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Dear Sir or Madam,

### **The Greater Manchester Transport Strategy 2040: Draft Delivery Plan 2020-2025**

The British Vehicle Rental and Leasing Association (BVRLA) and its members welcome the opportunity to comment on the draft delivery plan for 2020-2025. BVRLA members are responsible for one in eight cars, one in five vans and one in five trucks on UK roads. With near to five million vehicles on UK roads the rental and leasing industry has a large stake in the transport ecosystem.

While we accept that the Transport Strategy has a strong focus on reducing the number of car journeys made in favour of walking, cycling and public transport, this transition and fundamental shift in behaviour is likely to take time. BVRLA members are instrumental in the move away from ownership to usership. The uptake of leased vehicles is growing while rental members are increasingly involved in innovative solutions which support public transport and more active travel. Where a car is a necessity, due to the high volume of new vehicles purchased and the frequency of fleet replacement cycles, our members will accelerate the uptake of low emission vehicles. Ultimately BVRLA members are offering a low-cost solution for businesses and individuals that supports the ambitions set out in the transport strategy and which will promote more active use of more sustainable modes of transportation. The BVRLA's fleet air quality factsheet has more information <https://www.bvrla.co.uk/resource/fleet-air-quality-factsheet.html>

We welcome the focus within the plan on integration and innovation, such as Mobility as a Service (MaaS) projects. BVRLA members are leading the way in providing access to shared cars (car club or rental) which is a key part of the transition to public transport and active travel.

### **Future Mobility and Innovation**

In 2016, the shared mobility charity CarPlus, now CoMoUk, surveyed 186,000 car club members sharing 2,800 cars and estimated that 25,000 privately-owned vehicles had been taken off the road as a result of membership. Furthermore, a CarPlus survey of 4,000 London based car club members found that they walked, cycled and used public transport more than the national average. The study also found that car club members were increasingly interested in driving electric vehicles. This therefore demonstrates the positive behaviour change that can result from providing new low-cost and shared access to cars.

One member business is leading an innovative pilot with Transport for Greater Manchester to trial MaaS in the city. It is essential that any pilot provides a full suite of mobility options to ensure it meets consumer requirements and that shared assets are included to compliment existing MaaS transit options.

### **Mobility Credits Scheme**

#### **British Vehicle Rental and Leasing Association**

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Chairman: Matt Dyer  
A company limited by guarantee

Chief Executive: Gerry Keaney  
Registered Office as above

Registered in England No. 924401

Our proposed mobility credits scheme is a modification of proposed diesel scrappage schemes. As well as dramatically improving air quality by removing the most polluting vehicles, the scheme also encourages more active and efficient travel. Mobility credits can be used on a range of transport options, including shared or public transport. By offering an exchange of credits for a household scrapping their old polluting vehicle the scheme advances the shift away from private car ownership towards more sustainable modes of travel, such as public transport, car clubs or rental journeys. According to our figures, such a scheme could have a major impact in reducing NOx emissions – a scrappage of 40,000 older diesel vehicles could be achieved within two years, with a first-year reduction of 67 tonnes in NOx emissions. Over a 10 year appraisal period, this would lead to a further reduction of 1,272 tonnes of NOx emissions. We believe that such a scheme would be more impactful, progressive, and less expensive than would a blunter diesel scrappage scheme. Our proposal paper, which was produced with the environmental economic analyst firm Ecuity, is available here: [https://www.bvrla.co.uk/sites/default/files/u3471/ecuity\\_study\\_-\\_air\\_quality\\_mobility\\_credits\\_analysis.pdf](https://www.bvrla.co.uk/sites/default/files/u3471/ecuity_study_-_air_quality_mobility_credits_analysis.pdf)

A mobility scrappage scheme is an option that is available to all, not just the most affluent and offers an excellent solution to support behavioural change which will take longer to fully evolve. Many people are still unsure about making the leap to electric motoring. Car clubs, vehicle rental and leasing can provide a ‘try before you buy’ experience or long-term access to an Electric Vehicle without any of the risks of ownership. By providing an affordable, pay per journey alternative to vehicle ownership, car clubs and vehicle rental have been shown to help people think more about their trips and make greater use of more sustainable transport options such as public transport, walking or bikes.

The BVRLA believes that mobility credits could be operated via an online app, as being carried out by new ‘Mobility as a Service’ providers Whim and Trav.ly, which have been trialled in Birmingham and Leeds respectively. Following the development of the new Oyster Card app by Cubic, this could operate as the provider of the appropriate amount of credits to be awarded by the appropriate authority, with funding to be sourced from the Government’s £220 million Clean Air Fund.

### **Behavioural change: Plug-in-Pledge**

While we understand the aspiration to reduce vehicle use we also recognise that behavioural change will take time. We also believe that BVRLA members are well placed to help accelerate the uptake of electric vehicles due to the large number of new vehicles purchased and the frequency of fleet replacement cycles. Last year the BVRLA launched its Plug-in-Pledge which would see its members’ combined plug-in vehicle fleet size surge from 50,000 today to 720,000 by 2025. By that time, vehicle rental and leasing companies would be buying 300,000 plug-in vehicles per year. This represents an increase in the industry’s share of annual new plug-in hybrid and pure electric vehicle registrations from 36 per cent to 60 per cent. The pledge is therefore a clear demonstration of the vehicle rental and leasing industry’s commitment to playing a vital role in delivering this ultra-low emission goal. With BVRLA members also responsible for about 20 per cent of the used car market, the speed of fleet renewal means the sector can deliver cleaner cars into the new and used car market, far more quickly than the private vehicle market is able to.

### **Freight and logistics**

We also welcome the reference within the plan to providing assistance to organisations to minimise, re-mode or re-time freight movements. Commercially, it is difficult for large fleets to change or amend their vehicle purchasing cycles meaning that many large operators need support in replacing commercial vehicles (HGVs and LCVs) which could be operated for another 9 years (and for some particularly large HGVs, this can be up to 12 years). The BVRLA is keen to discuss the availability of retrofit grants, tapered charges and exemptions for night time deliveries. Giving hauliers the flexibility to deliver at night would result in a





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lot of freight vehicles moving off congested urban roads during peak business hours. Allowing HGVs to use bus lanes outside of commuting hours would enable them to operate as efficiently as possible and avoid them sitting in congestion idling. A lorry stuck in congestion, stopping and accelerating back up to 30mph three times a mile triples fuel consumption compared to cruising at a constant speed. In addition, the Government needs to provide local authorities with sufficient guidance and resources to identify congestion hotspots and improve traffic management.

In relation to last mile logistics our members can play a significant role in providing low cost transport solutions from transport hubs on the outskirts of the city. We believe that a customer travelling to a transport hub from outside the city would be more encouraged to use public transport if they had ready access to short term rental vehicles.

We would also encourage Transport for Greater Manchester to engage with Transport for London to understand how BVRLA members are supporting a van scrappage scheme to support small businesses and charities.

The BVRLA is keen to support Greater Manchester in its aim to be at the forefront of transport innovation and believes that BVRLA members are critical to this success. We appreciate the engagement we have had with TFGM to date but would welcome the opportunity to discuss the role our members can play in further detail. I am happy to share a copy of our Mobility Credit report which is due to be launched on Tuesday 19<sup>th</sup> March and would welcome your feedback on our proposals. Please could you let me know whether this would be of interest and whether there is a specific email address I could send this to.

I look forward to hearing from you in due course.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Catherine Bowen', is written over a light blue horizontal line.

Catherine Bowen  
Senior Policy Adviser

***Bona-fides BVRLA, the industry and its members***

- Established in 1967, the British Vehicle Rental & Leasing Association (BVRLA) is the UK trade body for companies engaged in vehicle rental and leasing.
- BVRLA membership provides customers with the reassurance that the company they are dealing with adheres to the highest standards of professionalism and fairness.
- The association achieves this by maintaining industry standards and regulatory compliance via its mandatory codes of conduct, inspection programme and conciliation service. To support this work, the BVRLA shares information and promotes best practice through its extensive range of training and events.
- On behalf of its 980+ members, the BVRLA works with governments, public sector agencies, industry associations and key business influencers across a wide range of road transport, environmental, taxation, technology and finance-related issues.
- BVRLA members are responsible for a combined fleet of almost five million cars, vans and trucks, supporting around 465,000 jobs and contributing £49bn to the economy each year.