

## Appendix C



### South Somerset Community Accessible Transport

Balsam Centre, Balsam Park, Wincanton BA9 9HB

Tel: Office: 01963-34594 Bookings: 01963-33864

Email: [sscatringride@yahoo.co.uk](mailto:sscatringride@yahoo.co.uk)

Nigel Collins  
Transport Strategy Officer  
South Somerset District Council  
The Council Offices  
Brympton Way  
YEOVIL  
BA20 2H

28<sup>th</sup> September 2017

Dear Nigel

#### **Re: Proposed changes to Section 19 and 22 permit interpretation**

First of all as Chairman of SSCAT, can I thank you for the opportunity of commenting on the issue of the proposed changes or re-interpretation of Section 19 and 22 permits under which the Community Transport organisations operate. These proposed changes will impact significantly on all CT Operators and may well result in a sizeable reduction in the size of the CT sector itself.

Essentially, the proposed change to Section 19 specifically (as this is the permit regime under which most CT actually operate) envisages a higher mandatory qualification and training to achieve a "Driver CPC (Certificate of Professional Competence) which, in effect, is the PSV licence level. For organisation like SSCT, we were exempted from this requirement under the original interpretation. Most CT operators engage in a mix of activities such as Group Hire, Contract Work (usually education and Social Services), Local Ring and Ride and similar but although these activities were in the main commercial, being constituted as a registered Charity meant that ourselves (and others) qualified for the original exemption.

Specifically as far as SSCAT is concerned, these are the two most significant areas where the consequence of the implementation of these changes will impact;



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- 1) Financial – we estimate that it will add something in the region of £1000 per driver to take them through the required additional training to achieve CPC. So in a full year, this will represent something in the region of an additional £20k to our cost base.
- 2) Effect on the SSCAT Driver Pool. - In common with most other CT Operators, our driver pool consists mainly of retired individuals who wish to have a part time job for a day or two a week. Because of the nature of the demand for the service, it does not justify the employment of full-time drivers. It is apparent to us that should this proposed change implemented, most of our drivers will simply walk away because they perceive that the requirement of the extra training and qualification will be A) too onerous B) the CPC requirement is really the preserve of full time employment and not part time. We have spent considerable efforts over the years recruiting to this pool and the attraction to most of our drivers is that they and we can arrange their hours and routes on a mutually agreeable basis. Technically, by definition we are part of what is now labelled the “Gig” economy BUT the critically important point to be made that operating on this scale with 5 mini-buses, it is not remotely financially feasible to operate with full time drivers.

As the District Exec Members may also be aware by the recent report to Area East Committee, we were recently unsuccessful in our lottery submission. In light of this, we have undertaken a series of actions in association with other organisations to urgently seek out other sources of funding such as contributions from the local Town and Parish Councils. What I must say at this point is that given our current situation, the implementation of these Section 19 will truly and ultimately be the straw that breaks the camel’s back financially.

Finally I would point out the following about the SSCAT organisation. It was set up in 2001 as part of SSDC following the SSDC commissioned report “Transport Needs Project in SSDC” in 2000. It became a charity in 2003 and has operated successfully on that basis since that time. The original thinking behind the creation of Charitable Status was that the organisation should not be reliant on SSDC for revenue support funding as it would be free in its own right to access core funding from organisations such as the lottery. To date that objective has been achieved and no revenue funding has been accessed from SSDC in that period. Capital funding has been accessed periodically to contribute towards the acquisition of replacement vehicles. The service



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is greatly appreciated by the community of Area East especially in the current situation of continual withdrawal of scheduled bus services.

I would finally conclude by thanking all members of SSDC for their support over the years and would respectfully request that District Exec Members appreciate the enormity of this current threat to ourselves and other CT Operators within the District in the form of the proposed changes to the Section 19 permit system. I would ask that SSDC makes the strongest representation to the relevant organisations to avoid what can only be described as a terminal body blow to Community Transport Operators. Thank you.

Yours Sincerely

Tim Carroll – Chairman, South Somerset Community Accessible Transport

