

CTA's response to the call for evidence on the barriers to the successful implementation of the Future Generations Act

About the Community Transport Association (CTA)

1. This response is submitted by the Community Transport Association – a national membership charity working with community groups across the UK to support community-led transport.
2. Around 30% of CTA's 1,300 plus members are charities whose main work is the provision of community transport, while the other 70% run transport to complement their main charitable activities, such as Scout groups, Age Cymru and RVS branches.

About community transport

3. Community transport provides accessible community-led transport on a not-for-profit basis in response to local transport needs that the market has failed to meet, and often represents the only means of transport for people who are isolated and in vulnerable situations. Often, unmet needs result from:
 - a. Commercial and subsidised services that are unavailable, or have been reduced, withdrawn or altered because they are deemed commercially 'unprofitable'.
 - b. Services and vehicles that are inaccessible, particularly for those with mobility issues.
4. Under these circumstances, communities band together to create transport solutions to support a wide range of people to access key services and social settings vital for a good quality of life. For example, it enables older people with limited mobility to leave their house and meet friends, family and care needs; it helps people with disabilities to lead independent lives; and supports children and young people to reach school, college or work, and socialise.
5. By effectively harnessing local resources and forging partnerships with public bodies, civil society organisations and other local groups, community transport helps to alleviate transport poverty and its attendant problems. These include social disadvantage and exclusion, time and financial poverty, and multimorbidity.
6. Using a range of transport modes, including minibuses, MPVs, cars and mopeds, our members deliver services including dial-a-ride, voluntary car schemes, health transport, wheels to work, group hire, and more. Community transport vehicles are also uniquely inclusive – many vehicles are wheelchair accessible, with rear passenger lifts and convertible spaces, while drivers and passenger assistants are professionally trained to assist passengers with mobility issues.

Our response

Awareness and understanding of the Act and its implications

7. It is CTA's understanding that while most public and third sector bodies are aware of the Act, including small grassroots organisations, the Act as yet has little effect on how these smaller organisations work unless they are contracting for work with a public body. For most community transport operators in Wales, this is not relevant for them and so the impact of the Act is little felt.

The leadership of the Welsh Government

8. The CTA welcome the Welsh Government's continued commitment to the Act its use of the Act to underpin every piece of work. We also welcome the approach taken in the consultation process for the Wales Transport Strategy which embeds the Act at every level of both the strategy itself and the development process.
9. However, we feel concerned that short-term relief efforts and in year underspend may generate a tension with the long-term thinking and generational approach underpinning the Act. As such, we would welcome a commitment from the Welsh Government to ringfence funds to support the community transport sector beyond the immediate, emergency relief period, and for the Welsh Government to continue to think strategically about what resource is needed to ensure services that are fit for the future.

Any other barriers to successful implementation of the Act (e.g. Brexit, covid, etc.)

10. We believe that there are several barriers that may hinder the successful implementation of the Act – covid, Brexit, overemphasis on electric vehicles and digital exclusion; we address each of these factors in turn:

Covid

11. Since March, the community transport sector has been vital in maintaining community cohesion and supporting the wellbeing of its passengers, many of whom live in vulnerable situations. This is despite facing significant reductions in income owing to core community transport activities having to cease over the lockdown period:
 - **Vital services have continued** - such as transport to health settings like GPs and hospitals
 - **CTs have adapted their service** to meet new community needs, often in **collaboration with other community groups** such as local food banks, supermarkets and pharmacies, to:
 - o Deliver food, medicine and prescriptions to isolated passengers, often free of charge
 - o Provide transport for key workers
 - Stay in contact with passengers over the phone

- **CTs have adopted new cleaning protocols, invested in PPE and adapted vehicles** at significant cost to adhere to distancing rules and reduce transmission risks, such as by installing screens

12. As such, the community transport sector has provided for those who would not have otherwise been able to leave their homes and meet essential needs, such as shopping for food, collecting medicines and reaching work and health appointments, in a safe and secure way. Moreover, by maintaining social contact with passengers who have been shielding, CTs have also helped to alleviate loneliness and isolation for many in vulnerable conditions.

13. Due to the impacts of covid-19 these efforts to maintain community cohesion and wellbeing in line with the Act's aims to 'help equalise opportunities for all and play a role in supporting healthy lifestyles, improving community cohesion, and creating a well-connected Wales', are at risk.

14. The impacts of the pandemic are twofold:

Financial

- a) While many CTs have been able to make savings over the pandemic (mainly from reduced fuel costs and furlough payments) and use reserves to sustain operation for the current financial year, they have also been heavily impacted by lost fare income and group hire payments, which constitute a significant proportion of usual income for most CTs. Moreover, use of reserves undercuts monies originally saved for future needs, such as fleet replacement, placing operators in a precarious position for the future.
- b) Furthermore, while demand increases as services and businesses reopen, ongoing social distancing requirements will continue to place pressures on vehicle capacity, meaning that operators will have to incur increased operational costs (on fuel and salaries) to cater to renewed transport needs. In other words, CTs will need to work doubly hard to meet rejuvenated demand, preventing operators from recovering income lost over lockdown.

15. Confidence

- a) Fears over contracting coronavirus and Government messaging to avoid public transport where possible has generated a fear of leaving home, particularly for those who are unable to access and use private cars and must instead rely on public transport. Research conducted by the Research Institute of Disabled Consumers has found that 64% of respondents have not used public transport at all since restrictions were eased in July, with many citing fears about other passengers' and staff members' behaviour and use of masks and PPE aboard vehicles.

- b) Meanwhile, a [recent poll](#) conducted by Disability Equality Scotland in partnership with CTA found 95% of respondents agreed that changes to transport, such as altered timetables, reduced capacity and limiting car sharing has affected their access to key services; while another 93% agreed that the pandemic had made it more difficult to afford transport. However, respondents were quick to praise their local community transport providers for delivering vital support – for example, the report quotes one user who says, ‘Poor public transport, but Berwickshire Wheels Community Transport...fill the gap. They have even been delivering food during COVID-19 as people can’t get to shops or deliveries.’
- c) While results of this research are not Wales-specific, it demonstrates the overall fears felt by a vulnerable passenger group – people with disabilities – towards resuming transport in shared vehicles; and simultaneously proves the value of community transport in easing passengers’ concerns and helping them to access services.
- d) However, community transport has a high proportion of older volunteers, owing to licence requirements, many of whom have needed to shield during the pandemic. Conversations with our members has revealed that many feel fearful of returning to voluntary work, leaving the viability of volunteer-run services vulnerable.

16. These impacts – financial pressures, reduced vehicle and volunteer capacity, and an eroded passenger base – has left many community transport operators across Wales in precarious positions. The absence of CTs, should they be pushed to cease operations, will leave the needs of those in vulnerable situations, such as the elderly, disabled and rurally isolated (encompassing all generations) at risk of further transport poverty. This will have significant social and economic impact for Wales that could threaten the Act’s aims to protect future generations.

Brexit

17. Another key risk to the sector is the withdrawal of EU funds. Our concern is that future funds will be fewer and awarded through a competitive process, where payment will likely be conditional on immediate results, rather than the achievement of long term aims, and it is our view that awarding a grant or contract through competition, with price as the main or only consideration, does not get the best outcome for the commissioner or client and can leave providers in a precarious position. Where commercial services prioritise profit, community transport services prioritise social outcome and passengers’ needs, which then generate a healthy balance of social and economic benefits.

18. Should future public services or grants be commissioned/awarded through competitive, results based processes, the social and economic outcomes generated by CT are at risk

of being lost, to the detriment of the Act's ambitions to balance and protect all four dimensions of wellbeing for future generations.

19. CTA believe that to have impact and to truly make change that lasts, funding needs to be driven by community-led, asset-based approaches, rather than top-down private sector delivery.

EVs and modal shift

20. CTA agree with the Commissioner's report that Wales must prioritise modal shift as the primary way of achieving the Act's environmental goals and support the Commissioner's call for greater support for, and investment in, public transport and active travel. We also support the view that mass uptake of electric cars risks undermining efforts to achieve modal shift.
21. Improving public transport would reduce vehicles on the road, thereby cutting congestion and pollution; conversely, encouraging electric vehicle uptake will likely reduce motoring costs and encourage private vehicle usage, drive traffic growth and thereby increase carbon emissions, counter to the Act's goals. Furthermore, the production and manufacturing process of electric vehicles is carbon intensive and therefore underlines the need to make better use of existing shared vehicles.
22. Secondly, growing public transport will have a wider and deeper impact than the electrification of cars, owing to public transport being a more widely affordable form of transport. Conversely, electric vehicles are currently too expensive for most passengers, especially those groups who are already unable to afford a conventional private car. A push for increased electric car use would hence risk furthering socioeconomic barriers to transport.
23. Thirdly, we have considerable concerns surrounding the accessibility of electric vehicles and would be concerned that a policy drive towards its mass uptake would come at the expense of existing and future efforts to improve the accessibility of public transport, and ultimately result in disabled and mobility impaired people, as well as those living in rural areas, being written out of sustainable transport policy.
24. A recent research report on the accessibility of plug-in electric vehicles conducted by the Research Institute for Disabled Consumers (RIDC) found that the existing charging points infrastructure is not accessible for a large proportion of disabled people with mobility or dexterity impairments and that an increase in anxiety surrounding difficulties with charging electric vehicles can lead to changes in motoring behaviour that may culminate for some people in a loss of independence.
25. To ensure that vulnerable passengers are not left behind by sustainable transport measures, we recommend that community transport, as an accessible and

inclusive form of shared transport, is recognised when implementing the Act. Community transport vehicles are often wheelchair accessible, with rear passenger lifts and convertible spaces, while drivers and passenger assistants are professionally trained to assist passengers with mobility issues. Many of the trips that CTA members enable are 'everyday' journeys to visit shops, attend school and work, see family and friends, and reach medical appointments, which are vital to passengers' health and wellbeing, enabling them to feel more empowered, healthy and independent, and preventing and reducing social isolation and loneliness.

How to ensure that the Act is implemented successfully in the future

26. **Stable multi-year funding for community transport** – to ensure that community transport operators can provide well-maintained and stable services, there is a need for secure, long-term funding streams. The Bus Services Support Grant is awarded on an annual basis which creates uncertainty and the inability to plan for the future. It has also come to our attention that there has been a recent contract advertised for support for emergency departments with the Red Cross – funding is for one year only, which is not in keeping with the spirit or aspirations of the Act.
27. **More effective measures to ensure compliance** – where public bodies in any situation are not complying with the Act, there seems to be little evidence of repercussions and, while the Act is law, the Commissioner does not seem to have the powers to enforce it.
28. **A holistic assessment of needs with well-being goals and local objectives built into transport solutions from the outset** – to ensure that the wellbeing of all social groups, the needs of those with accessibility requirements must be built in from the outset, which can then benefit everyone else, too. For example, step-free access in bus and train stations not only benefits those with disabilities, but also those with pushchairs and small children and those using bikes.
29. **Co-design transport solutions with passengers and community members** - we agree with the Commissioner that transport bodies need to 'consider connectivity in its widest sense...plan and deliver mobility in a way that simultaneously improves health, encourages community cohesion and supports carbon reduction.' Community transport is able to deliver all these goals and has a unique insight into the needs of those with mobility needs; it is essential that the voice of CT operators and their users are included in any future implementation of wellbeing into transport design.
30. **Conduct a mobility accessibility audit** – currently the transport network is not sufficiently integrated to allow for efficient use of resources. While we are advocates of community-led transport solutions, we recognise that community transport cannot serve every transport need, especially given recent pressures placed on the sector by the pandemic. However, CT can be a huge asset to the public transport network, helping passengers to reach otherwise inaccessible bus stops and train stations either through

demand-responsive services or timetabled bus services, which then makes an overall journey on the public transport network possible. Yet, this contribution is often overlooked despite the benefits it creates for social and health outcomes (reduced loneliness and isolation, improved mental and physical wellbeing, and access to health appointments), and economic outcomes.

31. As such, we believe there is a real need to map what can be provided where, most efficiently, effectively and cost-effectively because this gap in knowledge is a huge hindrance to an effective transport network that is stable and reliable and helps to achieve the wellbeing outcomes that are long-lasting for future generations. An effective and systematic mapping exercise would also enable resources to be better shared, which would generate cost savings and help to achieve environmental goals. There still does not, moreover, seem to be a commitment to shared learning, which needs to be a key part of how we survive and then thrive in the future.

For further information, please do not hesitate to contact CTA's Policy Executive, [REDACTED]