

B&NES 2024/25 parking charge review

consultation response from

The Motorcycle Action Group

6th August 2024

Background

The Motorcycle Action Group (MAG) is a national riders rights membership organisation with over 60,000 full and affiliated members. The Motorcycle Action Group was formed in 1973 and represents its members views collected via a democratically elected network of local and regional representatives.

Position

The Motorcycle Action Group opposes the proposed introduction of parking charges for motorcycles. The current policy applied to motorcycles is for no charge. No charge was and remains the most logical policy outcome.

Stated purpose for introducing emission-based parking charges – air quality

The emission-based parking policy currently in place for cars and vans is justified in terms of air quality. The aims are stated as follows:

“These proposals aim to improve air quality through a major shift to sustainable transport, walking and cycling and incentives to reduce the use of more polluting vehicles.”

“Traffic emissions pose a significant threat to clean air. Vehicles with petrol and diesel-based internal combustion engines emit a wide variety of pollutants, such as carbon monoxide (CO), oxides of nitrogen (NOx), volatile organic compounds (VOCs) and particulate matter (PM10), which have an increasing impact on urban air quality.”

“These pollutants from traffic may not only prove a problem in the immediate vicinity where they are released but can be transported long distances.”

“While there are national targets and legal limits for air pollution and air quality, there is no safe limit. Any measures that aim to reduce the impact of vehicle emissions will have a beneficial impact on human health and the environment.”

(<https://beta.bathnes.gov.uk/parkingchargereview>)

Flaws in the CO2 proxy for air pollutants

Despite the air quality justification, the measure of vehicle emissions employed by the Council is vehicle tailpipe CO2 emissions.

Using tailpipe CO2 emissions as a proxy for tailpipe air pollutant emissions is fundamentally flawed.

CO2 is a greenhouse gas that contributes to climate change, but it does not directly impact local air quality. As referenced in the Council's stated objectives, air quality concerns are related to pollutants like nitrogen oxides (NOx), particulate matter (PM), carbon monoxide (CO), and volatile organic compounds (VOCs), which have immediate health effects and environmental impacts.

Vehicles can have similar CO2 emissions but vastly different levels of other pollutants due to differences in engine technology, emission control systems, and fuel type/quality. For example, a modern petrol car with efficient catalytic converters might produce low levels of NOx and PM, while an older car with similar CO2 emissions could produce higher levels of these harmful pollutants.

Particulate matter from transport does not come solely from tailpipe emissions. Brake and tyre wear, and re-suspension of particulate matter are all recognised sources of harmful particulates in the air.

If parking charges are based solely on tailpipe CO2 emissions, there might be less incentive for drivers to choose vehicles with advanced technologies that reduce other harmful emissions. Ideally, policies should encourage reductions in all types of harmful emissions to improve air quality.

Policy designed to encourage use of smaller, lighter motorcycles as opposed to cars are a logical driver for improvements in local air quality.

Current exemption of motorcycles in parking charge structure and existing B&NES parking strategy

B&NES current policy recognising and supporting use of motorcycles is entirely consistent with the stated aims of the emission-based parking charge proposal.

Currently there are no charges for parking motorcycles.

The current B&NES parking strategy ("Balancing Your Needs: A parking strategy for Bath & North East Somerset" published 5th January 2018) also states:

"The use of motorcycles is increasingly popular due to their ability to bypass congestion, fuel efficiency and ease of parking. They also produce significantly lower emissions than cars and so have positive impact on air quality as well as congestion levels."

(https://beta.bathnes.gov.uk/sites/default/files/2018-07/parking_strategy_05.01.2018_summary.pdf)

The current policy position of B&NES on motorcycles can thus be taken as recognising the fact that motorcycles have a positive impact on air quality.

The proposals to introduce emissions-based charges for motorcycle parking make no attempt to provide evidence or justification for a change which clearly contradicts the Council's current accepted policy position.

Referral to No Safe Limit (NSL) for air pollutants is clearly in conflict with a parking policy that recognises the importance of trade-offs. The absolutist statement on safe levels also seems to be confined and used only for justification of parking charges, not extended to other policy areas.

B&NES currently has three Air Quality Management Areas with Air Quality Management Plans. But B&NES revoked AQMP's in Keynsham (2010) and Saltford (2013) stating "levels of nitrogen dioxide no longer exceed the national annual average objective of 40 micrograms per cubic metre ($\mu\text{g}/\text{m}^3$)."

 (<https://beta.bathnes.gov.uk/air-quality-management-areas>)

Revoking AQMP's without reference to NSL but suggesting NSL as justification for parking charges presents as a cynical use of a questionable claim.

Flaws in the baseline charge for zero emission vehicles

The emission-based motorcycle parking charges are built around a common baseline charge for cars and motorcycles. This approach is clearly lacking in any consideration of existing policy or the physical size differential between two and four wheeled motor vehicles.

Despite Councillor Rigby's claims that motorcycles are "increasingly of a size that they take up a full bay", there is no evidence provided to back this claim. Indeed, there can be no evidence as it is manifestly not true.

The Department for Transport guidelines for car parking bay dimensions are 2.4 x 4.8 metres. The guidelines for motorcycle parking bays are 1.2 x 2.4 metres. Thus four motorcycle parking bays have the same footprint as a single car parking bay.

Given the trend towards larger four-wheeled vehicles, it is likely that more local authorities and private parking operators will consider increasing the dimensions of car parking bays. However, the general guidelines for the dimensions of motorcycle parking bays remain unchanged with no discussion of future revision.

Given the footprint of a motorcycle parking bay in comparison with that of a car, there is no logical justification from the spatial perspective for a common baseline charge.

As previously discussed - and recognised in B&NES parking strategy - motorcycles have a positive impact on air quality by virtue of lower tailpipe emissions, lower non-tailpipe particulate emissions, and lower contribution to congestion. Thus, from an air quality perspective there is no logical justification for a common baseline charge.

From the perspective of CO₂ emissions, whilst tailpipe emissions directly relate to fuel consumption, again the engine capacity is not always a direct relationship with fuel consumption of a vehicle. More importantly though, embedded CO₂ emissions from manufacture and end of life disposal of vehicles shows a great advantage to smaller, light weight motorcycles over cars. There is no logical CO₂ emissions justification for a common baseline parking charge.

Case for full exemption for motorcycles from emission-based parking charges

The case for exempting motorcycles from parking charges is compelling:

1. Environmental Impact

Lower Emissions: Motorcycles generally emit fewer greenhouse gases and pollutants compared to cars. Studies show that motorcycles can be more fuel-efficient and have a smaller carbon footprint per mile travelled. (https://wiki.mag-uk.org/images/3/39/Motorcycle_Carbon_Emissions_v1.pdf)

Fuel Efficiency: Motorcycles often achieve significantly higher miles per gallon (MPG) than cars. This efficiency contributes to lower overall fuel consumption and reduced emissions.

Urban Air Quality: Given their lower emissions, encouraging motorcycle use can improve urban air quality, particularly in densely populated areas where pollution is a major concern. (https://wiki.mag-uk.org/images/c/cf/Promoting_Modal_Shift_to_PTWs_August_2018_%28%29.pdf)

2. Traffic and Congestion

Reduced Congestion: Motorcycles take up less space on the road, which can help to alleviate traffic congestion. In urban areas, where road space is at a premium, this benefit can lead to more efficient traffic flow and reduced travel times. (https://wiki.mag-uk.org/images/1/15/TM_Leuven_Report.pdf)

Parking Space Efficiency: Motorcycles require less parking space, which can ease the demand for parking in busy areas. This can lead to better utilisation of available parking infrastructure.

3. Economic Considerations

Cost Savings for Riders: Exempting motorcycles from emission-based parking charges can provide financial relief to riders. Motorcyclists often choose their mode of transport for economic reasons, and additional charges could be a disproportionate burden.

Support for the Motorcycle Industry: Encouraging motorcycle use through exemptions can stimulate the motorcycle industry, including sales, maintenance, and associated services, thereby supporting jobs and economic activity.

Economic benefit: Modal shift from cars to motorcycles reduces congestion and has been shown to create a significant net economic gain when cost benefit analysis is performed. (<https://www.sciencedirect.com/science/article/abs/pii/S0967070X11000436>)

4. Policy Consistency and Fairness

Proportionality: Given their lower emissions, charging motorcycles the same emission-based fees as cars is disproportionate. Policies should reflect the actual environmental impact of different vehicle types.

Incentivizing Cleaner Transport: Exemptions for motorcycles align with broader environmental goals by promoting cleaner transportation options. This can be part of a comprehensive strategy to reduce emissions without penalizing those already using more efficient vehicles.

5. Safety and Infrastructure

Encouraging Safe Riding: Financial incentives, such as parking charge exemptions, can encourage more people to adopt motorcycles, which can lead to a cultural shift towards safer riding practices and better infrastructure for motorcycles. (https://wiki.mag-uk.org/images/a/ad/Safety_in_Numbers_Report_Final_2019_06_17.pdf)

Dedicated Parking: Exemptions can lead to the development of more dedicated motorcycle parking, which improves safety for riders and reduces conflicts with other road users.

6. Environmental Justice

Accessibility for Low-Income Individuals: Motorcycles are often more affordable than cars, making them a viable option for lower-income individuals. Emission-based charges could disproportionately impact these individuals, making the exemption a matter of fairness and accessibility.

7. Encouraging Technological Advancements

Innovation in Low-Emission Motorcycles: By exempting motorcycles from emission-based charges, the policy can encourage manufacturers to invest in and develop even cleaner, more efficient motorcycle technologies, including electric motorcycles.

Market Growth for Electric Motorcycles: Exemptions can spur market growth for electric motorcycles, contributing to broader adoption of zero-emission vehicles.

Conclusion

Exempting all motorcycles from emission-based parking charges in the UK presents a multifaceted opportunity to promote environmental sustainability, reduce traffic congestion, support economic activity, and ensure fairness and accessibility in transportation policy. Given the lower emissions of motorcycles, their efficiency in urban environments, and the potential positive economic and social impacts, a compelling case exists for their exemption from these charges. This policy could serve as a model for integrating transportation and environmental objectives in a balanced and equitable manner.

Flaws in the DVLA CO2 data and proposed mapping motorcycle engine capacity to car engine capacity

The proposals state: “Charges would be based on a vehicle’s carbon dioxide (CO2) emissions, in line with the DVLA Vehicle Excise Duty (VED) classifications. Where no CO2 emissions rating is available, typically including all vehicles registered before 2001, the charge would be based on engine capacity”

For motorcycles the DVLA CO2 emission data is very poor. An FOI request to the DVLA has revealed that CO2 Emissions data is not held for 91.5% of all registered motorcycles in the country. (https://www.whatdotheyknow.com/request/dvla_motorcycle_emissions_figure)

Of the DVLA registered motorcycles with CO2 emission data, 84% are below 130g/km (the baseline emission band proposed by B&NES). Only 1% of motorcycles emitting over 130g/km are below 600cc capacity.

DVLA data on motorcycle emissions is virtually non-existent prior to 2017 and has only surpassed 20% of newly registered motorcycles on two occasions (2020 and 2023). There is no apparent increasing trend in percentage of newly registered motorcycles with CO2 data held. Of over 8800 newly registered motorcycles so far in 2024, CO2 data is held for just 18.5%.

The proposed charging structure and engine capacity proposals will place 95% of motorcycles above the baseline charge when our estimate shows that only 8% of motorcycles in the country emit over 130g/km

The proposed structure for motorcycle emissions when DVLA data is not available (91.5% of the time) equates motorcycle engine capacity to car engine capacity as follows:

Motorcycle:	Car:
Up to 150cc	Up to 1550cc
151 – 400cc	1551 – 1950cc
401 – 600cc	1951 – 2950cc
Over 600cc	over 2951cc

This is clearly lacking in internal logic that emissions relate directly to engine capacity. All motorcycle engine capacity bands fall within the first car engine capacity band. Emissions from a motorcycle up to 150cc cannot feasibly be compared with a 1550cc car. Even for the over 600cc motorcycle band, which is compared to a car over 2951cc, we estimate that no more than 30% of bikes in the over 600cc bracket have an engine capacity over 1000cc. The largest production motorcycle in the UK is the Triumph Rocket 3 with a 2,458cc engine which is still below the minimum 2951cc car to which the pricing structure compares an over 600cc motorcycle. The largest capacity motorcycles are less frequently used as daily commuter vehicles and are mostly reserved for leisure use. Presence of motorcycles with engine capacities over 1550cc (the lowest band for car engine capacity) will be numerically insignificant when considering their presence in B&NES parking bays.

Lack of data

In a meeting with B&NES Council officers held on 22nd July the admission was made that the Council holds no data on the numbers of motorcycles using B&NES parking bays. It follows that there is no understanding of the engine capacity distribution of motorcycles in B&NES parking bays. Furthermore, there was an admission that there is no data to show the level of air pollutants generated specifically by motorcycles in B&NES. It was also confirmed that there is no modelling of expected revenue to be generated from motorcycle parking charges.

Lack of potential to monitor impact of policy

The lack of baseline data for motorcycles means that there no evidential way to justify the introduction of the proposed charges. There is also no opportunity to monitor the impact of the policy on changing road user behaviours or air quality.

No claim can be made that this is evidence-based policy making.

Consultation survey response form and opinion of the subject group affected by the proposals

We note that the consultation survey response asks for the transport choice frequency of respondents: “How often do you use the following forms of transport?” The options available do not include motorcycles, which seems a significant oversight in a consultation proposing introduction of parking charges for the mode. Motorcyclists are left to respond under the category of Other, thus giving the Council no means to identify the responses of those using motorcycles from a range of possible alternatives, for example e-scooters.

MAG has collected signatures on a petition opposing the charges (attached) signed by 73 individuals. The signatures were collected from visitors to a MAG stand over a period of a few hours at one event (Calne Bike Meet) on 27th July 2024.

Logical conclusions on actual impact of the proposed policy

The Motorcycle Action Group concludes that, if introduced, the proposed motorcycle parking charges will:

- Disproportionately charge motorcycles based on false representations of their genuine environmental impacts.
- Create expectations of equal parking space dimensions for cars and motorcycles thus increasing the overall spatial requirement for parking facilities.
- Discourage use of motorcycles.
- Encourage modal shift from motorcycles to cars to access B&NES town and city centres.
- Increase air pollution due to increased car use and congestion.
- Encourage illegal parking of motorcycles in B&NES outside of Council designated parking bays.
- Increase the local rate of motorcycle road casualties.
- Increase levels of crime including theft of, and antisocial use of motorcycles.
- Decrease the prosperity of the local economy and the individual prosperity of B&NES residents.
- Damage the reputation of B&NES Council.