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Dear Ben,

Automated Vehicles Bill – CPT Scotland Response

Thank you for your letter regarding the Automated Vehicles Bill. As the trade association that represents the bus and coach sectors, CPT is happy to give our views on the passenger service vehicle (PSV) aspects of the Bill in its current form.

How big an impact is this Bill likely to have on bus operators in Scotland – how many operators use automated vehicles in their services at present?

Only one operator currently deploys an automated vehicle in service in Scotland. This is the UK's first autonomous bus service, the Stagecoach AB1, which runs between Ferrytoll Park & Ride and Edinburgh Park. The service is a pilot, created by CAVForth and its partners Fusion Processing Ltd, Stagecoach Plc, Alexander Dennis Ltd, Transport Scotland, Napier University and Bristol Robotics Lab. Further information about the vehicle and the trial can be found here: <https://www.cavforth.com/>

As such, the impact of the Bill is limited to one current service. However, this is an area of technology that will only grow in use as it matures and gains greater passenger confidence.

Are the provisions in the Bill likely to encourage or discourage their use?

The provisions of the Bill set out the legal framework for the safe deployment of self-driving vehicles. I do not believe the Bill does this in a way that discourages further trials.

Any operator considering autonomous vehicles will look at a raft of factors including the ability of new and emerging technologies, driver and passenger safety, cost,



routing, and infrastructure, among the wider business case. The provisions within the Bill will likely form part of this consideration but it is my view that they do not represent an impediment to further progress in this field.

Does the permit scheme set out in Part 5 of the Bill seem to strike the right balance between regulation and allowing operators to make use of new technology?

The supplementary legislative consent memorandum is correct in acknowledging that there are many unknowns in this policy area, and that an interim permit system that allows for a degree of co-design to address issues of accessibility, safeguarding of passengers and road safety is appropriate.

Part 5 of the Bill requires the national authority to consult with traffic authorities and emergency services that may be affected before granting a permit. This is fair and proportionate. The Bill requires the national authority to have regard as to what extent the granting of 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 or disabled passengers. The permit holder must also publish reports about the automated passenger service, with particular regard to the steps taken to ensure its accessibility. Again, I do not believe this is too onerous on the national authority or the permit holder.

The collection and sharing of data as laid out in paragraph 88 is central to the purpose of such trials and appears focussed on informing government and trial partners such as vehicle manufacturers, rather than providing commercial information to potential competitors. As such, this seems an acceptable approach.

The deployment of autonomous technology within passenger service vehicles is still very much in its infancy. Scotland should be proud that we are leading the way with the UK's first autonomous bus service.

As the technology evolves and progresses so should the legislation that governs it – a point recognised by the joint report by the Law Commission and Scottish law Commission.¹ The Law Commissions also note the potential opportunities autonomous vehicles provide.

“The possible benefits of this technology are far-reaching. AVs have the potential to improve road safety, give greater independence to people unable to drive, and provide new opportunities for economic growth.”²

¹ Paragraphs 1.4-1.6, [Automated Vehicles Joint Report](#), Law Commission and Scottish law Commission,

² Paragraph 1.3, [Automated Vehicles Joint Report](#), Law Commission and Scottish law Commission,



Regulation in this field is a balancing act of minimising risk while not impeding innovation. My reading of the bill at this stage is that the provisions as they relate to bus are fair and hopefully give the flexibility to allow schemes like the CAVForth trial to grow and shape future autonomous trial and services in Scotland.

Yours sincerely,

Director, CPT Scotland