bicycle" (p.404) is another objective with which PTWs have the potential to assist.

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14. London has an established tradition and infrastructure based around deliveries by motorcycle courier, which could be expanded to help manage the growth in short-distance deliveries within London to and between workplaces and homes. The use of zero-emission ePTWs for this purpose would, as outlined below, also have a beneficial effect on air quality.

15. We note the launch in January 2018 of a new delivery scheme in the City of London to help businesses tackle toxic air pollution by shifting deliveries from diesel vans to cargo bicycles[v]. We would suggest that ePTWs, which have the same eco-friendly advantages and often greater carrying capacity, could usefully bridge the gap between cargo bikes and vans, playing a complementary role to cargo bikes in this transition.

EPTWS AS A SOLUTION TO URBAN CONGESTION

16. The number of electric cars in London has grown significantly in the last five years, with 10,000 electric cars registered in London – ten times as many as in 2012. A clear benefit of electric cars is the production of no emissions at the point of use, which will assist with improving urban air-quality. However, electric cars will do nothing to reduce congestion or wear and tear on UK roads and infrastructure. In fact, offering incentives for electric vehicle use in urban centres – such as the Central London Charging Zone – may result in congestion returning to its previous pre-charge levels.

17. Encouraging the use of ePTWs, on the other hand, offers an efficient solution to both congestion and air pollution.

18. We note the Draft New London Plan's identification of a shift from car use to more spaceefficient travel as the only long-term solution to London's congestion problems (p.402) and would argue that this modal shift should include lower-polluting and zero-emission PTWs alongside other alternatives to car use.

We offer the following considerations in support of this argument:

- Motorcycles can, in most cases, avoid or extricate themselves from congestion. The ability of motorcycles to gain time against rush-hour traffic jams is attested to in several studies[vi].
- While a gridlocked car – even when carrying four passengers – returns zero miles to the gallon, PTWs are not forced to remain stationary in grid-locked traffic with an idling engine.
- In particular, the practice of "filtering" – which allows motorcycles to move between lanes of slow or stationary traffic – eases congestion for all road users, not just the PTW rider, while also resulting in lower accident rates for motorcyclists than remaining stopped in traffic[vii].
- A 2011 study by Transport and Mobility Leuven[viii] showed that a modal shift of 10% from private cars to PTWs reduced lost vehicle hours in congestion on a trunk road by 63% for everybody using that route (i.e. not just PTW riders). A modal shift of 25% (one quarter of all cars replaced by PTW) eliminated congestion altogether.

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- If the shift identified by TM Leuven were applied to London, this would require a switch from car to PTW use by around 205,000 commuters.[ix]
- A second study, published in 2011 by Pierre Kopp[x], showed that an 36% increase in PTW traffic in Paris between 2000 and 2007 accounted for a net benefit of €168 million besides reducing congestion to the people of Paris.
- In many major cities, particularly in Asia and Latin America, a very high rate of motorcycle use has arisen as a means of beating traffic congestion among other economic and cultural reasons. In these cases, it has been observed that even in intensely motorcycle-dependent environments like Ho Chi Minh City, which has 7.5 million people and nearly five million motorcycles, a high rate of traffic flow is still possible even at peak travel times.[xi]

19. Measures to increase the use of other alternative modes (cycling, walking, public transport) would require significant changes to current infrastructure, such as the building of new bus or cycle lanes, therefore incurring a high level of cost and disruption to communities and businesses. An increase in the use of motorcycles, by contrast, would involve minimal or no infrastructure changes and incur minimal cost or disruption.

20. It would therefore seem prudent to encourage drivers, and particularly commuters, to switch to motorcycle use and particularly to electric motorcycles using financial and/or other incentives.

PTWS AND AIR QUALITY

21. We note the Mayor's proposals, reiterated in the Draft New London Plan, to expand the UltraLow Emission Zone in which all vehicles that do not meet emission standards will be liable to pay a daily charge, with PTWs included in this charge alongside cars and vans.

22. We would like it to be recognized that, as has been noted in several studies[xii], motorcycles contribute extremely little to the amount of air pollution produced by transport. The draft air quality control plan proposed by DEFRA in May 2017 itself noted this point.[xiii]

23. The phasing out of older models of motorcycle and production of newer models, which have tighter regulations on emissions control and tougher testing regimes, has the potential to reduce this contribution even further. As outlined above, an increase in the proportion of ePTWs within the national fleet would also reduce overall emissions of CO2 and other pollutants.

24. Since motorcycling is not a critical source of air pollution, and since newer models will come with lower limits on pollutant emissions, any scheme that levies an entry charge on PTWs should at least offer incentives for newer vehicles, in order to encourage a switch towards these newer lowemission models. Such incentives could take the form of a scrappage scheme for older/ICE PTWs, or of offering increased subsidies for those wishing to upgrade their vehicles.

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25. The MCIA will be submitting a separate response to Transport for London's consultation on changes to London's Ultra-Low Emission Zone and Low Emission Zone, which will expand on the above points.

ROAD SAFETY

26. The PTW industry has always and continues to prioritise road safety and the MCIA has been working with Transport for London to increase road safety for many years. It is evident that the increasing use of automation by car drivers – specifically, of current advanced driver-assistance systems (ADAS) – can pose a significant, if unintentional, danger to PTW and other vulnerable road users. We therefore welcome the Mayor's Vision Zero strategy to reduce deaths and serious injuries on London's streets.

27. The MCIA would, in particular, promote the further usage of TfL's Urban Motorcycle Design Handbook[xiv].

PARKING

28. We note the Draft New London Plan's specific mention of motorcycling on p.422 regarding parking provision: "Motorcycle parking will be evaluated on a case-by-case basis. Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all land uses."

29. We would further note that there is an urgent need for additional on-street secure motorcycle and scooter parking in central urban areas.

30. Points 18-20 above outline the improvements to congestion which could be generated by a modal shift from car to PTW use among commuters. Any such shift – ideally to a situation where 25% of vehicles used to commute into London are PTWs – would require a proportionate increase in the number of parking spaces available for PTWs. We estimate the number of extra parking spaces required to be around 205,000. Building these extra spaces would incur less cost and disruption than the building of new train or tube infrastructure to cope with increased numbers of commuters.

31. We would further suggest that, where parking provision is made for ePTWs, this should be targeted at transport hubs such as stations and airports (as recommended in the IHE guidelines on motorcycle infrastructure)[xv].

CONCLUSION

32. PTWs, and particularly the growing market of ePTWs, can play a significant role in assisting the Mayor's Office and Greater London Authority to achieve its stated targets for lower-emission vehicles, as well as furthering air quality control and other environmental strategies.

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33. In addition to this, PTWs offer a unique opportunity to reduce congestion, in contrast to zeroemission cars. It is therefore important that the motorcycle industry forms part of both thinking and developments in this policy area.

The MCIA, in particular its Chief Executive, would be happy to answer further questions on any of the points made above.

[i] https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-londonplan-0 [ii] http://www.mcia.co.uk/sub/pocket-guides [iii] https://scootysharing.be/
[iv] http://www.cityscoot.eu/paris/?lang=en [v] https://www.businessgreen.com/bg/news/3023910/city-of-london-launches-cargo-bike-deliveries-to-slashair-pollution
[vi] See Estupian et al, 'Motorcycle ownership and use: The case of Latin America', accessed 07.12.06, http://www.academia.edu/3856834/Motorcycle_ownership_and_use_The_case_of_Latin_America_Nicolas_Estupinan_et_al [vii] See EU Motorcycle Accident In-depth Study (MAIDS) Final Report (2009), http://www.maidsstudy.eu/pdf/MAIDS2.pdf

[viii] See http://www.tmleuven.com/project/motorcyclesandcommuting/20110921_Motorfietsen_eindrapport_Eng.pdf
[ix] See https://londondatastore-upload.s3.amazonaws.com/Zho%3Dttw-flows.pdf [x] See https://www.pierrekopp.com/downloads/2011%20The%20unpredicted%20rise.pdf
[xi] See Hanlon, 'New research indicates motorcycle commuting reduces traffic congestion and emissions', *New Atlas*, February 13, 2012
[xii] See ICCT, "Managing Motorcycles: Opportunities to Reduce Pollution and Fuel Use from Two- and ThreeWheeled Vehicles" (October 2009), at http://www.theicct.org/sites/default/files/publications/managing_motorcycles.pdf and Christian Hilber and Charles Palmer,"Urban development and air pollution: Evidence from a global panel of cities" (December 2014) http://www.lse.ac.uk/GranthamInstitute/wp-content/uploads/2014/12/Working-Paper-175-HilberPalmer-2014.pdf
[xiii] See p.7, https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogendioxide/supporting_documents/Consultation%20Document.pdf [xiv] http://content.tfl.gov.uk/tfl-urban-motorcycle-design-handbook.pdf [xv] http://www.motorcycleguidelines.org.uk/