



# Developing the Automated Vehicles Regulatory Framework

**A Response from CTA**

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**[www.ctauk.org](http://www.ctauk.org)**

# DEVELOPING THE AUTONOMOUS VEHICLES REGULATORY FRAMEWORK: CALL FOR EVIDENCE

## Summary

The Community Transport Association (CTA) welcomes the UK Government's commitment to develop a regulatory framework for Autonomous Vehicles (AVs), which seeks to enable and control the deployment of autonomous taxis, buses and other vehicles in the future.

The Department for Transport (DfT) has issued a call for evidence to inform this work.<sup>1</sup>

**In our response on behalf of CTA members, we make the following key points:**

- **Accessibility is fundamental** and must be embedded within the AVs regulatory framework;
- **AVs should be deployed on the basis of fair, equitable and affordable access** to ensure disabled people are excluded or not left behind;
- **There are some potential benefits to AVs for some users with accessibility needs;**
- There are some potential challenges to AVs for some users with accessibility needs and **AVs will never be appropriate for others;**
- **Co-design with disabled people, DPOs and CTOs** is essential and must be mandatory within the AVs regulatory framework; and,
- The Government's approach must be proportionate and realistic about the potential advantages, disadvantages and unintended consequences. **AVs must not distract, or redirect resources, from getting the basics right** and making buses, minibuses, coaches and rail more accessible, affordable and attractive.

## ACCESSIBILITY

### **121. In your view, are there any wider considerations regarding accessibility that should be taken into account in the deployment of AVs?**

Accessibility should not merely be part of 'wider considerations' in relation to Autonomous Vehicles (AVs), but should be fundamental to their deployment in the UK.

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<sup>1</sup> <https://www.gov.uk/government/calls-for-evidence/developing-the-automated-vehicles-regulatory-framework>

Rather than being framed as a marginal or additional issue or approached through the lens of mitigation, accessibility should be embedded into and present throughout the AVs regulatory framework. AVs represent a new mode of transport, which it is essential that we get right for everyone from the start.

AVs should be deployed on the basis of the principles of fair, equitable and affordable access. If the AVs regulatory framework does not enhance and expand the availability of accessible, inclusive transport it should be judged to have failed our people and communities, especially disabled people.

Technological process should be fairly shared and equitably distributed. It should not leave people or communities behind, whether disabled people or rural places. At present, progress towards the deployment of AVs is largely and disproportionately focused on London, which will inevitably lead to question marks over the relevance or benefits for other cities, regions and nations across the UK.

We recognise that there are potential benefits to AVs for some users with accessibility needs, including those who have been subjected to assault, discrimination or harassment from fellow passengers, drivers or other staff while travelling. Research by Transport Scotland found that almost all of the women who participated in the study reported that they 'very often' or 'always' felt unsafe when using public transport.<sup>2</sup> Over a quarter of disabled people in England have recently been refused access when trying to travel by taxi, according to Transport for All.<sup>3</sup> However, it is clear that while the absence of staff in some contexts (e.g. autonomous taxis) might be reassuring for some passengers, it will also raise safety concerns for others in other contexts (e.g. autonomous buses).

The Community Transport sector is facing a serious and growing shortage of qualified minibus drivers, which is already disrupting essential services, restricting innovation and growth and threatening the long-term sustainability of our movement. AVs could present one solution to this challenge in some areas, particularly for community bus services (Section 22) or Demand Responsive Transport (DRT). Nevertheless, we believe that this would be better and more comprehensively rectified by changes to D1 licensing rules.<sup>4</sup>

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<sup>2</sup> <https://www.transport.gov.scot/publication/womens-and-girls-views-and-experiences-of-personal-safety-when-using-public-transport/>

<sup>3</sup> <https://www.transportforall.org.uk/blog/2023/12/05/are-we-there-yet-barriers-to-transport-for-disabled-people-in-2023/>

<sup>4</sup> <https://ctauk.org/d1-campaign>

We recognise that there are some passengers for whom AVs will never be appropriate, including many people who currently rely on local, non-profit Community Transport operators to provide them with the kind of personalised, profoundly human support they need to travel, such as full-time wheelchair users, those who need door-through-door support or those who may lack travel confidence. Accessible, person-centred transport can be best delivered by people who are caring, trained and trusted. Research by the Centre for Autonomous Vehicles has confirmed that 21 out of 66 driver roles are 'very challenging' or 'challenging' to 'fulfil without a driver or onboard attendant', such as supporting passengers to board and alight safely from the vehicle.<sup>5</sup> This means that the rollout of AVs poses a significant risk of exclusion for many disabled people.

To prevent this, the deployment of AVs will need to be subject to meaningful co-design with disabled people, Disabled Peoples' Organisations (DPOs) and Community Transport operators. Operators, platforms and regulators must learn from people with lived experience and organisations with expertise, not least because disabled people have a variety of different needs. The regulatory framework must make this mandatory.

We welcome the development of this regulatory framework. Regulations are required – and robust and meaningful enforcement of these regulations is essential – to ensure this is and remains the case as technologies evolve and AVs are more widely deployed. Existing enforcement mechanisms for accessibility requirements in public transport are relatively weak and progress on improving the accessibility of bus, coach and rail services has been stalled for many years.

It is important that the UK Government is realistic about the potential advantages and cognisant of the potential disadvantages and unintended consequences of AVs. We must take a proportionate approach which ensures that new and emerging technologies do not become a distraction, or redirect capacity and resources, from the essential work of getting the basics right. We already have the tools and technologies we need to make public, shared and community transport – conventional, non-autonomous modes which are already proven to be effective, cost-effective and safe – more accessible, affordable and attractive for everyone, no matter who they are or where they live.

## Further Information

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<sup>5</sup> <https://assets.publishing.service.gov.uk/media/6859299876eec44bf9d71df9/automated-passenger-services-researching-driver-roles-and-passenger-inclusivity.pdf>