

Securing Community Transport's future

Licensing rule changes
for the next generation of
minibus drivers



Contents

Executive summary	3
Our movement	3
The crisis	3
The status quo	4
The cliff edge	5
The solution	6
Implementation	7
Precedents	7
Context	8
The crisis: minibus driver shortages	9
Minibuses: an essential enabler	9
The status quo: rules not fit for purpose	11
The cliff edge: losing the ‘grandfather rights generation’	15
The solution: D1 licensing changes	19
Our proposal: changing minibus driver licensing rules	19
MiDAS: training-based upgrade	22
Additional safeguards	26
The case for change	29
Northern Ireland: case for action	30
Implementation	32
Secondary legislation	32
Precedents	32
Specific amendments	33
Conclusion: it’s time	36
References	37

Executive summary

Our movement

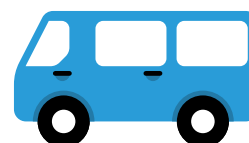
More than 16 million passengers rely on Community Transport for journeys to education, employment, healthcare and local amenities across the UK every year. These lifeline services are vital for hundreds of thousands of older and disabled people who would otherwise face significant accessibility barriers. Community Transport plays a critical role in supporting local economies, enabling access to public services, improving health outcomes and strengthening community ties in every postcode.



Over **1,300** Community Transport operators across the UK



More than **16 million** Community Transport passengers every year



3 in 4 Community Transport vehicles are minibuses

The crisis

However, Community Transport is facing a severe and worsening shortage of qualified minibus drivers with D1 licences, which now represents an existential threat to the viability of our sector. Local charities and community groups across the UK report major difficulties in recruiting and retaining drivers to sustain existing services. This is constraining capacity, preventing growth and leading to reduced services. The most vulnerable passengers are disproportionately affected and, in some cases, left without access to essential transport altogether.



55% of Community Transport operators report D1 driver shortages today



81% of Community Transport operators do not believe they will have enough D1 drivers 3 years from now



How does a lack of D1 drivers impact CTA members?

Reduced or cut services – **14%**
Unable to grow or expand – **43%**
Increased workload for existing drivers – **57%**
Turn down requests for transport – **41%**

The status quo

The primary cause of this crisis is the current minibus licensing regime. Under the existing rules, anyone who obtained a Category B car driving licence from 1 January 1997 onwards must obtain a separate D1 licence, which requires additional training and passing a separate test to be able to drive a minibus when the driving is undertaken in a paid capacity.

Although limited exemptions exist under Section 19 and 22 permit provisions, these are tightly controlled. Category B licence holders relying on these exemptions may only drive on a voluntary basis and they are also restricted to vehicles up to 3.5 tonnes, or 4.25 to 5 tonnes where vehicles are adapted for accessibility or zero-emission.

In contrast, drivers with pre-1997 'grandfather rights' benefit from automatic D1(101) entitlement, allowing them to drive minibuses (up to 16 passenger seats) without undertaking an additional test and in a paid capacity within permit-based conditions. While still limited to the D1 vehicle category, they are not subject to the same lower weight thresholds as Category B volunteers, providing Community Transport operators with significantly greater flexibility.

These provisions were specifically designed to support the sector and ensure access to an adequate supply of drivers. However, the system is no longer effective as the 'grandfather rights generation' decreases year on year.



60% of Community Transport operators oppose the current D1 licensing rules



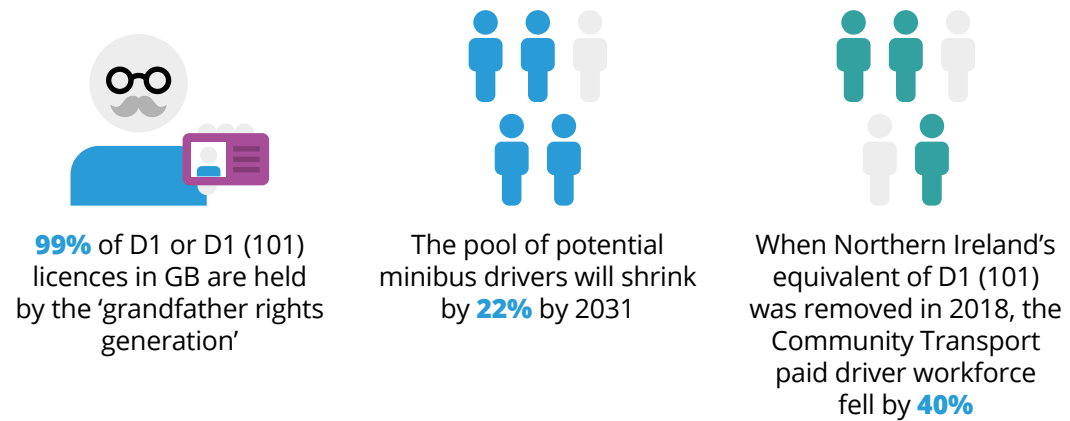
Why do CTA members not have enough D1 drivers?

Cost of D1 training is too high – **59%**
Cannot secure funding – **32%**
Lack of D1 trainers – **18%**
Lack of D1 assessors – **10%**

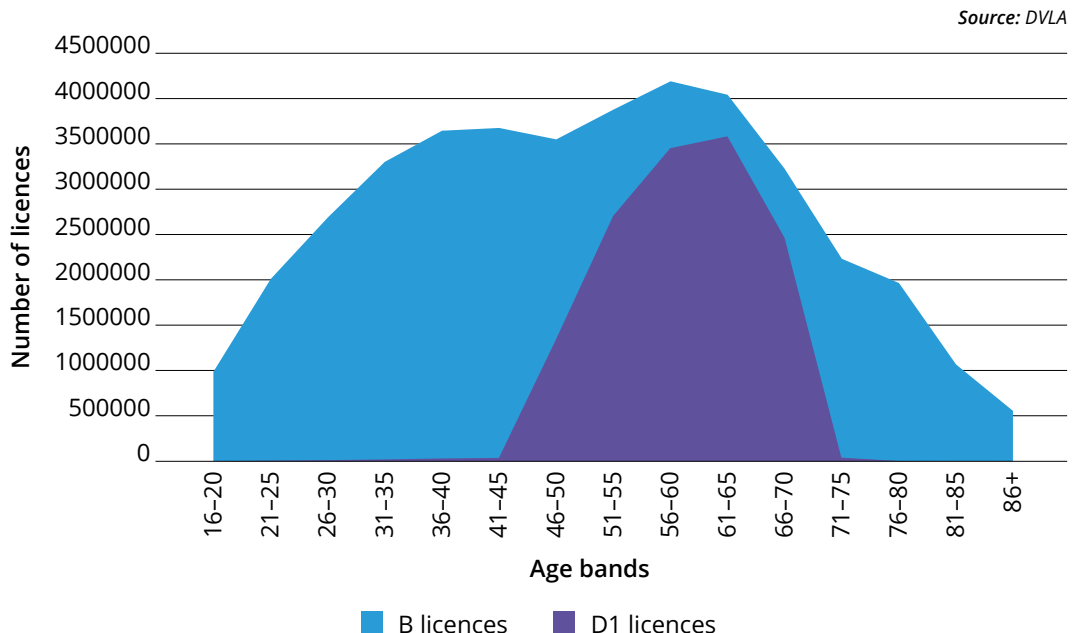
The cliff edge

99% of all D1 licences in Great Britain are held by the 'grandfather rights generation' of potential minibus drivers aged 47 to 69. In the next five years, more than 3 million D1 licences are likely to be lost by drivers turning 70, which is 22% of all D1 licences.

The current minibus driver licensing regime is not fit for purpose. The rules must change to empower the Community Transport movement to train, recruit and retain the next generation of minibus drivers, which would avoid the dangerous cliff edge and secure a sustainable long-term future for our sector.



GB Cat B and D1 Licences by 5 year age bands (DVLA, May 2026)



The solution

CTA proposes that UK B licence holders should be able to acquire a D1 (101) licence by completing a DVSA-accredited training-based upgrade, such as the Minibus Driver Awareness Scheme (MiDAS), if they also meet the following criteria:

- Minimum age of 25 years old
- Minimum experience of 5 years on a B licence
- Medical checks every 5 years
- Conduct standard for no drug or alcohol offences

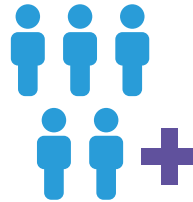
Our proposal would significantly increase the availability of D1 drivers and avoid the cliff edge, while strengthening passenger safety and driver competency.

We understand that questions about road safety may be raised with any proposal to change driver licensing rules. We recognise the need to address potential concerns. For this reason, our proposal includes a mandatory training requirement alongside four additional safeguards.

Nonetheless, Community Transport has a strong safety record and is trusted by commissioners and insurers to maintain high standards. There is no evidence of a sector-wide safety problem. Minibus accident rates remain very low.



78% of consultation respondents support CTA's proposal



73% of Community Transport operators believe our proposal would increase the availability of D1 drivers for their organisation



More than **20,000** drivers were assessed to the MiDAS Standard last year



68% of consultation respondents believe MiDAS is robust enough to be a training-based upgrade to D1 (101)

MiDAS has been the gold standard for enhancing the safety and care of minibus passengers since the 1990s. It is widely utilised and respected and better reflects Community Transport operations. MiDAS has achieved RoSPA-assured status after recent updates and improvements to its content and delivery. However, new or alternative training options could also be DVSA-accredited.

Implementation

Our proposal can be implemented by the UK Government through secondary legislation, via a statutory instrument, using targeted amendments to the following regulations:

- The Motor Vehicles (Driving Licences) Regulations 1999
- The Section 19 Permit Regulations 2009
- The Community Bus Regulations 2009

Precedents

Substantial changes to the regulatory framework can be made through secondary legislation where Parliament has already delegated the necessary powers to Ministers. These powers have been exercised repeatedly, as enabled by the Road Traffic Act 1988, to make changes to driver licensing categories, entitlement conditions and exemptions.

There are two clear and relevant precedents where these powers have been exercised, as per our proposal:

- The Motor Vehicles (Driving Licences) Regulations 1996 (SI 1996/2824) removed the automatic post-1997 D1 entitlement
- The Motor Vehicles (Driving Licences) Regulations 2025 (SI 2025/608) changed eligibility rules for driving zero-emission minibuses

Context

The growing shortage of qualified minibus drivers across the UK is the most serious crisis facing Community Transport in decades. The current minibus driver licensing framework is no longer fit for purpose.

The status quo restricts services, limits innovation and growth, and undermines the sector's ability to provide lifeline transport. It also places additional pressure on vital statutory services, particularly health and social care, by weakening community solutions which improve access and support prevention.

For the Community Transport Association (CTA) and our members, addressing this crisis is our top policy priority. Our D1 Licensing Campaign seeks to develop, promote and secure a practical, responsible and long-term solution which will:

- **Protect Community Transport services for passengers and communities;**
- **Significantly increase the availability of qualified minibus drivers;**
- **Strengthen passenger safety; and,**
- **Raise driver competency and service quality standards.**

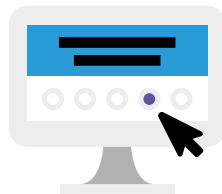
In 2022, the Department for Transport (DfT) issued a call for evidence on granting B (car) licence holders an automatic entitlement to a D1 (minibus) licence, among other potential changes.¹ Respondents overwhelmingly backed the proposed change, as did CTA – 73% were supportive, including 31% who were supportive with additional stipulations. Despite this strong mandate, the proposal was not implemented.²

In November 2025, we published a consultation document, our 'green paper', which outlined the challenges caused by the status quo and presented four potential options for change.³

In January 2026, we launched an extensive consultation on these options to gather evidence, views and insights from Community Transport operators and other interested parties, which included:



3 Focus Groups with
26 participants



Online Survey with
419 respondents



Conversations
with **experts** and
stakeholders

Our consultation gave us a strong mandate from our members to campaign for change, as well as clear evidence of the urgent need for action.⁴

In October 2026, informed by analysis of our results and further specialist advice, we have produced this document, our 'white paper', which:

- Demonstrates the significance and scale of the crisis;
- Explains the urgent need for decisive action;
- Sets out our proposal for change; and,
- Identifies a realistic route to effective implementation.

The crisis: minibus driver shortages

Minibuses: an essential enabler

Minibuses are synonymous with Community Transport. For local communities across the UK, they are an essential tool in delivering transport services which are accessible, safe and sustainable.

Nearly three-quarters of all vehicles in the UK's Community Transport fleet are minibuses with between 9 and 16 passenger seats. Vehicles of this type and size give local charities, community groups and social enterprises the flexibility they need to operate and innovate safely with more affordable costs.

Community Transport services overwhelmingly rely on minibuses for operational and practical reasons, because they could not be delivered as effectively or efficiently with an alternative mode of transport. Buses, Multi-Purpose Vehicles (MPVs) or cars, for example, would not enable operators to meet the level of demand or the support needs of their passengers at the same scale.



Minibuses

78% of all Community Transport vehicles in England⁵
67% of all Community Transport vehicles in Scotland⁶
86% of all Community Transport vehicles in Northern Ireland⁷

Source: CTA



Passengers

More than **16 million** passengers use Community Transport in the UK every year

Source: CTA

Community-owned and leased minibuses enable millions of journeys every year in every corner of the UK, connecting hundreds of thousands of people with amenities, education, employment, family, friends, and health and social care.

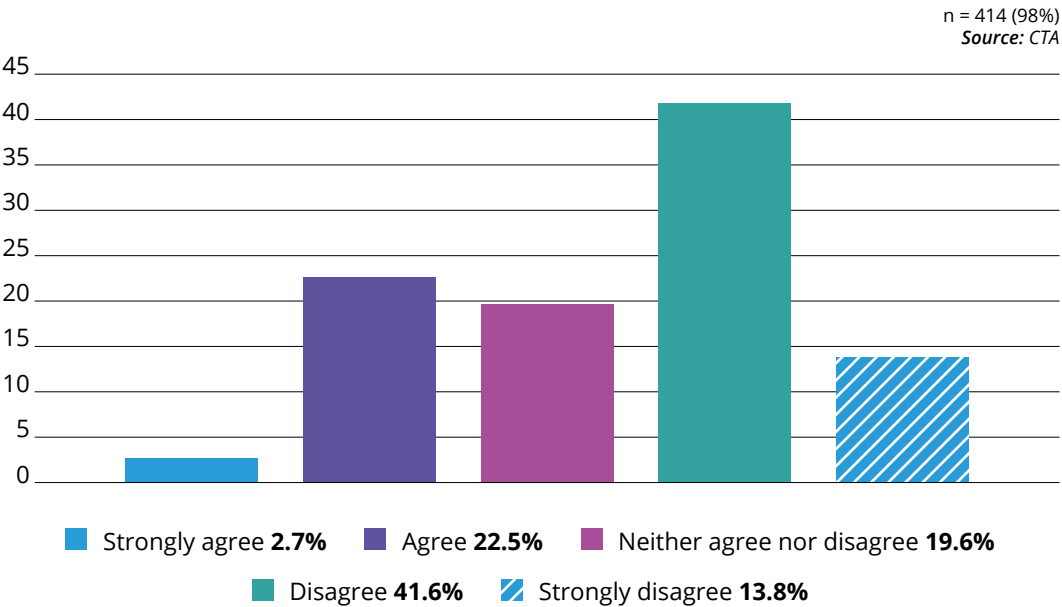
They play a major role in growing local economies, strengthening public services and bringing communities together.

However, the survival of these services, and the future of the Community Transport sector itself, is uncertain due to minibus driver licensing rules. A serious and growing shortage of qualified minibus drivers poses an existential threat.

The crisis is already here. More than half of Community Transport operators in the UK already report not having enough D1 drivers to meet demand for their services.



Q3: Does your organisation have enough volunteer or paid D1 drivers to meet demand for your services?



The status quo: rules not fit for purpose

B licence holders can drive petrol and diesel vehicles weighing up to 3.5 tonnes. As a result of secondary legislation in 2025, the weight threshold is up to 4.25 tonnes if the vehicle is accessible or powered by electricity or hydrogen, and up to 5 tonnes if it is both accessible and alternatively fuelled.⁸

Drivers must hold a category D1 licence to operate a minibus with between 9 and 16 passenger seats. A D1 licence can be acquired either via an automatic entitlement from so-called 'grandfather rights' or via the D1 test.

The automatic D1 entitlement was granted as a D1 (101) exemption to anyone who passed their standard B licence test to drive a car before 1 January 1997. The 101 code, which refers to 'minibus - not for hire or reward', will remain on the licence until it expires when the driver reaches 70 years old or unless removed by the Driver and Vehicle Licensing Agency (DVLA) (or the DVA in Northern Ireland), typically for medical reasons.⁹

D1 (101) licence holders can drive a minibus operated under a Section 19 or 22 permit without additional conditions. They can drive a minibus of any weight, provide their services as a volunteer or be paid directly to drive it.¹⁰

These provisions were specifically designed to support Community Transport services and enable the social, economic and environmental value they deliver. However, the youngest people holding this entitlement are now in their mid-forties, and once drivers reach the age of 70, they must re-apply for their D1 (101) licence to be renewed.

The alternative to a D1 (101) licence is a full D1 licence. This requires a separate driving test, which does not properly reflect minibus driving and does not meet the needs of the Community Transport sector. The D1 test does not contain critical elements necessary for minibus and Community Transport drivers, such as safely operating accessible equipment like ramps, lifts and restraints, or providing tailored support to passengers with accessibility needs. It also requires drivers to complete a medical assessment, the Driver Certificate of Professional Competence (CPC) and undertake 35 hours of approved training every five years to maintain it.¹¹

Altogether, this process is costly and time-consuming, further exacerbated significant delays caused by a lack of training and assessment capacity. For many individuals and operators, this is unaffordable and unrealistic. As a result, the D1 requirement has become a major barrier to recruiting and retaining minibus drivers, whether paid employees or unpaid volunteers, particularly among younger and more diverse demographics.

Financial barriers are also a major concern, with most of our consultation respondents reporting that costs are too high for individuals and for operators. As non-profit, often small organisations, Community Transport operators are generally unable to absorb the cost of D1 training for their drivers, particularly volunteers. With UK training providers commonly advertising all-inclusive D1 courses in the range of £1,000–£2,000 per driver, this represents a significant financial barrier to recruitment and retention.¹²

The current system lacks the capacity to address nationwide shortages. More than one in ten of our consultation respondents said that there is a lack of D1 assessors in their area, while nearly twice as many suffer from a lack of local D1 trainers.

This creates significant barriers and delays to securing qualified minibuss drivers, especially in more rural and remote areas, where shortages are already more acute. Further investment in D1 training within the current rules, whether through subsidy or increased provision, would remain constrained by these structural barriers, and is therefore unlikely to deliver an adequate improvement in driver supply.

The status quo rules lack legitimacy, because they are failing to effectively sustain Community Transport as originally intended and they are not supported by the sector today. 60% of our consultation respondents told us that they oppose the current D1 licensing rules, with only around one in ten registering their support for the status quo.

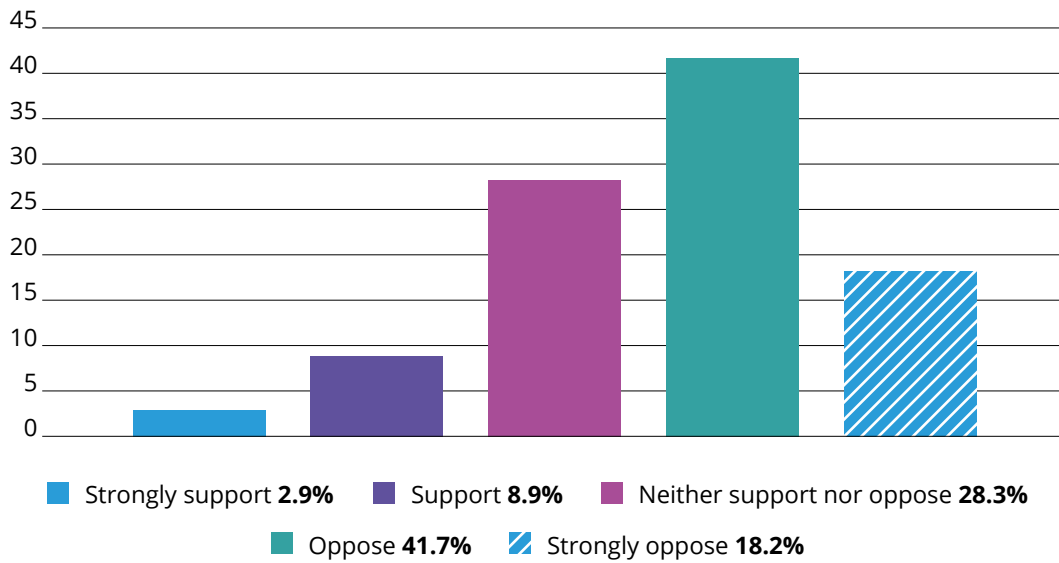
TESTIMONIAL

“Access to D1 test centres, trainers and assessors in West Wales is extremely limited. Even full funding of D1 training cannot overcome these geographic and capacity constraints.”

Wyndham Williams Pembrokeshire Association of Community Transport Organisations (PACTO)

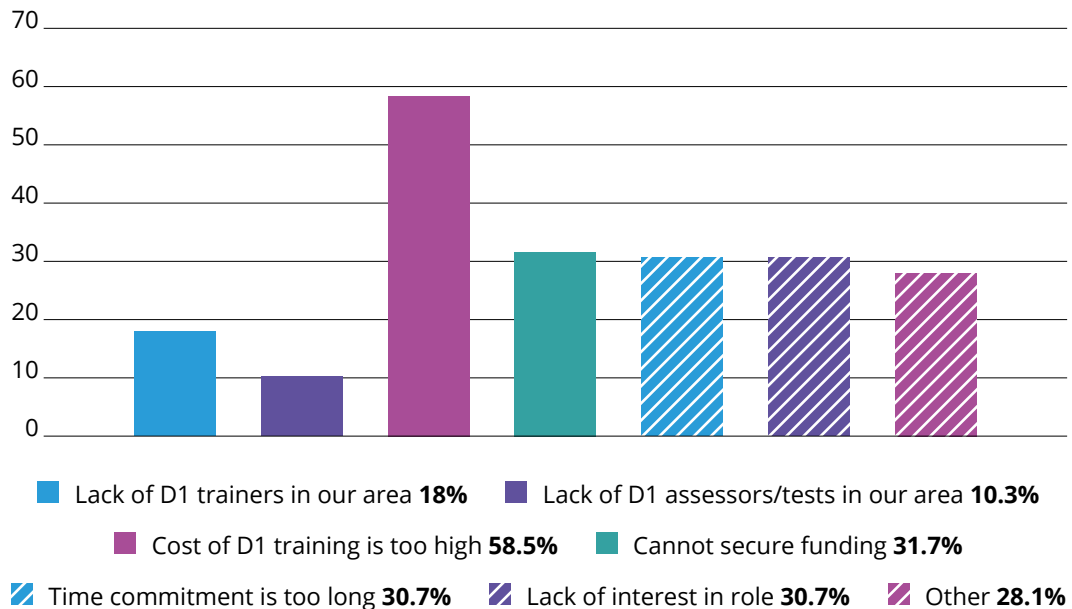
Q7: Overall, how do you feel about the current D1 licensing rules?

n = 417 (99%)
Source: CTA



Q4: Can you tell us why your organisation does not have enough D1 drivers?

n = 388 (93%)
Source: CTA



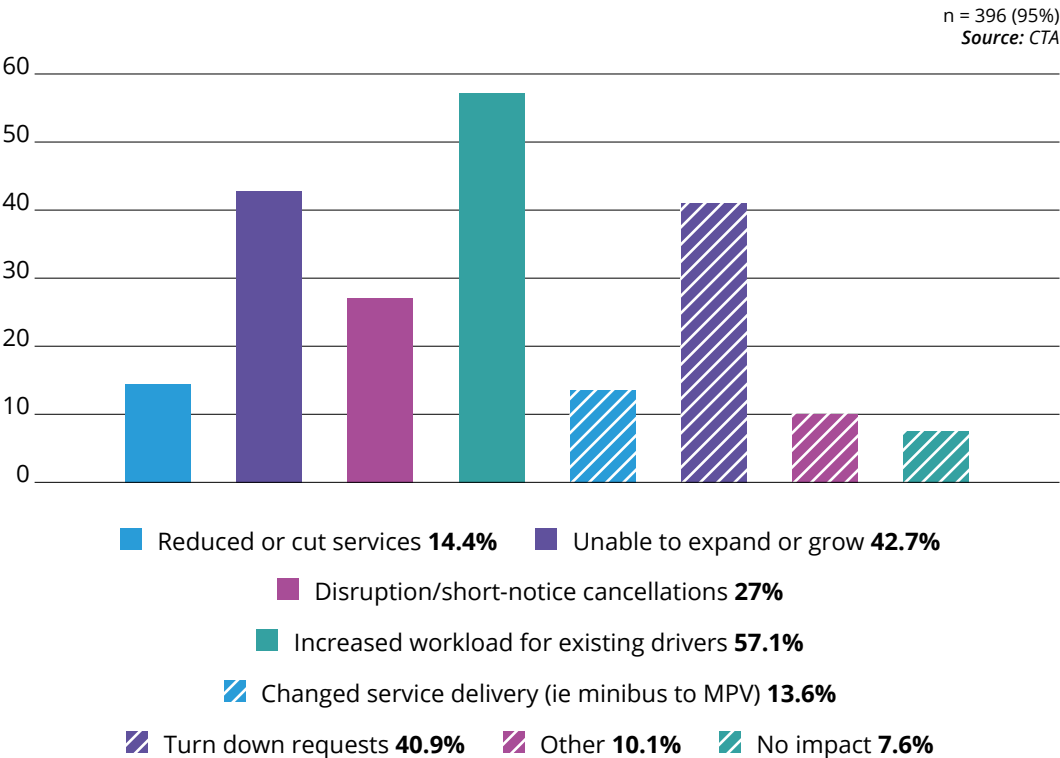
Consultation respondents overwhelmingly agree that minibus driver shortages are having significant negative impacts on Community Transport services and passengers, as well as staff and volunteers.

More than two in five operators have turned down requests for support due to a lack of D1 drivers, leaving people and communities with unmet transport needs. A similar proportion are unable to expand or grow their services, while nearly one in six have had to reduce or cut services. More than half report higher workloads on existing drivers, putting pressure on an ageing cohort of dedicated drivers and making it increasingly difficult to recruit and retain volunteers.

More than one in ten operators have had to change their service delivery model. This has primarily involved switching from using minibuses which require D1 licence holders as drivers to cars, MPVs or ‘lightweight minibuses’, which can be operated by unpaid B licence holders. Although these legitimate operational decisions can enable essential transport to continue to be delivered in some form, they generally result in lower capacity, higher costs and greater complexity in service delivery, as well as higher environmental impact due to more journeys and more vehicles on the road.

.....

Q5: How does your lack of D1 drivers impact your organisation?



The use of adapted 'lightweight minibuses' can also mean a reduction in safety equipment and features. However, many operators have little choice in the current regulatory environment, which continues to incentivise this transition.

TESTIMONIAL

"With ageing staff levels, our future staff recruitment would be restricted through lack of D1 entitlement. As an organisation we would have to consider the fleet dynamics as younger drivers without D1 would be restricted to smaller minibuses or MPVs."

Beverley Mather Dial A Ride Denbighshire

The cliff edge: losing the 'grandfather rights generation'

The Community Transport sector is rapidly approaching a dangerous cliff edge, which threatens to turn this crisis into an existential challenge to the future of our sector.

According to data from the DVLA from October 2025, only 1% of D1 licences (by test and 'grandfather rights') in Great Britain are held by people under the age of 47, while just 0.5% are held by people aged 70 or over. Therefore, 99% are held by people between the ages of 47 and 69 – in other words, the 'grandfather rights' generation of minibus drivers.¹³ The Community Transport sector is heavily reliant on this narrow and decreasing cohort of drivers due to current D1 licensing rules.

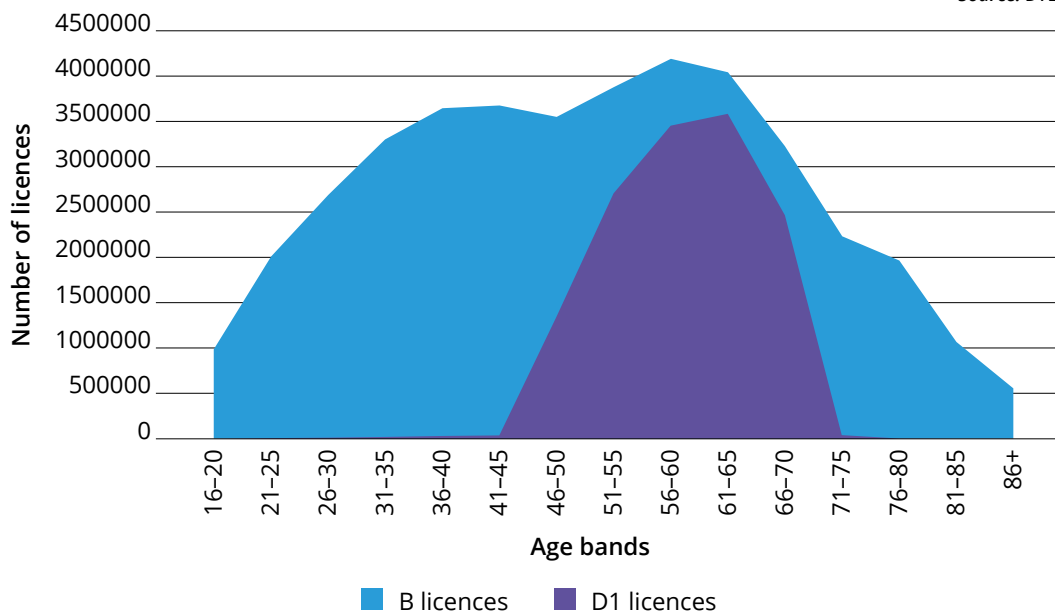
In the next five years, more than 3 million D1 licences are likely to be lost by drivers turning 70, which is 22% of all D1 licences.¹⁴ D1 entitlement will continue to reduce in each of the following years, severely reducing the pool of potential employees and volunteers authorised to drive minibuses. The current rate of attrition is unsustainable, quickly escalating the crisis for Community Transport.

Nearly half of volunteer Community Transport drivers in England currently hold their D1 entitlement because they passed their car test before 1997, while 31% of volunteer drivers hold only a standard 'B' licence.¹⁵

Three-fifths of volunteer drivers and two-fifths of paid drivers who complete Minibus Driver Awareness Scheme (MiDAS) training, which is the nationally recognised standard, passed their test after 1 January 1997. Overall, half of all those taking MiDAS training do not hold 'grandfather rights' to a D1 (101) licence.¹⁶

GB Cat B and D1 Licences by 5 year age bands (DVLA, May 2026)

Source: DVLA



This challenge is compounded by wider socio-economic trends affecting volunteering nationally. Older people are staying in work for longer, returning to work or taking on caring responsibilities for grandchildren, on top of an already ageing volunteer population. The State Pension age is legislated to rise to 67 by 2028, with a further rise to 68 planned for 2044-46, currently under government review, which is likely to mean more people of working age deferring retirement for longer.¹⁷

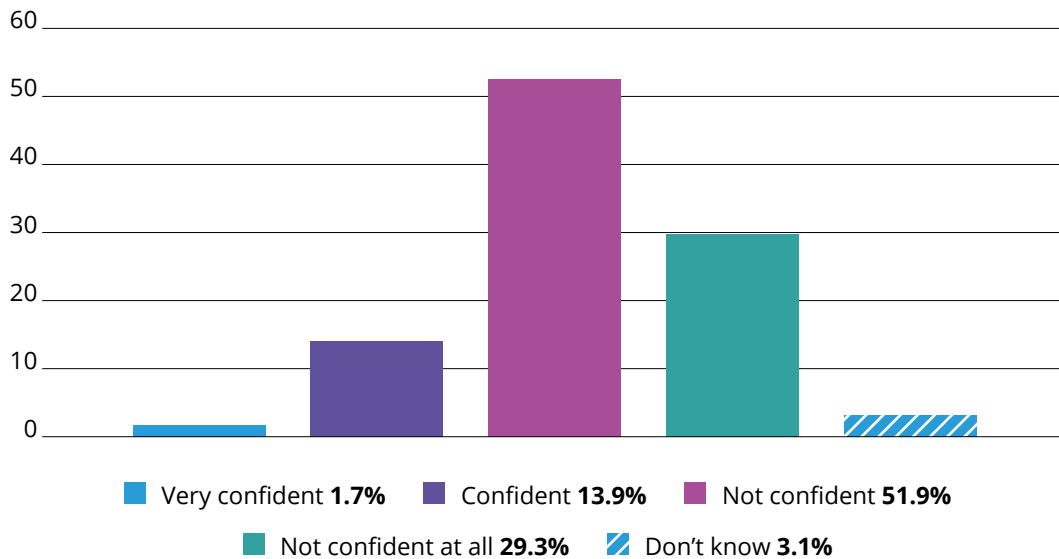
Without changes to widen who can become a D1 driver, there is no clear pipeline of younger volunteers to replace those retiring, increasing the case for both a wider volunteer pool and a stronger role for paid staff who can drive the full range of Community Transport vehicles.

Community Transport operators are fearful of the future, with 81.2% of our consultation respondents reporting that they are not confident in having enough D1 drivers in three years' time. Few are confident about the future, with operators over five times more likely to lack confidence than to have confidence.

.....

Q6: How confident are you that your organisation will have enough D1 drivers to sustain your services over the next three years?

n = 416 (99%)
Source: CTA



Without decisive action, many Community Transport services are at risk in the medium- to long-term. Without changes to widen the pool of potential minibs drivers, and ensure that D1 licences are more accessible and attractive, many operators may not be able to sustain their work.

They will struggle to deliver essential services. They will lose paid and volunteer drivers struggling with the burden of ever heavier workloads. They will be forced to turn down increasing numbers of requests for transport from the people and communities they once served. They will cut services and cancel growth plans.

Thousands of Community Transport passengers will be left without the accessible, affordable and reliable transport they need to access amenities, education, employment, health and social care, and social connections, damaging our society, our economy and our environment.

Unless Government acts now to implement a practical, responsible and long-term solution.

TESTIMONIALS

"We're struggling right now. We're recruiting for nine new minibus drivers and it's very difficult. You want to be able to bring younger drivers on board, but it's mostly older drivers, retired people, we're getting through... Is that really better, is that really safer, than bringing younger drivers into the sector? It's about survival."

Kelvin Cochrane HcL Transport

"In our experience, the problem isn't necessarily finding younger people who are willing to drive; it's finding younger people who already have the necessary licence entitlement... Our drivers are now either approaching retirement age or already beyond it and we genuinely don't know where their replacements are going to come from. For a small Community Transport organisation like ours, reform is becoming increasingly urgent... Without a practical route for the next generation of Community Transport drivers, I am genuinely concerned about how organisations like ours are expected to replace the drivers on whom our services depend."

Michele Asbury Newtown and District Dial a Ride

"We provide transport in a predominantly rural area where the distances between communities can make isolation a very real risk for people without access to a car or mainstream public transport. Community Transport does exceptional work in bridging that gap. We rely heavily on older drivers who have the D1 entitlement. The difficulties around D1 licensing will make it harder for us to recruit and retain drivers, potentially reducing the availability of essential transport for people who rely on us."

John Reid South Ayrshire Community Transport

The solution: D1 licensing changes

Our proposal: changing minibus driver licensing rules

Minibus driver licensing rules must change to empower the Community Transport movement to train, recruit and retain the next generation of minibus drivers. We believe that the requirement for drivers operating Community Transport minibuses to acquire a D1 licence by test must be amended.

CTA proposes that the status quo rules should be replaced with an option to secure a training-based licence upgrade from a B licence to a D1 (101) licence, provided that certain additional stipulations are adhered to, which would ensure further safeguards are in place.

This solution would enable more people to acquire the equivalent of 'grandfather rights', authorising them to safely drive minibuses with up to 16 passenger seats for non-profit organisations using Section 19 or 22 permits, and receive payment for doing so. This would be the case until individuals reach 70 years old at which point the D1 (101) licence would expire and a medical check would be required for renewal, as at present.¹⁸

Our proposal would recognise the distinct position of Community Transport and reinstate the original purpose of the D1 (101) exemption by only enabling people to drive minibuses safely for social and non commercial purposes in their local community.¹⁹

It would open up opportunities for individuals to secure paid employment, or participate in volunteering, not just in the Community Transport sector, but with other non-profit organisations too. Individuals could also work for public bodies and local authorities, but not with commercial transport operators.

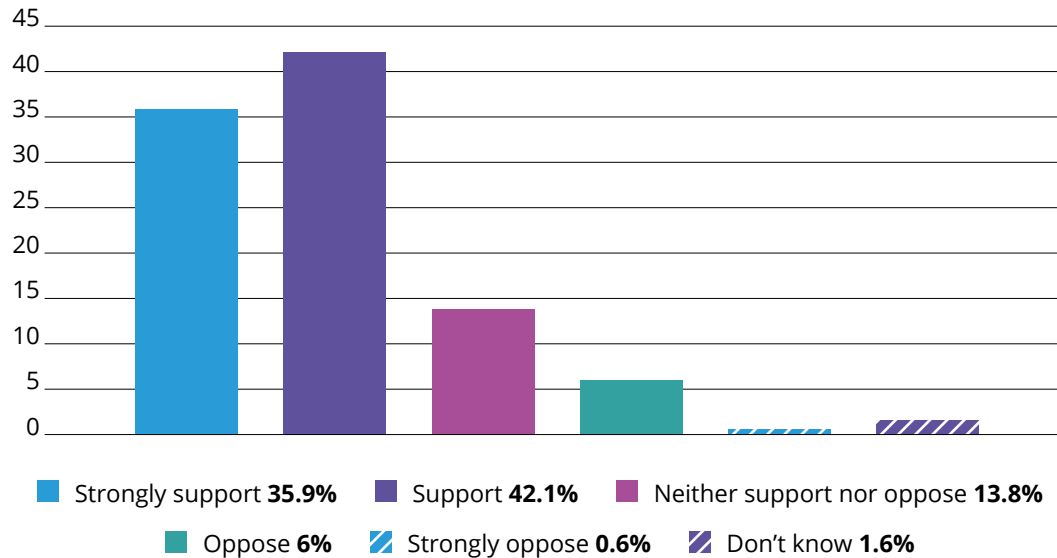
This solution would therefore support the retention of D1 drivers within the non-profit sector, rather than being lost to commercial organisations. This is a common challenge at present, damaging the sector's ability to build a qualified workforce and disincentivising operators to invest in D1 training.

During our extensive consultation, this option for change secured a strong mandate from our movement. Of the four options which we developed and presented, respondents were:

- Most likely to support it (78%)
- Least likely to oppose it (7%)
- Most likely to believe it would increase the availability of D1 drivers for their organisation (73%)

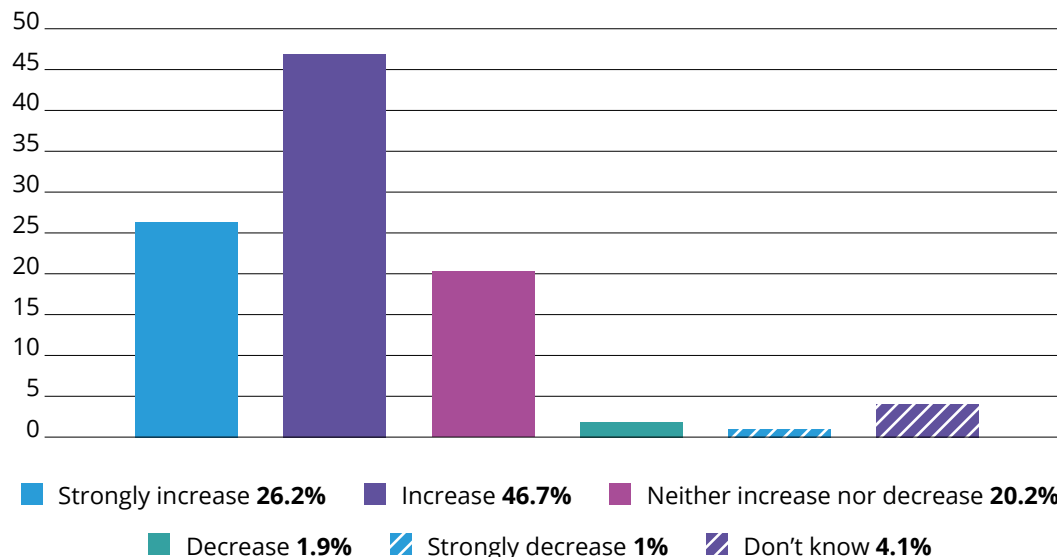
Q14: Option 2B: Replace the requirement to take a D1 test with a training-based licence 'upgrade' (i.e. MiDAS) to a D1 (101 exemption) licence and introduce certain additional stipulations to maintain safety and quality standards. What is your view on Option 2B?

n = 318 (76%)
Source: CTA



Q16: If implemented, how would Option 2B impact the availability of D1 drivers for your organisation?

n = 317 (76%)
Source: CTA



TESTIMONIALS

"The proposal will strengthen the sector, increase volunteer availability and address [safety] concerns... as it will be mandatory to have efficient and robust training before you are allowed on the road. It will also give the private sector reassurance that our sector is credible and by law all drivers have appropriate training in place."

Susan Dever Coalfield Community Transport

"Over the past 10 years we have seen a significant decline in the number of volunteer drivers with the D1 entitlement on their licence. This has increasingly put our services at risk at a time when Community Transport is needed more than ever... We need a safe, robust alternative training route that enables people to become qualified to drive Community Transport vehicles while maintaining the highest standards of passenger safety."

Sally Lloyd Davies South Denbighshire Community Partnership

MiDAS: training-based upgrade

The current D1 test is widely inaccessible, unaffordable and unrealistic as a training requirement for Community Transport drivers, especially volunteers. Our proposal seeks to replace it with a more accessible, affordable and realistic training requirement, which acts as an upgrade to minibus driving. The Minibus Driver Awareness Scheme (MiDAS) is a viable option for this training requirement.

MiDAS is a national programme of quality-assured education and training for the Community Transport sector and beyond and is managed by CTA. It ensures that organisations deliver safe, legal and comfortable minibus journeys.

MiDAS has been the gold standard for enhancing the safety and care of minibus passengers for more than three decades. The scheme provides a nationally recognised standard for the assessment and training of minibus drivers, as well as passenger assistants. It is widely used by Community Transport operators in onboarding and refresher training, and widely adopted by service commissioners as a contractual requirement.

In 2026, the Royal Society for the Prevention of Accidents (RoSPA) awarded course assurance to MiDAS, which demonstrates that it has been independently reviewed to confirm it meets recognised standards for course design, trainer competence and delivery.²⁰

MiDAS was first developed by CTA and Hampshire County Council in the 1990s after a series of road traffic accidents involving minibuses. It represented a pro-active response 'by the sector, for the sector' designed specifically for minibus operations in Community Transport. MiDAS has made a major contribution to building and maintaining the sector's long-standing reputation for passenger safety and trust.

MiDAS is enabled by a network of ten CTA Approved Training Centres, which train and support more than 1,000 Driver Assessors from 678 organisations to deliver training in communities all over the UK. It is significantly more accessible and relevant than D1 training. MiDAS is available locally and at a much lower price point. D1 training is up to ten times more expensive than MiDAS.



The Gold Standard

Over **20,000** drivers were successfully assessed to the MiDAS Standard last year.

Source: CTA

COMPARING D1 AND MIDAS

Content:

D1 involves an online theory and hazard perception test, practical sessions with an instructor, and a formal practical off-road and on-road test with a DVSA Examiner. MiDAS involves online learning, an online interactive theory test and a short, practical session and on-road assessment by a MiDAS Driver Assessor, which are minibus-specific and focussed on Community Transport operations.

Cost:

There is significant variation in the cost of D1 training from around £1,000 to over £2,000 for D1. MiDAS is under £300.

Duration:

The entire D1 process can take between two and three months from completing a medical, securing a provisional licence, and preparing for and passing theory and practical tests. These timelines can be stretched with large delays caused by significant shortages of D1 trainers and examiners.

The MiDAS online interactive theory test takes up to 90 minutes to complete. One-to-one practical sessions and on-road assessments with a MiDAS Driver Assessor are 45 minutes each.

Method:

D1 is based on teaching, practice, test preparation and independent examination to acquire a licence. MiDAS delivers online learning, discussion, practice and assessment to identify competence, translating the existing driving skills of B licence holders to larger vehicles. D1 is more intensive, while MiDAS is more targeted.

Delivery:

Both D1 and MiDAS have online and in-person elements, as well as both on-road and off-road elements. D1 tests are delivered by DVSA, while MiDAS is delivered 'by the sector, for the sector'. Online theory tests are administered by CTA, while practical and on-road learning is supported by Driver Assessors, who are trained by CTA-approved Training Centres.

Approach:

D1 is primarily focused on driving competence, providing legal entitlement to drive a minibus. MiDAS is focused on safe, legal and comfortable journeys; a passenger-centred approach, which provides exceptional care and service at every stage of the journey.

MiDAS is very widely used by the Community Transport sector. More than half of our consultation respondents informed us that passing a MiDAS assessment is a mandatory requirement for all of their minibus drivers. A further quarter of operators encourage or offer MiDAS.

Approximately 25% of all MiDAS certificates issued include MiDAS Accessible. This additional training focuses on how to provide safe, legal and comfortable journeys for disabled passengers and covers the use of specialist equipment, such as passenger lifts and ramps, and wheelchair tiedown equipment.²²

There is currently no legal requirement for Community Transport operators to provide minibus drivers with practical and operational training, as long as they have the necessary licence. A licence check and basic knowledge of maintenance are, therefore, theoretically sufficient to comply with the law.

CTA does not issue permits to operators which do not commit to providing additional training for new drivers. However, due to the legal position, this is not a requirement enforced by other permit-issuing bodies, such as the Office of the Traffic Commissioner (OTC). Ensuring MiDAS, or a similar training-based upgrade, was a mandatory requirement, would help establish a consistent national standard, matching and enforcing the high voluntary standards already achieved across the sector.

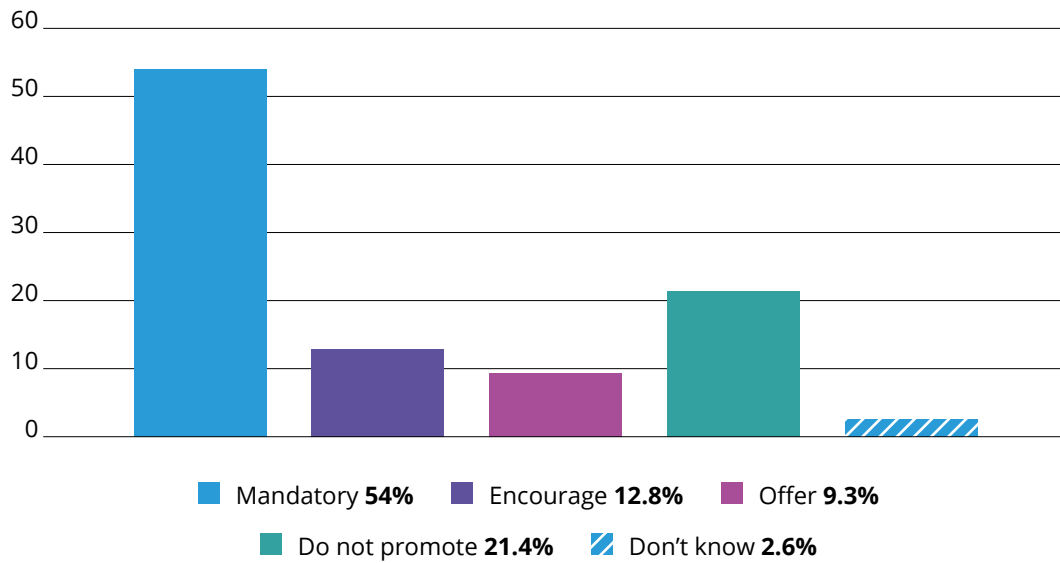
The content and delivery of MiDAS have been successfully transformed in recent years, with the first phase launched at the start of 2024 delivering refreshed content, new online modules for more flexible learning and more robust quality controls for trainers.

We propose that MiDAS become an accredited training option, designated by the DfT and recognised by the Driver and Vehicle Standards Agency (DVSA), for upgrading a B licence to a D1 (101) licence. More than two-thirds of our consultation respondents agree that MiDAS is now robust enough to act as this training-based upgrade.

This view is widely shared by the insurance industry. Minibus drivers are viewed as extremely safe by insurers when operating with permits and on a not-for-profit basis, especially when in possession of a valid MiDAS certificate. MiDAS has been acknowledged by several major insurers to justify a significant discount in premiums. They recognise that MiDAS educates learners on not just fundamental basics of the rules and regulations at a theory-based level, but also develops the practical skills they need to drive vehicles safely and with confidence.

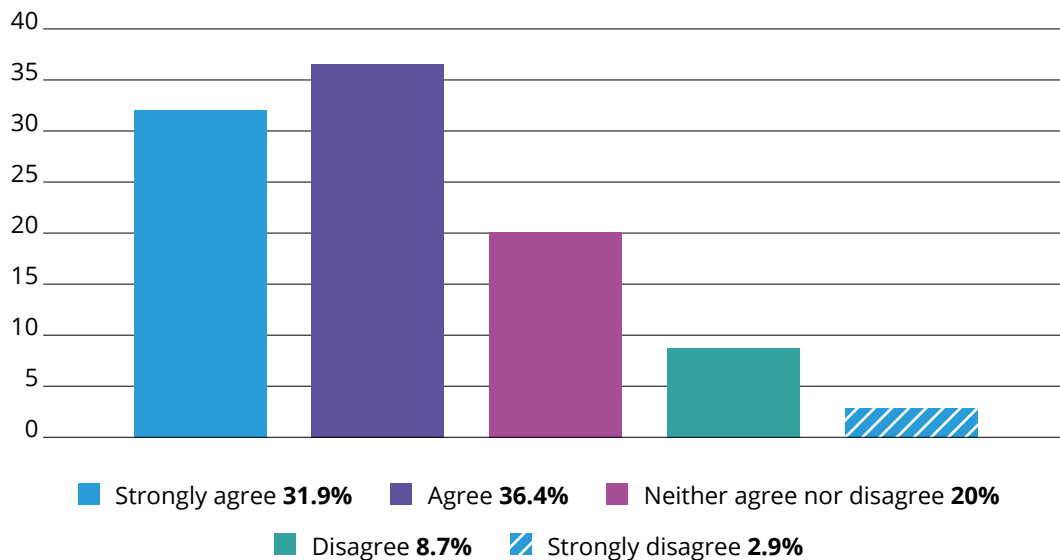
Q17: Do you currently require your minibus drivers to have passed their MiDAS assessment?

n = 313 (75%)
Source: CTA



Q18: In your view, to what extent is MiDAS robust enough to act as the training-based upgrade to D1?

n = 310 (74%)
Source: CTA



In addition to MiDAS, alternative training options, which are either already in the marketplace or still to be developed, and meet certain standards, could also be considered for DVSA accreditation to ensure learner choice. We are also open to other potential models and would welcome constructive discussions with the Government on this issue.

TESTIMONIAL

“Putting a driver through a D1 is an expensive undertaking when funding is hard to find. We know when a driver undertakes MiDAS they are not only learning the correct way to handle disabled people but are also having their driving assessed.”

Ian McDermott Manager, Welsh Border Community Transport

Additional safeguards

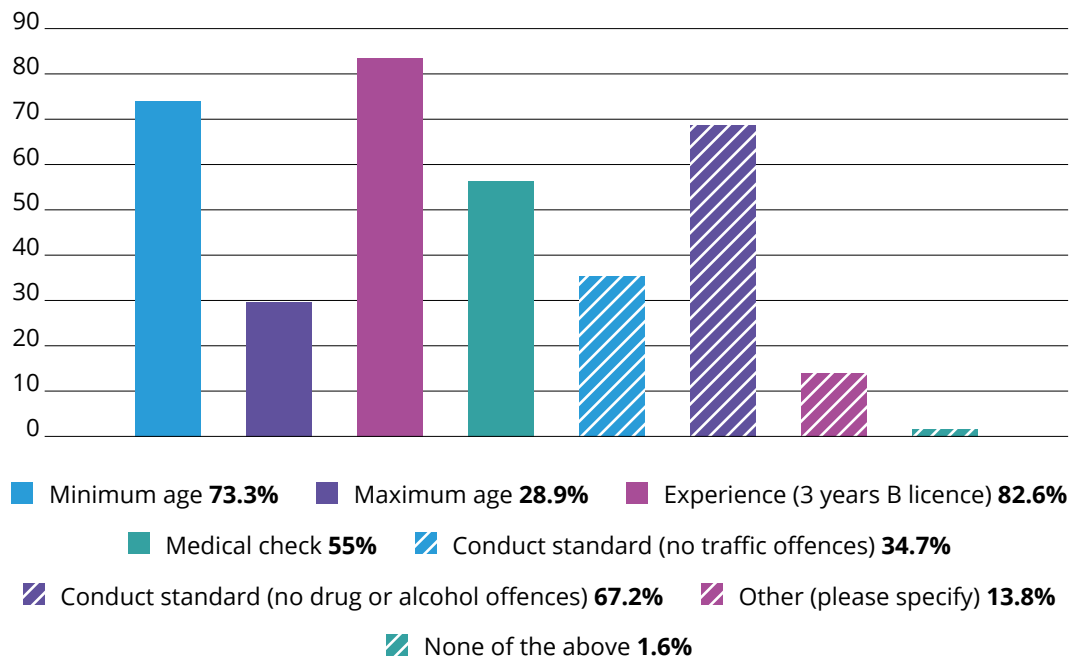
CTA and the Community Transport sector are both strongly committed to passenger safety. The sector is widely recognised for maintaining a high standard of safe operations with an enviable safety record. The evidence that is available does not identify any systemic safety issue with how minibuses are both maintained or driven, either within the sector or regarding the general use of minibuses more broadly.²³

Official road safety statistics taken from DfT’s STATS19 data is evaluated by vehicle type rather than by operating model. Therefore, the data does not differentiate Community Transport minibuses operated under Section 19 and 22 permits from general minibus use by other organisations (including commercial operators or individuals).²⁴ Nonetheless, this available evidence does significantly indicate that minibuses are only involved in a very small proportion of personal injury collisions (around 0.27–0.33% in the years examined).²⁵

Minibus accident rates have, therefore, been very low and historically stable over the long-term compared to other vehicle classes (including larger buses, coaches and cars) and remain so. Community Transport’s reputation with local commissioners and policymakers for high safety standards is based on this quantitative evidence and their own direct experience of working in partnership with our sector.²⁶

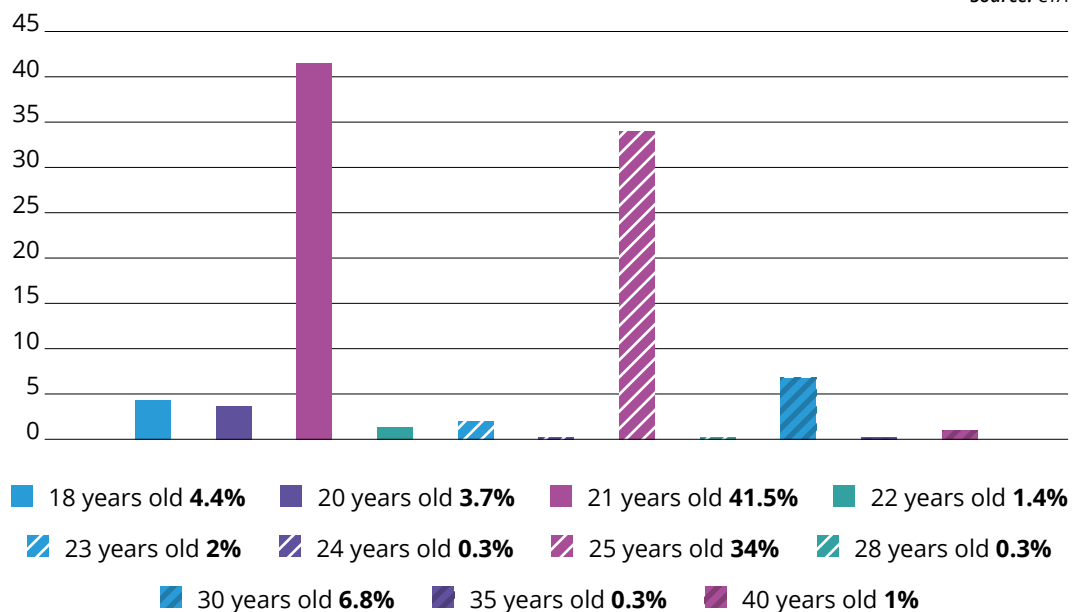
Q20: Which additional stipulations should be mandatory before someone could acquire the training-based upgrade to D1? Please tick all which you believe should apply.

n = 311 (74%)
Source: CTA



Q21: In your view, what should the minimum age be?

n = 294 (70%)
Source: CTA



Nevertheless, we believe that it is important to allay potential safety concerns and that it is possible to further strengthen passenger safety and ensure driver competency under new minibus driver licensing rules. We therefore support the creation of new safeguards to further minimise the risks of accidents. There is strong support across our movement for regulations which would require a:

- Minimum age of 25 years old to reflect the lower risk profile above this demographic threshold and to align with insurance industry practices;
- Minimum experience of 5 years on a B licence to demonstrate that the individual is an experienced driver with appropriate skills and knowledge;
- Medical checks every 5 years to demonstrate that the prospective minibus driver does not have any health conditions which may impair their ability to drive safely; and,
- Conduct standard for no drug or alcohol offences to demonstrate that the prospective minibus driver is a responsible, trustworthy citizen.

D1 (101): TODAY VS TOMORROW

A D1 (101) code on a UK driver's licence authorises the holder to:

- Drive a minibus of any weight with up to 16 passenger seats;
- Drive for a non-profit organisation; and,
- Receive payment when operating under a S19/S22 permit.

Today, D1 (101) can only be acquired either by:

- 'Grandfather rights' - acquiring a B licence by test before 1997; or,
- D1 test.

Going forward, we propose that D1 (101) can be acquired by B licence holders who complete a DVSA-accredited training-based upgrade, such as MiDAS, and fulfil each of the following criteria:

- Minimum age of 25 years old
- Minimum experience of 5 years on a B licence
- Medical check every 5 years; and,
- Conduct standard for no drug or alcohol offences.

The case for change

In summary, our proposal for minibus driver licensing change would:

- ✓ **Significantly increase the availability of D1 drivers;**
- ✓ **Avoid the cliff edge** threatening the future of Community Transport to protect services for the long-term;
- ✓ **Strengthen passenger safety and driver competency** by introducing mandatory training for all minibus drivers;
- ✓ **Create new safeguards** by introducing new requirements for a minimum age, minimum experience, medical checks, and a conduct standard;
- ✓ **End the distorting effect of the current rules** on operational decisions;
- ✓ **Establish consistent national driver standards** by introducing a mandatory driver training requirement for the first time; and,
- ✓ **Re-establish a single minibus driver licensing regime across the UK** with consistent rules across Great Britain and Northern Ireland.

Northern Ireland: case for action

Northern Ireland's equivalent of the D1 (101) entitlement is called D1 (nfhr) ('not for hire or reward'). It is granted on the same basis: passing a category B car test before 1 January 1997. Northern Ireland operates under separate legislation, with Section 10B permits serving as the equivalent of Section 19 permits in Great Britain. Since 2018, Northern Ireland has been operating under a licensing system that has diverged from, and is no longer aligned with, current practice across the rest of the UK.

In November 2017, the Department for Infrastructure (DfI) issued revised guidance to Section 10B permit holders, announcing a new interpretation of the rules, effective immediately. From that point, paid drivers could no longer rely on D1(nfhr) 'grandfather rights' and would need to pass the full D1 test instead. Separately, any organisation generating a financial surplus, even one reinvested straight back into its service, would no longer count as 'non-commercial' and would put its Section 10B eligibility at risk.

This letter was sent while DfI's own public consultation on the changes was still open. Of the 422 consultation responses that came from Community Transport users and community groups, the overwhelming majority opposed the proposals. They highlighted the risk that the changes would disrupt services aimed at reducing rural and social exclusion and that grant funding underpinning rural transport could be lost altogether. The final guidance, published in April 2018, confirmed the November position largely unchanged.

DfI's stated justification was road safety and the need to comply with EU law, despite a different approach being taken elsewhere in the UK. In law, the same EU rules apply in Great Britain, which reached a different, less restrictive conclusion. On safety, there is no evidence linking D1(nfhr) drivers to safety concerns, and the Police Service of Northern Ireland (PSNI) has confirmed it holds no evidence connecting collision risk to D1 licence category.

Up to 90% of the driver workforce did not hold a D1 PSV (now PCV) licence and suddenly required one. The consequences have been stark: the region's paid Community Transport driver workforce has since fallen by around 40%, and rural areas, where no alternative transport option exists, have been hit hardest.

The damage illustrates what happens when change is imposed without clear evidence of why it is needed, without meaningful sector engagement and without planning for its implementation. It also demonstrates how critical the continued availability of D1 (101) licences is to maintaining Community Transport services.

Recruitment and retention of driving staff remains extremely difficult. Community Transport drivers are now required to hold the same qualifications and training as by the commercial sector, but without comparable pay or terms.

The lesson for Great Britain from Northern Ireland is the scale of disruption and damage caused when minibus driver licensing rules are tightened suddenly, with the loss of the D1 (101) or D1 (nfhr) entitlement, without evidence or a managed transition.

Our proposal is designed to avoid that outcome for Great Britain by providing a practical, responsible and long-term solution for the whole of the UK based on substantial evidence and extensive consultation.

TESTIMONIALS

“The changes to D1 licensing requirements have had a significant impact on our ability to recruit and retain drivers. The pool of eligible candidates has reduced considerably, creating acute workforce shortages and increasing operational pressures at a time when demand for transport services remains high. The inconsistency between licensing requirements in Northern Ireland and the rest of the UK has created additional barriers to recruitment and has limited access to a workforce that would previously have been able to support the sector.”

Ashley Keane CDM Community Transport

“Our experience illustrates the human and organisational consequences of this abrupt policy change... The consequences extended beyond the drivers themselves: the loss of experienced staff put continuity of accessible transport at risk for people who depended on the service and often had no realistic alternative.”

Jason Donaghy Fermanagh Community Transport

Implementation

Secondary legislation

It is our view that our proposal could be implemented via amendments to secondary legislation enacted directly by the Secretary of State for Transport (also known as a statutory instrument), thereby avoiding the need for more challenging and complex primary legislation to be considered and passed into law by Parliament.

Part III of the Road Traffic Act 1988 provides for the licensing of drivers. The requirement to hold a driving licence for the relevant class of vehicle is in Section 87 of the Act. Section 105 of the 1988 Act provides that the Secretary of State may make regulations for the purposes of Part III.²⁷

The relevant regulations are The Motor Vehicles (Driving Licences) Regulations 1999, which provide in Regulation 4 that the Secretary of State shall grant licences authorising the driving of motor vehicles in accordance with the categories set out in Schedule 2.

In Schedule 2, Category D covers all vehicles designed to carry more than 8 passengers. Category D1 covers vehicles designed to carry between 8 and 16 passengers in addition to the driver, with a length not exceeding 8 metres. Category D1 (not for hire or reward) (101) covers vehicles in category D1 when driven otherwise than for hire or reward (although there is no restriction on the driver being paid within permit conditions).²⁸

Precedents

The driver licensing categories, entitlement conditions and exemptions from category B restrictions set out in the 1999 Regulations have been amended repeatedly by statutory instrument.

There are two clear and relevant precedents: firstly, the creation of the current D1 regime in 1996 and, secondly, the changes to zero-emission minibus regulations in 2025.

The Motor Vehicles (Driving Licences) Regulations 1996 (SI 1996/2824) removed automatic post-1997 D1 entitlement using powers under the Road Traffic Act 1988.²⁹ This demonstrates that substantial changes to the regulatory framework can be made through secondary legislation where Parliament has already delegated the necessary powers.

The Motor Vehicles (Driving Licences) Regulations 2025 (SI 2025/608) changed eligibility rules for driving zero-emission minibuses originally set out in the Road Traffic Act 1988.³⁰ B licence holders were authorised to drive an electric or hydrogen-powered vehicle with a maximum authorised

mass (MAM) of up to 4,250kg in order to support the UK's transition to zero-emission vehicles and net zero by 2050. The normal MAM limit for petrol and diesel vehicles with a B licence remains 3,500kg, which severely restricts Community Transport operators given the nature and weight of modern minibuses.

The 2025 regulations were a welcome and necessary adjustment to address the additional weight of electric zero-emission minibuses, ensuring that Category B licence holders can operate heavier electric vehicles without triggering licensing barriers. However, they do not alter the underlying driver licensing framework or the conditions attached to Section 19 and Section 22 permit operations. Category B licence holders without D1 entitlement remain subject to the same restrictions on paid driving and may only operate within the exemption framework on a volunteer, expenses-only basis. While the reforms enable electrification by compensating for the additional weight of battery technology, they do not expand the pool of drivers who can be deployed in paid Community Transport roles and therefore do not address the underlying workforce constraint.

Community Transport overwhelmingly relies on diesel minibuses to deliver essential services and will continue to do so for the foreseeable future. While electric minibuses are gradually being deployed by a limited number of operators, the sector's transition to zero-emission fleets will continue to be incremental and uneven due to a range of factors.

The electric minibus market remains underdeveloped. Only a limited number of adapted and accessible models relied upon by Community Transport operators to meet passenger needs are available as zero-emission vehicles. Our sector predominantly relies on the used minibus market, but used electric minibuses are not yet widely available in appropriate classes or at affordable prices.³¹

Electric minibuses are associated with considerably higher upfront capital costs, which many operators cannot afford due to a lack of funding. Potentially complex infrastructure improvements are often required to guarantee sufficient range and reliability, which are widely absent, especially in rural, remote and island communities where Community Transport frequently operates.³²

Specific amendments

After seeking specialist legal advice, CTA have identified the specific amendments which would be required to implement each element of our proposal:

1. Removal of the restriction on post-1 January 1997 category B licence holders being paid to drive Section 19 and/or Section 22 permit vehicles without variation of the weight limit:

This would be a relatively straightforward change, which could be implemented through:

- a. Deletion of Regulation 7(6)(e) of the The Motor Vehicles (Driving Licences) Regulations 1999
- b. Deletion of Regulation 7(11)(c)(v) of The Motor Vehicles (Driving Licences) Regulations 1999
- c. Deletion of Regulation 4(3)(e) of the Section 19 Permit Regulations 2009
- d. Deletion of Regulation 4(3)(e) of The Community Bus Regulations 2009

2. Increase in the weight limit for volunteer drivers of the restriction on post-1 January 1997 category B licence holders being paid to drive Section 19 and/or Section 22 permit vehicles:

All components of this proposal can be delivered through targeted amendments of Regulation 7 of the Motor Vehicles (Driving Licences) Regulations 1999 and related secondary legislation, without the need to amend primary legislation.

Recent amendments have modified Regulation 7 to permit category B licence holders to drive zero-emission vehicles above the standard 3,500kg limit, including up to 4.25 tonnes (and up to 5 tonnes where additional weight is attributable to accessibility equipment), subject to specified conditions.³³ This use of secondary legislation by Statutory Instrument has been clarified in an accompanying Explanatory Memorandum.³⁴

The increase in the weight limit could be implemented through:

- a. Insertion of a new Regulation 7(7) of The Motor Vehicles (Driving Licences) Regulations 1999 which replicates regulation 7(6) (including 7(6)(e)) but modifies the relevant weight limit at (i) and (ii) in line with the above
- b. Insertion of a new Regulation 7(11A) of The Motor Vehicles (Driving Licences) Regulations 1999 which replicates regulation 7(11) (including 7(11)(c)(v)) but modifies the relevant weight limit in line with the above

3. Introduce a requirement for DVSA-accredited training as an additional condition for drivers benefiting from the expanded eligibility:

A training requirement based on the Compulsory Basic Training (CBT) framework already in place for motorcycle and moped riders could be introduced for minibus drivers.

The Motor Vehicles (Driving Licences) Regulations 1999 provides for the authorisation by the Secretary of State of 'approved training bodies', which must satisfy certain conditions. In practice, the Secretary of State's powers are delegated to the Driver and Vehicle Standards Agency (DVSA) and the approval of training bodies is administered by them.

A similar process could make MiDAS (or alternative and additional training options) mandatory for drivers with a post-1 January 1997 category B licence to drive a Section 19 or Section 22 permit vehicle, either generally or as a condition of expanded eligibility in terms of payment and/or weight limits.

This could be implemented through:

- a. Amendment of Regulation 7 of The Motor Vehicles (Driving Licences) Regulations 1999 in relation to both petrol/diesel and zero emissions vehicles
- b. Amendment of Regulation 4(3) of the Section 19 Permit Regulations 2009
- c. Amendment of Regulation 4(3) of The Community Bus Regulations 2009

4. Create additional stipulations:

To maintain, or even enhance safety standards, we propose that eligibility would be subject to the following clearly defined further stipulations, which would act as additional safeguards:

- a. Minimum age of 25 years old
- b. Minimum experience of 5 years on a B licence
- c. Medical check every 5 years
- d. Conduct standard for no drug or alcohol offences

There are already age limits and a requirement for a minimum number of years on a B licence in Regulations 7(6) and 7(11) of The Motor Vehicles (Driving Licences) Regulations 1999. Creation of a new category of exemption for drivers over 25 with increased weight limits and so on, could be achieved by including the requirements in a new subparagraph to Regulation 7. If separate provision is required for zero emissions vehicles, this may be two subparagraphs.

Corresponding amendments to Regulations 4(3) of both The Section 19 Permit Regulations 2009 and The Community Bus Regulations 2009, or the creation of a new category under those Regulations, would be required.

All of this can be implemented via secondary legislation. Meanwhile, compliance could be facilitated through established DVLA processes, such as licence checks, medical certification and self-declaration, with the DVLA verifying age, licence tenure and driving record. Medical fitness could accordingly be evidenced through standard DVLA procedures, ensuring enforceability without creating burdensome administrative requirements.

Conclusion: it's time

The evidence collated to prepare this white paper underlines the urgent need for decisive action to address the growing shortage of qualified minibus drivers, which threatens the future of the UK's Community Transport movement.

This is not tomorrow's problem. The crisis is already here. Most Community Transport operators report D1 driver shortages today, resulting in reduced services, cancelled growth plans and stranded passengers.

But the crisis is also growing, and a dangerous cliff edge is fast-approaching. More than 3 million D1 licences will be lost by 2031, as the 'grandfather rights generation' continues to decrease, reducing the pool of potential minibus drivers for Community Transport by 22%. Within three years, most operators expect that there will not be enough D1 drivers to meet existing demand.

We believe that changes to minibus driver licensing rules can significantly increase the availability of D1 drivers, while strengthening passenger safety. We have developed a proposal which would introduce a new mandatory training requirement for all minibus drivers and create additional safeguards.

The precedents which we highlight in this white paper include the creation of the D1 regime itself back in 1996 and demonstrate that our proposal is actionable via secondary legislation. Our proposal would reflect that similar changes were made to minibus driver licensing rules for zero-emission vehicles in 2025 by a similar statutory instrument.

Doing nothing is simply not an option. If Government fails to act, it risks repeating in Great Britain the experience of Northern Ireland, where the effective withdrawal of 'grandfather rights' in 2018 caused a 40% drop in the number of paid Community Transport drivers almost overnight.

It is time for a practical, responsible and long-term solution for all of the UK. It is time for decisive action to avoid the cliff edge. It is time to empower our movement to recruit, train and retain Community Transport's next generation of minibus drivers.

References

- ¹ Department for Transport (2022) *Driving licensing call for evidence*: <https://www.gov.uk/government/calls-for-evidence/driving-licensing-review-call-for-evidence-on-opportunities-for-changes-to-the-driver-licensing-regime/driving-licensing-call-for-evidence>
- ² Department for Transport (2023) *Driver Licensing Review: Call for evidence on opportunities for changes to the driver licensing regime summary report*: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161186/driving-licensing-review-summary-responses.pdf
- ³ Community Transport Association (2025) *Safeguarding Community Transport's future through driver licensing changes*: <https://ctauk.org/sites/default/files/2025-11/Safeguarding%20Community%20Transport%27s%20future%20through%20driver%20licensing%20changes%20%28CTA%29%20%282025%29.pdf>
- ⁴ D Kelly, 'D1 licensing reform: what community transport operators told us', *Community Transport Association*, 22 June 2026: <https://ctauk.org/news/d1-licensing-reform-what-community-transport-operators-told-us>
- ⁵ Community Transport Association (2024) *Mapping England: State of the Sector Report 2024*, p.45–46: <https://ctauk.org/sites/default/files/2024-09/CTA-Mapping-England-Report-2024.pdf>
- ⁶ Community Transport Association (2022) *More Than a Minibus: Scotland's Community Transport Sector in 2021*, p.24–26: <https://ctauk.org/sites/default/files/2024-09/More%20Than%20A%20Minibus%20Report.pdf>
- ⁷ Community Transport Association (2025) *Mapping Northern Ireland: State of the Sector Report 2025*, p.38: <https://ctauk.org/sites/default/files/2025-02/Mapping%20Northern%20Ireland.pdf>
- ⁸ Office for Zero Emission Vehicles (2025) *Driving an electric or hydrogen-powered vehicle*: <https://www.gov.uk/government/publications/driving-an-electric-or-hydrogen-powered-vehicle>
- ⁹ UK Government, *Driving a minibus*, 2026: <https://www.gov.uk/driving-a-minibus>
- ¹⁰ Community Transport Association (2024) *How To Guide: Driver Licensing in Great Britain*: <https://ctauk.org/sites/default/files/2024-08/Driver%20Licensing%20Guide%20Great%20Britain.pdf>
- ¹¹ UK Government, *Become a qualified heavy goods vehicle (HGV) or bus driver*, 2026: <https://www.gov.uk/become-lorry-bus-driver/applying-for-a-bus-or-lorry-provisional-entitlement>
- ¹² Department for Transport (2023) *Driving licensing review: call for evidence – summary of responses*, p.142: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161186/driving-licensing-review-summary-responses.pdf

- ¹³ National Data Library (2026) '23 May 2026 GB Driving Licence Data', *GB Driving Licence Data*: <https://www.data.gov.uk/dataset/d0be1ed2-9907-4ec4-b552-c048f6aec16a/driving-licence-data>
- ¹⁴ National Data Library (2026) '23 May 2026 GB Driving Licence Data', *GB Driving Licence Data*: <https://www.data.gov.uk/dataset/d0be1ed2-9907-4ec4-b552-c048f6aec16a/driving-licence-data>
- ¹⁵ Community Transport Association (2024) *Mapping England: State of the Sector Report 2024*, p.26–27: <https://ctauk.org/sites/default/files/2024-09/CTA-Mapping-England-Report-2024.pdf>
- ¹⁶ From internal MiDAS database held by CTA
- ¹⁷ H. Wyatt, 'One in 10 returns to work after retirement', 19 July 2024: <https://www.hrmagazine.co.uk/content/news/one-in-10-returns-to-work-after-retirement>
- ¹⁸ Community Transport Association (2024) *How To Guide: Driver Licensing in Great Britain*: <https://ctauk.org/sites/default/files/2024-08/Driver%20Licensing%20Guide%20Great%20Britain.pdf>
- ¹⁹ Some commercial transport providers have previously argued that, in their view, Community Transport operators have not operated according to 'exclusively non-commercial purposes' and represent 'unfair competition'. However, the High Court's judgement in the Judicial Review of 2019 reiterated that it is not legal for Community Transport services to operate commercially: <https://www.bailii.org/ew/cases/EWHC/Admin/2019/3319.pdf>
- ²⁰ D. Gallanders, 'RoSPA awards course assurance to MiDAS', *Community Transport Association*, 18 March 2026: <https://ctauk.org/news/rosa-awards-course-assurance-midas>
- ²¹ Community Transport Association (2025) *MiDAS Information Pack*: <https://ctauk.org/sites/default/files/2025-12/news/MiDAS%20Information%20Pack%20v2.0.pdf>
- ²² Community Transport Association (2025) *MiDAS Information Pack*: <https://ctauk.org/sites/default/files/2025-12/news/MiDAS%20Information%20Pack%20v2.0.pdf>
- ²³ Department for Transport (2022) *Reported road casualties Great Britain, annual report: 2021*: <https://www.gov.uk/government/statistics/reported-road-casualties-great-britain-annual-report-2021>
- ²⁴ In response to a written question in the House of Lords, the Minister of State for the Department for Transport confirmed that STATS19 records bus and coach incidents, but does not provide operational disaggregation, such as relating to Community Transport – UIN HL2623 (18 November 2024): <https://questions-statements.parliament.uk/written-questions/detail/2024-11-18/hl2623>
- ²⁵ Written evidence to the House of Commons Transport Select Committee by Mobility Matters reports that minibuses account for approximately 0.27–0.33% of injury collisions. The statistical record 'does not support any suggestion' that there is a systemic problem 'with how minibuses are maintained or driven' – CTT0271 (13 December 2017): <https://committees.parliament.uk/writtenevidence/83024/html/>

- ²⁶ House of Commons Transport Select Committee (2017). 'UK legislation and guidance and emerging concerns', *Community Transport and the Department for Transport's proposed consultation*: <https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/480/48005.htm>
- ²⁷ Road Traffic Act 1988, Part III (including s.87 and s.105), established the statutory framework for driver licensing and conferred powers on the Secretary of State for Transport to make regulations governing licence categories and conditions: https://www.legislation.gov.uk/ukpga/1988/52/contents?utm_
- ²⁸ Motor Vehicles (Driving Licences) Regulations 1999 (SI 1999/2864), including Regulation 4 and Schedule 2 (licence categories), as amended, which define category D1 entitlement and associated conditions: https://www.legislation.gov.uk/uksi/1999/2864/contents/made?utm_
- ²⁹ Motor Vehicles (Driving Licences) Regulations 1996 (SI 1996/2824), made under the Road Traffic Act 1988 and coming into force on 1 January 1997, which implemented the modern driver licensing regime (including category D1 entitlement and 'grandfather rights') in accordance with Directive 91/439/EEC (Second Driving Licence Directive): <https://www.legislation.gov.uk/uksi/1996/2824/made>
- ³⁰ The Motor Vehicles (Driving Licences) (Amendment) (No. 2) Regulations 2025: UK Statutory Instruments – 2025 – No. 608: <https://www.legislation.gov.uk/uksi/2025/608/made>
- ³¹ Anon, 'CTA's response to DFT's consultation regarding the ending of sales of non-zero emission minibuses', *Community Transport Association*, 30 June 2022: <https://ctauk.org/news/ctas-response-dfts-consultation-regarding-ending-sales-non-zero-emission-mini-buses>
- ³² Community Transport Association (2024) *Act Local: Community Transport, Climate Action and Scotland's Just Transition to Net Zero*: <https://ctauk.org/sites/default/files/2024-09/Act%20Local%20Net%20Zero%20Scotland%20Report.pdf>
- ³³ Motor Vehicles (Driving Licences) (Amendment) (No. 2) Regulations 2025 (SI 2025 No. 608), draft instrument (UKD SI), amending the Motor Vehicles (Driving Licences) Regulations 1999, authorises category B licence holders to drive zero-emission vehicles with a maximum authorised mass up to 4.25 tonnes (and up to 5 tonnes where additional weight is attributable to specialist accessibility equipment), subject to specified conditions: https://www.legislation.gov.uk/ukdsi/2025/9780348270303/pdfs/ukdsi_9780348270303_en.pdf?title=Motor+Vehicles+%28Driving+Licences%29+%28Amendment%29+%28No.+2%29+Regulations+2025&utm_
- ³⁴ Motor Vehicles (Driving Licences) (Amendment) (No. 2) Regulations 2025, Explanatory Memorandum (Department for Transport, 2025), paras 4.1–4.3 (scope and effect of amendments to regulation 7 permitting category B drivers to operate zero-emission vehicles up to 4.25t/5t with conditions) and paras 5.2–5.6 (policy rationale, removal of prior restrictions including training requirement, goods-use limitation, and alignment with equivalent petrol/diesel vehicle rules): https://www.legislation.gov.uk/ukdsi/2025/9780348270303/pdfs/ukdsiem_9780348270303_en_001.pdf?utm_



Community Transport Association

91 Princess Street
Manchester
M1 4HT

0161 351 1475

Charity registered in England and Wales (1002222) and Scotland (SC038518)

policy@ctauk.org
www.ctauk.org

[facebook.com/CTAUK1](https://www.facebook.com/CTAUK1)

[linkedin.com/company/community-transport-association-uk](https://www.linkedin.com/company/community-transport-association-uk)

© CTA 2026