



Zero Emissions Vehicle Mandate

CTA Response

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Introduction to the CTA

The Community Transport Association (CTA) is the national charity that represents and supports providers of community transport (CT) - 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.

Summary

CTA recognises the need to address transport-related emissions to combat the climate crisis, and we are broadly supportive of the government implementing measures to achieve this. However, whilst reducing emissions is undoubtedly important, this must be done fairly. The Department for Transport (DfT) needs to ensure that they are considering the needs and capabilities of all communities and transport organisations of all sizes. This is particularly important when phasing out the sale of new polluting vehicles.

The community transport sector is already playing a crucial role in the path to net-zero. Community Transport is reducing the need for private car ownership and is acting as a form of modal shift, combining what would need to be multiple private journeys into one shared form. Additionally, many of our members are at the forefront of the transition to ZEVs, demonstrating the uses of ZEVs in passenger services.

DfT needs to consider the impact of the ZEV mandate policy on the community transport sector, as many organisations rely on cars, vans and WAVs. DfT must ensure that ZEVs are readily available and affordable for community transport organisations and that the infrastructure, including charging points, is in place, especially in more rural communities. Doing this will be essential to ensure that community transport organisations are able to use ZEVs within their services and continue to support and deliver at a high quality for their passengers.

This response addresses the consultation questions which CTA feels are most relevant to us and the community transport sector. CTA are willing to work with DfT to discuss further how

best to shift the community transport sector to ZEVs and transition to net zero in a just and practical way.

CTA Response – ZEV Mandate

Question 1: Do you agree or disagree with the UK Government’s preference to introduce a UK-wide regulatory framework?

A UK-wide regulatory framework for a ZEV Mandate must respect the devolution settlements in Scotland, Wales, and Northern Ireland. The consultation document recognises that this ZEV mandate falls under a devolved area as set out by the 2008 Climate Change Act. Therefore, the policy should only be implemented UK-wide with the consent of the respective devolved governments. Devolved responsibilities and competencies should not be undermined. Policies and strategies must meet the unique circumstances and needs of each nation. A one size fits all approach is not always the right path.

CTA agrees that the regulation being consulted on currently should be ‘viewed as a floor rather than a ceiling on the pace of change and investment needed this decade’. It is essential to consider that any UK-wide approach should also not be used as a barrier to further ambition if one nation of the UK can go further, faster.

CTA welcomes collaboration between the Department for Transport, Transport Scotland, Welsh Government and Northern Ireland’s Department for Infrastructure and encourages them to continue working together constructively to reach an agreement on the path forward, whether this is a UK-wide or through an individual nation approach.

Question 11: Do you agree or disagree with the proposal to provide additional credits to ZEVs used in car clubs? Are there any additional criteria or provisions that can increase the effectiveness of these incentives? Please explain your reasoning.

CTA is supportive of this proposal. Car clubs are an essential form of shared transport. They reduce the need for car ownership by providing additional transport options for people who may not be able to or want to own a vehicle. They also help reduce transport-related carbon emissions. Car clubs, therefore, bring benefits for both people and the environment.

The proposal to provide additional credits to ZEVs used in car clubs would incentivise manufacturers to produce and sell vehicles to car clubs. This, in principle, could make it easier for these organisations to obtain vehicles for their groups, enabling expansion and bringing the benefits of ZEVs to more people.

It is, however, important that DfT consider and look to include community-owned and led car clubs. These local non-profit car clubs are vital in places where the market, which is primarily dominated by larger commercial operators of car clubs, may not identify commercial viability. CTA would like to see DfT working to ensure opportunities for car clubs operated by community transport organisations to be included within the scheme.

Additionally, CTA would like to see opportunities for volunteer car schemes to be involved within the scheme. Volunteer car schemes are a vital form of community transport and are essential in both rural and urban communities. They involve volunteers driving a car to pick up people who are often elderly and/or have additional transport needs and taking them to where they need to go. These services are often door-to-door and are particularly important for transporting people to health appointments. Many volunteer car scheme operators do own the vehicles to run these services. Similarly to car clubs, these vehicles reduce the need for private car ownership and have environmental benefits. CTA would like DfT to consider including vehicles for volunteer car schemes within the additional credit proposals.

Question 12: Is the proposed incentive mechanism an appropriate and beneficial way to support the development of zero emission WAVs?

CTA welcomes the proposed mechanism to incentivise the development of zero-emission wheelchair-accessible vehicles (WAVs). Community transport is about accessibility, and the vehicles the sector uses reflect this. In Scotland, 64% of the sector's vehicles are accessible for people with disabilities.¹ People with disabilities in all four nations rely on community transport operated accessible vehicles to get where they need to go. 51% of community transport providers in Scotland were involved in transporting people with disabilities or those with long-term conditions.²

WAVs comprise a critical and sometimes a core part of community transport fleets across the UK. The availability of WAVS is, therefore, essential to the community transport sector and a substantial amount of the passengers they support. The importance of WAVs is likely to continue as the UK phases out polluting vehicles and shifts to ZEVs. Currently, as is acknowledged in 2.96, there is not an ample supply of zero-emission WAVs available. Many CTA members have reported that they have faced difficulties obtaining them. This is a significant issue for people with disabilities and community transport organisations as they depend on these vehicles for vital journeys, and the current lack of supply does not provide confidence when looking to the future.

DfT, therefore, needs to guarantee that WAVs are readily available and affordable for community transport providers through the shift to ZEVs and beyond, so these providers can

¹ <https://ctauk.org/wp-content/uploads/2022/09/More-Than-a-Minibus-CTA-2022.pdf>

² <https://ctauk.org/wp-content/uploads/2022/09/More-Than-a-Minibus-CTA-2022.pdf>

continue to deliver their valuable service to passengers. This incentive programme is, therefore, a step in the right direction to ensure ZEV WAV availability.

Question 25: What are your views on the potential impact of the two proposed schemes on communities in the more rural and remote parts of the UK and to those businesses involved in the sale of vehicles in those areas?

Whilst community transport is essential in all areas and geographies of the UK, it is particularly important in rural areas. Community transport can often be the only public transport option available in rural areas where in many cases, commercial bus service has been withdrawn because of cuts or a lack of commercial viability. Additionally, community transport service enables rural people to live car-free. Data from England demonstrates the strong connection between rural communities of community transport, as 85.5% of community transport organisations operate in rural areas in some form.

Due to the importance of community transport in rural areas, the ZEV mandate policy needs to work for these operators. Rural operators need to be able to source vehicles that can overcome the challenges unique to their geographies. If ZEVs are going to become a viable option for these rural operators, considerable investment will be required.

Many rural community transport providers have substantial barriers to transitioning to ZEVs. In rural locations, community transport organisations must cover significant distances (in some cases three figure distances) in a single journey, including to key services like the nearest hospital. Currently, many operators do not have confidence in ZEVs to complete these journeys. These concerns stem from worries about the range of ZEVs and the availability of charging infrastructure in rural areas.

Rural areas are lagging significantly behind urban areas in terms of the number of public charging points. The scale of investment needed across the UK is evident when looking at public charging statistics. Of the 42,566 public charging points, 31% of these are in Greater London, which is a larger number than Scotland (9%), Wales (4%) and Northern Ireland (1%) combined.³ Additionally, the Society of Motor Manufacturers has advised that the UK will require 2.3 million charge points by 2030, which seems extremely far off given current numbers.⁴

Therefore, if the government is looking to phase out the sale of polluting vehicles by 2035, this needs to go hand in hand with a large-scale increase in charging infrastructure which caters to not only urban but also more rural communities.

Additional Areas to Consider

³ <https://www.zap-map.com/ev-stats/how-many-charging-points>

⁴ <https://smmt.publicfirst.co.uk/>

The ZEV Minibus Market

Whilst minibuses may be outside the scope of this policy, CTA would like DfT to consider the future of the minibus market, including retrofit and wheelchair-accessible minibuses. If DfT looks to bring in a similar approach in the future to ending the sale of polluting minibuses, considerable work will be required to ensure the minibus market is ready for these changes. There is a noticeable lack of options and supply of ZEV minibuses. The risk of the ZEV minibus market not improving is that it could make it challenging for community transport organisations to obtain vehicles. This could adversely impact their service delivery which would affect the inclusion of people with limited transport options, including many isolated older people and people with disabilities. DfT, therefore, needs to act to improve the ZEV minibus market to ensure ZEV minibuses become readily available, affordable and of a suitable standard.

Furthermore, on charging infrastructure DfT should also consider the future of electric minibuses. Minibuses will require larger charging bays to have the space to stop and recharge their battery. DfT should therefore ensure that larger charging bays are included within the programme to increase the amount of charging bays in the UK. This is essential as community transport providers that want to use ZEV minibuses must have the confidence that wherever they operate, they will be able to charge their vehicles.

The Second-Hand Market

The second-hand vehicle market is an important source of vehicles for the community transport sector. As the sector comprises not-for-profit and often small organisations, many do not have the funds or believe it is the best use of charitable funds to buy vehicles new. For these organisations, therefore, the second-hand market is essential.

Although the mandate on sales of ZEVs focuses on the sale of new vehicles, CTA would like to see organisations that depend on the second-hand market having the opportunity to purchase ZEVs. As the ZEV mandate should increase the sales of new ZEV, it will hopefully filter through into a larger second-hand ZEV market. However, CTA would like DfT to ensure that they consider the role of the second-hand market within the policy.

Further Information

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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.