



19 October, 2011

Aviation Policy Framework
Department for Transport,
Great Minster House (1/24),
76 Marsham Street,
London.
SW1P 4DR

Direct Dial: 01494 545706
Email: jay@bvrla.co.uk

Dear Sirs,

Developing a sustainable framework for UK aviation: Scoping document

We welcome the opportunity to comment on the Department for Transport's proposals for a sustainable UK aviation framework. We are supportive, in principle, of a scheme which aims to manage aviation growth with environmental impacts in mind. However, we feel that the document neglects a key area where low carbon transport could be utilised in a sustainable manner.

The majority of the journeys to and from UK airports are made by road, but as the scoping document outlines, there is increasing pressure to make airports sustainable by reducing carbon emissions, and reducing congestion in and around the airports. While the car rental sector already supplies millions of customers with access to affordable greener motoring, we believe that this is not fully recognised and often fails to be incorporated within an integrated transport strategy for airports.

It is on this basis that we wish to bring to your attention the simple steps which could be taken to enhance the department's framework and critically help to underpin its success.

Reduce unnecessary road trips

We urge the government to consider industry proposals which would encourage airport passengers to switch from using mini-cabs or family and friends for pick-ups and drop-offs. We do not believe the so-called 'kiss and fly' model is sustainable from an environmental perspective. In light of this, we believe that a strategy which focuses on promoting car rental as a low carbon option for air passenger's onward journeys would be in line with the government's vision of sustainability, particularly where travellers are able to access a zero emission electric vehicle.

Encourage greener travel

Our members already provide access to a pool of greener vehicles to millions of UK customers each year. The fleet being operated by our members is one of the greenest fleets in the UK and includes electric cars. With our members replenishing their vehicles every year, consumers can be assured of being able to benefit from driving the most fuel-efficient vehicles.

BVRLA rental members alone operate a combined fleet of around 200,000 cars, the average age of these vehicles prior to disposal being seven months. These figures demonstrate that rental fleets can comprise of some of the newest and least polluting cars on the market. Combined with

British Vehicle Rental and Leasing Association

River Lodge, Badminton Court, Amersham, Bucks HP7 0DD
tel: 01494 434747 fax: 01494 434499 e-mail: info@bvrla.co.uk web: www.bvrla.co.uk

Honorary Life President: Freddie Aldous Chairman: Neil Cunningham Chief Executive: John Lewis
A company limited by guarantee Registered Office as above Registered in England No. 924401

Department for Transport

October 2011

the growing move towards electric vehicles by our members, it is evident that car rental is becoming synonymous with an increasingly green fleet.

Reduce unnecessary journeys and congestion to and from airports

Congestion causes slower speeds and longer journey times, as well as wasted fuel and a rise in both greenhouse gases and local air quality pollutants. Our members report congestion problems at most key UK airports. The issue becomes most prominent when relatives or friends drop off travellers, also known as 'kiss and fly'. Not only does this create a bottleneck of congestion but it also highlights the unnecessary number of journeys that are made in connection with a flight in and out of the UK.

Issue: vehicle related emissions and congestion at UK airports

Since travelling to the airport by car is the most practical option, air passengers often use a minicab, or are driven by a friend or relative. In these instances, the number of trips made is twice the amount necessary for both departure and arrival. E.g. the relative will drive to the airport and back, only to repeat the same journey when the passenger returns. By travelling in a rental car instead, only a one way trip is needed for both departure and arrival. This eliminates the unnecessary trips as well as the resulting emissions.

Proposal to help reduce emissions and congestion at UK airports

Although many urban locations have an array of public transport links to airports available, the same is not true for rural areas. With the delivery and collection service that many rental companies offer and access to one way rental, our members offer a flexible and convenient way of getting passengers to the airport or connect them to public transport links.

We believe that greater use of car rental could decrease the distances travelled by air passengers and, provided the public transport meets certain occupancy levels, emissions per passenger will also be reduced. To take the example of Heathrow airport, a mere 1% increase in the use of car rental would reduce 225,000 unnecessary journeys to and from the airport.

Increase awareness

Currently we do not feel there is sufficient information given to air passengers, especially non car owners, on the practical options available to them when travelling to and from the airport. It is possible that this lack of information may influence their decision to use modes of transport which are more damaging to the environment. Ultimately, we believe the level of information provided plays a critical role in influencing the mode of transport selected, highlighting the need for greater resource in this area. Simple proposals such as clear communication of options on airline's websites and use of a journey planner which combines the most suitable/carbon efficient methods of travel may have a significant impact on consumer decisions.

Transport Research Laboratory (TFL)

To help support our comments that car rental is helping to support a more sustainable transport system, we recently commissioned Transport Research Laboratory to research this area. We are pleased to bring your attention to the key findings of this research:

- **On average, rental vehicles have lower emissions than private cars:** In 2010, average emissions from UK rental cars were 146g CO₂/km, more than 12% lower than the average for the UK car fleet (164g CO₂/km).

If a journey to a UK airport is 50 miles (80.4km), for every 1,000 journeys made in a rental vehicle rather than a private car there would be a potential emissions reduction of 1.447 tonnes.

Department for Transport

October 2011

- **Rental can provide a key link to other forms of transport:** Around 1/5th of car rentals are for one way trips, which indicates that rental is being used to access or connect with other means of transport.
- **On average, rental vehicles are likely to be more roadworthy than private cars:** Rental vehicles are newer and better maintained than the average privately owned car, and more likely to be fitted with recent safety technologies. National evidence suggests that a higher level of vehicle maintenance helps to reduce both collisions and casualties.

Closing comments

We hope that the reasons outlined above provide a succinct overview of the key benefits of including car rental in the government's strategy. Any endeavours to incorporate and promote the use of this mode of transport would be greatly welcomed by the BVRLA. We would of course be happy to assist with any questions you may have and provide further information if required.

Yours sincerely

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

Jay Parmar
Legal and Policy Director

Bona-fides BVRLA, the industry and its members

- The BVRLA is the trade body for companies engaged in the leasing and rental of cars and commercial vehicles. Its members provide rental, leasing and fleet management services to corporate users and consumers. They operate a combined fleet of 2.5 million cars, vans and trucks, buying nearly half of all new vehicles sold in the UK.
- Through its members and their customers, the BVRLA represents the interests of more than two million business car drivers and the millions of people who use a rental vehicle each year. As well as lobbying the Government on key issues affecting the sector, the BVRLA regulates the industry through a mandatory code of conduct. www.bvrla.co.uk