



23 October, 2017

Office for Low Emission Vehicles,
Zone 1/31, Great Minster House
33 Horseferry Road
London, SW1P 4DR

Direct Dial: 01494 545706
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Dear Sir/Madam,

Regulatory changes to support the take-up of alternatively-fuelled light commercial vehicles

The BVRLA welcomes the opportunity to comment on your proposals to support the take-up of alternatively-fuelled light commercial vehicles (LCVs). We believe that regulatory changes are necessary to encourage the use of alternatively-fuelled LCV's and we support the proposal to increase weight capacity to allow LCVs to be granted exemption from O-licence regulation. We also support the proposal to allow alternative fuelled vehicles up to 4,250kg maximum authorised mass to be driven on a category B car licence.

We would urge the Government to ensure that a rigorous road safety evaluation is undertaken before these changes are made to ensure that there are no adverse safety implications.

As the trade association for companies engaged in the rental and leasing of cars and commercial vehicles, the BVRLA recognises the importance of reducing nitrogen oxides (NOx) and the association supports the need to phase out the number of older, higher polluting diesel vehicles on UK roads.

The BVRLA believes that more needs to be done to encourage the take-up of alternatively-fuelled light commercial vehicles, of which over 98% are diesel-fuelled. We have suggested a mobility credits scheme as a way of getting drivers out of older more polluting vehicles which also considers support for companies tied in to existing lease contracts for older commercial vehicles. In such cases, the scrappage payment could take the form of a resolution in the early termination fee on the lease of the vehicle (which should also be redeemable by the lease company), and be put towards the cost of a newer, cleaner leased vehicle, conforming to the Euro VI Standard.

As the leasing sector is a key enabler to assist small businesses, further exploratory work should be carried out to assist companies to carry out this migration from older diesel vehicles to newer ones as part of any scrappage scheme. Further detail is available in our research produced in conjunction with Ecuity: A mobility credit scheme – an economic analysis.

Proposal 1: To increase the weight limit of alternatively-fuelled vans that can be driven on category B driving licence in the United Kingdom

British Vehicle Rental and Leasing Association

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We support the proposal to increase the weight limit of alternatively-fuelled vans that can be driven on a category B driving licence. For van operators who only operate up to 3.5 tonnes this is vital to ensure an additional layer of complexity is not added to their operation by only having certain drivers who can drive the alternatively-fuelled vans in their fleet.

Proposal 2: To exempt certain alternatively-fuelled vans from goods vehicle operator licensing requirements in Great Britain

To support the development of the market for larger alternatively-fuelled vans we believe that an exemption from O-licence requirements is essential given the cost and compliance burden the regime places on operators. An operator who is currently only operating vehicles that are below 3.5 tonnes would never consider an alternatively-fuelled van if it meant he needed an O-licence as well. This exemption should help ensure the take up of alternatively-fuelled vans in this sector of the market.

Proposal 3: For roadworthiness testing for electric vans in Great Britain

From a road safety perspective, we believe it is vital that electric vans are subject to roadworthiness testing and that vans, regardless of weight are treated the same. It therefore seems sensible to remove the exemption for electric vans.

We welcome the opportunity to continue our constructive dialogue in this area and are happy to meet and discuss further our work with Ecuity.

Yours sincerely

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

Jay Parmar

Director of Policy & Membership

Bona-fides BVRLA, the industry and its members

- Established in 1967, the British Vehicle Rental and Leasing Association is the UK trade body for companies engaged in the rental and leasing of cars and commercial vehicles. Its members operate a combined fleet of 4.71 million cars, vans and trucks.
- BVRLA members buy nearly 50% of all new vehicles sold in the UK, an estimated 1 million vehicles (including 308,000 UK-made vehicles) per annum.
- Collectively, members of the BVRLA support around 317,000 jobs and contribute over £24.9 billion to the UK economy each year.
- Through its members and their customers, the BVRLA represents the interests of over 2 million business car drivers and 10 million people per year who choose to rent a vehicle.
- As well as informing the Government and policy makers on issues affecting the sector, the BVRLA regulates the industry through a mandatory code of conduct, helping its members deliver safe, sustainable and affordable road transport to millions of consumers and businesses. For more information, please visit www.bvrla.co.uk.