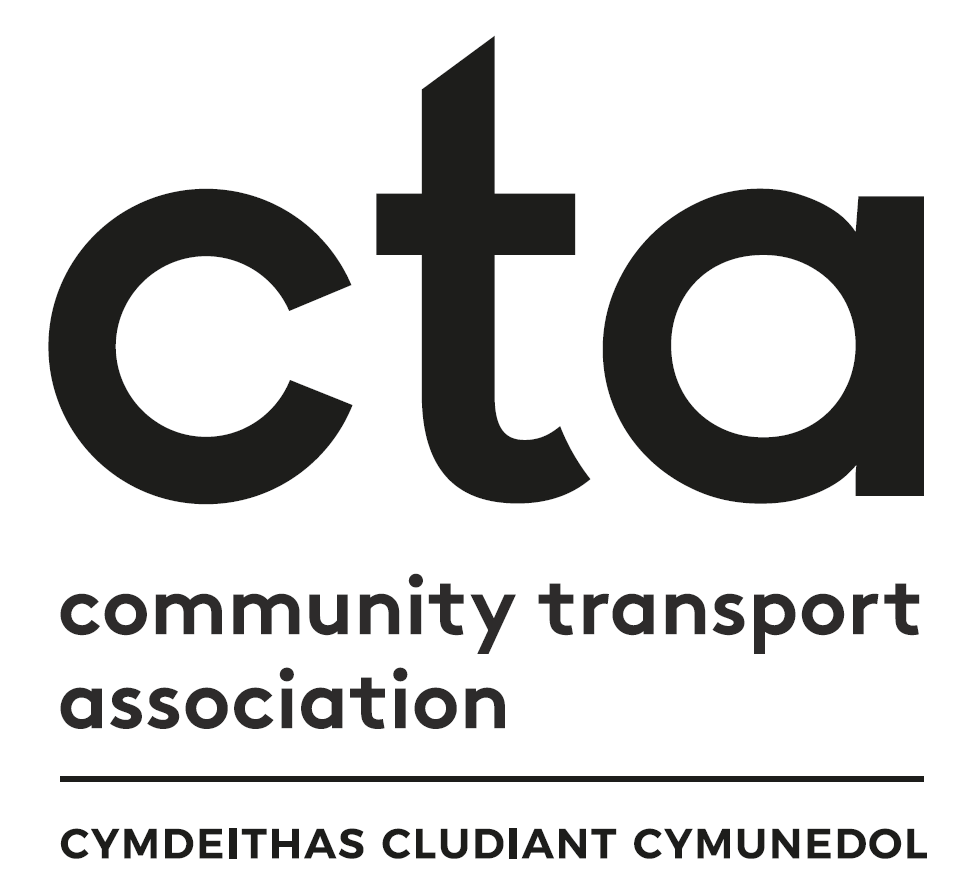
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**National transport delivery plan (NTDP): 2022 to 2027**

Name: **Gemma Lelliott**

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Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: 

**Please note**

CTA welcomes this consultation opportunity, and have responded to the questions posed whilst linking recommended actions to itemised elements from the NTDP. We hope this adds specificity in translating the Third Sector Mini Plan ambitions into practical action.

Our team in Wales looks forward to working with Welsh Government and other key stakeholders to develop and refine any further policies and delivery plans as we recognise that it is a rapidly changing policy landscape around passenger transport. We remain a fully supportive partner, committed to helping to implement Llwybr Newydd for the benefit of current and future generations.

Q1. Do you think the plan will have a positive impact on the Welsh Government targets for creating modal shift to more sustainable forms of transport?

very positive

positive

neutral

negative

very negative

Please provide comments and reasons for your response here:

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| --- | --- | --- | --- | --- | --- | --- |
| The Community Transport Association welcomes the National Transport Delivery Plan (NTDP) for its focus on creating modal shift to more sustainable forms of transport, and for putting equality and access at the heart of the passenger transport network in Wales.  These values are shared by the Community Transport Association (CTA) as our vision is of a world where communities can shape and create their own accessible, inclusive and sustainable transport solutions. We champion, connect, support and grow the UK’s not-for-profit Community Transport sector, and our members deliver a diverse range of adaptable, cost-effective and innovative services which are always for a social purpose and community benefit. In Wales, our team works alongside more than 100 Community Transport operators.  The emphasis within the NTDP on the Sustainable Travel Hierarchy, following on from its central prominence within Llwybr Newydd, provides a clear direction for all future activity, and this strong leadership by Welsh Government is notable. CTA sees itself as a supportive partner in helping to deliver aspects of the Wales Transport Strategy ‘on the ground’. Community Transport facilitates modal shift away from private cars to more sustainable modes such as buses, minibuses, e-bikes and car-share. The sector delivers shared transport services including dial-a-ride, electric car clubs, community car schemes, patient transport, school transport, wheels to work, minibus hire and e-bike hire, as well as scheduled community bus services on socially necessary routes.  Many older and disabled people, as well as those in disadvantaged households or marginalised neighbourhoods are most likely to be underserved or excluded by public transport. The recognition within the NTDP of the vital role played by Third Sector transport services within the passenger network is a significant step forward as Community Transport operators provide shared mobility transport solutions that help to avoid the problem of ‘forced car ownership’ (households who own cars despite limited economic resources because of the limited availability or inaccessibility of public transport). Forced car dependency can result in households cutting expenditure on other necessities and / or reducing travel activity to the bare minimum, both of which may result in social exclusion.  For example, disabled people in the UK make 38% fewer journeys every year than non-disabled people due to inaccessible transport. Investing in accessible, inclusive services delivered by community transport, which can then integrate with the wider public transport network, will ensure disabled people are not left behind in the transition to net zero. Similarly, with nearly a third of the Welsh population aged over 60, investing in an integrated, accessible and supportive transport network will make a substantial contribution to making Wales the best place in the world to grow older.  Equality and accessibility is integral to our sector, and when referring to any modal shift targets, it is essential to consider weighting them positively in favour of people and communities who may otherwise be left behind. Inclusivity is the central and most fundamental value within the community transport sector – it is based on the underlying principle that no-one within a community should be excluded from access to services or amenities because of a lack of appropriate transport and is also why Community Transport remains distinctive from commercial operators. It takes a values-driven, needs-based, community-led approach to service planning and delivery, and should therefore be viewed as a lynchpin of a transport infrastructure aiming to be socially equitable, and of any policies and measures aimed at addressing transport poverty. **Our members could contribute positively to the development of the Equalities and Rural Pathways due to their reach into communities** where it will be especially important to provide transport solutions that support people to move away from private car use.  The NTDP includes a welcome commitment to providing development support for the Community Transport sector, which will enable the sector to grow, increase coverage across Wales, and proactively assist the Welsh Government to meet the modal shift targets. CTA recommends the following actions:  **Annex 2: Programmes, projects and interventions**   |  |  | | --- | --- | | **Third 1** | **Action 1**: That the Memorandum of Understanding to be developed between Welsh Government, Transport for Wales and CTA specifically addresses CTA’s role in the four underpinning Pathways to ensure a clear mechanism for the engagement of our members.  **Action 2**: In view of the challenging targets already set by Welsh Government and the need to progress Llwybr Newydd, CTA to now develop the Third Sector Mini Plan in relation to community transport, creating a five-year Delivery Plan for the sector, integrating relevant elements from Llwybr Newydd, Bws Cymru, and the NTDP Appendix, and focusing on implementation. | | **Third 3** | **Action 3**: That CTA works in in partnership with Welsh Government to develop a Grants Plus Community Challenge Fund for Community Transport sector, with a focus on developing new schemes for better geographical coverage across Wales as well as enhancing existing schemes. | | **Third 10** | **Action 4**: CTA launches a Community Car Scheme Tool-box and Peer Network to aid the quick and effective set up of hyper-local shared mobility volunteer car driver schemes in areas which do not currently have such schemes, supported by the Community Challenge fund. | |

Q2: Do you think the plan will have a positive impact on the Welsh Government targets for reducing greenhouse gas emissions from transport?

very positive

positive

neutral

negative

very negative

Please provide comments and reasons for your response here:

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| CTA is reassured to see Welsh Government targets to decarbonise transport fleets in Wales, including the target to move to a net-zero emission tailpipe bus fleet by 2035. This will help reduce emissions and create healthier communities. There is a significant opportunity here to include **specific reference in the NTDP to including the Community Transport sector in the national investment programme to convert the passenger transport fleet to zero emission.**  The sector has been struggling to update fleets due to insecurity of funding (for example, the one-year Bus Service Support Grant has been static for nearly a decade and is now split among more operators than ever before) and lack of organisational reserves for capital purchases. It is not unusual for operators to have vehicles which are over 10 years old, with over 200,000 miles on the clock, and whilst operators are committed to transitioning to electric vehicles, the high capital costs are a significant barrier.  **The sector faces a net-zero funding gap, as the higher upfront capital costs of electric vehicles are prohibitive for our not-for-profit operators.** The cost of Zero Emission Vehicles (ZEVs) is considerably more than the cost of an Internal Combustion Engine vehicles – on average a new electric minibus is between £80,000-£100,000 compared to a new diesel minibus at £56,000 - £65,000. The cost of purchasing the vehicle is too much to be able to undertake without some form of government financial assistance. Additional costs should also be noted which include higher insurance premiums for electric vehicles. CTA would like to see Welsh Government scale-up funding for operators to decarbonise their fleets and empower communities to take action.  A successful transition requires an extensive roll-out of high speed electrical connections in the community, with the electrical supply to deliver the charging network requirements. We need infrastructure capable of being used by minibus operators. Consideration must also be given to the operators that run their organisations from rented sites, as this may create barriers to investing in charging infrastructure as a lease may expire. Similarly, the charging infrastructure needs in rural communities must not be overlooked as commercial operators in the infrastructure delivery market will not be prioritising remote areas.  Despite these challenges, the recognition by Welsh Government of the need to invest in its communities is welcomed. In 2021, CTA administered over £1million of Welsh Government ULEV funding to Community Transport organisations to pilot the use of electric vehicles within their fleets. The response was incredible with operators running electric shuttle buses, electric community car schemes, and siting vehicles in rural areas where there is significant disadvantage and transport poverty, opening up affordable transport for people who would otherwise face social isolation.  As evidenced by some operators during the pilot scheme, one potential solution to the siting of electric vehicle charge points may be to support the sector to install and manage community owned charging sites which are accessible to operators and made available to members of the general public, increasing the availability of net-zero technology to rural communities. There is scope for the CJCs to play an instrumental role in the joined-up planning and roll-out of electric vehicle charging infrastructure between local authorities and Community Transport operators, ensuring that charging sites include sufficient parking provision for electric minibuses as well as MPVs, and working collaboratively to enhance integrated connectivity across the transport network.  CTA is of the opinion that for a just transition to net zero for the Community Transport sector to be achieved **there needs to be a clear and consistent Wales-wide Community Transport Decarbonisation Strategy, which supports not-for-profit organisations transition** by giving long-term assurance over capital investment for decarbonisation, as well as planning based on the needs of the sector. We need recurring multi-year investment in the sector to provide financial support to transition to low-carbon fleets.  **Annex 2: Programmes, projects and interventions**   |  |  | | --- | --- | | **Third 4** | **Action 5**: To include in the NTDP a specific reference to developing a Wales-wide Community Transport Decarbonisation Strategy. This links to the grants programme for the uptake of ZEVs to ensure a planned and cost-effective transition.  **Action 6**: CTA recommends including provision within Annex 2, Programmes, projects and interventions, for a Community Transport decarbonisation pilot scheme to be launched as soon as feasibly possible. The scheme would pilot exactly what is needed to serve an area / region with ZEVs, testing and learning what needs to be in place to effectively decarbonise the entire sector in Wales. CTA would plan, deliver and evaluate the pilot scheme.  **Action 7**: That a stakeholder working group is established in 2023 bringing together Community Transport Operators, Transport for Wales, Welsh Government and commercial minibus suppliers to develop a shared specification for electric vehicles that will be able to meet passengers’ needs, and to identify a procurement process for maximum cost-effectiveness across the sector. | |

Q3: To what extent, within the funds available, do you think the plan will meet the headline 5-year priorities set out within Llwybr Newydd: The Wales Transport Strategy 2021?

fully

partially

in a limited way

not at all

unsure

Please provide comments and reasons for your response here:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| There is always a tension between the ambitions within strategies and the funding available to implement them. The headline priorities include a shift away from private car use to more sustainable transport modes for the majority of journeys and, as a shared mobility transport sector, CTA welcomes the commitment to target funding over the next five years to aid this transition.  The headline priorities also refer to encouraging people to make the change to more sustainable transport through getting buy-in at a local level by “engaging with communities to design transport interventions that meet local needs and circumstances” – and this is an area where CTA has considerable expertise, having supported many communities across Wales to develop tailored transport solutions based on the particular needs of an area and the local communities within it. There is reference within the NTDP (Annex 2: Third 13) to developing a support function through Transport for Wales to assist communities in developing local solutions. CTA looks forward to working closely with Transport for Wales on the development of any support function and we offer our staff team’s skills in transport-related community development.  To achieve the headline priorities in relation to Community Transport, the suggestion that existing transport grant schemes may be revised to “better reflect the priorities and ambitions” of Llwybr Newydd is welcomed. It is CTA’s opinion that **the Bus Service Support Grant review provides an opportunity to redirect existing funds to better support the growth of locally-tailored Community Transport schemes, without the necessity of having to find ‘new money’.**  The Bus Service Support Grant funding to Community Transport operators has remained static for many years, and in effect has reduced in real terms due to soaring fuel, labour and vehicle costs. Many operators struggle to survive on a shoestring budget and run services on small, short term, grants without long-term certainty. For sector stability and growth, fair, adequate and multi-year funding is needed: funding which keeps pace with inflation and contributes to core operating costs. The vitally important emphasis on wellbeing within Llwybr Newydd and the NTDP could now be translated into Bus Service Support Grant weighting away from commercial operators and towards community providers which contribute to community wealth building and deliver social value.  **Annex 2: Programmes, projects and interventions**   |  |  | | --- | --- | | **Bus 2** | **Action 8**: Through CTA, to include the Community Transport sector in stakeholder discussions around the Bus Service Support Grant to identify the added social value that could be included within requirements for future allocation of grants. To roll-out the use of a Social Value Toolkit, such as that provided by Ealing Community Transport, to support operators to demonstrate their social value when applying for BSSG grant funding. | | **Third 13**  **Third 1** | **Action 9**: With reference to the proposed Transport for Wales support function to assist communities in developing local transport solutions, to ensure that a partnership approach to this is embedded within the Memorandum of Understanding between Welsh Government, Transport for Wales and CTA. | |

Q4: To what extent, within the funds available, do you think the plan will meet the well-being ambitions set out within Llwybr Newydd: The Wales Transport Strategy 2021?

fully

partially

in a limited way

not at all

unsure

Please provide any further comments here:

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| It is difficult to comment as, although the headline figures are provided, the NTDP does not contain a detailed breakdown of costs across the different transport sectors. One point CTA would like Welsh Government to note is the immense value of the Community Transport sector, in delivering on wellbeing aims, with operators regularly receiving feedback from passengers that their services are ‘a lifeline’. This point is reflected in the new draft WELTAG which places community value above conventional modelling. **Our sector brings people together, builds community wealth and tackles big problems like poverty, inequality, exclusion and loneliness.** As Wales recovers from COVID-19, struggles with a cost of living crisis, and transitions to net zero, Community Transport is perhaps more important now than ever before.  The Community Transport sector has always involved a collaboration between paid staff and unpaid volunteers. As community-led organisations, the sector is well placed to harness the knowledge, skills and expertise of professionals alongside the energy, enthusiasm and diversity of communities to deliver transport solutions and build community wealth and well-being. Volunteers are the lifeblood of the Community Transport sector and wellbeing assessments of transport schemes need to consider the community cohesion aspects of services which provide high quality and rewarding volunteering opportunities.  The recognition within the NTDP of the importance of volunteers to the establishment, governance and delivery of community-led transport solutions is welcome, as is the commitment to provide an accelerated skills / training programme and peer mentoring for volunteers working for Community Transport organisations across Wales. **CTA believes that additional support is required to help operators with recruiting volunteers, as the sector has been affected by a significant loss in volunteer numbers due both to COVID-19 and the cost of living crisis.** CTA is currently leading a consortium of 11 organisations to highlight the impact of fuel rises on volunteer drivers when the Approved Mileage Allowance Payment has not been increased for over a decade. Whilst the AMAP campaign is focused on the UK Government and HM Treasury, the reality for Community Transport organisations in Wales is that without investment in volunteer recruitment many of their activities could be adversely impacted.  Also, as referred to earlier in this response, **CTA would welcome a review of the Bus Service Support Grant that increases the funding available for community transport services which are routinely delivering wider wellbeing benefits.**  As there is currently an open consultation on WELTAG, CTA will provide a separate response, simply noting here that the proposed changes to WELTAG provides a framework to support the achievement of the Welsh Government wellbeing ambitions in relation to large capital transport projects.  To deliver on the wellbeing ambitions within Llwybr Newydd, the proposed creation of more innovative and flexible services is likely to support a positive outcome, particularly in geographic ‘transport deserts’ where commercial transport options have retracted or been withdrawn, leaving individuals and communities disconnected. Following the initial pilot phase for fflecsi services, which included commercial and Community Transport operators, our sector now needs to be considered as a key stakeholder partner for new fflecsi and other demand-responsive services, and supported to deliver these services to their full potential. The value people place on their journey with a Community Transport service is very different to the value placed on public transport journeys. **The added social benefit, value, and wraparound support provided when Community Transport operators run fflecsi, or other demand-responsive services, should be included within the cost/quality matrix used to award any new contracts.**  The Community Transport sector in Wales has significant untapped potential, and an appetite to deliver a wider range of transport services that will help citizens meet their needs and connect with their communities. In order to deliver on Welsh Government’s aspirations for fully integrated transport options, and meet the wellbeing ambitions, the sector requires additional support around investment in real time information, journey planning, and mobility as a service (MaaS), to achieve parity with commercial operators to deliver fflecsi schemes. Following investment in digital capabilities and infrastructure, any MaaS platforms and projects should integrate Community Transport as far as possible and provide capacity building programmes tailored to the sector.  **Annex 2: Programmes, projects and interventions**   |  |  | | --- | --- | | **Third 5** | **Action 10**: The focus on an accelerated skills / training programme for volunteers to be widened to include the development of a Volunteering Strategy for the Community Transport Sector and a Fund to support operators to recruit new volunteers, promote uptake of Investing in Volunteers, and support a training development programme for Community Transport Co-ordinators with volunteer management responsibility. | | **Third 9** | **Action 11**: CTA to facilitate stakeholder discussions between the Traffic Commissioner, Welsh Government and the Community Transport sector regarding the regulatory environment, to ensure it supports volunteer drivers and community operations. | | **Third 1** | **Action 12**: That the reference to developing a minimum level of lifeline journey provision is included within the MOU, and CTA leads on a stakeholder working group and co-produces a service specification with the Community Transport sector and Transport for Wales for a minimum level of lifeline journey provision.  **Action 13**: Following the development of a minimum level of lifeline journey provision specification, CTA works in partnership with Welsh Government to deliver a lifeline journey pilot in selected areas of Wales. The pilot will be independently evaluated and widely disseminated. | | **Third Sector Mini Plan** (main text from p80 ) | **Action 14**: CTA to lead on a partnership project with Transport for Wales to develop a service specification and service level agreement for community-delivered fflecsi services, for use when tendering future contracts and awarding tenders, to ensure that the wellbeing element of Community Transport delivered demand responsive services are embedded in the future roll-out of any such services by Welsh Government. | | **Third 11** | **Action 15**: That a Digital Strategy for the Community Transport sector is developed, supported by a capacity building programme to improve the digital infrastructure, software and skills within the sector so operators can develop new ways of working and greater efficiencies.  **Action 16**: Agree a pilot scheme for CTA to support rural Community Transport operators to test the effectiveness and viability of emerging technologies and services, providing an evaluation of key learning. | |

Q5. To what extent, within the funds available, do you think the plan will meet the 5-year priorities set out within each of the modes and sectors mini-plans in Llwybr Newydd: The Wales Transport Strategy 2021?

strongly agree

agree

neutral

disagree

strongly disagree

Please provide any further comments here:

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| There will be challenges given the need to address the different transport modes and sectors in an equitable way due to the demands of competing interests. The Community Transport sector has always been entrepreneurial in approach, looking for opportunities to develop a range of income streams to support the delivery of their charitable aims and objectives. Funding from the Bus Service Support Grant has provided a foundation for operators from which they can lever in funding from other sources such as the National Lottery and charitable trusts to help meet rising operational costs. Accordingly, CTA has suggested prioritising the recycling and reallocation of existing funding, such as the Bus Service Support Grant, to assist with meeting some of the priorities in the Third Sector Mini Plan to underpin the growth of the Community Transport sector and equitable coverage across Wales.  With regard to the Community Transport sector, the CTA welcomes plans to launch a Community Challenge Fund to grow the community and voluntary transport sector (Annex 2, Third 3) and offer our expertise around capacity building within communities to develop tailored transport solutions. Our team in Wales has the expertise to promote the Fund and provide practical support to help existing community transport schemes to apply, as well as working with communities to encourage the establishment of new schemes in areas which currently lack any provision.  Having administered grants to the sector on behalf of Welsh Government, such as the £1million ULEV fund and the £1.1 million Western Valleys Project and the £500,000 Winter Pressures funding, CTA has considerable in-house knowledge and skills around reaching community groups that are often under-served and unable to access funding without support. **Having already established a common grant administration and monitoring framework across these three grant funded projects this know-how could be used for the new Community Challenge Fund** outlined in the NTDP Third Sector Mini Plan.  Furthermore, this expertise could assist Welsh Government with its plans to offer grants to community and voluntary transport for the uptake of zero-emissions vehicles (Annex 2, Third 4) and to create a fund for local Community Transport groups for the purchase of e-bikes (Third 7). The learning from CTA’s administration of grants in Wales recently led to the development of a Grants Plus programme in our England Directorate as our Wales Team supported colleagues to bid for and administer a Tackling Loneliness Through Transport Grant on behalf of the Department for Transport. The Grants Plus model focuses on identifying learning in real-time across multiple community transport projects, providing capacity building support for operators to help embed pilot projects into their mainstream activity, and peer support to enable operators to make new connections and provide a platform for knowledge and skills exchange.  Through our ongoing capacity-building work with the Community Transport sector in wales, the CTA team are often able to support operators to lever in external funding to supplement any available grant funding from Welsh Government, adding value to the Welsh Government investment and enhancing the development of operators.An example of this is our previous Connecting Communities in Wales programme which assisted Community Transport operators to lever in over £2million in funding to develop services.  **Annex 2: Programmes, projects and interventions**   |  |  | | --- | --- | | **Third 3** | **Action 17**: CTA manages and administers the Community Challenge Fund in 2023 / 2024 for the Community Transport sector on behalf of Welsh Government, to improve geographical coverage, strengthen capacity, and enhance hours of operation. To provide a Grants Plus Package for successful applicants and an evaluation report on impact. | | **Third 4**  **Third 7** | **Action 18**: CTA manages and administers a Net Zero Fund for the Community Transport Sector on behalf of Welsh Government, to administer grants for the uptake of Zero Emission vehicles and the purchase of e-bikes. To provide a Grants Plus Package for successful applicants and an evaluation report on impact. | | **Third 10**  **Third 11** | **Action 19**: CTA oversees an electric vehicle Community Car scheme trial in three areas of Wales to encourage community-owned transport schemes.CTA to support operators in the chosen areas, identify the critical success factors and resources required for wider application, and co-develop a Blueprint Business Model. | | **Third 6** | **Action 20**: Working collaboratively with Welsh Government and Transport for Wales, CTA establishes Trailblazer Neighbourhood / Community Transport Partnerships in two areas of Wales to identify challenges and key learning prior to roll-out. CTA to facilitate and support the engagement of operators, identify transport priorities, and build operator capacity. | | **Third 8** | **Action 21**: CTA to use the Trailblazer Neighbourhood / Community Transport pilot to work with Transport for Wales to explore maintenance support for the Community Transport sector at bus garages within the two pilot sites prior to any national extension. | |

Q6: Do you think the plan provides the right balance between the modes and sectors to meet the Welsh Government ambitions set out in Llwybr Newydd: The Wales Transport Strategy 2021?

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| CTA considers that the plan provides the right balance between the modes and sector to meet the Welsh Government ambitions set out in Llwybr Newydd / Wales Transport Strategy 2021. We recognise that there is a difficult balance to strike between competing priorities, within the context of the climate and nature emergency and the cost of living crisis, in a challenging budgetary context. We are pleased to see that Welsh Government continues to give equal weighting to the importance of Third Sector transport alongside other modes, and by making commitments to action are recognising the importance of this vital sector to so many people across the country.  One additional comment to note is that the Bus Mini Plan refers to evaluating the different fflecsi models to determine its future while the TfW Business Plan refers to developing a ‘five-year plan for fflecsi’. There have been two Community Transport fflecsi pilots, and the sector would like to participate in further opportunities to become involved in any roll-out of these services. CTA would welcome discussions with Welsh Government and Transport for Wales about how Community Transport fits into any proposed plans to develop fflecsi services, and how they might work within other rural areas as well as potentially linking passengers living in more outlying areas to the developing Metro schemes in north, mid and south Wales.  **Annex 2: Programmes, projects and interventions**   |  |  | | --- | --- | | **Third 11**  **Third 12**  **Third Sector Mini Plan from p80** | **Action 22**: CTA suggests that further community-led fflecsi pilots are developed in four areas of Wales, enhancing the two schemes from 2022 and extending to two new areas in 2023. CTA would work in partnership with Welsh Government and Transport for Wales to apply the learning from the four areas to develop a five-year plan for community-delivered fflecsi services. | |

Q7. Do you think the Integrated Sustainability Appraisal Report identifies the most important sustainability issues relating to the plan?

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| CTA agrees that the Integrated Sustainability Appraisal Report does identify the most important sustainability issues relating to the plan, although **we would welcome strengthening ISA Objectives 2,6 and 8 to better reference the role that Community Transport will potentially play in achieving these objectives.**  **ISA Objective 2**: **To create the conditions within which improvement in social cohesion and equality can be achieved.** Reference is made to the NTDP recognising the ‘essential use of private cars in rural communities’ and considering ‘ways public transport options could be improved in these areas’ such as fflecsi demand-responsive services.  Given the climate emergency and need for modal shift within a short timescale, ISA Objective 2 could have a much stronger focus on weighting the growth of the Community Transport sector in rural communities to provide accessible and affordable alternatives to private car use. Just over a third of Wales’ population live in rural areas and in order for them to access key services and facilities they typically need to travel longer distances than those living in urban areas. Taking a strategic approach to the start-up and development of community car schemes, dial a ride services and car clubs, in areas where such services do not currently exist, would be a more cost-effective and sustainable solution than ‘maintaining and enhancing the road network’ for private car users. The proposed Community Challenge Fund could focus funding largely on sector development in rural communities to help level up after years of underinvestment in public transport in these communities.  **ISA Objective 6: To reduce greenhouse gas emissions from transport.** Reference is made to greater support for electric vehicles and community transport, but states that any enhancements are unlikely to allow people living in rural areas to travel as efficiently, sustainably or to make the most of low-emission vehicles as those living in urban areas.  We greatly welcome the support for the Community Transport sector throughout both the NTDP and ISA Report, and would suggest that recognition needs to be given to address the need for a sector-wide Decarbonisation Strategy. This would link to our proposal to run a pilot to test and learn from the decarbonisation challenges currently facing the sector, resulting in specific information that can be used to develop a Decarbonisation Strategy. There is enormous potential for the sector to assist and support Welsh Government in achieving its modal shift targets, and in encouraging behaviour change, even in areas that have traditionally had high private car ownership / car use due to rurality.  **ISA Objective 8: To protect and improve air quality.** Reference is made to the NTDP seeking to support the continuing transition towards cleaner vehicles, electric vehicles and other modes of transport that adopt innovative technologies such as hydrogen. We refer again to the points made above and the need to start work as soon as feasible on decarbonising the Community Transport fleet. This could build on the exciting work that has already begun, albeit in a small way, through the Community Transport ULEV project which CTA administered on behalf of Welsh Government.  **Table 2.2 Key sustainability issues and opportunities in Wales, identified during the review of baseline conditions** There is a clear omission within this table under Wellbeing Goal 3: A healthier Wales and a more equal Wales. While the CTA is fully supportive of the principle of ‘provisioning the inclusivity of public transport to allow everyone to have the same level of access’, it has to be recognised that for some people public transport will never be fully inclusive due to their need for door-to-door provision and supported transport that caters for their disability or physical or mental health conditions. Community Transport offers, for many people, the only viable journey provision that is individually tailored to meet their needs. The inclusion of Community Transport within the public transport spectrum of travel options is a key way in which the NTDP will meet its equality, inclusion and accessibility goals, and we would like to see recognition of this given a much higher profile. |

Q8. Do you have any further feedback or comments on the plan?

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| Our members welcome the opportunity to work alongside Welsh Government and Transport for Wales in the plans to develop transport services that are integrated, accessible, affordable, flexible, and low carbon. The Community Transport sector has continued to grow at a time when conventional public transport has contracted. Moreover, these community-focused services directly improve the wellbeing of people who use this form of passenger transport, making community transport integral to the conversation about Wales’ future passenger transport.  CTA recognises the breadth of vision for an integrated transport network, and particularly appreciates the emphasis on equality and inclusion throughout Llwybr Newydd, Bws Cymru, One Network, One Timetable, One Ticket, and culminating in the NTDP. The NTDP is the initial five-year plan to begin implementing Llwybr Newydd, and as such has to be seen in the context of the twenty-year framework of the Wales Transport Strategy. It would be useful to consider how the actions and programmes in Annex 2 can be built upon / extended within successive years following this first phase – that is, **to think about the cumulative positive impacts that will be developed over a longer time-frame.** Providing some additional detail around this may be more relevant when Mini-Plans are worked up more fully for each of the transport modes and sectors.  **Annex 2: Programmes, projects and interventions**   |  |  | | --- | --- | | **Third 1- 13** | **Action 23**: CTA to take the lead on developing the Third Sector Mini Plan, for the Annex 2 Third Sector actions and programmes, siting them within a longer-term framework so that any work begun in the first five years can be enhanced in successive years. | |

Question A: We would like to know your views on the effects that the National transport delivery plan would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.  
  
What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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| Potentially there could be positive impacts on the Welsh language, such as through developing clear standards for bus operators and the wider transport sector to deliver services bilingually, including the development of bilingual information.  The Community Transport sector will contribute to these positive impacts by developing services that enable people to attend cultural and sporting events, by increasing the number of operators with staff and volunteers who can speak conversational Welsh, and through providing updated information materials / websites in both Welsh and English. **CTA will work with our sector to co-produce a Passenger Charter which will include clear Welsh Language standards**, and potentially linking the Charter and standards to any revised Bus Service Support Grant for the sector would reinforce the commitment to continuous development to delivering services bilingually. |

Question B: Please also explain how you believe the proposed policy, National transport delivery plan 2022 to 2027, could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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| No additional comments. |

Question C: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

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| To address a couple of additional points that have not been covered elsewhere in our response:  **Active Travel (AT) Mini Plan** – CTA would like to explore opportunities for the Community Transport sector to link into the AT Network Maps prepared by local authorities as they refresh their Integrated AT Networks every three years based on consultation with people with protected characteristics, children and young people, and those who do not currently walk or cycle for local trips. There is potential to link schemes, for example, operators such as O Ddrws i Ddrws and their Coastal Bus, and Partneriaeth Ogwen’s Bws Ogwen, that support local residents and visitors to access AT routes.  **The CJCs** - The NTDP has confirmed CTA’s belief in the importance of having Community Transport representation within CJCs as they develop the Regional Transport Plans and set the policy to deliver Llwybr Newydd at a local and regional level. As the Regional Transport Plans will be aligned to the Metro and Transport Decarbonisation Programme, providing a strategic framework for the Local Authorities to deliver within, effective and early involvement of the Community Transport sector is essential. When designing local and regional transport plans, the Community Transport sector’s cost-effective and extended reach into communities furthest from the public transport network will be invaluable to the realisation of Welsh Government’s ambitions in Llwybr Newydd, Bws Cymru and One Network.  CTA welcomes the Welsh Government’s vision of a single, integrated approach to supporting communities to access a public transport system that works for them. This is in direct contrast to the approach taken in England where we are already seeing the challenges inherent in 300+ local authorities making decisions and delivering plans which are disconnected, fragmented and short-term in nature. We believe Llwybr Newydd has created a constructive framework for a Wales-wide approach which draws on local and regional knowledge and experience, utilising the expertise of local authority officers without overburdening them with bureaucracy and this plan is key to delivering the first phase of the work. We look forward to working with Councils, and the newly launched CJCs, to connect them with the Community Transport Operator network and the people who benefit from their services, in order to ensure development of an accessible, inclusive and co-produced transport network fit for future generations.  **Mini Plan freight and Logistics** Welsh Government’s ReAct programme has supported unemployed and redundant workers to gain the skills sought by employers, with over 800 people supported to gain an LGV licence. The NTDP states that “our Personal Learning Account programme includes a number of logistics and automotive courses and qualifications and we are consulting partners on expanding this further within the sector”. CTA would welcome a discussion about how the ReAct programme and apprenticeships could be developed within the Community Transport sector.  To conclude, CTA looks forward to continuing our supportive relationship with Welsh Government and Transport for Wales colleagues to transform the far-reaching ambitions outlined in Llwybr Newydd into positive change in local communities. We share the Welsh Government’s vision whereby active travel is the natural option for short distances, whilst public and community transport becomes the preferred choice for longer journeys.  **The focus on inclusivity and access throughout the NTDP must underpin all the delivery actions that follow, as no one in our community should be excluded from access to services or amenities because of a lack of appropriate transport. For anyone unable to walk even short distances or to cycle or use public transport due to poor health, disability, or mobility issues, Community Transport is the first and only choice.** |