

15<sup>th</sup> January 2021

Councillor Tom Hayes  
Deputy Leader and Cabinet Member for Green Transport & Zero Carbon Oxford  
Members Room  
Town Hall  
St Aldate's  
Oxford  
OX1 1BX

**Re Oxford City Zero Emission Zone**

Dear Councillor Hayes

MAG has reviewed the proposals with a shared aim of improving air quality and reducing greenhouse gas emissions. MAG's position is that the proposed ZEZ pilot is unworkable and counterproductive when applied to motorcycles.

We are disappointed by the fact that the process and thought given to motorcycles, the technical aspects and regulation for the vehicle class, and the role they can play in achieving the desired goals of the scheme, have been entirely ignored. This has led to a proposal (based on evidence for other modes of transport) that is clumsy, unjust and unenforceable for motorcycles. We are particularly frustrated that, despite our repeated offers to support the Council by providing knowledge and advice with respect to this transport mode, we have received no notable engagement from the Council.

Motorcycles were entirely absent in the Oxford Zero Emission Zone Feasibility and Implementation Study Final Report published in July 2017. We pointed out this omission in earlier consultations and expressed our belief that the Red Zone should not be used as a template for the wider zone. We received assurances that the wider zones would follow a conventional CAZ model, but clearly no work has been done since to consider the particular case of motorcycles. The current proposal to redefine the Red Zone as a pilot for the roll out of the ZEZ to the wider Green Zone is thus ill-considered in the specific case of motorcycles.

We appreciate the desire of the Council to accelerate plans, and have no desire to criticise or delay the Council's ambition.

Motorcycle emissions are a tiny part of the problem. In terms of air pollutant emissions the DfT/DEFRA framework and guidance lists that motorcycles are not expected to be included in any Class D charging scheme for this reason. The Scottish Government's Transport Bill states that motorcycles should be out of scope for LEZ unless modelling specifically shows that motorcycles have a measurable impact in any proposed zone. Nationally there is currently only one class D CAZ proposed or implemented – Birmingham. Birmingham's Class D CAZ exempts motorcycles. In London the ULEZ does charge pre-Euro 3 motorcycles, but TfL has put in place provision for individual vehicle exemptions for motorcycles proven to be compliant with the defined emission level for NO<sub>2</sub>. This is achieved through individual testing or manufacturer Certificate of Conformity paperwork. Evidence is showing that in excess of 70% of pre-Euro3 motorcycles are compliant for NO<sub>2</sub> emissions.

With respect to CO2 emissions, motorcycles consumed just 0.46% of all transport fossil fuel, despite covering 0.86% of all motorised vehicle miles in 2018. The Government proposal to end the sale of petrol and diesel cars and vans by 2030 does not apply to motorcycles.

The insignificant role of motorcycles in overall CO2 emissions is indeed a double-edged sword, meaning that the sector has not seen the same level of development and support for electrification. The Government's plug-in grant for BEVs was only extended to motorcycles six years after being introduced for cars. The level of the grant is smaller, covering only 20% of the cost up to £1500 as opposed to 35% of the cost up to £3000 for cars. The number of models eligible for the grant is smaller (27 motorcycle models as opposed to 43 car models). Only two mainstream manufacturers are included on the motorcycle list (BMW and Harley Davidson – both 'premium' brands). No motorcycles are eligible for the Government Homecharge scheme. Discussion of charging infrastructure never mentions the needs of electric motorcycle owners. There remain more barriers to entry for motorcyclists than for car drivers.

The level of emissions from motorcycles in the initial pilot zone will be vanishingly small. We recommend that, in order to avoid delay, motorcycles are entirely exempted from the pilot. We would recommend that genuine effort is then put into devising a workable and proportionate approach to motorcycle restrictions/charges and support for the proposed roll-out to the wider zone in 2022. Once again we freely offer our support, knowledge and advice in devising a workable solution for motorcycles.

Yours sincerely

Selina Lavender

A handwritten signature in black ink, appearing to read 'S. Lavender', written in a cursive style.

Chair

The Motorcycle Action Group