



NTS2 Delivery Plan Impact Assessments

A Response from CTA

January 2022

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Summary

The Community Transport Association (CTA) welcomes the opportunity to review the impact assessments undertaken by Transport Scotland on the National Transport Strategy 2 (NTS2) Delivery Plan.

We have responded on behalf of our members in Scotland and as a champion of accessible, inclusive and sustainable transport for all. Through our membership network we get insights into the lived experience of people who cannot drive, as well as those who rarely or never use other forms of passenger transport, which we are able to draw on in contributing to wider discussions about accessibility and inclusion within, and through, transport.

Our response scrutinises the Delivery Plan's key policies and calls on Transport Scotland to:

- Restore confidence in public and Community Transport to promote a safe return to sustainable travel
- Consider additional financial support which may be required by the Community Transport sector as Scotland recovers from COVID-19
- Work in partnership with local authorities, health boards and Community Transport operators to better support transport to health and tackle health inequalities
- Build on the Plugged-In Communities Grant Fund to help the sector transition to zero-emissions vehicles and deliver a just transition
- Explore eligibility for full reimbursement under the National Concessionary Travel Scheme and the Young Persons' Free Bus Travel Scheme for operators with Section 19 permits
- Ensure clarity, consistency and fairness in the Blue Badge Scheme for Community Transport operators and passengers across Scotland
- Work more closely with Community Transport operators in rural and island communities to tackle transport inequalities

Social and Equality Impact Assessment

S5. What further actions do you think should be included in future NTS2 Delivery Plans?

In order to achieve the objectives of the NTS2, we believe future Delivery Plans should include action to:

- Explore eligibility for full reimbursement under the National Concessionary Travel Scheme and the Young Persons' Free Bus Travel Scheme for Community Transport providers operating under Section 19 permits. The status quo in effect excludes many eligible people across Scotland, especially disabled and older people or young people in rural communities, by preventing them exercising their entitlement to accessible, inclusive transport.

- Work with the NHS and National Care Service to ensure transport to health and social care services by Community Transport operators are properly funded in every local authority to tackle health inequalities and transport inequalities.
- Build on the success of the pilot round of the Plugged-In Communities Grant Fund to provide expanded and more flexible financial support for Community Transport, which empowers the sector to transition to zero-emissions fleets and maximises its potential to reduce Scotland's transport emissions.
- Expand the existing programme of station improvements to ensure Scotland's transport system is accessible for all across all modes, vehicles and locations, backed by a new national target to create momentum and set a date for delivery.
- Strengthen the Blue Badge Scheme's Code of Practice to restore clarity, consistency and fairness across Scotland for all Community Transport operators and passengers. It is important that all local authorities recognise the role and value of the sector in supporting and aligning health, social care and transport services.

S6. Would you like to comment on any of the specific policies contained within the NTS2 Delivery Plan 2020-2022?

RI-1: We will ensure active, public and sustainable travel access to employment, education and training locations, continuing to engage with those who have lived experience of transport inequalities, including delivering of our commitment to engage with young people on the future of transport. (SEQIA score: Major Positive Effect)

It is welcome that the strategic policy focus on active, public and sustainable travel includes commitments to accessibility and to engage with those who have lived experience of transport inequalities. It is important that this engagement is inclusive, meaningful and ongoing.

CTA is ready to support Transport Scotland and partners in this endeavour through our network of members and stakeholders across the Community Transport sector, which includes over 160 providers serving over 100,000 people every year. For example, many Community Transport providers support young people to access education and employment opportunities, such as through 'wheels-to-work' schemes which offer shared motorbikes, bicycles or e-bikes. It is important that new platforms and partnerships such as the Transport Young People and Employment Partnership (Action RI-1F) recognise this and engage with the sector to inform their work.

Action RI-1D notes that a review took place of the 'options, and cost and benefits, for extending Concessionary Travel across all modes of public transport to those aged under 26', which will be published in 2022. The review considered consider the options, and costs and benefits, for extending reimbursement under the National Concessionary Travel Scheme to Community Transport providers operating under Section 19 permits. We argued that such an extension would improve the affordability and accessibility of transport for several user groups, while also underlining that the scheme as currently applied to the commercial bus sector would be financially unsustainable for Community

Transport operators, particularly when reserves have already been decimated by the Covid-19 pandemic. We therefore recommended applying the scheme at full reimbursement rates, provide training opportunities and deliver the scheme nationally across Community Transport. This remains our position, although we recognise that the review concluded otherwise at this stage.

The SEQIA screening suggests that as 'disabled people already qualify for free bus travel, the effect of these actions will be limited'. However, while disabled people are indeed eligible for free bus travel, many still struggle to actually access or use it – partly because of a lack of accessible options in their area and partly because of being unable to access Concessionary Travel via some accessible Community Transport services.

RI-2: We will continue to consider additional support required for public transport and keep this under review in light of the uncertainty and other challenges presented by COVID-19. (SEQIA score: Major Positive Effect)

The COVID-19 pandemic has underlined the impact and value of Community Transport, while also creating significant new challenges, including severely reduced revenue and increased operating costs, which may require Transport Scotland to consider additional support for the sector in the near future. The sector demonstrated its adaptability, professionalism and resilience by innovating to keep vital services going throughout the pandemic. When other transport providers were unable to do so, Community Transport operators helped to protect lives and livelihoods by connecting people and communities with hospitals, care homes, pharmacies and vaccination centres.

Bus Services Operators Grants (BSOG) from local authorities have protected the continued viability of many Community Transport operators during the pandemic faced as passenger numbers and revenue decreased dramatically due to public health restrictions. It is essential that financial support continues for the sector and that Transport Scotland works with local authorities to help Community Transport operators, as well as private operators providing public transport, to recover from COVID-19.

RI-3: We will ensure transport in Scotland is accessible for all. We will support the implementation, review and development of Scotland's Accessible Travel Framework. We will also continue to support Local Authorities deliver and improve the Blue Badge Scheme. (SEQIA score: Major Positive Effect)

The Blue Badge Scheme is an important asset for Community Transport operators in enhancing and facilitating their support for the care and transport of disabled people. 53% of community transport operators in Scotland serve disabled people, while 85% support older people, often with mobility needs.

However, some members of CTA have recently reported that some local authorities have refused to renew long-standing organisational Blue Badges due to apparently new interpretation of the legal guidance which does not recognise Community Transport operators as care providers. Meanwhile, many local authorities continue to issue Blue Badges as before given their direct and indirect role in supporting staff, volunteers, patients and service users in health and social care.

We do not believe there is any evidence of abuse of the scheme by Community Transport operators to justify a change in approach. It has the potential to cause operational issues for affected operators and to undermine their ability to continue to meet the highest standards of accessibility for their service users.

It is important that Transport Scotland works with local authorities, including through the ongoing review of guidance, to restore clarity, consistency and fairness to the Blue Badge scheme across Scotland for all Community Transport operators and passengers.

RI-4: We will remove barriers to public transport connectivity and accessibility within Scotland. (SEQIA score: Major Positive Effect)

As Transport Scotland works with local transport authorities to capitalise on the Transport (Scotland) Act 2019 which empowers them to influence and improve bus services through partnership working, local franchising or running their own buses (Action RI-4A), it is important that due consideration is given to the opportunities for purposeful, cost-effective partnerships with local Community Transport operators to deliver better local services which are accessible, sustainable and community-led.

We welcome the commitment to continue to address accessibility on Scotland's rail and Glasgow's subway networks (Actions RI-4E and RI-4F). However, this remains a very limited programme of improvements, with confirmed funding for new step-free access at just five rail stations across Scotland. Accessibility should be considered essential and standard across all modes and at all stations across our national transport system. Significant additional investment in accessible infrastructure and vehicles will be required in the lifetime of this Delivery Plan to genuinely remove barriers to connectivity.

RI-8: The Scottish Government will improve sustainable access to healthcare facilities for staff, patients and visitors. (SEQIA score: Major Positive Effect)

We are pleased that the SEQIA recognises the positive role of Community Transport in supporting access to health and social care, which is the most common reason for accessing the sector's services. Community Transport helps tackle exclusion, isolation and loneliness and helps people live happier, healthier and more independent lives for longer in their own homes and communities. This reduces long-term costs for the social care system through prevention and early intervention. With demand increasing as Scotland's population ages, the need for proper investment in and support of the sector's activities in health and social care will only increase.

We therefore welcome the commitment to actively engage with 'community transport organisations, NHS health boards, Regional Transport Partnerships and relevant stakeholders to help remobilise services and improve coherence and joined-up planning for patient transport' (Action RI-8F). Community Transport is generally not brought in at the planning or design stage of health and social care services and transport. There is a need to broaden awareness and understanding of our sector across partners and stakeholders. The costs and necessary lead-in times for delivery of accessible, inclusive and affordable or funded transport in the right places is often underestimated or overlooked.

Community Transport providers need time and resources to plan and scale-up their capacity to deliver these services

Accessible, inclusive transport should be considered an integral part of holistic, person-centred care packages. Health, social care and transport services should be aligned. We agree with the need for a more joined-up, strategic approach (Action RI-8G), but this will need to be backed by long-term planning, stable public funding and genuine partnership working between the NHS, the new National Care Service, the Scottish Ambulance Service and the diversity of the Community Transport sector.

CA-1: We will reduce emissions generated by the transport system to mitigate climate change and improve air quality. (SEQIA score: Minor Positive Effect)

It is appropriate that action is taken to encourage and support a safe return to public transport in the context of COVID-19 (Action CA-1A), which should also apply to the Community Transport sector. Passenger levels remain significantly below pre-COVID-19 levels for the vast majority of operators. Our members report that this is partly due to the vulnerability to the virus of groups which tend to rely on community transport, such as disabled and older people.

It will be important that efforts to encourage a safe return to travel recognise their need for reassurance for the foreseeable future. Public health messaging must include a clear focus on restoring confidence in public and Community Transport, as well as recognising the significant, robust and often costly adaptation and mitigation efforts in line with the latest guidance which operators have taken to keep their passengers, staff and volunteers safe.

CA-2: Not taking steps to effectively manage demand for car use is no longer an option and we will therefore continue to explore effective options to manage demand. (SEQIA score: Major Positive Effect)

Community Transport can play a critical role in tackling transport emissions and reducing the distance travelled by car by 20% by 2030 (Action CA-2A). Shared transport models are inherently more sustainable, reduce the need for private car ownership and reduce the number of single occupancy journeys. The sector is also leading the way by investing in zero-emissions vehicles and innovating with active travel solutions like e-bike schemes.

However, as 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 Electric Vehicles, for example, which meet accessibility standards are often prohibitive. This is especially challenging for smaller local operators which are the backbone of the sector in Scotland. Further financial support to manage and meet these costs building on the pilot round of the Plugged-In Communities Grant Fund will be necessary to maximise the full potential of the sector in the fight against climate change.

We welcome the commitment to an ambitious transformation of place-based investment and planning to create 20-minute neighbourhoods which are accessible, inclusive and sustainable (Actions CA-2C, CA-2D and CA-2E). Transport Scotland and local authorities will need the capacity, vision and political will to implement significant structural changes to our cities, towns and villages which properly

reflect the sustainable transport hierarchy by deprioritising private cars and prioritising pedestrians, cyclists and public, community and shared transport.

Given the emphasis on the 'walkability' of our places, it will be important to recognise the role of Community Transport in supporting access to 20-minute neighbourhoods for those in very rural areas and mitigate for potential negative impacts on disabled or older people with reduced mobility.

CA-4: We will work with the Bus Decarbonisation Taskforce to co-design a pathway to a fully decarbonised bus fleet, and put in place solutions to any remaining hurdles. (SEQIA score: Neutral / Negligible Effect)

In order to deliver a just transition to net zero, it is vital that the affordability of public and community transport increases in order to encourage behaviour change and modal shift and prevent significant and disproportionate negative impacts on socio-economically disadvantaged groups. The growth in the cost of travel by bus has outstripped inflation and the cost of private car use for many years.

We agree with the SEQIA's conclusion that access to funding, or lack thereof, 'may disadvantage smaller operators or those operating small demand responsive services', especially Community Transport operators which are not-for-profit and likely to face significant new costs as they seek to decarbonise their vehicles. Community Transport operators face some unique challenges with the technologies and markets for Electric Vehicles, which further raise costs. For example, there is currently limited supply from manufacturers of the types of EVs, such as Electric Wheelchair Accessible Vehicles, which would meet the specific needs of the sector in relation to accessibility and mileage, and there are growing delays in the supply chains of retrofit firms.

There is a risk that financial support for fleet replacement in community transport may fall short of the true costs of adaptation and operation to operators, thereby delaying, disincentivising or damaging the sector's transition to zero-emissions fleets. It is vital that Transport Scotland builds on the pilot round of the Plugged-In Communities Grant Fund to provide necessary and appropriate levels of financial support to the sector.

CA-10: We will support strategically coordinated investment in the charging network that enable wider energy and transport system benefits and efficiencies. (SEQIA score: Neutral / Negligible Effect)

We welcome the ambition for a national EV charging network. To deliver wider energy and transport system benefits and efficiencies, investment in expanding the network should include Community Transport operators as a strategic priority and reflect their distinct needs and circumstances. Many Community Transport operators report a lack of charging points or enabling infrastructure in their region. Meanwhile, many also lack suitable in-house premises, to support a safe and confident transition to EVs. Smaller community transport operators, 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.

Failing to tackle these barriers could significantly affect take-up of EVs, especially in rural areas, and increase existing inequalities in access to clean, affordable transport, especially for older or disabled people. Overcoming these barriers would enable and empower Community Transport to not only decarbonise its own sectoral emissions, but to play a larger positive role in reducing other transport emissions through facilitating modal shift, managing demand and increasing shared journeys.

CA-12: We will improve the quality and availability of information and software systems to enable all to make more sustainable transport choices. (SEQIA score: Neutral / Negligible Effect)

Mobility as a Service (MaaS) is an exciting opportunity to deliver a better integrated transport which is more transparent and easier to navigate. It is vital that MaaS projects and funding strongly encourage or require alignment of transport information and services from all providers, including Community Transport operators.

We agree that digital- or smartphone-only technological solutions would risk excluding many types of passengers from the likely benefits. It is important that information and services are accessible to all.

Transport Scotland should consider whether the Smart Pay Grant Fund, which is currently only available to commercial transport providers, could be opened to community transport providers that always operate for a social purpose and never for a profit to support the digitisation and modernisation of their services.

Health Inequalities Impact Assessment

H8. Would you like to comment on any of the specific policies contained within the NTS2 Delivery Plan 2020-2022?

RI-3: Ensure transport in Scotland is accessible for all.

We agree that access to health and social care is a human right and that this cannot be delivered without accessible, inclusive transport for all.

Community Transport operators, their staff and volunteers can offer useful insights into the lives of people who rarely or never use public transport, because of challenges they face with accessibility, health or mobility. As community-led solutions, Community Transport is the heart of local communities and often provides befriending services and support. Community Transport can be a preferred mode of transport, compared to public or even private transport, for elderly, disabled or vulnerable people as they offer a safe, high-quality, personalised and door-to-door service.

Investment in Community Transport can help mitigate the health inequalities identified in the HIIA. Community Transport offers a sense of connection and community from trained volunteers and staff, which can be absent from public or private alternatives, strengthening mental health, wellbeing and social capital. The sector knows its passengers and can often be the first to spot something might be wrong to help find advice and support or in an emergency.

Community Transport operators have a long and proud record of helping older, vulnerable and disabled people to access the amenities, services and support they need to live happy, healthy and independent lives for longer in their own homes and communities. Investment in Community Transport is cost-effective, preventative spending which delivers strategic, long-term benefits and better outcomes by reducing the number of people who need to rely on social care or who need to go into costly full-time residential care.

Many older people living alone, for example, struggle to access traditional public or private transport. This can cause elderly people to struggle with isolation and loneliness – or to access shops, pharmacies, libraries and other amenities or services which they need to live independently – with resulting negative impacts on their physical and mental health and wellbeing.

RI-5: Minimise the connectivity and cost disadvantages faced by island communities and those in remote rural and rural areas, including safeguarding of lifeline services

Transport affordability is a significant challenge in island communities, especially for transport to health or social care, which often involves long journeys or journeys to the mainland. Supporting disabled, older or ill people to access health or social care is a major activity for island Community Transport operators.

However, some are not funded or supported by any public body to do so, exacerbating health inequalities experienced by those with chronic, long-term or serious health conditions. It is therefore vital that Transport Scotland works with local authorities, NHS health boards and the future National Care Service's local delivery boards to support the valuable work of community transport operators through long-term planning, partnership working and appropriate funding.

HW-4: Reduce the negative impacts which transport has on the safety, health and wellbeing of people

There is a risk that Low Emissions Zones (LEZs) could negatively impact the ability of people with protected characteristics to access health and social care if exemptions for Blue Badge holders are not implemented fairly and successfully. We welcome ongoing consultation on this issue to mitigate these risks through the design and implementation of LEZs.

It is important that local authorities continue to recognise the critical and valuable role of community transport in supporting the provision of health and social care by continuing to issue Blue Badges to relevant providers. It is important that Transport Scotland works with local authorities, including through the ongoing review of guidance, to restore clarity, consistency and fairness to the Blue Badge scheme across Scotland for community transport operators.

Island Communities Impact Assessment

14. Would you like to comment on any of the specific policies contained within the NTS2 Delivery Plan 2020-2022?

RI-1: Ensure active, public and sustainable travel access to employment, education and training locations

The ICIA concludes that the policy of extending free bus travel to young people is ‘less effective in island and remote mainland communities due to there being fewer buses in operation’. In these communities, Community Transport operators often provide lifeline services which are the only way for local people who cannot afford or access a car to access employment, education and training, while also helping to support local tourism jobs. As things stand, Community Transport providers operating under Section 19 permits are not participating in this positive expansion of the scheme. Addressing this anomaly as well as supporting these communities to strengthen or start community-led transport solutions would be cost-effective and sustainable solutions to address this challenge.

RI-4: Remove barriers to public transport connectivity and accessibility within Scotland

The ICIA concludes that the National Concessionary Travel Scheme for older and disabled people has a limited positive impact on islands due to a lack of accessible bus services. Its effectiveness could be increased by reforming existing regulations to enable Community Transport operators, which offer lifeline services on a number of Scotland’s islands, to be eligible for reimbursement under this scheme. This would increase access to free services for older and disabled people, while also better supporting the financial security of Community Transport operators.

CA-2: Support management of demand to encourage more sustainable transport choices

We agree that reducing car kilometres by 20% in island communities could be especially challenging given the larger distances which are often required to complete journeys and the relative lack of alternative modes of transport compared to densely populated urban environments. However, Community Transport offers a range of flexible and innovative shared transport solutions, from car schemes to e-bikes to DRT, which can reduce overall mileage and emissions by being tailored to the needs and circumstances of specific places.

CA-10: We will support strategically coordinated investment in the charging network that enables wider energy and transport system benefits and efficiencies

The ICIA identifies specific challenges relating to the capacity and resilience of energy networks which face island communities and could be a barrier in the transition to zero-emissions vehicles. It is important therefore that financial support for households, businesses and Community Transport operators to purchase EVs is coordinated with or preceded by the financial and regulatory interventions needed to ensure enabling infrastructure is in place.

Further information

To discuss this consultation response further, or to engage with the CTA and our members in Scotland on any other issue, please contact:

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The Community Transport Association (CTA) is the national charity that represents and supports providers of community transport – thousands of local charities and community groups in all parts of the UK that 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 by contributing to the formation of public policy that affects our sector and their service users and 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.