



**Northern Ireland's 2030 & 2040 Emissions
Reduction Targets & First Three Carbon Budgets &
Seeking views on Climate Change Committee (CCC)
Advice Report: The path to a Net Zero Northern
Ireland.**

A Response from CTA

October 2023

Introduction to Community Transport and CTA

Community Transport Association (CTA) champions, connects, supports, and grows the UK's Community Transport sector and our mission is providing accessible, inclusive, and sustainable transport for all. CTA in Northern Ireland has circa 100 members who operate in urban and rural communities. The sector encompasses community-led solutions to local transport needs, playing a critical role in meeting unmet transport needs. CTA members deliver a diverse range of adaptable, cost-effective, and innovative services, which are always for a social purpose and non-profit. Our members are practical and passionate problem solvers who deliver services which fight poverty and inequality; tackle isolation, exclusion, and loneliness; reduce carbon emissions, air pollution and congestion. Community Transport facilitates modal shift away from private cars to more sustainable modes such as minibuses and car share. The sector delivers shared transport services – such as dial-a-lift, patient transport, school transport, 'wheels-to-work' and minibus hire. Many older and disabled people, as well as those in deprived households or marginalised neighbourhoods are most likely to be underserved or excluded by public transport and least likely to be able to afford or own a private car. Many rely on Community Transport to access amenities, education, employment, family and friends, health & social care, and other public services. Most Community Transport vehicles are minibuses which are wheelchair accessible. Drivers are professionally trained to assist with health or mobility issues and often deliver door-to-door support to passengers.

CTA's Position

CTA very much welcomes the opportunity to respond to this very important consultation on the Emission Reduction Targets & First Three Carbon Budgets and the capturing of views on the CCC advice report on: The path to a Net Zero Northern Ireland. Within this response we are very much focusing on the role that Community Transport can play to enhance the CCC advice on decarbonisation for Northern Ireland which we will outline within this document.

Community Transport is essential for community-led climate action in Northern Ireland. It can offer sustainable transport solutions that are delivered by local charities, community groups and social enterprises. It can also help rural communities and other members of society to transition to net zero emissions in a fair and inclusive way. Community Transport deserves recognition from the government as a valuable partner to support the decarbonisation of transport in Northern Ireland.

Impacts on the community transport sector in Northern Ireland

CTA believes that a just transition to net zero for the community transport sector requires a clear and consistent decarbonisation strategy, which supports not-for-profit organisations by providing long-term assurance over capital investment and planning based on the sector's needs. The CT sector faces complex and challenging decarbonisation issues due to the lack of suitable zero emission vehicles on the market that meet the passengers needs and the high cost of replacing traditional internal-combustion engine vehicles. The sector also needs suitable infrastructure that caters to its specific requirements. These challenges can be overcome, and we have outlined within this document how that can happen.

Infrastructure & Electricity Supply

For transitioning to be successful, there needs to be an extensive roll-out of high-speed electrical connections in both the depots and in the community with the electricity supply to deliver the charging network requirements. This example is helpful to explain this point: A CT operator in NI, to charge CT vehicles onsite the operator would require 10 x 22kw chargers, the chargers require a 3-phase electrical supply which is not readily available. When the operator spoke to the NIE (Northern Ireland Electric) when considering a move to new premises which only had a single-phase supply, the operator asked about the possibility of 3-phase, and they replied that there wasn't enough electricity supply in some areas of Northern Ireland and to achieve the levels needed it would require government investment. CTA's understanding that the electricity network across NI would require considerable investment for our members to be able to consider transitioning their fleets to electric. We need infrastructure capable of being used by minibus operators, consideration must also be given that certain CT operators run their services from rented sites. This will create barriers when investing in charging infrastructure as there are additional risks to be considered when investing in infrastructure as a lease may expire and the possibility to take the charging infrastructure to a new site impossible. The high-speed charging infrastructure needs in rural communities must not be overlooked; NI government departments need to understand that the commercial operators in the infrastructure delivery market will not be prioritising remote, rural areas. There needs to be a government policy designed to ensure no rural community is left behind. Lessons should be learnt from the roll out of the high-speed internet across the UK, it required a joined-up government backing to deal with the gaps of service delivering across the UK and those most disproportionately impacted was those living in rural communities the same must not happen when it comes to the rolling out of electric vehicle charging/ refuelling infrastructure that includes a joined up approach. Community Transport sector will require a comprehensive charging infrastructure be it electricity or hydrogen that meets the specific needs of the sector. This will require government investment as the CT sector does not have the means to be able to invest in the creation of the infrastructure, given the nature of this not-for-profit sector and the financial burdens that would put onto

organisations already running on limited budgets. Community Transport would need to be involved in the planning/ development stage of creating local charging infrastructure to ensure that the needs of the sector are met, there are multiple examples already where the infrastructure has been installed however it doesn't meet the needs of the community transport operators, charging bases are not the right size for the vehicles, charging points aren't compatible with the vehicles, charging points are regularly in use or if they are out of service they are not being fixed quickly enough are problems that electric minibuss operators are facing currently. The reliability of the charging network is not where it needs to be and there isn't confidence in the charging network. The CT sector would also be keen to note that operators would require government funding to support the infrastructure needs especially in the early phase and there needs to be technological advancements to reduce costs and improve range/battery capacity.

Cost of Zero-emission vehicles

The cost of zero-emission vehicles (ZEVs) is considerably more than the cost of an Internal Combustion Engine (ICE) vehicle, on average a new electric minibus is between £110,000 - £130,000 compared to a new diesel minibus would be approx. £60,00-£72,000. For not-for-profit operators the expense of purchasing the vehicle is too much to be able to undertake without some form of government financial support helping with the transition from diesel to ZEV's.

CTA is concerned that for operators, the cost could be a barrier for them to continue their services given that many of the operators run with very modest income and do not have a means to generate a profit to invest in the ways that commercial operators can. There has been discussion around the potential for conversion/retrofitting options to move from diesel to electric vehicles, but this is extremely immature market but a market that should be continued to be monitored and explored. Without regulation, standards or government oversight set on this type of conversion approach to decarbonising a vehicle, it is not a form to decarbonise that we can rely on currently. Additional costs should also be noted which would be additional running costs which are higher when compared with operating ICE vehicles, specialist mechanical costs and higher insurance premiums to name a few.

Range

There are several issues when it comes to addressing the issues regarding the current range of ZEV's. The range of ZEV falls short of the needs of operators especially operators working in rural communities, given rural terrain and a lack of mid-journey charging infrastructure, CT operators are unable to undertake the same level of journeys, thus impacting the service delivery to the members who use the service. Some CT operators would consider EVs currently too precarious when carrying elderly/disabled passengers if there is a risk that the vehicle may run out of battery (range-anxiety). At present, no manufacturer can give range with

confidence, with early learning from the Northern Ireland pilot indicating 80-mile range. It is also important to note when considering range, that the degree of rurality will have a massive impact. Specific consideration needs to be given to the challenges of 'deep rural' areas which have exceptionally low population densities and large expansive area. Often, the deep rural areas will be marked by challenging topography which place greater demands on an EV than are experienced in more metropolitan and urban areas. EV's do not operate well in:

- Damp and wet conditions
- Hilly type typography
- And, on long runs, as they depend on braking to help recharge.
- Loading of the vehicle, with the greater the number of passengers the lower the distance the vehicle can travel.

Managing the journey capability of the EV adds another level of complexity to journey planning, it requires dedicated expertise on the limitations of the vehicle and details of the journey ensuring it matches the vehicle's capabilities. This expertise requires investment in training, another outgoing that needs to be taken into consideration. This would be lessened by longer range vehicles, and if there is the mid-journey charging infrastructure in place. In urban areas there are a different set of challenges and risks still to be considered, the mid-journey fast charge infrastructure isn't where it needs to be and for a lot of our members mid-journey charging is not a viable option for operators as there are specific issues around driver hours, finding charging point that can accommodate the size of the vehicle, waiting for such charging points to become available and finding charging points that fast charge the "over-sized" battery packs as compared to multi-purpose-vehicles.

What government can do to support the decarbonisation of the community transport sector.

- Recurring multi-year investment in the sector to provide financial support to phase out the ICE minibuses
- Incentives put in place for the technology sector to move smarter and faster to bring more zero-emission minibuses onto the market which have a longer range / battery life / lighter, fully operational via the battery and that heating system/using the tail-lift doesn't have a massive impact on the mileage range
- Create the charging infrastructure across NI which will be suitable for the charging of minibuses understanding the bespoke needs of the Community Transport sector
- Understand the unique nature of the Community Transport sector and support community transport operators who do not own their own premises have access to charging infrastructure. Joining up with commercial operators to share their infrastructure resources and that there are incentives in place for commercial operators to support local community transport operators in this way.

- Government support would be required to cover the cost differential between ZEVs and internal combustion engine (ICE) models. Either incentivise the ZE minibus manufacturing market to reduce the cost of their vehicles or provide grants for the community transport sector to go towards the purchasing of new ZE minibuses or indeed an attractive scrappage scheme like that which we have seen in the private vehicle sector over the years.
- Vehicle Maintenance – there would need to be a review of the current capabilities around the maintenance of vehicles, mechanics need to be upskilled in the maintenance of an EV fleet.
- CTA would like to see a decarbonisation pilot scheme launched as soon as feasibly possible. Within that scheme it would pilot exactly what is needed to serve a region with zero-emission vehicles, we can test and learn exactly what needs to be in place to effectively decarbonise the entire sector, practical lessons can be learnt. CTA would be willing to support in the planning and delivery of such a scheme and has the expertise and structure in place to support the undertaking of the pilot.
- Community Transport cannot cover the financial burden of installing dedicated charging/refuelling infrastructure, particularly expensive grid connections, we would require investment to cover those costs or looking at joining up with the current public transport infrastructure and sharing facilities.
- Investment in the development of the hydrogen minibus market, currently there are no hydrogen minibuses for sale within the UK and from our research limited worldwide. This is a potential market which would support the decarbonisation of the rural areas while waiting for the electric capability to catch-up to the needs of rural communities.
- Given governments potential investment in a nationwide network of hydrogen refuelling stations it would support the CT sector greatly if hydrogen development was also focused on minibuses and the sector could make use of the hydrogen refuelling stations.
- Community Transport would welcome a national scrappage scheme to provide an incentive to our members to scrap their ICE in favour of the ZEV, however this scheme would be of no benefit if the infrastructure, weight, range, and ongoing maintenance costs were not addressed.

Community Transport as a partner to support decarbonisation (Modal-shift)

Community transport is a term that refers to various types of transport services that are provided by the community, for the community, often using volunteers or social enterprises. Community transport can play a role in modal shift by offering alternatives to private car use, especially for people who have limited access to public transport or active travel options. Within the Carbon Budget Consultation it states that: There must also be an increased proportion of journeys made by walking and cycling to improve public health and air quality

alongside reducing greenhouse gas emissions¹. However, within that statement consideration is not given to people who cannot walk or cycle due to barriers which can include age or people with a disability. Community transport can be a solution to address these barriers.

Some examples of how community transport can support modal shift are:

- Community bus services: These are bus services that are run by local groups or organisations to meet the specific needs of their community, such as connecting rural areas, serving elderly or disabled people, or providing links to employment or education. Community bus services can complement or supplement existing public transport networks and reduce the need for car trips. For example, the dial-a-lift service operated by Northern Ireland's 11 Rural Community Transport Partnerships provides door-to-door transport.
- Car clubs and car sharing schemes: These are schemes that allow people to share cars with others, either by renting a car from a pool of vehicles, or by offering or requesting a lift from someone who is travelling in the same direction. Car clubs and car sharing schemes can reduce car ownership and car dependency and encourage people to use other modes of transport for some of their journeys. Car clubs and car sharing schemes have been growing in popularity in Scotland, England, and Wales. CTA would like to work with NI Government to remove barriers that are in place now in Northern Ireland when related to car sharing so CTA can work with local communities to grow this way of decarbonisation.
- Bike schemes and bike libraries: These are schemes that provide bikes for people to use for free or for a small fee, either for a short-term loan or for a longer-term rental. Bike schemes and bike libraries can promote cycling as a mode of transport and increase access to bikes for people who cannot afford or store their own.

Community transport can also work in partnership with other modes of transport, such as rail, bus, walking and cycling, to create integrated and seamless journeys. For example, community transport can provide feeder services to rail stations or bus stops or offer bike racks or bike hire facilities at their hubs. Community transport can also engage with local communities and stakeholders to raise awareness and understanding of the benefits of modal shift, and to identify and overcome barriers and challenges. By doing so, community transport can contribute to transport decarbonisation, social inclusion, health and wellbeing, and local economic development.

CTA would like to see after this consultation that Community Transport is included when modal-shift is being considered alongside, walking, wheeling and public transport.

Section 22 Permit and Digital Demand Responsive Transport

CTA would call on the Northern Ireland government to introduce a similar permit arrangement in NI as there is in GB (Section 22 permits) which allows community transport operators provide

¹ [Carbon Budget Consultation Document FINAL.pdf \(daera-ni.gov.uk\)](#)

transport for members of the general public by way of a local registered bus route². This would be a great way to support the increase of bus services especially in rural areas and support the modal shift away from car usage to a shared transport model. This can be further enhanced with the introduction of Digital Demand Responsive Technology (DDRT), which is a type of transport service that uses technology to match the demand and supply of transport in real time. DDRT can support decarbonisation by:

- Reducing the number of vehicles on the road, and thus the emissions from transport, by optimising the use of existing vehicles and avoiding empty or underutilised trips.
- Encouraging modal shift from private cars to shared or public transport, by providing convenient, flexible, and affordable transport options for users, especially in areas where conventional public transport is not available or viable.
- Promoting the use of low-carbon or zero-emission vehicles, such as electric or hydrogen vehicles, by integrating them into the DDRT fleet and providing charging or refuelling infrastructure for them.
- Enhancing the integration and interoperability of different modes of transport, such as rail, bus, bike, and walking, by providing seamless and multimodal journeys for users, and enabling them to access information and payment through a single platform.

The Department for Transport's plan for decarbonisation is a document published in July 2021, which sets out the government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes a pathway to net zero transport in the UK, the wider benefits net zero transport can deliver, and the principles that underpin the approach to delivering net zero transport. The plan covers all modes of transport, such as road, rail, aviation, and shipping, and outlines specific policies and measures to reduce greenhouse gas emissions from each sector.

The role of DDRT and DFT plan for decarbonisation is to work together to achieve the vision of a net zero transport system in the UK by 2050. DDRT can help implement some of the policies and measures proposed by the DFT plan, such as providing on-demand public transport services, integrating with other modes of transport, and using low-carbon or zero-emission vehicles. DDRT can also complement the DFT plan by addressing some of the challenges and gaps in the existing transport network, such as providing transport options for people who have limited access to public transport or active travel options, serving rural areas or areas with low demand, and offering flexible and affordable transport solutions for users. DDRT can also contribute to the wider benefits of decarbonising transport, such as improving air quality, health and wellbeing, social inclusion, and local economic development³. We appreciate that transport in general is devolved to NI, but there are certainly learnings that could be taken from this plan and the role of DDRT on how we go about decarbonising the transport sector in Northern Ireland which could also be applied in Northern Ireland.

² [Application for a section 22 community bus permit \(PSV368\) - GOV.UK \(www.gov.uk\)](#)

³ [Transport decarbonisation plan - GOV.UK](#)

Question 14. Transport Sector Contribution to Net Zero: Do you think that the Northern Ireland Executive should follow the transport sector advice provided by the CCC?

Yes, but they do not go far enough, there is a role for community transport and the community sector to play in supporting decarbonisation, and it needs to be the government's role to lead and support that. There are multiple examples from Scotland where the government supported the funding of grassroot community-based projects which contribute to decarbonisation, examples of these can be read in CTA Scotland's Act Local report⁴. CTA is arguing for a place for Community Transport within Northern Ireland's decarbonisation plans. There are many benefits for the inclusion of Community Transport, including the reduction of carbon emissions, improved air quality, and increased accessibility to sustainable transport options which in itself has a raft of social, health and economic benefits.

Conclusion

CTA would call on DAERA and DFI to give serious consideration to the points raised throughout this consultation without losing sight of who the Community Transport sector serves. It is delivering services which connect communities, delivers services for the most vulnerable of society including our elderly and those with disabilities and is presently adding immense value in terms of modal shift and decarbonisation by virtue of reducing the need for individual single vehicle journeys. The sector is operated by a dedicated network of staff, many of whom are voluntary who provide an invaluable service they are proud of, they play an important and often unseen role, and they need our support. Community Transport should also very much be viewed as a partner to support decarbonisation and a catalyst to bring about change at a community level. CTA is keen to work with Northern Ireland's government Departments on the planning and delivery of the decarbonisation and we feel we are best placed to be able to help facilitate that with governmental support.

⁴ [Act-Local-CTA-2023.pdf \(ctauk.org\)](https://cta.uk.org/act-local-cta-2023.pdf)

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The Community Transport Association (CTA) is the UK charity that represents and supports providers of Community Transport. Our 1200 members across England, Wales, Scotland, and Northern Ireland are local charities and community groups which provide transport services always for a social purpose and never for profit. We believe in accessible, inclusive, and sustainable transport for all.