

Community Transport Consultation
Buses and Taxis Division
Department for Transport
Zone 2/12
Great Minster House
33 Horseferry Road
LONDON
SW1P 4DR

1 May 2018
DfT_CT_S19/22

Dear Sirs

COMMUNITY TRANSPORT – SECTION 19/22 PERMIT CONSULTATION

I am writing in response to the Department's Section 19/22 consultation which ends on 4 May 2018, relating to the licensing arrangements for Community Transport groups and the broader issues concerning the sustainability of the sector, following guidance issued by your department.

To provide some context, Shropshire has eight small Community Transport groups (*not for profit charities*) who operate minibuses within their communities, with some of the schemes also providing village based community car schemes, with volunteers using their own cars to transport passengers to health appointments.

The transport the groups provide is designed to meet local needs that conventional transport services leave unmet. This is usually due to non-availability of a conventional service or passenger's mobility issues which makes traditional public transport unsuitable.

All the groups operate Dial-a-Ride style services where journeys must be pre-booked, these journeys are generally essential in nature and provide access to local services and amenities such as healthcare appointments and shopping opportunities.

Whilst the council supports the Community Transport groups through grant allocation, many groups have found the demand for their services has grown considerably over the last few years. To offset these increased costs a number of the groups have tendered to the Council for some small value contracts in order to improve their sustainability (school transport and local dial-a-rides services).

The guidance your office has issued, highlighted that should these contracts be subject to competition from other commercial operators (which we would normally expect them to be), then those contracts cannot be awarded.

The current guidance on the legislation appears to be a "blanket approach" to the application of the law which whilst potentially having a reduced impact in some urban areas of the Country, rural communities such as the ones in Shropshire would find themselves with no

alternative means of transport. As a result, communities and local people will find themselves isolated and unable to access essential services.

Given the levels of volunteer involvement and the economies the groups achieve within their locally managed operations, it is acknowledged that Shropshire Council would not be able to replicate the current level of activity within the sector in a financially sustainable way. We are sure this would be the same in many other rural areas across the Country and the cumulative effect of the associated cost nationally could be significant.

When you combine the fact that Shropshire is the largest inland county, with its rural nature, sparsity, topography and the lack of significant areas of dense population, the ability to access services to the wider community is essential. Whilst public transport is an option for some of the county's largest towns, public transport in Shropshire is not widely available for the significant proportion of our rural communities, who without a community transport option, would become isolated and unable to travel.

I have attached for your information two appendices which provide a visual representation of this unique challenge that we face in Shropshire. Appendix A depicts the current commercial and subsidised public transport network in Shropshire and Appendix B the occupied addresses within the county. As you can see from a comparison of the two appendices, large areas of the County do not have access to public transport and as such many vulnerable people and isolated communities will rely on Community Transport

Nationally amongst the Community Groups and their partners, a number of suggestions to amend the legislation to allow Community Groups to operate some contracts in their current format has been discussed.

One suggestion would be to allow Local Authorities to work with the community transport sector whereby we could award contracts to the sector up to a certain cumulative limit or cap.

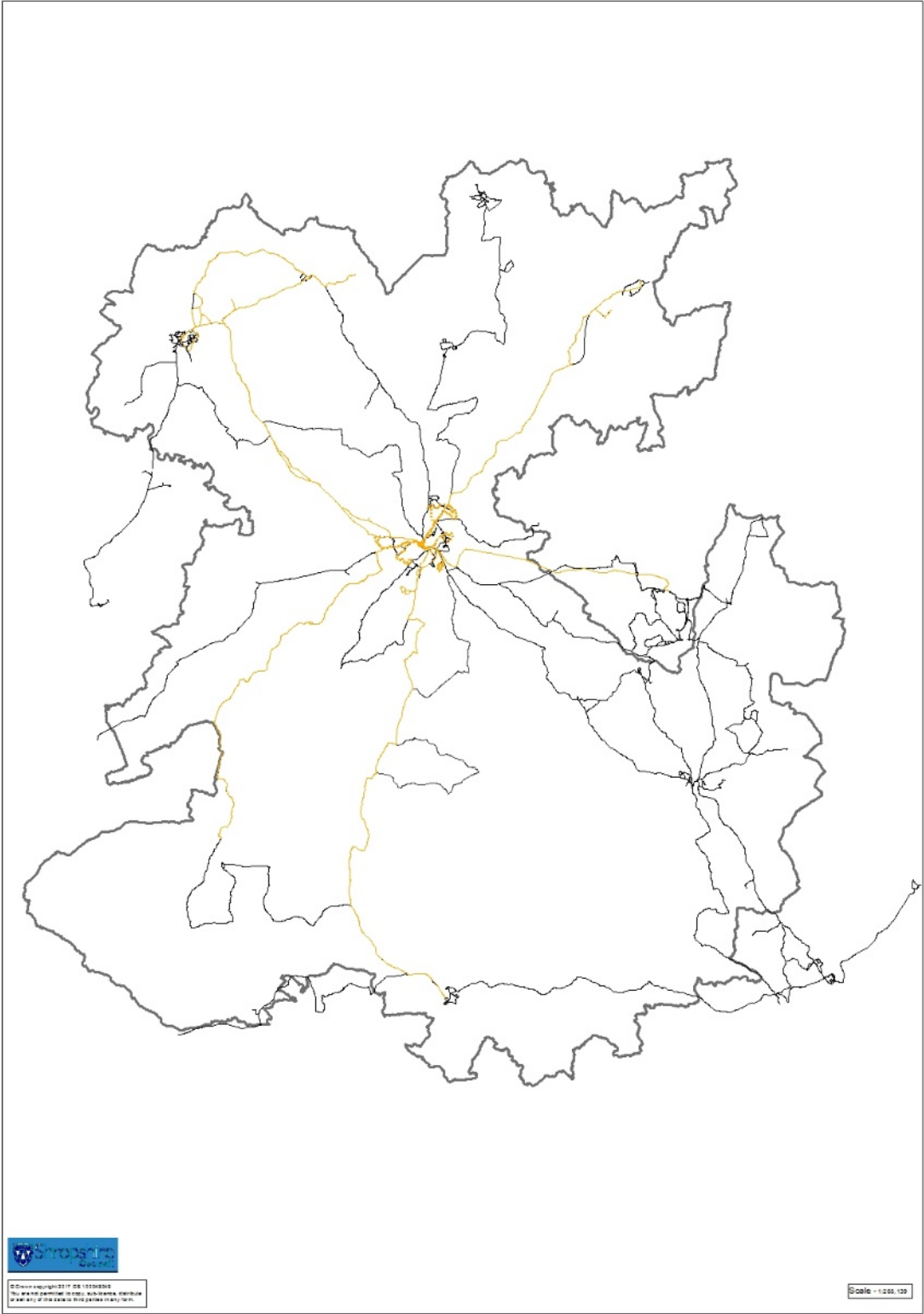
This option would improve the sustainability of the sector, prevent Community Groups from operating on a purely commercial basis, whilst assisting Local Authorities in maintaining affordable services for those people in rural communities.

Whilst we understand the need for the consultation and would welcome legislation which gives clear parameters under which community transport can continue to operate, consideration needs to be given to the additional burdens that this legislation requires in its current format.

Should the legislation remain in its current format we do believe that many of Community Groups will cease to operate, leaving rural communities across Shropshire and other areas of the Country further isolated.

Yours sincerely

Appendix A



Appendix B

