



Department
for Transport

Open consultation

Automated passenger services (APS) permitting scheme consultation

Published 21 July 2025

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Introduction

The Automated Passenger Services (APS) permitting scheme will provide a clear legal route to deploying commercial passenger services with no human driver, providing certainty for operators to enter the GB market. It will be introduced through the Automated Vehicles (AV) Act 2024^[footnote 1], which establishes a targeted high-level regulatory framework.

While being introduced in advance of other parts of the AV Act, the proposed statutory instrument (SI) will continue to be in effect following the introduction of the full AV Act. This means that the proposed SI will apply for initial pilots from spring 2026 and for deployments following the full implementation of the AV Act in the second half of 2027.

APS permits have been developed as a bespoke route for regulating passenger services that either operate without a human driver or that are trialling services that might be used without a human driver. Without this certainty, both Law Commissions identified that automated passenger services ‘may either be banned or entirely unregulated’.^[footnote 2]

The APS permitting scheme intends to provide a flexible approach that enables the potential for new service models to emerge while maintaining passenger safety.

For services that have been granted an APS permit, taxi, private hire vehicles (PHV) and public service vehicles (PSV) legislation will be disapplied. The APS permitting scheme does not replace these existing licensing routes for passenger carrying vehicles, instead sitting alongside them as an additional route targeted specifically at self-driving vehicles.

Details for the APS permitting scheme are intended to be set out through secondary legislation. The Centre for Connected and Autonomous Vehicles (CCAV) is now seeking views on the scheme and proposed secondary legislation through this consultation.

The consultation has 7 chapters:

1. [Legislative scheme outline](https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#legislative-scheme-outline)
(<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#legislative-scheme-outline>)
2. [Local consent](https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#local-consent)
(<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#local-consent>)

3. [Accessibility](https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#accessibility) (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#accessibility>)
4. [Application process and renewals](https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#application-process-and-renewals) (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#application-process-and-renewals>)
5. [Variation, suspension or withdrawal](https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#variation-suspension-or-withdrawal) (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#variation-suspension-or-withdrawal>)
6. [Reviewing the decision](https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#reviewing-the-decision) (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#reviewing-the-decision>)
7. [Disclosure and use of information](https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#disclosure-and-use-of-information) (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#disclosure-and-use-of-information>)

1. Legislative scheme outline

Part 5 of the AV Act 2024 (the act) introduces APS permitting, designed to provide a new, flexible scheme to issue permits for automated passenger services and provide businesses with the regulatory confidence to invest in testing and deploying these innovative services.

APS permits not only apply to self-driving vehicles (those without a human driver and listed or authorised as self-driving). They are also available, as set out in the act, for trials ‘with the aim of developing vehicles’ able to carry passengers without a driver.^{[[footnote 3](#)]}

Given the importance of APS permits in providing clarity to enable commercial passenger carrying services, including for trials with or without a safety driver, the government intends to bring Part 5 of the act into effect in spring 2026.

This would see the provision of Part 5 in advance of the full implementation of the act, including, for example, before the full schemes of authorisation and no user-in-charge operator (NUICO) licensing.

In addition to providing clarity for organisations that wish to deploy a commercial service, bringing forward implementation of the APS permitting scheme will help further inform:

- government about the in-use challenges
- the benefits of automated passenger services

Operators could use these proposed regulations to deploy passenger services in one of 3 ways:

1. With a safety driver, as part of a trial to develop automated services.
2. In advance of full implementation of the AV Act, in a vehicle that has been listed as capable of safely driving itself under section 1 of the Automated and Electric Vehicles Act 2018.
3. After full implementation of the AV Act (in an authorised vehicle) where an APS permit will operate alongside authorisation and no user-in-charge operator licensing. The APS permitting scheme will continue, but aspects of the guidance may be simplified to reflect the fact that some issues will be covered in the no user-in-charge operator licencing.

The following provides background on some of the aspects of the APS permitting scheme.

Statutory framework

While much of the APS permitting scheme is set out on the face of the act, other parts of the scheme are left to secondary legislation.

For example, while the act sets out the definition of an APS, ^[footnote 4] the disapplication of existing legislation, ^[footnote 5] and the consent requirements, ^[footnote 6] it does not set out the form and content of an application, how a permit can be varied, suspended or withdrawn or the maximum period for which a permit may be valid.

In this consultation, we are not seeking views on the provisions of the act itself: that has already been approved by Parliament. We are consulting on the initial regulations to be made under the scheme.

We are also interested in receiving views on the practicalities of running the scheme in its initial phase and following implementation of the act.

Appropriate national authority

Section 82 gives the power to grant a permit to ‘the appropriate national authority’, which depends on the service model that is proposed for deployment.

For services that resemble a PSV, such as a bus, the appropriate national authority, as a reserved matter, would be the Secretary of State for Transport.

For devolved services resembling a taxi or PHV in England, the appropriate national authority would be the Secretary of State for Transport, while in Scotland or Wales, the power is with Scottish or Welsh Ministers [\[footnote 7\]](#).

The APS permitting scheme does not apply in Northern Ireland.

This consultation is confined to powers granted to the Secretary of State for Transport as the appropriate national authority. It, therefore, covers:

- services resembling taxis or PHV that operate in England
- services resembling a bus or coach that operate anywhere in Great Britain

From this point on, the Secretary of State for Transport will be referred to in the consultation in their role as the appropriate national authority.

The act allows the Secretary of State for Transport to delegate some or all of its functions to the traffic commissioners [\[footnote 8\]](#). However, the initial intention is for APS permit applications to be granted by the Driver and Vehicle Standards Agency (DVSA) for the Secretary of State for Transport.

Consent

Where a service resembles a taxi or PHV, a permit may only be issued with the consent of the licensing authority for each place where the service is provided [\[footnote 9\]](#).

Where a service resembles a bus and operates in an area covered by a franchising scheme, consent is required from relevant franchising authorities [\[footnote 10\]](#).

For non-franchising areas, the Secretary of State may exercise discretion over how far to require service providers to register timetables or take part in local partnerships (for example, by joining ticketing schemes) ^[footnote 11].

We discuss the procedure for obtaining consent in [chapter 2: local consent](https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#local-consent) (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#local-consent>).

Older and disabled passenger needs

Under section 87(3), the Secretary of State for Transport must consider whether and to what extent to grant a permit:

“is likely to lead to an improvement in the understanding of how automated passenger services should best be designed for, and provided to, older and disabled passengers ^[footnote 12]”

This is in addition to the Secretary of State for Transport’s public sector equality duty (PSED) when:

- deciding whether to grant a permit
- to have due regard to the need to eliminate unlawful discrimination, harassment or victimisation
- to advance equality of opportunity
- to foster good relations

Early implementation of the APS permitting scheme will provide the opportunity to accelerate learning in advance of full implementation of the act.

Any deployment would provide the opportunity to build an understanding of how to realise the full extent of benefits from these services for older and disabled people, alongside others who have limited or restricted mobility.

In [chapter 3](https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#accessibility), we outline accessibility considerations (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#accessibility>).

Consulting traffic authorities and emergency services

Under section 87(1), before granting a permit, the Secretary of State for Transport must consult traffic authorities and emergency services that are likely to be substantially affected by the permit ^[footnote 13].

We discuss the consultation procedure in chapter 4 (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#application-process-and-renewals>) as part of the application.

Permit conditions

When a permit is granted, the act requires the permit to specify the area where the service may be provided:

- the vehicles (or description of vehicles) in which the service is provided
- the period for which the permit is valid ^[footnote 14]

Permits will also be subject to conditions. Conditions may limit the service, for example, to times of day, or impose obligations on the permit holder ^[footnote 15].

Some conditions are required by the legislation: for example, the permit holder must publish reports about their service. ^[footnote 16]

Other conditions will be discretionary, and may, for example, be linked to consent given by appropriate licensing authorities or reflecting concerns raised by emergency services or traffic authorities.

We discuss conditions alongside the application process more generally in chapter 4 (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#application-process-and-renewals>).

Fees

The act provides for regulations to be made about fees, including those for the grant, retention and renewal of a permit. ^[footnote 17] Costs notices, to cover the cost of compliance orders and monetary penalties, are specified in the act itself. ^[footnote 18]

We discuss fees alongside the application process more generally in chapter 4 (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#application-process-and-renewals>).

Civil sanctions

When fully implemented, the act provides for civil sanctions if the permit holder infringes the scheme. We do not intend to implement the civil sanctions scheme for pilots because there may be a risk that civil sanctions are overly punitive, given their nature.

Variations, suspensions and withdrawals

As an addition or alternative to applying civil sanctions, the Secretary of State for Transport may react to an infringement by varying, suspending or withdrawing the permit.

This issue is not dealt with in the act itself, which states that regulations may be made to specify both the circumstances in which a permit may be varied, suspended or withdrawn, and the procedure to be followed in connection with these actions. ^[footnote 19]

Regulations may also provide for reviews and appeals against the decision. ^[footnote 20]

We discuss variations, suspensions and withdrawals in chapter 5 (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#variation-suspension-or-withdrawal>).

Reviewing the decision

Where a permit holder believes a decision has not been made correctly, under the proposed regulations, they can request DVSA to undertake an internal review.

This is discussed in [chapter 6](#)

(<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#reviewing-the-decision>).

Disclosure and data sharing

Permit conditions will require some information to be published and may require other information to be shared with:

- public authorities
- private businesses on a confidential basis [\[footnote 21\]](#)

Section 88 of the act protects confidential information and makes it an offence for the recipient to disclose it [\[footnote 22\]](#) except for a purpose that is specified in regulations or where authorised by another enactment.

We discuss [disclosure and data sharing in chapter 7](#)

(<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme/automated-passenger-services-aps-permitting-scheme-consultation#disclosure-and-use-of-information>).

2. Local consent

An automated passenger service that resembles a taxi, PHV or bus will require consent from the appropriate local licensing authority or franchising body. These bodies will be referred to as consenting authorities from this point.

To successfully provide the APS permitting scheme, clarity of consent is critical for:

- consenting authorities
- organisations that wish to deploy a service
- other stakeholders that wish to understand deployment requirements

This chapter explains when consent is needed and outlines the procedure for obtaining it.

We want to know what guidance and coordination the consenting authorities may find useful and what information these authorities need to make a decision.

Services resembling taxis or private hire vehicles

Definition of resembling taxis or PHV

A service ‘resembling a taxi or private hire vehicle’ would require a taxi or private hire vehicle licence if it had a driver and was not exempt from the legislation ^[footnote 23]. The reliance of this definition on existing legislation governing taxis and private hire vehicles makes this complex.

This consultation is only concerned with taxi and private hire-like services in England.

APS licensing for taxi and private hire-like services in Wales and Scotland is a matter for Welsh Ministers and Scottish Ministers.

Within England, separate legislation covers London, Plymouth and the rest of the country. ^[footnote 24]

This means the definition applies to commercial passenger services that use vehicles designed to carry fewer than 9 passengers and where passengers pay a single fare for the journey. However, there are several exemptions, for example, for wedding and funeral cars. ^[footnote 25]

Passenger services using larger vehicles, or charging separate fares, are known as PSVs and would typically be seen as buses or coaches.

Who must consent?

If the service resembles a taxi or PHV, it requires consent from each licensing authority in whose area the service may be provided, of which there were 263 in England as of April 2024. ^[footnote 26]

These are typically unitary or lower-tier local authorities such as borough and district councils. However, Transport for London (TfL) is the licensing authority for Greater London.

Government’s [English devolution white paper](https://www.gov.uk/government/publications/english-devolution-white-paper-power-)
(<https://www.gov.uk/government/publications/english-devolution-white-paper-power->

[and-partnership-foundations-for-growth/english-devolution-white-paper](#)) included a commitment to consult on granting responsibility for taxi and private hire vehicle licensing to all Local Transport Authorities (including Strategic Authorities) ^[footnote 27].

The consenting power for taxis and PHVs would align with any changes that are implemented following the consultation.

Services resembling buses

Most bus services do not need consent to obtain a PSV licence. The decision whether to grant an APS permit for a 'bus-like' service will be a matter for the Secretary of State for Transport, whether the service is in England, Wales or Scotland.

The only bus-like services that require consent to obtain an APS permit are 'local services' – as defined by section 2 of the Transport Act 1985 – that operate within an area subject to a bus franchising scheme. For example, a local bus service that uses a vehicle operating with a PSV licence and carries passengers by road for separate fares.

The route can be any length if passengers can alight within 15 miles of where they started (measured in a straight line). There are a variety of exclusions, for example, for excursions, school buses and rail replacement bus services.

TfL and Transport for Greater Manchester (TfGM) are currently the only bus franchising bodies. Where further bodies gain franchising powers, their consent will also be required.

Consent procedure

Under the legislation, the Secretary of State for Transport is to request consent from the consenting authority or authorities where the service would operate across licensing boundaries.

Consenting authorities have a key role in this process, where they have a 6-week period to:

- evaluate the proposed service and the potential effect on the local area

- respond with their decision and reasoning in writing to the Secretary of State for Transport

Where no response or written reason is provided within that period, consent is given automatically. [\[footnote 28\]](#)

Consent provisions in practice

Initial discussions

It is beneficial for consenting authorities to understand as much as possible about the proposed deployment before receiving the formal consent request.

To enable this, applicants should discuss their proposals with the consenting authority (or authorities) or other key stakeholders before making a formal application.

While there are likely many details that would need to be considered, useful initial information could likely include:

- the proposed deployment area
- any key points within this, for example, access to railway station pick-up/drop-off points
- the number and types of vehicles
- what vehicles will do between rides
- the operating hours of the service

When DVSA receives an application, it may also hold preliminary, informal discussions with the licensing authority or franchising body before the formal request if the application is helpful.

Helping consenting authorities with the decision

Consent is a broad and important power within the act. Consent must be understood by organisations wishing to deploy a service and by consenting authorities.

Coordination

Where a proposed service would operate in different consenting authority areas, there will be a need for a level of consistency in considerations in whether to grant consent or not.

We welcome views on whether government should be involved in supporting any coordination of information and best practice sharing.

Guidance

Government is considering publishing guidance, including for consenting authorities, to help support the deployment of automated passenger services and understanding what is required to make an application and the process it follows.

The aim of guidance for consenting authorities would be to clarify their role. For example, there will be a safety assessment process that is followed before a vehicle can be legally deployed, so we would not expect this to form the basis of consenting decisions.

As part of the process to consider the granting of an APS permit, government would require evidence that vehicles are appropriately insured and maintained, and it is proposed that relevant staff undergo safeguarding checks, including appropriate passenger safeguarding.

The policy intention of consent, as outlined through the act's explanatory notes, is that it ensures consideration is given to local issues relating to policy and standards for taxi and PHV licensing and those applied through bus franchising.

Where guidance is published, we will aim to make it as helpful and practical as possible for all those with a role in enabling the deployment of any proposed services.

Formal request

It is important that when the Secretary of State for Transport makes a formal request for consent, consenting authorities receive information that enables an informed consent decision to be made within the 6-week period.

It is, therefore, important that the application process requests relevant information that can be shared with consenting authorities. We are seeking views on what information consenting authorities would view as being useful to make a decision.

Consent questions for authorities

Question 1: what guidance, if any, do you think government should provide to enable preliminary discussions between those wishing to apply for an APS permit and authorities?

Question 2: in your view, should we support any coordination, information sharing and best practice sharing between authorities?

Question 3: in your view, what would you expect to see included to make the proposed guidance as useful as possible for your authority?

Question 4: in your view, what information are taxi and private hire licensing authorities likely to view as useful in deciding whether to grant or refuse consent?

Question 5: in your view, what information are bus franchising bodies likely to view as useful in deciding whether to grant or refuse consent?

3. Accessibility

Around 1 in 4 people report having a disability in the UK

([https://www.gov.uk/government/statistics/disability-accessibility-and-blue-badge-scheme-statistics-2023-to-2024/disability-accessibility-and-blue-badge-statistics-england-2023-to-](https://www.gov.uk/government/statistics/disability-accessibility-and-blue-badge-scheme-statistics-2023-to-2024/disability-accessibility-and-blue-badge-statistics-england-2023-to-2024#:~:text=There%20are%20now%20approximately%2016.1,age%20has%20remained%20relatively%20stable)

2024#:~:text=There%20are%20now%20approximately%2016.1,age%20has%20remained%20relatively%20stable). In line with the government's Inclusive Transport

Strategy, self-driving passenger services provide an opportunity to improve transport options for disabled people who otherwise may struggle to make a journey.

Benefits are also likely to be seen by other people with limited or restricted mobility. Widely accessible APS could offer essential transport links, particularly in areas where accessible public transport services are currently limited.

Accessibility in the act

In section 87 of the act:

“In deciding whether to grant a permit, the Secretary of State must have regard to whether, and to what extent, the granting of the permit is likely to lead to an improvement in the understanding of how automated passenger services should best be designed for, and provided to, older or disabled passengers.”

The act further sets out that, where a permit has been granted, it must include a:

“...condition requiring the permit holder to publish reports about the automated passenger services which it provides, and in particular about the steps which it takes to meet the needs of older or disabled passengers, and to safeguard passengers more generally.”

The Public Sector Equality Duty

Beyond the act, the Public Sector Equality Duty (PSED) applies in respect of all the Secretary of State for Transport's functions under the permit scheme. This includes considering how the decision to grant a permit, attach conditions, vary or renew a permit would support the requirement of the PSED.

PSED also applies to other public sector bodies, such as consenting authorities and to organisations, such as service providers, carrying out a role for a public authority. For example, where they are contracted to do so.

Reporting condition

The Law Commission's final joint report recommended that the permit holder should publish a report that highlights how the service safeguarded passengers and how it met the needs of older and disabled passengers.

This reporting will help build an evidence base in understanding accessibility provision on what could be new approaches to providing passenger transport.

We welcome views on this.

Accessibility guidance

As outlined earlier in this consultation, consideration is being given to the development of guidance. Current consideration includes the provision of guidance on accessibility.

We welcome views on this.

Accessibility questions

Question 6: what information would you expect to see published by permit holders on the safeguarding of passengers?

Question 7: what information would you expect to see published by permit holders on how the service was meeting the needs of older and disabled people?

4. Application process and renewals

The application and renewal processes are intended to be flexible rather than being fixed by legislation. This approach intends to enable government to revise and develop the process and any supporting guidance over time. For example, as experience is gained or in response to applicant feedback.

With most aspects not being set in regulations and not forming part of the statutory consultation on the regulations, this chapter focuses on information that applicants may be asked to provide during the application process.

This is to provide some clarity and direction on the government's current thinking. This requested information will be used to support licensing/franchising authorities with their consenting decisions:

- by DVSA to decide whether to grant the application
- to formulate permit conditions

Proposed regulation 4 sets out the renewal window for existing permit holders, in which an application can be made to renew from between 2 to 6 months before the existing APS permit's expiry date.

Where a renewal is applied for within this proposed window, it is proposed that the permit will continue until either a decision on renewal is made or the permit has been in place for 5 years.

This chapter will also discuss fees: while the act allows for a regulation to be made about fees, this power is not currently being taken, so there will not be a cost associated with applications at this stage.

Information required for applications

Service scope

Under section 82(4), the permit must specify the areas in which the service is provided and the vehicles (or a description of the vehicles) involved. We will, therefore, ask applicants to specify the:

- area where a service will be provided
- number and description of vehicles intended to be deployed
- times of operation

Applicants will also need to confirm in what sense the service is automated, under section 82(2). This is to understand if the proposed service will use vehicles that have been listed or authorised as able to travel autonomously, or whether they are being used with a safety driver in a trial with the aim of developing automated services.

The APS permitting scheme is not a bypass to avoid licensing routes for normal taxis, PHVs, or PSVs.

Proposed service wider assessments

Further information will be requested to enable an assessment of the proposed service and operational capability of the organisation. This would include elements such as:

- operational competence, such as depots, other operational centres and support infrastructure, maintenance, monitoring and incident response, including where third-party services are contracted
- operational plan, such as deployment area, contingency planning in the event of road closures, service and vehicle type, any schedules, and fare information provision
- passenger safety management, including safeguarding policy

- data management policy
- appropriate insurance for passenger carrying services and financial stability
- evidence of any engagement with consenting authorities and other appropriate stakeholders
- consideration of providing an accessible service

We have provided more details on some of these aspects below.

Traffic authorities and emergency services engagement

Under section 87(1), the Secretary of State for Transport must consult:

- traffic authorities, as defined by the Road Traffic Regulation Act 1984, s.121A
- emergency services they consider are likely to be affected if the permit is granted

As with consenting authorities, we strongly encourage permit applicants to engage with the appropriate traffic authorities and emergency services before submitting their application.

To make this a productive process, both for the engagement and application, applicants should include information about how:

- the service will impact congestion and affect traffic flow
- their vehicles will respond to emergency vehicles and situations
- emergency services and other officials can engage with the vehicle and/or applicant

Information on congestion and traffic flow could, for example, include:

- what will happen to vehicles between trips
- how breakdowns will be responded to
- how pick-up and drop-off points will operate, particularly with consideration of busy areas

This is in addition to the scope of the service, which is likely to be useful for the wider context of the proposed deployment.

We are considering providing guidance to support discussion between applicants, emergency services and traffic authorities. We welcome views on this consideration.

Proposed services resembling a taxi, private hire vehicle or a bus

The legislation distinguishes between services that resemble taxis or PHVs and those that resemble buses. To apply these categories, consider how many passengers each vehicle can carry and how fares will be charged. For example, a separate or whole vehicle will need to be known.

If a proposed service uses larger vehicles (carrying 9 or more passengers) or charges separate fares, it could resemble a local bus service. Consideration will need to include:

- how the service will operate
- if passengers alight within 15 miles of where they started (measured in a straight line)
- if it would fall within one of the statutory exceptions

Where an exception doesn't apply, the service may be considered as bus-like.

For a bus-like service, the service should comply with the regulatory provisions regarding buses in the service area unless there is a good reason why the provisions should not apply. Therefore, any operator intending to operate bus-like services should indicate how they will align with existing regulatory provisions, such as participating in ticketing schemes. Applicants should also provide draft timetables.

Where consent is required, the application form will ask for details of any engagement with the consenting authority.

Safeguarding

Service providers should ensure that any passenger-facing staff are subject to enhanced checks with the Disclosure and Barring Service. This would apply to:

- any staff employed within the vehicles (such as stewards or safety drivers)
- those undertaking remote oversight
- those who support with the ability to control or interact with the vehicle and/or passenger(s)

For the service itself, applicants will be required to set out how they have considered passenger safeguarding and their safeguarding policies. Under

section 87(4)(b), permit holders must be subject to a condition to publish reports about the steps they take to safeguard passengers.

If a permit is granted, the holder will be expected to publish its safeguarding policy on its website at the start of the service.

Fare information

It is not our intention to regulate fares. However, we believe passengers should have an opportunity to compare prices before booking. Given the importance of fare information, it is likely to be a condition of the scheme.

Applications will also include fare structure information and how this is communicated to passengers. Applicants should disclose if there are any circumstances in which additional charges would be levied that are not agreed upon in advance.

Children

Under current legislation, it is the driver's responsibility to ensure that children under the age of 14 use the correct restraint [\[footnote 29\]](#), with exemptions for some buses and special provisions for taxis and private hire vehicles.

If the correct child car seat is not provided, children can travel without one, but only if they travel in a rear seat and:

- wear an adult seat belt if they are aged 3 or older
- do not wear a seat belt if they are under 3 [\[footnote 30\]](#)

Applicants should indicate how they intend to cater for children in their vehicles through the application.

Customer service assistance

In addition to the safeguarding considerations for those in customer support roles, the application should further provide information on how customers will be supported through and pre or post-journey.

This would be expected to include information on:

- how customers will be supported in the event of an emergency
- when customers have an urgent need for support

Information should also be provided on how customers and others can more generally contact the company, for example, to make a complaint.

Other information

The above is not exhaustive of all that will be required, but it provides an understanding of current thinking for APS.

As new approaches to providing passenger transport, it is important that the application is refined to ensure it remains appropriate for the services being deployed.

Maximum period for a permit

Proposed regulation 3 specifies that a permit may not be valid for a period exceeding 5 years. This is based on the same period as operator licences for PHVs [\[footnote 31\]](#). When the scheme is fully established, we think it is important that operators are given sufficient certainty to make plans, so we have proposed a period that is longer than the 3 years recommended by the Law Commissions [\[footnote 32\]](#).

It is important to note that this is the proposed maximum period and that permits can be granted for any period up to 5 years. It is expected that the first permits issued will likely be part of the pilot process in advance of the act. We think that these permits should be valid for long enough to allow the holder to gather data about the vehicles and the service and make an application to renew.

We anticipate that, subject to discussions with the applicant, pilot APS permits should be granted for around 12 to 18 months and allow for an appropriate period to allow deployments to renew after full implementation of the act.

Post-implementation of the act, we propose a similar approach to be adopted with shorter permit periods initially granted to new services. This would be to provide confidence to consenting authorities, emergency services and other stakeholders that they will continue to have a role in the granting of permit applications to build understanding and trust of deployments.

As understanding and trust are developed, which could vary between applicants, dependent on deployment experience, permit lengths would be considered for longer periods.

Renewal window

As with the application process, the intention for renewals is that it will be flexible and build on the application process and deployment experience. To attempt to avoid being in a position where a service may have to be suspended because of delays in the renewal process, where there is currently uncertainty as to how long it could take, proposed regulation 4 sets out a renewal period. This is defined in proposed regulation 4(2) as beginning 6 months before the permit's expiry date and ending 2 months before the expiry date.

A permit holder who applies for a renewal within this 'window' is protected against delays to the renewal that would otherwise have seen the permit expire.

The proposed regulation will continue the permit beyond its original expiry date until either a decision on renewal is made or the 5-year maximum period is reached. Where a decision is made to renew, the renewed permit will be subject to a new 5-year maximum period.

Fees

Section 89(3) of the act sets out that the Secretary of State may make regulations about fees payable for:

- making an application for, or applying to renew, a permit
- the grant, retention or renewal of a permit

Any fee set may be determined by reference to costs incurred, or likely to be incurred, by the Secretary of State for Transport in connection with managing the APS permitting scheme. This would mean that a fee could be more than the cost of a particular function, for example, the costs for undertaking enforcement could be added to the application cost.

In this consultation, consideration for fees that could be charged by the Secretary of State for Transport, undertaken by DVSA for:

- bus-like services in Great Britain
- taxi- and private-hire like services in England

It is proposed not to exercise this power at this stage, to enable government to gain a greater understanding of the cost likely to be incurred by the DVSA in managing the APS permit scheme. Several fee-charging schemes were

examined in considering what an appropriate fee structure would be. However, these vary considerably.

The intention is for this power to be exercised in the future and that fees will be charged for full cost recovery in managing the permit system. We may commence the charging of fees alongside full implementation of the act.

Current consideration is being given to the consideration of fee bands based on vehicles number and the duration of the permit. We welcome views on fees and managing the transition to introducing them.

Application process and renewals questions

Question 8: what information do you think should be requested in the APS permit application process?

Question 9: what information do you think should be requested in the APS permit renewal process?

Question 10: what information do you think would be useful to include in any guidance to support discussions between APS permit applicants and emergency services and traffic authorities?

Question 11: do you agree or disagree that safety drivers or passenger assistants should be subject to the same criminal record checks and medical standards as taxis and PHV drivers and why?

Question 12: do you agree or disagree that regulations should set the maximum permit validity period at 5 years?

Question 13: do you agree or disagree with our proposed approach to initially grant APS permits for a shorter validity period?

Question 14: do you agree or disagree with the length of the proposed APS permit renewal window?

Question 15: do you agree or disagree with our proposal for an existing permit to remain valid, subject to the maximum 5-year period, where the renewal process is delayed?

Question 16: do you agree or disagree with the proposal to not immediately charge an APS application fee?

Question 17: do you agree or disagree with the proposal to introduce a fee in the future, following the implementation of the full act?

5. Varying, suspending or withdrawing a permit

Through section 89(1) of the act, a permit may be varied, suspended or withdrawn ‘in such circumstances as are specified in regulations’. The proposed regulations set out both the grounds and procedures for doing this.

The regulations aim to achieve a balance. It is important to provide commercial certainty in planning a service and understanding what novel deployment approaches could be.

It is also important that there may be a need to alter or stop services that prove unsafe or fail to operate as planned.

To achieve this balance, we look at the grounds for varying, suspending or withdrawing a permit, before discussing the procedure for doing so.

Variation by agreement

Proposed regulation 5(1) allows a variation by agreement (alongside suspension and withdrawal), which is likely to be led by a request from the permit holder. This can only be made by the Secretary of State for Transport with the permit holder’s consent.

This power cannot be used to circumvent the consent requirements set out in the act, as proposed regulation 6 provides that if the original permit required the consent of a consenting authority, then the permit cannot be varied without their new consent.

For example, if a permit holder wishes to extend their operating area, consent must be gained for their new plans. The procedure for obtaining that consent is set out in regulation 6(2) and mirrors the procedure in the act itself.

Grounds

In other cases, the Secretary of State for Transport may vary, suspend or withdraw a permit unilaterally, on one of the grounds set out in the proposed regulation 5(2).

These proposed grounds, discussed in more detail below, are:

- the permit holder breaches a permit condition
- a vehicle to which the permit applies commits a traffic infraction that the Secretary of State for Transport considers serious or repeated
- multiple vehicles to which the permit applies commit the same or similar traffic infractions
- the permit holder does not fulfil an undertaking given to the Secretary of State for Transport
- during the application process, the applicant made a statement of fact that (whether to the applicant's knowledge or not) was false
- during the application process, the applicant made a statement of expectation, and that expectation has not been fulfilled
- since the permit was granted, there has been a material change of any circumstances that were relevant to the grant of the permit
- the Secretary of State reasonably believes, in relation to a vehicle to which the permit applies, that:
 - there are serious safety concerns about the vehicle,
 - the vehicle has caused or will cause serious or repeated disruption to traffic
 - the vehicle has caused or will cause an unacceptable delay to an emergency worker who is responding to emergency circumstances
 - a vehicle to which the permit applies is in an unroadworthy condition within the meaning of section 75 of the Road Traffic Act 1988 (vehicles not to be sold in unroadworthy condition or altered to be unroadworthy)

Breaching a permit condition

Under section 82 of the act, the Secretary of State for Transport may grant a permit subject to conditions, which either limit the proposed service or place obligations on the permit holder. If the permit holder fails to comply, there is the possibility of civil sanctions under Schedule 6.

Initially, government does not intend to implement civil sanctions until full implementation of the act, with variation, suspension or withdrawal being the means of enforcing permit conditions.

The proposed regulation 5(2)(a) enables the variation, suspension or withdrawal of a permit where the permit holder breaches a permit condition.

Committing serious or repeated traffic infractions

Human drivers are subject to a wide variety of criminal offences or penalty charges if they fail to comply with traffic laws. We intend that self-driving vehicles should abide by the same traffic laws.

Under proposed regulation 5(3)(b), a vehicle 'commits a traffic infraction' if it does anything that, were an individual in control, would amount to a criminal offence or cause that individual to become liable to a penalty charge.

Proposed regulation 5(2)(b) allows the Secretary of State for Transport to vary, suspend or withdraw a permit without the permit holder's consent where a vehicle is considered to have committed serious or repeated traffic infractions.

Permits will not be varied, withdrawn or suspended for any infraction that is considered minor, such as entering a yellow box junction before the exit is clear, but may be where it continues to do so.

Multiple vehicles committing the same or similar traffic infractions

Proposed regulation 5(2)(c) applies where offences are repeated by vehicles in the same fleet.

Failing to fulfil an undertaking given to the Secretary of State for Transport

For less serious infractions or failing to meet other agreed undertakings, DVSA may ask for an undertaking that the issue will not recur.

Under proposed regulation 5(2)(d), action may be taken if the permit holder fails to fulfil such an undertaking.

Misrepresentations in the application process

A permit may also be varied, suspended or withdrawn following a misrepresentation during the application process. This applies if the applicant made a statement of fact which was false (proposed regulation 5(2)(e)).

The applicant does not need to have known that the statement was false. This approach is comparable to revoking a PSV licence under section 17(3)(a) of the Public Passenger Vehicles Act 1981.

Failure to fulfil a material statement of expectation

Like above, a permit may also be varied, suspended or withdrawn following a statement of expectation which has not been fulfilled (proposed regulation 5(2)(f)).

Material change in circumstances

Under proposed regulation 5(2)(g), a permit may be varied, suspended or withdrawn following a material change of circumstances that would have been:

“relevant to the grant of the licence such that, had those circumstances existed at the time the permit was granted, the Secretary of State would not have granted the permit.”

Examples of this would arise if the holder became insolvent or if vehicles were de-listed [\[footnote 33\]](#).

Serious concerns about safety or traffic disruption

A permit may be varied, suspended or withdrawn following serious concerns about safety or traffic disruption.

Proposed regulation 5(2)(h) applies where the Secretary of State for Transport reasonably believes that a vehicle:

- raises serious safety concerns
- has caused or will cause serious or repeated disruption to other traffic
- has caused or will cause an unacceptable delay to emergency workers who are responding to emergencies

For these purposes, ‘emergency worker’ covers the police and all the services listed in section 1(2) of the Emergency Workers (Obstruction) Act 2006.

Failing to maintain roadworthiness

Under proposed regulation 5(2)(i), permits may be varied, suspended or withdrawn if vehicles are used in an unroadworthy condition, within the meaning of section 75 of the Road Traffic Act 1988.

We welcome views on these grounds.

Procedure

The proposed procedure for varying, suspending or withdrawing an APS permit is similar to the procedure for varying, suspending or withdrawing authorisation under Schedule 1 to the act.

The procedure distinguishes between ordinary and urgent cases.

In both cases, the Secretary of State for Transport must consider any representations made by the permit holder and the consenting authority.

If the final decision is to vary or suspend the permit, the Secretary of State for Transport must issue a document giving reasons for that decision.

Ordinary cases

In ordinary cases (proposed regulation 7), the Secretary of State for Transport must give the permit holder and the consenting authority notice of their intention to vary, suspend or withdraw.

The notice must give reasons and invite representations within a specified period.

Urgent cases

Under the urgent procedure (proposed regulation 8), the Secretary of State for Transport may suspend or make a temporary variation first and then invite representations.

Varying, suspending or withdrawing a permit questions

Question 18: do you agree or disagree with our proposed approach to vary, suspend or withdraw an APS permit?

Question 19: do you agree or disagree that in ordinary cases, the Secretary of State for Transport should give the APS permit holder and consenting authority notice of an intention to vary a permit and invite representations?

Question 20: do you agree or disagree that in urgent cases, the Secretary of State for Transport may suspend or make a temporary variation to an APS permit first, and then invite representations?

6. Reviewing the decision

The act sets out a power for regulations to make provision about ‘reviews of, or appeals against, decisions’. [\[footnote 34\]](#)

With the potential for APS to enable new and novel services to come forward and understand their operation without a human driver, at this stage, we are not proposing to establish a formal appeals system in which a court or tribunal examines whether the rules have been followed.

However, there must be a route to ensure that decisions are fully scrutinised. Proposed regulation 9, therefore, provides for the opportunity to request DVSA to review a decision they have made on behalf of the Secretary of State for Transport.

DVSA internal review

Under proposed regulation 9(1), applicants and permit holders will be entitled to request an internal review if they are dissatisfied with a decision that DVSA have made on behalf of the Secretary of State for Transport.

The right to a review applies to the full range of DVSA decisions, including:

- refusing to grant a permit
- refusing to renew a permit
- imposing a permit condition
- refusing a request to vary or remove a permit
- varying, suspending or withdrawing a permit under regulation 5(2)
- specifications made under section 82(4) about the areas and vehicles in which services may be provided and the period for which the permit is valid

Any applicant or permit holder may request an internal review within 28 days, beginning with the day after the day on which the decision was sent. The request must include any written representations they wish to make.

Under regulation 9(3), DVSA will then confirm receipt of the request within 14 days and provide a date on which they anticipate sending the applicant or the permit holder the outcome of the internal review.

Requesting a review of a consenting authority’s decision is outside the scope of the power for review. Any consideration of a review or appeal would need to follow the consenting authority’s local process.

Status of an existing permit during the review process

In some cases, the permit holder will have asked for a renewal or variation to the existing permit. Under proposed regulation 9(4), the original permit will remain valid until the review process is complete.

This is intended to protect permit holders against delays in the renewal process. Provided that a permit holder applies for a renewal within the 2-to-6-month 'window' in regulation 4(3), their existing permit should remain valid either until:

- it is renewed
- the full decision and review process is complete
- the 5-year maximum validity period is exceeded

Reviewing the decision questions

Question 21: do you agree or disagree with our proposed approach to reviews of decisions made by DVSA?

7. Disclosure and use of information

Section 88(1) of the act sets out that permit conditions may require information to be collected and shared, either with public authorities or private businesses.

This information is protected by s.88(6), which specifies that it is a criminal offence for the recipient of this information to disclose it to a third party or use it for a different purpose, unless the disclosure or use is authorised by regulations. The offence carries an unlimited fine.

Defences available to a defendant who has disclosed information in this way are that:

- the information provider consented to the disclosure
- the defendant reasonably believed the disclosure was lawful

- the third party already had lawful access

The act stresses the importance of not using information shared under a permit condition to harm commercial interests.

Regulations are not to be used to authorise information to be disclosed or used in a way that would be liable to harm the commercial interest of any person unless the regulation specifically allows it, or if it is necessary for the regulation.

The proposed regulations allow some information required under a permit condition to be disclosed by the recipient to any person for any purpose. In particular, scheduled services are likely to be subject to bus open data requirements.

If so, information may be shared about:

- routes, stopping places, timetables, fares and tickets
- changes or proposed changes to the above
- the operation of services, such as live information, for example, vehicle location and expected arrival time and historical service information

The proposed regulation also includes that, where a permit condition requires sharing information about accidents with the police, this can be used by the recipient for any purpose for which they could use a report under section 170 of the Road Traffic Act 1988 (duty of driver to stop, report accident and give information or documents).

A permit condition may require additional safety-related information to be shared with the Secretary of State for Transport. If so, the proposed regulation enables the Secretary of State to disclose this information if they consider it would be in the public interest to do so and the information disclosed is factual.

Where other information is required to be shared with the Secretary of State for Transport, they may disclose the information to appropriate agencies and bodies to investigate potential criminal offences and for appeal or court proceedings for which it is relevant.

Where information was otherwise required to be published and has not been, the Secretary of State for Transport may make this information available for compliance with the permit condition.

Where complaint information is shared with any complaints-handling organisation, it is proposed that this body can disclose the information to the complainant.

The proposed regulation intends to enable this information to be shared for examples such as those below.

Bus open data

In 2024, research found that many people are put off using buses because they lack reliable journey information (<https://bettertransport.org.uk/research/better-bus-stops-creating-a-national-bus-stop-standard/>). Since 2020, steps have been taken to improve the information available to passengers about routes, bus stops, timetables, bus location and fares (<https://www.orr.gov.uk/monitoring-regulation/rail/passengers/information/improvement-plan>).

Under the Bus Services Act 2017, operators of local bus services in England must share timetable, bus location and fares information with the bus open data service (BODS). It then becomes free open data that can be downloaded by anyone setting up an app, product or service, or analysing traffic patterns. The intention is that this would apply to APS services providing a bus-like service.

Such services would be required to share information about routes, stopping places, timetables, fares and tickets (or changes to them) with BODS, which will then be available for anyone to use.

Incidents raising safety concerns

Section 20 of the Public Passenger Vehicles Act 1981 places a duty on PSV operators to report 'any failure or damage of a nature calculated to affect the safety of occupants' to the Secretary of State for Transport.

DVSA guidance on reporting an incident involving your organisation's bus or coach ([https://www.gov.uk/guidance/report-an-incident-involving-your-organisations-bus-or-coach#:~:text=You%20must%20report%20any%20incident%20involving%20your%20organisation%27s%20public%20service%20vehicles%20\(PSVs\)%20if%20there%20are%20fatalities%2C%20serious%20injuries%2C%20or%20serious%20damage.](https://www.gov.uk/guidance/report-an-incident-involving-your-organisations-bus-or-coach#:~:text=You%20must%20report%20any%20incident%20involving%20your%20organisation%27s%20public%20service%20vehicles%20(PSVs)%20if%20there%20are%20fatalities%2C%20serious%20injuries%2C%20or%20serious%20damage.)) explains that, by law, PSV operators must report:

- fatalities

- serious injuries (such as broken bones, damage to major organs or overnight hospitalisation)
- allegations of a safety defect
- serious damage as a result of the incident (such as major body or mechanical component damage, which needs specialist recovery and the vehicle being taken out of service to be repaired)
- a safety critical component failure or a history of the same component failing
- a vehicle catching fire

PSV operators must also send a report if the police request them to. ^[footnote 35]

An APS permit holder will likely be required to report, at least, any failure or damage affecting safety to the Secretary of State for Transport (acting through DVSA) – no matter the service type.

Consideration is being given to extending this to failures affecting the safety of all road users and any collision, rather than just those that require the vehicle to be taken out of service.

In considering the sharing of this information, there is a balance required between what is likely to be a strong public interest and harming commercial interests. The proposed regulation intends to enable the Secretary of State for Transport to share this information:

- where it is viewed to be in the public interest
- to support potential criminal investigations

Complaints logs

With complaint systems currently in place for bus and coach operators as well as taxi and private hire companies, the expectation is that the requirement for a complaints system will form the basis of a permit condition. The scope of this would not be targeted at collating safety concerns, but, for example, to provide a route for passengers to raise concerns about the quality of the service they experienced.

People not using the service may also wish to complain, for example, if they have been affected by what they perceive to be poor driving or parking. The expectation would be for permit holders to log complaints, likely within defined

categories and for details of categories and numbers to be published through the reporting requirement.

DVSA may also wish to have access to information from complaints logs relating to safety, accessibility and safeguarding, or to investigate where a complainant is unsatisfied with a response. A high number of complaints could be used to justify failing to renew a permit or, in serious cases, a variation or withdrawal.

It is important that DVSA can share the information justifying such a decision with any reviewer, tribunal or court. Local consenting bodies, traffic authorities and emergency services are likely to also have an interest.

Information intended for publication

Some permit conditions will require information to be published. Under section 87(4), permits must include a condition requiring the holder to publish reports that have to include how the service meets the needs of older or disabled passengers and safeguards passengers more generally.

Further reporting requirements could include elements such as publishing an annual report, listing any safety-related incidents and giving figures of complaints, broken down by category.

Where a report does not contain information that is required, the proposed legislation allows the Secretary of State for Transport to share this information.

Investigating safety incidents

The proposed legislation sets out to strike a balance between its short-term use in advance of implementation of the act and post-implementation in the longer term.

This balance provides a way for accident information to be shared with police, and for the police to be able to request any information or documents from the permit holder.

Where safety-related information is shared with the Secretary of State for Transport for transparency purposes, they can disclose this information to any person if they feel it is in the public interest and done so factually.

Disclosure and use of information questions

Question 22: do you agree or disagree with our proposed approach to information sharing?

How to respond

See the [Ways to respond](https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme) section of the consultation page on GOV.UK (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme>) to find out how you can respond to this consultation.

The consultation period began on 21 July 2025 and will run until 23:59 on 28 September 2025. Ensure that your response reaches us before the closing date.

What will happen next

We will publish a summary of responses and the government response on the homepage for this consultation. Paper copies will be available on request.

If you have questions about this consultation, contact:

CCAV
3rd floor, Great Minster House
33 Horseferry Road
London, SW1P 4DR

Alternatively, you can email: consultation@ccav.gov.uk.

Full list of questions

These questions are listed here to give you an overview of what we are asking. The consultation response form may include more questions, for

example, questions about who you are.

See the [Ways to respond](https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme) section of the GOV.UK home page (<https://www.gov.uk/government/consultations/automated-passenger-services-permitting-scheme>) for this consultation to read a full list of questions and find out how you can respond to them.

Question 1: what guidance, if any, do you think government should provide to enable preliminary discussions between those wishing to apply for an APS permit and authorities?

Question 2: in your view, should we support any coordination, information sharing and best practice sharing between authorities?

Question 3: in your view, what would you expect to see included to make the proposed guidance as useful as possible for your authority?

Question 4: in your view, what information are taxi and private hire licensing authorities likely to view as useful in deciding whether to grant or refuse consent?

Question 5: in your view, what information are bus franchising bodies likely to view as useful in deciding whether to grant or refuse consent?

Question 6: what information would you expect to see published by permit holders on the safeguarding of passengers?

Question 7: what information would you expect to see published by permit holders on how the service was meeting the needs of older and disabled people?

Question 8: what information do you think should be requested in the APS permit application process?

Question 9: what information do you think should be requested in the APS permit renewal process?

Question 10: what information do you think would be useful to include in any guidance to support discussions between APS permit applicants and emergency services and traffic authorities?

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Question 20: do you agree or disagree that in urgent cases, the Secretary of State for Transport may suspend or make a temporary variation to an APS permit first, and then invite representations?

Question 21: do you agree or disagree with our proposed approach to reviews of decisions made by DVSA?

Question 22: do you agree or disagree with our proposed approach to information sharing?

Freedom of information

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory code of practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the department.

Data protection

Your consultation response and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. DfT will, under data protection law, be the controller for this information.

DfT's privacy policy (<https://www.gov.uk/government/organisations/department-for-transport/about/personal-information-charter>) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

1. Most provisions in the Automated Vehicles Act 2024 are not yet in force. References in this document to provisions of the act are phrased to reflect the anticipated legal position once the relevant provisions are in force.
2. Law Commission and Scottish Law Commission, Automated Vehicles: joint report (2022) Law Com No 404, Scot Law Com No 258, para 10.8.
3. Automated Vehicles Act 2024, s 82(2)(b).
4. Automated Vehicles Act 2024, s 82(2).
5. Automated Vehicles Act 2024, s 83.
6. Automated Vehicles Act 2024, s 85 and s 86.
7. Automated Vehicles Act 2024, s 90(4).
8. Automated Vehicles Act 2024, s 89(7).
9. Automated Vehicles Act 2024, s 85(3).
10. Automated Vehicles Act 2024, s 86.

11. For details of enhanced partnerships under the Bus Services Act 2017 (for example), see The bus services act 2017: enhanced partnerships, (PDF) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1002507/national-bus-strategy.pdf).
12. Automated Vehicles Act 2024, s 87(3).
13. Automated Vehicles Act 2024, s 87(1).
14. Automated Vehicles Act 2024, s 82(4).
15. Automated Vehicles Act 2024, s 82(5).
16. Automated Vehicles Act 2024, s 87(4).
17. Automated Vehicles Act 2024, s 89(3)(b).
18. Automated Vehicles Act 2024, Sch 6, para 4.
19. Automated Vehicles Act 2024, s 89(1) and (2).
20. Automated Vehicles Act 2024, s 89(3)(d).
21. Automated Vehicles Act 2024, s 88(1) and (2).
22. Automated Vehicles Act 2024, s 88(6).
23. Automated Vehicles Act, s 86(1) and (2).
24. For a detailed discussion of the definitions, see the Law Commission's background paper 2 automated vehicles final report, (PDF) (<https://s3-eu-west-2.amazonaws.com/cloud-platform-e218f50a4812967ba1215eaecede923f/uploads/sites/30/2022/01/Background-papers-24-01-22.pdf>).
25. Local government (Miscellaneous Provisions) Act 1976, s 75(1)(c) and (cc).
26. See taxi and private hire vehicle statistics, England, 2024 (revised) (<https://www.gov.uk/government/statistics/taxi-and-private-hire-vehicle-statistics-england-2024/taxi-and-private-hire-vehicle-statistics-england-2024>).
27. See English Devolution White Paper (<https://www.gov.uk/government/publications/english-devolution-white-paper-power-and-partnership-foundations-for-growth/english-devolution-white-paper>).
28. Automated Vehicles Act 2024, s 85(4) and (5) and s 86(5) and (6).
29. Road Traffic Act 1988, s 15.
30. Motor Vehicles (Wearing of Seat Belts) Regulations 1993, reg 10(b) and (c).
31. See Operator licences for private hire vehicles (<https://www.gov.uk/operator-licence-private-hire-vehicle#:~:text=PHV%20operator%20licences%20last%20for%20a%20maximum%20of%205%20years.>).

32. Law Commission and Scottish Law Commission, Automated Vehicles: joint report (2022), para 10.33.
33. De-listing would be where a vehicle is no longer viewed, in the Secretary of State for Transport's opinion, as being able to safely and lawfully drive itself under the circumstances for which it was previously viewed as being able to do so.
34. Automated Vehicles Act 2024, s 89(3)(d).
35. See [report an incident involving your organisation's bus or coach](https://www.gov.uk/guidance/report-an-incident-involving-your-organisation's-bus-or-coach#:~:text=You%20must%20report%20any%20incident%20involving%20your%20organisation%27s%20public%20service%20vehicles%20(PSVs)%20if%20there%20are%20fatalities%2C%20serious%20injuries%2C%20or%20serious%20damage.) ([https://www.gov.uk/guidance/report-an-incident-involving-your-organisation's-bus-or-coach#:~:text=You%20must%20report%20any%20incident%20involving%20your%20organisation%27s%20public%20service%20vehicles%20\(PSVs\)%20if%20there%20are%20fatalities%2C%20serious%20injuries%2C%20or%20serious%20damage.](https://www.gov.uk/guidance/report-an-incident-involving-your-organisation's-bus-or-coach#:~:text=You%20must%20report%20any%20incident%20involving%20your%20organisation%27s%20public%20service%20vehicles%20(PSVs)%20if%20there%20are%20fatalities%2C%20serious%20injuries%2C%20or%20serious%20damage.)) for more information.



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