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National Assembly for Wales  
Economy, Infrastructure and Skills  
Committee  
Decarbonisation of Transport  
Evidence from Community  
transport association



# Response to Economy, Infrastructure and Skills Committee inquiry into the Decarbonisation of Transport

August 2019

## About Community Transport

This response is submitted by the Community Transport Association (CTA), a UK-wide charity working with thousands of other charities and community groups across the UK that all provide and support local transport services that fulfil a social purpose and community benefit.

Around 30 per cent of CTA's 1,300 members are charities whose main work is provision of community transport and they would typically use this label to describe their work. This form of community transport helps to address the quality, affordability and accessibility of transport options for people who cannot drive and don't have access to conventional public transport, especially in rural areas. It also recognises that some needs are best met through communities doing things for themselves.

This is about providing flexible and accessible community-led solutions in response to unmet local transport needs, and often represents the only means of transport for many vulnerable and isolated people.

Community transport services are primarily provided through either a section 19 permit which offers door-to-door transport predominantly for those with mobility issues, or through timetabled section 22 services. Section 22 permits enable not-for-profit entities to run local bus services for the benefit of the community. They often use minibuses rather than larger buses, enabling them to operate routes with low levels of frequency and patronage, such as those serving rural villages, in a cost-effective way.

High levels of volunteer involvement, the ability to attract charitable funds, accessible vehicles and a not-for-profit business model all mean community transport is often a more reliable and resilient way of meeting a greater range of transport needs, especially for our more isolated and vulnerable citizens.

The other 70 per cent of CTA's members are charities, community groups and other not-for-profits who use the same permit regime to run transport to support their main charitable activities, such as youth groups or RVS branches.

## Introduction

A future with cleaner, more efficient and more sustainable transport is an ideal for community transport operators. Our members care for many of our communities' most vulnerable people, and have a keen awareness of the health and mobility problems brought by air pollution. Our sector hopes to be a positive and proactive partner in the decarbonisation of transport for the next generation.

In addition to the health and wellbeing benefits of decarbonisation, electric vehicles will likely provide technical innovations that bring huge benefits to our operators and service users alike. For example, new EV development platforms featuring low and flat vehicle floors (such as Mellor Coachcraft's range: <https://www.mellor-coachcraft.co.uk/>) will enable greater accessibility for those with mobility issues and greater flexibility to adapt vehicles for those with significant disabilities. Electric vehicles could also significantly lower the per-use cost of providing non-emergency passenger transport for health appointments and of community car-share schemes.

To take full advantage of the opportunities that electric vehicles could bring, however, there are several key barriers that must be overcome. Firstly, the development of infrastructure must be 'rural proofed' to ensure that areas which are poorly connected to the conventional transport network are not excluded from opportunities. Demand for community transport is often highest in communities where traditional public and private transport has the least reach. As a result, these areas are unlikely to be commercially viable locations for early installation of charging facilities by the private sector; policy must be developed to cater for this outcome.

Secondly, given that community transport operators in Wales are often small charities in deprived communities with limited reserves and few opportunities to fundraise in their local

area, support should be made available to ensure that the cost of installing infrastructure and purchasing an electric fleet are not prohibitive for operators.

Thirdly, the Committee should be made aware of the skills requirement that a movement towards electric vehicles would bring. To install electrical charging infrastructure and maintain the new technology, appropriate training for mechanics should be made available.

Despite these challenges, Wales is rich in natural resources and community-based energy generation projects are already springing up across the country. There is an opportunity for Wales to build its EV infrastructure from the community outwards, rather than relying on the private sector or large-scale public sector infrastructure projects. This would ensure that the infrastructure benefits from local support, and enable better reach out to rural Wales than a commercial project. A partnership between community energy and community transport could help provide clean, cheap, accessible and inclusive transport for even the most isolated rural communities, and we are keen to support the development of such partnerships in the future.

## CTA's Response:

### **Are the transport emission reductions targets, policies and proposals (set out in Prosperity for All: A Low Carbon Wales) achievable and sufficiently ambitious?**

The community transport sector recognises the need for a low carbon Wales strategy and fully supports the aims set out. It is important to set targets to ensure progress and the CTA is glad that these are ambitious. The sector does, however, face challenges in making the switch due to the high cost of electric minibuses and the inability to generate the profits required to invest as a result of permit requirements.

Firstly, low carbon targets may mean that community transport operators look to change their operating model, switching to multiple cars/MPVs as it would be cheaper to acquire low emission cars than minibuses. In Wales, the sector has enjoyed success in securing funds from wind farm trusts to increase the number of electric cars in the fleet but whilst these vehicles are more environmentally friendly, a switch to electric cars from higher capacity minibuses would increase the number of vehicles on the road and reduce the number of communal journeys, with a negative impact on congestion.

The small-scale nature of many community transport operations means that vehicles tend to be older and it is difficult for operators to accumulate the necessary capital to buy new vehicles, retrofit appropriate engines, or absorb running costs in the same way that a larger commercial operator working at scale would be able to. The amount and types of income that can be generated by community transport is further limited by the regulatory requirement that community transport operators cannot make a profit. A new standard minibus can cost upwards of £40,000 - a figure that would be especially difficult for smaller

organisations reliant on voluntary funds to raise – and electric minibuses cost around three times more than its diesel equivalent.

Finally, if the financial costs for upgrading vehicles are unsustainable, community transport operators may have to stop services altogether, leaving those with the greatest need, who are reliant on CT services due to mobility issues, without access to transport and subsequently vital services. In the long term, this is likely to add to loneliness and isolation, with a knock-on effect on health and social care services, to the detriment of the Welsh Government's commitment to achieving the National Well-being Goals.

CTA believes that clean air is an important issue facing our communities in Wales. We support steps to improve air quality across our towns and cities and acknowledge that vehicle emissions contribute to poor air quality. However, we believe that the Welsh Government should be mindful of the social impact that proposed changes will have on vulnerable passengers.

The CTA also supports initiatives that help to cover costs for compliance and protect community transport services.

**Recommendation: The Welsh Government should ensure that funding support is made available to allow community transport operators to support the delivery of the Low Carbon Wales strategy by switching to cleaner vehicles.**

### **Is the Welsh Government's vision for the decarbonisation of transport sufficiently innovative, particularly in terms of advocating new technologies?**

At CTA, we believe that in the future, more and more people will be making journeys in vehicles they don't own, with people they don't know at first which is the fundamental basis of community transport. Operators deliver flexible, door-to-door, demand responsive, group travel services which we believe will be a central part of the public transport offer in the future. The strategy includes a vision for modal shift, low-carbon vehicles and active travel but provides nothing about innovative models of transport delivery.

The Integrated Responsive Transport pilots being set up currently are a positive step and we would like the Government to communicate an ambitious vision for the future of transport that includes a range of services with a funding commitment that shows their ambitions for the future. The community transport sector has been offering demand responsive transport services for decades and are experts in the field so we believe that the Welsh Government should make a commitment to supporting the sector to work with communities to develop local solutions.

**Recommendation: The Welsh Government should ensure that measures to achieve decarbonisation include different models of transport delivery to make the most of all opportunities. In particular, steps should be taken to ensure the expertise available in the community transport sector is fully utilised and services expanded where possible to progress the demand-responsive transport offer for communities across Wales.**

## **What action is required, and by whom, to achieve the targets, policies and objectives?**

The forthcoming transport strategy for Wales should have decarbonisation at its heart, focusing on moving people out of private cars and into alternatives, promoting opportunities to travel together. We would also like to see greater community involvement in developing local solutions to transport needs. Community transport operators are at the heart of their communities and are best placed to understand local priorities, resources and needs, and hence best able to address their local transport challenges. Through our membership, we also have a unique insight into the worlds of people whose lives and choices are diminished by not being able to get to the places they want or need to be, and this experience and knowledge should be recognised in the delivery of strategic plans.

Critically though, what is needed to achieve decarbonisation in public transport is adequate funding for bus and community transport to make the transition. As set out earlier in this response, community transport operators are not in a position to raise the necessary funds for electric minibuses due to the high cost of vehicles and permit requirements to not turn a profit. There may be opportunities to retrofit the vehicles, meaning that the fleet could be converted at a reduced cost. Whilst the Connecting Communities in Wales project has been successful in drawing down funds for community transport projects which have allowed operators to increase the number of electric cars in the fleet, the cost of electric minibuses remains prohibitive and whilst electric cars are a positive step, the sector is conscious of the need to reduce the number of vehicles on the road. The project team has found that capital funding is challenging to secure and so new minibuses would need to be supported by a grant scheme.

Where the transition to electric vehicles has been successful elsewhere in the UK, this has been driven by significant funding, local authority support and planning from community transport operators. For example, Holderness Area Rural Transport (HART) worked in partnership with their local authority to receive a grant from E.ON and LEADER Coast, Wolds, Wetlands and Waterways sufficient to purchase two new electric vehicles: a five seat Nissan Combi and a 14 seat Orion minibus (the latter of which was a specially made vehicle from Mellor Coachworks owing to the lack of availability for electric minibuses), along with charging infrastructure.

Meanwhile in Nottingham, the installation of 40 charging stations within council premises with a further 60 planned, along with the provision of 95 public charging points in the city and a further 55 due to be installed, as part of Nottingham City Council's 'Go Ultra Low Nottingham' project, has meant that the council can be confident in their plans to replace seven of the diesel minibuses on their fleet with five electric minibuses. This provision of appropriate infrastructure will likely also facilitate the future electrification of fleets in other organisations.

The Welsh Government should also be mindful of actively including the voluntary sector in any future funding scheme. For example, while Transport Scotland's Green Bus Fund was a

positive step towards helping bus operators to become compliant with energy targets, their 2018 fund only allowed bids to help buy Low Emission Buses rather than minibuses, which constitute the majority of community transport vehicle provision. Similarly, the Energy Saving Trust's Scottish Bus Emissions Abatement Retrofit Programme (BEAR), while allowing community transport operators to apply for funding, has thus far only awarded funding to large and mostly commercial operators. More should be done to reach out to smaller organisations, such as community transport operators, to assist them to make bids for funding.

**Recommendation: The Welsh Government should ensure funding is available to support the transition to electric vehicles and ensure this support extends to minibuses.**

### **How should the new Wales Transport Strategy reflect the actions needed to decarbonise transport?**

The new Wales Transport Strategy should focus on reforming transport to support the aims of the low carbon strategy and respond to the Welsh Government's declaration of a climate emergency. Plans going forward should be based on the new transport hierarchy and promote new models such as demand responsive transport and community ownership. The sharing economy is growing and is becoming a central part of transport innovation through developments such as Uber, Blablacar, nextbike and so on, increasing opportunities for mobility without the need for vehicle ownership. The strategy needs to recognise that transport is changing and will change over the next decade or so beyond recognition. Policy must create an environment where new, low carbon, shared use vehicles can succeed.

As recognised by the Low Carbon Wales strategy, there is a need to 'transform the image and the reality of public transport to make it a more desirable alternative to the private vehicle.' Whilst we agree that a move towards a zero emission bus fleet will contribute to improving the attractiveness of bus travel, a number of further measures are required alongside this to ensure that public transport is seen as a viable alternative for current car-users. For example, the Welsh Government must ensure that transport is planned and implemented in a more joined-up manner so that people are able to travel across different modes of transport seamlessly – in Cardiff, for example, the loss of the bus depot by the train station stands as a disadvantage and disincentive for people with mobility problems to travel.

Moreover, modal shift can only be achieved when innovations take into account the full range of passenger needs. The provision of high quality, accessible and demand-responsive solutions by community transport organisations means that often they are able to provide the first and last mile of journeys that make an overall multi-modal journey possible, where someone would otherwise have driven, or be driven, the whole way, as a result of the station or stop on a journey being too far away or inaccessible for someone, particularly with mobility issues, to reach. It is therefore vital that work on the Wales Transport Strategy coordinates with community groups to ensure that those who are left behind by the current transport network have a voice in shaping future transport provision and that public

transport changes are truly accessible and inclusive for all, including for those currently disadvantaged.

**Recommendation:** The Wales Transport Strategy should ensure it provides for the full range of transport options and in particular, the Welsh Government should work with local groups to ensure those who are left behind by the current transport strategy can have a voice in shaping future plans.