



Future of Transport Regulatory Review Call for Evidence

Response from:

British Vehicle Rental and Leasing Association

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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 1000 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 over five million cars, vans and trucks, supporting around 465,000 jobs and contributing £49bn to the economy each year. For more information, please visit www.bvrla.co.uk.

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Introduction

The British Vehicle Rental and Leasing Association (BVRLA) represents over 1000 members in the vehicle rental and leasing sector. BVRLA members own and operate a combined fleet of over five million cars, vans and trucks. It purchases around 50% of all new vehicles sold in the UK, including an estimated 80% of new battery electric vehicles (BEVs).

It runs the [youngest, cleanest fleet on UK roads](#) and provides people and businesses with flexible, affordable access to road transport by the minute, hour, day, week, month or year. BVRLA members also advise their customers on how they can decarbonise or embrace more sustainable transport modes for their travel needs.

Members who provide flexible forms of transport such as car clubs and rental who are involved in MaaS pilots/schemes have a significant role to play in supporting behaviour change and shifting people away from their reliance on the car and private car ownership.

Mobility as a Service (MaaS)

Question 4.1 In your opinion, in the development of Mobility as a Service platforms, what should be the role of local authorities, central government, or other transport authorities? Please provide details.

Central government

The definition and understanding of MaaS can vary from country to country. Central government should define what it means when it refers to MaaS, so that there is a common understanding.

Central government should take responsibility for setting the overarching strategy for MaaS to ensure consumers are protected, safety standards upheld and that there is a fair and competitive environment for business models to thrive.

Policy leadership is also crucial. Central government should provide support and guidance to local authorities to help them determine what constitutes 'good MaaS' – identifying examples and approving suppliers that work collaboratively to align deployment with local policy objectives i.e. promoting active travel, improving air quality or reducing congestion.

Central government should also help prevent the adoption of 'bad MaaS' – where services are commoditised and aggregated by a single, dominant operator, leading to a misalignment with policy objectives and potentially damaging consumer confidence via higher prices and/or poor service provision.

It has a critical role to promote the role of shared mobility via MaaS and to provide funding, via the Future Transport Zones, to enable trials which help to identify good practice and to define some core principles of 'good MaaS' as well as to identify innovative mobility solutions.

Government should also seek to establish a Mobility Innovation Fund to help cash and resource strapped local authorities as they work with local transport operators and residents to develop new, integrated mobility services.

It should also provide additional funding and support for the roll-out of [mobility credits which offer a MaaS-based scrappage incentive](#) to drive transport behaviour change and air quality improvements.

As more examples of good practice are gathered central government could create a single source of insight that cities can contribute to and learn from.

Central government should continue to review MaaS pilots and work with the industry to identify areas where regulation may be needed to ensure consumer protection.

Local authorities

It is critical to get local authority support and leadership to develop, deploy and co-ordinate MaaS provision in their area. The local authority has a key role in working collaboratively with mobility providers to set a clear strategy which ensures MaaS aligns with their broader policies and delivers positive outcomes.

Local authorities should take responsibility for ensuring that MaaS trials are successful and must work with industry to understand and work through any potential barriers, for example where data sharing across different mobility providers is creating a barrier.

Transport authorities

Should have a role to ensure collaborative working across different local authority areas and across different mobility providers, coordinating joint projects to test MaaS. They should also work with other transport authorities to identify areas of best practice and to ensure a consistent approach across the UK.

Question 4.7

- a) What actions could help to ensure all sectors of the population can access Mobility as a Service applications?**
- b) Who do you think should be responsible for delivering these actions (e.g. central government, local government, industry, or other)? Please explain why.**
- c) What do you think government could do to encourage, incentivise or enforce the delivery of these actions?**

The BVRLA's [Cars in the City report](#) cited research findings that many people are unaware of the range of options available to them. It also found that the quality of public transport options has a large impact on whether people move to more flexible car usage or stop travelling by private car altogether. In many parts of the UK car travel is the only viable option and trials of MaaS should therefore be expanded to more rural locations as well as within urban centres.

There are over 30 million cars on the road in the UK today, but the multiple ways we can use cars and how we transition to a 'car-lite' future is rarely considered. The role the car can play must be recognised.

Covid-recovery

Car clubs and flexi-rental offer a simple solution to those seeking to safely return to work who are unable to walk or cycle. Unless flexible car use is promoted as an effective mechanism to help people plan their journeys there is a real danger car ownership could increase amongst those concerned about the safety of public transport. This would undermine and undo much of the great work done to date.

If we are to truly shift behaviour and support a move away from private car ownership it is imperative that Mobility as a Service (MaaS) is promoted widely across society. This may involve using more familiar terminology and ensuring all members of society understand the wide range of transport options available.

Mobility Credits

Mobility credits are an important tool which can influence behaviour change and promote the use of MaaS to parts of the community which may not be fully aware of all the transport options on offer.

The ['Mobility Credits Scrappage Scheme'](#) policy paper makes the case for a nationally funded, locally targeted vehicle scrappage scheme that offers a mobility credit in exchange for a household scrapping its older, polluting vehicle.

Individuals receive a credits payment of between £2500 and £4000 which can be redeemed against travel journeys with a range of transport providers, including car rental/car clubs, in return for scrapping their car.

This promotes the use of public transport and more active travel and moves people away from buying another polluting vehicle.

Mobility credits can be tailored to the needs of the local community. In areas with high unemployment they could be offered as a way to help people travel to job interviews when walking or cycling may not be viable.

Both central and local government have a role to fund and trial mobility credits, sharing best practice and using this as a way to deliver positive public policy outcomes.

Question 4.9

a) Can you provide any further evidence of the positive or negative impacts of Mobility as a Service on active travel and/or sustainable modes? Please provide examples.

b) Can you provide evidence of measures that could be incorporated into Mobility as a Service platforms to encourage active travel and/or sustainable modes?

Recent trials that BVRLA members have been involved in have shown that using car rental and car clubs as part of MaaS pilots has led to an increase in active travel and public transport.

There is growing evidence that flexible car use leads to:

- Fewer private cars on the road
- Reduced mileage
- Increased occupancy
- Increased car utilisation and
- Greater use of public transport and active travel

(Page 10 BVRLA's [Cars in the City report](#))

Mobility credits can easily be incorporated into MaaS platforms and would encourage more active travel and travel via more sustainable modes.