

## **Written Evidence to the Joint Inquiry on Air Quality**

Submitted by the Community Transport Association (CTA)

**The Community Transport Association (CTA)** is the national charity that represents and supports providers of community transport: thousands of local charities and community groups across the UK that all provide transport services which fulfil a social purpose and community benefit.

Our vision is of a world where people can shape and create their own accessible and inclusive transport solutions and our mission is to achieve this through championing accessible and inclusive transport, connecting people and ideas, and by strengthening our members and raising standards.

We do this through contributing to the formation of public policy that affects our members and our sector, showing how better outcomes are achieved for people and communities when they have access to community transport. We create partnerships with like-minded organisations across all sectors; manage a national programme of quality assured education and training; provide comprehensive advice and guidance to those delivering community transport; and we take every opportunity to champion the vital and indispensable work that our members do.

We are responding to this inquiry to bring to the committee's attention the potential impacts of clean air zones on community transport operators. CTA believe that clean air is a vital consideration on how we want our society to live, work, and travel. This must be considered alongside the role community transport plays in getting people out of their homes. There is a real risk that adding additional costs to community transport operators could drive them off the road.

In this response we have chosen not to highlight every issue but focus on the introduction of clean air zones.

## **The Current Configuration of Community Transport in Cities**

1. Community transport operators can be found in every city across the UK. Our 1,600 members work to deliver inclusive and accessible transport to those who often cannot access other modes of transport. In cities, our members play a vital role in connecting people to key infrastructure sites such as medical facilities, social hubs, and the shops. It is easy to imagine that people in cities have access to a variety of transport modes, however, if the first and last leg of a journey is inaccessible, people can find themselves unable to get to where they need to be.
2. Community transport uses and adapts conventional vehicles to do exceptional things – always for a social purpose and community benefit, but never for a profit. Across cities our members use cars, buses and minibuses to transport passengers.
3. Operators will usually run two types of service. They will run services under a section 19 permit where member's sign up to use a service and then pay fares, or they will run services under a section 22 permit where operators will act like a conventional bus service. A section 19 permit would most often be used to fulfil a particular unmet community need, such as lack of transport options to a local facility, while a section 22 permit would often be used to fill a gap in the transport network, unmet by commercial operators.
4. Community transport operators upgrade vehicles as and when they have sufficient capital to do so. The Department for Transport's Community Minibus Fund provided a one off new pool of vehicles to community transport operators across England. The availability of funds, and infrequent availability of grants, means that many community transport operators will rely on diesel minibuses which use Euro V or Euro IV engines.

## Clean Air Zones

5. One of the measures set out in the, *UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations: Detailed Plan*, lays out the scope of clean air zones which local authorities may choose to deploy<sup>1</sup>. The plan lays out the possibility for local authorities introducing clean air zones in cities, analogous with the ‘T-Charge’ in London. The plan aims to empower local authorities to restrict the use of more polluting vehicles in cities.
6. CTA believes that clean air is an important issue facing all parts of the UK. We are supportive of steps to improve air quality across our cities and we acknowledge that vehicles are a contributor to poor air quality. It is important however that we also acknowledge that the current arrangement of clean air zones risks impeding the work of community transport operators.
7. Our members often do not have access to the capital necessary to upgrade vehicles to a higher emissions standard. This is for a number of reasons. Primarily, as organisations are run on a charitable basis it is difficult to accumulate the necessary capital to buy new vehicles. A new standard minibus, which is more likely to be compliant with clean air zone requirements, can cost in the region of £40,000. Upgrading engines to meet the required standards is also equally prohibitive. Again, this will make it more difficult for our members to upgrade to the required standard.
8. The second major barrier for our members is that they are limited to the ways in which they can raise additional capital. Many smaller organisations would be reliant on voluntary funds to raise enough money for a new minibus. Clearly it would be difficult to raise enough money through voluntary donations for a new vehicle of this standard.
9. Compounding these issues, the new clean air zones will inevitably rapidly devalue vehicles which do not currently use Euro VI engines. This means that there isn’t the possibility of trading in older vehicles to raise funds for new vehicles.

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<sup>1</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633270/air-quality-plan-detail.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf)  
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## Potential Consequences

10. Many community transport operators will be unable to upgrade their vehicles to the required emissions standards, or pay ongoing charges to enter into clean air zones.
11. This will leave them facing two options. The first, is that they reduce the services they provide in city centres to avoid clean air zones. As a large portion of community transport users have disabilities, or are older, there is a risk that service users will have to be dropped off away from local amenities. This is likely to be a particular issue where users feel unconfident using other modes of travel.
12. Furthermore, for service users who are completely dependent on community transport, this will make them either have to choose to use services elsewhere, or access more expensive transport options to get to where they need to be. For community transport operators, this could mean a vital loss of income, and further restrict their ability to raise funds for new vehicles.
13. The second option would be that a community transport operator chooses to use a different configuration of vehicles to make trips. For example, depending on charges and engine configuration, an operator may choose to use multiple cars rather than a single minibus. Although this may reduce individual vehicle emissions, it will have a knock on impact to congestion, and pollutants more broadly.
14. Finally, it is important to make the committee aware that as community transport continues to face uncertainty in the light of the Department for Transport's 31<sup>st</sup> July letter clarifying their view of licensing regulations<sup>2</sup>, a sudden new charge to vehicle use could cause further uncertainty throughout the sector.

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<sup>2</sup> <http://www.ctauk.org/UserFiles/Documents/170731-DfT-Letter-to-Permit-Issuers-GB.pdf>

## **Community Transport Association Questions to Consider**

15. In analysing the new air quality plan CTA has arrived at a number of areas we would like the committee to consider:
16. Currently, there is a lack of clarity over the funding community transport operators can access to upgrade their vehicles and engines. We ask the committee to consider not only the scope of current funds, and the guidance that surrounds it, but the possibility for new funding.
17. Local authorities are able to exempt community transport from clean air zones under current guidance. We ask the committee consider how the unique financial arrangements and often marginality of services can be protected through appropriate guidance to local authorities
18. The introduction of the new Ultra-Low Emission Zones in London has an exemption for 'vehicles used by disabled people that have a disabled taxation class, e.g Dial-A-Ride'. We would support such moves for the new air quality plan, and ask the committee to consider the scope and applicability of disabled passenger classes.
19. At the moment we do not believe there has been sufficient research done into the impact on these new regulations on not for profit transport. Many of the measures are predicated on the ability for organisations to raise capital for upgrading services. We believe a study should be commissioned into the impacts of new clean air quality measures into the not for profit transport sector.
20. Finally, we believe there should be funding made available for community transport operators working in urban areas to retrofit their vehicle with appropriate equipment, and to buy new vehicles where necessary, to ensure they can be compliant with new clean air requirements.

## **More Information**

Any requests for further information should be directed to:

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