

6 December 2021

FAO

Andy Robinson, Head of Fleets, Infrastructure and Low Carbon Consumers, Transport Scotland
Neil Leckie, Senior Programme Manager, Energy Saving Trust

Dear Mr. Robinson and Mr. Leckie,

Plugged-In Communities Grant Fund 2021/22

I am writing on behalf of the Community Transport Association (CTA) and our members across Scotland in relation to the 2021/22 pilot round of the Plugged-In Communities Grant Fund.

We were delighted by the launch of the Fund and its welcome focus on supporting community transport operators (CTOs) to procure zero-emissions vehicles. Decarbonisation of community transport is a key challenge for our sector as well as a major opportunity to help deliver a more accessible, inclusive and sustainable transport system.

We are pleased that the Fund will support 15 projects to procure a total of 63 Electric Vehicles (EVs). This will have a significant positive impact on people and communities across Scotland by reducing transport emissions and air pollution, as well as supporting the long-term resilience and sustainability of organisations who serve disadvantaged, excluded or vulnerable people.

We recognise that this was a pilot with a limited amount of funding. Therefore, given our objective of being a helpful partner to Transport Scotland and the Energy Saving Trust, we would like to share constructive feedback from our members to inform decision-making, design and delivery.

Level of Demand and Future Rounds

We believe that the high level of interest in the Fund and the large number of applications from CTOs makes a strong case for further rounds of the Fund in 2022/23 and beyond. It is vital that the Scottish Government continues to support our sector play its part in tackling transport emissions, reducing the distance travelled by car by 20% by 2030 and delivering a just transition to net zero.

Community transport is always for a social purpose and never for a profit. The significant up-front capital costs involved in the purchase and retrofit of EVs to meet accessibility standards are often prohibitive, especially for smaller local CTOs which are the backbone of the sector in Scotland. Further financial support to manage and meet these costs would be greatly valued by our members.

Application Process



The level of data and evidence required was generally viewed as proportionate to the level of funds. The ability to rank preferences and submit different proposals was considered a very welcome and positive innovation which could aid both parties.

Our members also valued the opportunity at the pre-application stage to join the online advice drop-in sessions facilitated by the Energy Saving Trust. They appreciated being able to speak to a 'real person'. This was considered a useful platform to resolve queries, clarify issues and support the development of accurate, robust applications. Going forward, we would be happy to collaborate on this and to facilitate direct engagement with community transport operators to encourage and improve projects or applications.

However, some concerns were raised about the process and a number of suggestions for potential improvements were made, as noted below.

Postcode checks to establish whether applicants delivered services in rural areas under the Scottish Government Urban Rural Classification, or to communities in deprived areas under the Scottish Index of Multiple Deprivation (SIMD), were conducted after applications had been submitted. Some applicants were identified to be ineligible according to these criteria. Conducting postcode checks as part of a pre-screening process would have reduced the number of ineligible applications and prevented ineligible CTOs from investing limited capacity and resources in preparing proposals.

Application Criteria

The application criteria were justifiably designed to target funding at CTOs who provide services in rural or deprived communities with the aim of addressing transport inequalities as well as reducing carbon emissions. We welcome this focus on addressing accessibility, connectivity and sustainability together and in a joined-up way.

However, some additional flexibility could have further tailored the Fund to the distinct characteristics of the community transport sector and those it serves. This could have enhanced the impact of funding or reduced the risk of unfairly excluding some operators and passengers.

The narrow use of the Scottish Government Urban Rural Classification and the SIMD as indicators of rurality and deprivation respectively may not reflect the impact and diversity of community transport services. By definition, CTOs provide accessible, inclusive services to some of the most vulnerable people in our society who face the greatest inequalities in access to transport, regardless of where they live. 85% of CTOs serve older people and 53% serve disabled people across rural and urban, more deprived and less deprived, communities.¹ Pockets of deprivation still exist in more affluent areas, and are often overlooked by rigid criteria.

For example, a disabled person living in a neighbourhood which is neither rural under the Scottish Government Urban Rural Classification, nor deprived under the SIMD, is still likely to face exclusion or isolation as a result of transport poverty and inaccessibility, and may rely on their local CTO to access amenities, education, employment, family and friends or health and social care.

¹ <https://ctauk.org/report-serving-scotland-during-covid>



To deliver a just transition to net zero, it will be critical that no category of passenger or type of operator is left behind. There will be a need for significant investment over the longer-term to support CTOs in semi-rural, urban and less deprived communities to decarbonise their fleets.

Challenges with EV Technologies and Markets

More broadly, CTOs face a number of challenges in relation to the present state of the EV market, which impeded the ability of some to apply for the Fund and discouraged others from doing so. In the meantime, many CTOs concerned about these practical considerations of affordability, infrastructure and supply are adopting a cautious 'wait-and-see' approach and purchasing petrol or diesel fuel vehicles as an interim measure.

Firstly, there is limited supply from manufacturers of the types of EVs which would meet the specific needs of the community transport sector in relation to accessibility and mileage. There are few models of Electric Wheelchair Accessible Vehicles (eWAV) which could support long distance journeys without significant delays or interruptions for recharging. It is likely to take time for EV technologies and markets to develop to meet these needs. Some CTOs have reported experiencing issues with unreliability or repeated faults with recently purchased EVs.

Secondly, many CTOs report a lack of charging points or enabling infrastructure in their region, or suitable in-house premises, to support a safe and confident transition to EVs. Smaller CTOs, such as volunteer-led car schemes, may not own or control any site or facility at which heavier EVs or EV charging points could be stored or installed or face issues with landlord permission.

Thirdly, the requirement to spend all of the funding within the same financial year was seen as challenging. Some suppliers approached by CTOs were unable to guarantee delivery within this relatively tight timescale due to delays in the supply of vehicles, parts and equipment.

Working Together

I would be more than happy to discuss this further or provide any additional information which might be helpful. CTA's work in partnership with the Welsh Government is driving forward best practice around CTOs and EVs, while we are also exploring opportunities for a UK-wide network of peer-to-peer learning and support.

I look forward to working with you and your colleagues to deliver a just transition to net zero for the community transport sector and for Scotland.

Yours sincerely,

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