



The National Assembly for Wales' Economy Infrastructure and Skills Committee's Consultation on Electric Vehicle Charging in Wales

A response by the Community Transport Association

About Community Transport

1. 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.
2. Around 30 per cent of CTA's 1,600 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.
3. 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.
4. 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.
5. 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.
6. 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

7. 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 pollution through this. Our sector hopes to be a positive and proactive partner in the decarbonisation of transport for the next generation.
8. 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.
9. 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 rural areas and urban areas 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.
10. 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.
11. 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.

12. 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.
13. We will respond to the consultation's proposals in turn:
- ***To understand the current charging infrastructure in Wales, and to what extent it is fit for purpose.***
 - ***Examples of best practice from Wales and further afield.***
14. There is currently support and enthusiasm in the sector and with community organisation partners to explore the possibilities of creating projects using electric vehicles. This includes installing electric vehicle charging points in community centres and hub areas, or in strategic points such as at new hospital builds or car parks (with bay areas reserved for community transport operators).
15. In Wales, several of our operators already use electric vehicles, while others, such as South Denbighshire Community Transport and the Dyffryn Ogwen energy project, are in the early stages of developing electric car or bus schemes.
16. Many more of our operators are interested in replacing their fleet over time with electric vehicles, with some actively considering feasibility studies in order to develop projects and seek funding.
17. However, this aspiration is mitigated by cost and feasibility considerations, in terms of the range of the vehicles involved and the current lack of infrastructure. This uncertainty in itself creates inertia. We therefore cannot say definitively whether the current infrastructure is 'fit for purpose'.

18. To build on current efforts and further enthusiasm, we would recommend:

- A clear steer from the Welsh Government,
- A clear map of feasible areas for charging points for community organisations at a local level (especially in rural areas), which would simultaneously reduce the burden of feasibility studies from the third sector (with its limited resources),
- Clear guidance on standards for charging points to ensure that they are consistent for our vehicles in different areas, and that they are ‘future proof’ to take into account anticipated changes in technology.

19. Furthermore, it is important that communities are given ownership over charging points and their use – so whether they are placed at community hubs, in business areas or outside centres to combat congestion, must be a matter of consultation with communities themselves.

20. The CTA would be keen to support work in this area to assist our members, for example by providing the sector with an ‘EV toolkit’ to provide guidance and examples of best practice.

➤ ***How the infrastructure needs to develop to support an increase in EVs on our roads.***

➤ ***How the Welsh Government, private sector and third sector can work together to develop EV charging infrastructure***

21. We are concerned that the current pace of installation of EV charging infrastructure in Wales is slow, the choice of locations seems ad-hoc, and the availability almost exclusively urban. This will make EVs an impractical choice for people living outside of the M4 and A55 corridors. We welcome that the £2m 2017 budget agreement on charging points between Welsh Labour and Plaid Cymru included charging near the trunk road network, but this needs to go further in terms of both available funding and support for rural communities excluded from the process.

22. For our members, who are most needed in our most isolated communities, waiting for more widespread commercial installation of EV charging stations is not an option. We therefore ask Government firstly to consider co-ordinating a varied EV charging market that maximises the availability of private sector charging points to save on public sector costs. Secondly, enable rural communities and those poorly served by other infrastructure to develop their own EV energy schemes. Finally, create plans for the public sector to procure a network of EV points across Wales’s rural long-distance roads.

23. We would be keen to explore how community transport operators, already active in their local communities, could support the development of community EV projects, with the proviso that many of our members are small community concerns themselves and will therefore require assistance and funding.
- ***Whether the electricity grid in Wales is able to deal with a significant increase in EV infrastructure, particularly in rural areas***
24. We are concerned that a focus on the urban and the technical difficulties in terms of the electric grid in rural areas would lead to rural exclusion from the sector. Our members in rural areas are open to electric vehicles, but require infrastructure to work as effectively as they do with their current fleet.
25. Our sector often works in partnership with other community organisations and there is enthusiasm for siting charge points in community hubs, but clear guidance needs to be developed for this to work effectively.
26. Many of our operators supply door-to-door non-emergency patient transport and wait for patients while they receive treatment. As such, they would welcome bay areas for community transport vehicles, along with the installation of charging points, at new hospital builds and as part of car park changes. We are aware of new builds where this is currently being actively considered, but it is as yet to be confirmed. **A clear centre steer on this from Welsh Government in terms of an active consideration in any new build or conversion would be useful.**
27. Other similar strategic centres that could be used for community transport should be considered – e.g. GP surgeries, care centres, leisure centres, schools etc.
28. It is important that funding is made available for the transition to electric vehicles from appropriate funding pots (such as associated around windfarm areas), and where charging points can add value to outcomes already sought in these areas.
29. Nevertheless, a move to electric vehicles will take time in our sector as many members are already struggling for resources. The existing fleet provides a lifeline for its users, and our members' primary focus in these difficult financial times will necessarily be ensuring that they can continue to provide the core services their users rely on. Resourcing a new fleet cannot be at the expense of support for the day-to-day running costs for services.

30. 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.
31. A new standard diesel minibus can cost in excess of £40,000 – a figure that is especially difficult for smaller organisations reliant on voluntary funds to raise. Compounding these issues, the new EV standards are likely to devalue current vehicles, preventing organisations from trading in older vehicles to raise funds or in part-exchange for new vehicles.
32. The CTA support the intention to reduce emissions, but ask the Committee to note that the costs associated with compliance may lead to unintended consequences that obstruct environmental and wider societal objectives and impedes the vital work of community transport. If the financial costs for upgrading vehicles and installing necessary infrastructure are unsustainable, community transport operators may have to stop services altogether.
33. One example of a perverse incentive may be that a community transport provider may have to change its model to operating services using multiple cars/MPVs as it would be cheaper to acquire compliant cars than minibuses, with cars also being easier to charge. Hence, while vehicles would be more environmentally friendly, there would be more vehicles on the road, fewer communal journeys, and higher cumulative emissions, with an impact on congestion.
34. As such, it will take significant capital investment to get a replacement electric fleet that is adequate to community transport's wider needs. If Welsh Government is to view the transition to electric vehicles as a priority we would suggest that substantial funding should be made available to provide incentives, and to also ensure that those incentives fit those wider social needs, and do not indirectly create perverse outcomes.

35. We would also suggest actively ensuring that community transport and social operators are made aware of, and have adequate access to retrofitting schemes to combat emissions, on a similar basis to commercial bus operators.

➤ ***To explore the potential for electric vehicles to promote behaviour change, for example in terms of vehicle ownership and car sharing initiatives;***

36. Local empowerment around decisions on charging sites would also provide a good way to ensure learning around the issues and support behavioural change. The use of social and community transport would promote a good example in general behaviour change, and also provide an example of what is possible, if the risks noted above are mitigated properly.

Summary

37. The CTA's experience of working with our operators and partners is that there is enthusiasm to move toward electric vehicles as a social good, and this is already driving many projects forward. Some of our operators are already using Electric Vehicles where appropriate and looking to move their future fleet towards EV.

38. The charging infrastructure is one disincentive, along with perceptions around the range of vehicles and of battery life. When accessibility issues of weight and use of electricity on lifts are borne in mind, it is important to remember that the current fleet is likely to remain important for our sector, and there is need for awareness around possible perverse outcomes if policy is not designed carefully.

39. With funding made available for replacement vehicles, clearer guidance and a clear strategy on charging areas (particularly in rural areas), we believe the sector's enthusiasm can be harnessed to provide a strong backing to a move toward Electric Vehicles. We would be interested in working with partners to develop a toolkit on how to do so.