CoMoUK
supporting shared transport

Driverless shouldn't be directionless

A white paper discussing the risks, opportunities and policy environment required to ensure an integrated, sustainable and equitable introduction of automated vehicles to the UK

June 2026

Introduction

Why now?

2026 sees the arrival of automated services to UK roads, initially through trials of "robotaxis" in London, and subsequent pilots of automated bus services.[1] While these vehicles have brought attention to the topic of Connected and Automated Mobility (CAM) among the general public, the sector's history goes back much further. The UK government created the Centre of Connected and Autonomous Vehicles (CCAV) in 2015, and in the years since a number of automated trials have occurred, most typically taking the form of bus shuttles in closed loop environments.

Automated Vehicles (AVs) could bring with them a range of benefits to road users, pedestrians and the UK's transport mix as a whole. Their proponents often cite the greater safety and predictability of the vehicles, and Government press releases regularly reference dazzling economic predictions of a high value CAM sector and thousands of created jobs.[2] However, the addition of AVs is not without risk, and this white paper shines a light on the potential negative consequences across social, environmental and economic lenses.

AVs are here, but key questions must be answered. Where is the guiding vision? Who will benefit? How will they interact with other modes of transport? In this white paper, we discuss the direction of travel of CAM, with a specific focus on the impact of these new vehicle types on shared transport.

Why us? About CoMoUK

Collaborative Mobility UK ("CoMoUK") is the UK's charity with over 25 years of history promoting the social, economic and environment benefits of shared transport. Shared transport refers to schemes that enable people to use a mode of transport without having to own it. This includes car share, lift sharing, shared bikes and shared e-scooters. Mobility hubs, which bring together shared, active and public transport, have also been an in-depth focus for us since 2019.

We work collaboratively with national, regional, transport and local authorities, as well as the private sector, to advance the full range of benefits that shared transport can bring.[3] Our work includes publishing research and guidance, engaging with policy

[1] Press release: Passengers one step closer to booking taxi and bus-style self-driving vehicles (DfT and CCAV, 2026)
[2] Press release: Next step on the UK rollout of self-driving vehicles (DfT and CCAV, 2025)
[3] CoMoUK: Our work and funding

makers and other stakeholders, and supporting clients, including local and regional government authorities, to design and evaluate shared transport schemes.

Our interest in Connected and Automated Mobility

Our annual reports into car clubs[4] and shared micromobility[5] provide evidence on the complementary and additive nature of shared transport modes to the UK transport mix. The range of benefits for users of shared transport, as well as society as a whole, are presented later in this white paper.

Given our deep understanding of the valuable role of shared transport, built through years of research and delivery, the core motivation of this white paper is a desire for AVs to make a similarly positive contribution. As an organisation, CoMoUK is not against the introduction of AVs in the UK, far from it. It is possible to envision a world in which AVs and other forms of connected mobility have a mutually beneficial relationship with shared, public and active transport options. However, this reality will not magically come to fruition, and this report has been written and released at a time where there is a great deal of uncertainty regarding how AVs will be introduced. This makes it an opportune moment to discuss the type of future that we, both as CoMoUK and as society, want to see.

The white paper sets out the potential risks and opportunities of the new vehicle types, as well as the potential implications for the shared transport sector. It concludes with setting out a vision for AVs and the policy recommendations that would help to bring about that vision.

Key definitions[5]

Automated Vehicle (AV): a vehicle fitted with an automated driving system that uses both hardware and software to move.

Automated Passenger Services (APS): transport provision for passengers using AVs on public roads.

Connected and Automated Mobility (CAM): the sector of transport services that use connected and automated vehicles.

Automated Ridehailing Service: one service within the CAM environment, referred to throughout this report with the commonly used term "robotaxis".

[4] CoMoUK Annual Car Club Report 2025
[5] CoMoUK Annual Shared Micromobility Report 2025
[5] BSI Flex 1890 v6.0 Connected and Automated Mobility (CAM) - Vocabulary

Policy context: A brief history

A full overview of the UK legislative environment is beyond the scope of this whitepaper. This section will instead highlight key policies, strategies and stakeholders which give an indication of how AVs are viewed within the UK government and wider decision-makers.

The origins of a UK CAM sector

The Centre for Connected and Autonomous Vehicles (CCAV) was established in July 2015 as a joint unit sitting across the Department for Transport (DfT) and what is now the Department for Business and Trade (DBT). The announcement of its launch pitched its functions as "leading innovating policy development" and "delivering a programme of research…".[6] Since its creation, millions of pounds of funding has been directed to feasibility studies, pilots and other projects across a range of CAM modes. Most recently, the UK Government's Industrial Strategy increased funding to the CAM Pathfinder programme to a total of £150m until 2030.[7] The programme is delivered in partnership with Zenzic and Innovate UK, part of UK Research and Innovation (UKRI).

The types of projects funded have included a range of use cases with high social value (in many cases centred on public transport options) and it would be hard to challenge the "programme of research" role of CCAV. However, with ten years to focus on this policy area, there is not a lot to draw upon in terms of policy and strategy. Zenzic, themselves part funded by CCAV, state in their own CAM Roadmap to 2035 report that a threat to the sector is "no clear overarching strategy aligning different transport solutions".[8] Government policymakers should be the ones to provide this clarity.

The Automated Vehicles Act 2024

While other countries have seen commercially available AVs sooner than the UK, there is a broad consensus among stakeholders that the Automated Vehicles Act 2024[9] is one of the leading examples of legislation of its kind. The AV Act covers key aspects relating to definitions, safety, liability, accountability and regulation, and is expected to be fully implemented by the second half of 2027. A core principle is the requirement that AVs will be at least as safe as "careful and competent human drivers".

As part of the roadmap towards full implementation, there is active work to develop the detailed aspects of legislation. Earlier in 2026, we responded to a call for evidence

[6] Driverless vehicles: connected and autonomous technologies
[7] Government commits extra £150m to grow UK CAM sector
[8] UK Connected and Automated Mobility Roadmap to 2035 (Zenzic, 2023)
[9] Automated Vehicles Act 2024

regarding the AV regulatory framework.[10] In our response, we highlighted concerns that this detailed policy development is occurring in the absence of a clear vision for the future role of AVs within the UK transport network. Clarity on the end goal for CAM broadly, and AVs specifically, would support the creation of a regulatory framework that provides the necessary regulations and enforcement mechanisms to deliver the types of AVs that most benefit society.

Current government policy: what the Manufacturing Sector Plan and Better Connected tell us

The priorities of the current UK government are indicated by recently published strategies. The Government's Advanced Manufacturing Sector Plan, published by the DBT in June 2025, frames Zero Emission and Connected Automated Vehicles as one of the six "frontier industries that will shape the future of manufacturing in the UK".[11] CCAV now sits entirely under the DfT remit, and is overwhelmingly focused on implementing the AV Act. This decoupling means that the limited policy development related to AVs that is occurring focuses on the economic and business aspects, which is seen by repeated references to the potential financial impact and job creation of the sector. For AVs to deliver on the potential social and environmental benefits illustrated in the next section of this report, a greater degree of joined up thinking and working across government departments is vital.

Timeline of key events

July 2015
CCAV created

2016
First self-driving vehicle trialled in UK public space

2017
CAM Testbed UK launched + Zenzic launches

2018
Zenzic published first UK CAM Roadmap to 2035

May 2024
AV Act 2024 received Royal Assent

2025
CAM Testbed UK expands to 8 sites

2025
£150m CAM Pathfinder programme

April 2026
Better Connected strategy launched

In April 2026, Better Connected was published, setting out a strategy for integrated transport. Connected and automated vehicles are mentioned in both urban and rural settings, with the importance of "[complementing] the existing integrated transport network", "[improving] road safety" and "[providing] more travel options" discussed. The

[10] Call for evidence: Developing the automated vehicles regulatory framework
[11] Policy paper: Advanced Manufacturing Sector Plan (DBT, 2025)

focus on integration continues the principle set out by a CCAV policy paper from 2022 discussing the government of the time's plans for CAM technologies, specifically that "new mobility services must be designed to operate as part of an integrated transport system".[12] Setting out the aim for AV integration with other modes is positive but, as discussed by CoMoUK Chief Executive Richard Dilks in response to the Better Connected strategy[13], there is a lack of join up between AVs and other aspects of the strategy. The themes of safety and choice are also positive, but there is, we feel, a missing link between AVs and transport emissions.

Conclusion: a policy gap and need for a clear vision

This opening section has introduced some of the key pillars of the UK policy environment for AVs at the time of writing. At the same time as recognising that it is not an exhaustive account, it has shown that there are gaps. The framing of the CAM sector by various government departments is often an economic one, with less attention paid to social and environmental concerns, despite the CAM Pathfinder programme often funding projects of a more socially valuable nature. Then there is the vision, or lack thereof. The celebrated AV Act, and the expected regulatory framework, may well be a world leader on considerations relating to safety, accountability and liability, but falls short of depicting a clear vision for the future. The Better Connected Strategy takes a step towards this, centring the importance of integration with the existing transport mix. Nonetheless, we believe that a more comprehensive and thought-out vision is required, and the final section of this white paper introduces our view in this regard.

In April 2026, the Institute for Driverless Transport launched as an independent research body that aims to "prepare policymakers, businesses, and communities for the consequences of the arrival of autonomous vehicles".[14] We agree with the Institute that there is an "under-examined"[15] set of questions regarding AVs, including key considerations regarding decarbonisation and data security. We hope that this white paper contributes to a growing conversation among civil society organisations and other stakeholders on the topic.

[12] Connected and automated mobility 2025: realising the benefits of self-driving vehicles (CCAV, 2022)
[13] Response to the Better Connected strategy by Richard Dilks, CoMoUK CEO (April 2026)
[14] About us: Institute for Driverless Transport
[15] Driverless transport Institute launches in UK to examine societal impact of AVs (ZAG daily, 2026)

AVs in the transport mix: opportunities and risks

In the absence of a clear and holistic vision of the role that AVs will play in the future UK transport network, there is a spectrum of pathways and potential outcomes. AVs could well emerge as a force of positive change, resulting in a sustainable and accessible transport option that works alongside other modes. Alternatively, we could end up with an overwhelmingly operator-led introduction of AVs that prioritises use cases with the greatest commercial viability, replaces trips that would have been made by active means, and reinforces car-dependent behaviours. The reality will likely be somewhere in the middle of this spectrum. This section compares the two extreme futures, highlighting the tensions at play across four themes of safety, integration, sustainability and equity of access.

Safety: AVs should be more responsible road users, but concerns remain for disabled pedestrian

The impact of AVs on the safety of road users is regularly highlighted as a key benefit. In the UK, over 80% of road collisions resulting in personal injury are caused by human error.[16] Self-driving vehicles don't get distracted, angry or tired. The result of this should be more predictable road users, increasing levels of safety for those inside and outside of vehicles, and contribution to Vision Zero. The Institute for Engineering and Technology (IET) claims that a self-driving vehicle will make just one error for every 10,000 errors made by human drivers.[17]

Within the overall context of safety improvements, doubts, concerns and some scepticism remain for key stakeholder groups. AV operators have engaged with various Disabled People's Organisations (DPOs), and highlight the positive impact that their vehicles can have on the lives of disabled people.[18] However, we are a member of the Accessible Transport Policy Forum, and in our response to DfT's consultation on the AV regulatory framework, we raised the concerns of DPOs regarding the ability for AVs to interact safely with road users with "non-typical" silhouettes and behaviours, such as wheelchair users. This concern is supported by evidence of bias in the machine learning algorithms such as those that train AV software.[19] Living Streets also highlight the risk

[16] Connected and automated mobility 2025: realising the benefits of self-driving vehicles (CCAV, 2022)
[17] Autonomous Vehicles: A thought leadership review of how the UK can achieve a fully autonomous future (IET, 2017)
[18] UK Safety and Accessibility Experts Ride with Waymo Ahead of Its London Launch (Waymo, 2025)
[19] Addressing Disability and Ableist Bias in Autonomous Vehicles (DREDF, 2022)

that adding AVs to already car-centric streets can happen "at the expense of pedestrian or cyclist freedom to use roads and pavements safety and conveniently".[20] A further consideration in the area of safety is the impact that having vehicles with embedded cameras driving around our towns and cities can have of personal data security and privacy.

Integration: AVs could support first-and-last mile journeys to public transport nodes but may lead to a mode shift away from more sustainable options

Let us now turn our attention to the ways in which AVs could interact with other modes of transport. The principle of integration, as shown in the previous section of this white paper, is highlighted in the Better Connected strategy in relation to AVs, albeit without much substance. Here, we will focus primarily on the potential for integration of low-capacity AVs within urban areas (or lack thereof). Automated shuttles and other forms of public transport are discussed later on in this section. Taking a utopian view of the future, AVs would be introduced both alongside and as part of a public transport network, reducing a reliance of private cars and easing congestion. Ruter, who operate over half of Norway's public transport, published a report in 2019 that paints a picture along those lines, suggesting that adopting a shared-mobility model could see 30,000 shared AVs replace 600,000 private cars.[21] In the less distant future, a use case for integration would be the use of AVs for transport to-and-from rail and bus interchanges.

These predictions depend to some extent on a model in which AVs are part of a shared fleet. It is more likely, certainly during the initial introduction of the vehicles, that robotaxis, operated by private corporations, will make up the majority of AVs. It goes without saying that a taxi is not a shared vehicle, but AVs could be if their trips are pooled by default or used as part of a shared fleet, following a car club model[22]. Later, as prices of vehicles decrease, privately owned AVs may follow but the commercial viability of this is currently low. The key unknowns are what trip types will be made by robotaxi users, and what effect they will have on mode shift. Will AVs, in the same way we report each year for shared cars, drive increased use of public transport and active travel? Or rather, will the convenience and novelty of this new mode of travel replace trips that would have otherwise be made by more active and sustainable means? The latter reality is most likely if AVs are deployed like existing ridehailing options. A study by the UC Davis Institute of Transportation Studies found that if ride-hailing options

[20] Autonomous Vehicles Policy and Research (Living Streets)
[21] The Oslo Study – How autonomous cars may change transport in cities (Ruter, 2019)
[22] Pay per trip car clubs allow individuals and organisations to have access to a car without being tied to ownership. They differ from a taxi because there is not a paid driver of the vehicle.

didn't exist in California, 47% of Uber and Lyft trips would have been made by public transport, active travel, or not at all.[23] London (and the UK more generally) is not California, and public transport behaviours may be more firmly embedded, but the risk remains. In the next section, we will discuss the potential integration of AVs though mobility hubs. For now, we want to highlight the importance of the right set of policy interventions to back up the government's warm words regarding integration. Without both incentives (e.g. shared use of EV charge points) and disincentives (e.g. conditionality of licenses), AVs may well operate in isolation from (or worse, competition with) other modes.

Sustainability: AVs could help decarbonise a polluting transport sector, but there is uncertainty regarding vacant mileage

The potential contributions of AVs towards Net Zero targets derive from both how the vehicles are powered and the impact their use has on rates of use of more polluting modes. Transport is the most polluting sector within the UK, and the current approach to decarbonising the sector centres the transition to EVs. The rollout of AVs, which are almost always electric powered, has been estimated to reduce carbon emissions by up to 94%, given that they are almost always electric vehicles and are trained to take the most efficient route between origin and destination.[24] Coupled with this, each AV could replace an estimated 10 privately owned cars, though the research paper citing that figure assumed that the autonomous fleet is shared.[25] This impact aligns with our own published research that calculates that, in 2025, each car club vehicle replaced 23 private vehicles.[26] To further ensure that AVs contribute to decarbonisation, they should support increased use of public transport, shared transport and active travel by being well integrated with each. We discuss this further in the section of this report setting out our vision for AVs.

Again, the importance of AVs being predominantly shared use stands out. Without this, the impact of the vehicles on carbon emissions and other forms of air pollution would be significantly reduced. There is an additional sustainability concern regarding "deadheading", which refers to the miles driven by AVs when they are without a passenger. The percentage of dead (or vacant) miles will vary by location, but the extent of the potential problem is revealed from Waymo's own data in California. In September

[23] New research on how ridehailing impact travel behaviour
[24] Shared Autonomous Vehicles: Potentials for a Sustainable Mobility and Risks of Unintended Effects (Pakusch et al, 2018)
[25] Dynamic ride-sharing and fleet sizing for a system of shared autonomous vehicles in Austin, Texas (Fagnant and Kockelman, 2016)
[26] CoMoUK Annual Car Club Report 2025

2025, 44.3% of mileage was considered deadheading: 29.8% while the vehicle was idle, and 14.4% while travelling to an accepted trip.[27] Were the same to occur in the UK, this would more than counteract the mileage savings that are derived from AVs traveling by the most efficient route. A knock-on consequence of this could be that robotaxis "reinvent" congestion, rather than fixing it.[28] To elaborate, AVs could reduce congestion even without a significant mode shift due to their more predictable and efficient driving behaviours. However, they could induce a net increase in road-based traffic and thus cause an increase in overall congestion. Furthermore, AVs could generate congestion in different locations or at different times of the day. Greater congestion could drive an increase in emissions from other road vehicles, as well has having negative economic and health impacts. Despite this complex picture, the AV Act and other key pieces of government policy, demonstrate a minimal consideration for the impact of AVs on the need to decarbonise the transport sector.

Equity of access: AVs have clear social use cases, but this will not be prioritised without market intervention

AVs have the potential to offer a flexible mode of transport that addresses transport inequalities faced by disabled people, rural areas, and those who cannot typically access a car. We will briefly discuss each of these in turn. Firstly, AVs could benefit disabled people by increasing the range of potential journeys that don't need additional assistance, offering improved safety and greater independence. To this end, a paper in 2016 estimated that disabled people could see the greatest increase in distance travelled compared to other groups, with a predicted increase of over 14%.[29] However, as noted in a Motability Foundation funded report by TRL and the Research Institute for Disabled Customers, there is a large range of access needs that would have to be addressed for AVs to be genuinely accessible. [30] Left to the market, there are valid concerns that the needs of disabled people, both those riding the vehicles and in their surroundings, will be left behind. Furthermore, removing a driver has additional consequences for the user experience, with a separate TRL report identifying 66 non-driving-related driver roles such as the provision of information and supporting access.[31] The loss of these functions is particularly prescient for disabled individuals.

A predominantly operator-led introduction of AVs to the transport mix is also unlikely to deliver on the potential benefits for rural communities, underserved in many cases by transport options. While CAM Pathfinder funding has been directed to pilots and

[27] What CPUC data reveals about Waymo's deadheading and utilisation (Driverless Digest, 2025)
[28] Robotaxis won't fix congestion – they'll reinvent it (Kerney, 2025)
[29] Estimating potential increases in travel with autonomous vehicles (Harper et al, 2016)
[30] The impact of automated transport on disabled people (TRL and RiDC, 2024)
[31] Automated passenger services: researching driver roles and passenger inclusivity (TRL, 2024)

feasibility studies of this kind, AV operators are unlikely to pursue these avenues at scale without subsidy or mandate, given the lower likelihood of potential profitability. Finally, the equitable economic access of AVs is crucial, if they are to benefit users and households with lower incomes (who are less likely to own a car). Robotaxis and other automated transport options must be priced in a way that does not exclude those who would benefit most. Furthermore, as the price of AVs decreases, there is a risk of increased private purchases and single occupancy use of AVs by the public, reinforcing existing car dependent behaviours in the UK.

The implications of AVs for shared transport

The previous section gave an overview of the key opportunities and risks at play, taking a broad sustainable transport perspective. In this section, we highlight the specific considerations of AVs for shared transport, covering mobility hubs, car clubs, lift sharing and shared micromobility.

Key definitions

Shared transport: that which enables people to use a mode of transport without having to own it.

Car share: which can be in the form of formal car clubs (used annually by over 300,000 people in the UK) or peer-to-peer models.

Shared micromobility: the collective term given to shared bikes, e-bikes and e-scooters.

Lift sharing: also called ride sharing or carpooling, this is when a private citizen offers to share a trip with one or more passengers.

The benefits of shared transport: social, environmental and economic impacts

Our research activities and published guidance documents discuss, across the full range of shared modes, a breadth of benefits for users, communities and wider society. Some of the findings from our 2025 reports into car clubs[32] and shared micromobility[33] are introduced below. As automated options are rolled out, we are eager to see them support the expanded use of shared transport, and deliver on the same social, environmental and economic benefits.

Complementary with public transport

Shared transport users are more likely to use rail and bus services than the average population.

- 32% of car club users take a train trip at least once per week, compared to 10% of the English population.
- 40% of car club users take the bus with the same frequency, compared to 23% of the English population.

[32] CoMoUK Annual Car Club Report 2025
[33] CoMoUK Annual Shared Micromobility Report 2025

Reduced dependency on the private car

By removing cars from the road, shared transport options can free up kerbside space for more sustainable uses.

- Each car club vehicle replaces on average 23 private cars (rising to 28 in London)
- Across the UK, car clubs freed up a collective 300 miles of kerbside space in 2025.
- 19% of shared bike trips, and 26% of shared e-scooter trips, replace those that would have otherwise been made by car.

Contributions to transport decarbonisation

Car clubs and shared micromobility are both environmentally sustainable options.

- 28% of the UK car club fleet is made up of EVs, compared to 2% of privately owned cars.
- We estimate that 65.7kg of CO_2e is reduced on average by each shared micromobility user, due to the replacement of car miles.

Economic and health benefits for users

Shared transport is a healthy and cost-effective option for users.

- We estimate that £2,800 can be saved on an individual when using a car club each year as a direct replacement for owning and maintaining a vehicle.
- 61% of all active shared micromobility users cycle more often or much more often since starting to use a shared bike and/or e-scooter.
- 53% of bike share users confirm that their use provides them with exercise.

An accessible mode of transport

Disabled users in particular benefit from increased connectivity and health benefits.

- 22% of car club users with a constraining health condition would not have been able to travel by other means for their most common trip.
- 48% of shared e-scooter users with a disability report mental health benefits, compared to 25% of users without a disability.

Implications for car clubs

As reported in the 2025 CoMoUK car club report, 78% of car club users make between 1 and 5 hires a year.[34] In London, where AVs will first be available, 59% of trips lasted over an hour and 35% were over 11 miles long. These usage patterns suggest that the London robotaxi trials will be used more like existing ride hailing services rather than competing with car club trips.

The new mode could attract new users to UK car clubs, whose membership has remained around 323,000 since 2022. In anticipation of this white paper, the CoMoUK annual survey into car clubs asked respondents if they would consider using an automated vehicle if it were part of their car club. 42% of all users said that they would, rising to 44% for users in London, which indicates an appetite for incorporating AVs into the fleet.

In particular, AVs within the car club fleet could be used by disabled users who currently cannot benefit from most car clubs. It could also help to demonstrate the benefits of sharing AVs by default, something that we believe should be prioritised as automated vehicles join the UK transport mix.[35] Despite these potential benefits, the current cost of acquiring AVs is a significant barrier that would prevent car club operators from including AVs in the fleet. Given this context, we would like to see increased research and funding (via the CAM Pathfinder programme or otherwise) directed towards true ridesharing within AVs, and to better understand the consumer behaviours that can be expected with the AV and car club interaction.

Implications for shared micromobility

Shared bikes and e-scooters are, as reported in the 2025 CoMoUK shared micromobility report[36], often used for shorter and more frequent trips than car clubs. 60% of shared bike users and 47% of shared e-scooter users make at least weekly trips, and the vehicles are regularly used for first-and-last mile connections. Due to these usage patterns, we believe that the risk that shared micromobility trips are replaced by robotaxi journeys is greater than the risk of car club trips being replaced.

When first introduced, we expect that the pricing of robotaxi trips would limit the number of users who switch away from shared micromobility. Shared bikes and e-scooters also retain some unique benefits, such as the health benefits of riding and the likely quicker trips in urban areas due to the ability to use less congested bike lanes.

[34] CoMoUK Annual Car Club Report 2025
[35] Further comments on having AVs "shared by default" are found in the recommendations section of this report.
[36] CoMoUK Annual Car Club Report 2025

On a related note, the predictability of AVs as road users could be a potential benefit for users of shared micromobility and active travel modes, creating safer and more enjoyable journeys in urban environments. The benefit is contingent on there being a net decrease in congestion levels and car presence on the roads as a result of AVs being introduced.

Mobility hubs: A tool for introducing AVs in an integrated way

Mobility hubs co-locate and integrate shared transport with public transport and active travel in spaces designed to improve the public realm for all. Hubs can exist in different forms and at different scales, depending on the needs and features of a given location. Since it was published in 2022, the CoMoUK accreditation standard[37] has been used to design and deliver high quality hubs across the UK, against a typology of essential and desirable criteria. The standards incorporate six factors which are required of hubs of all types:

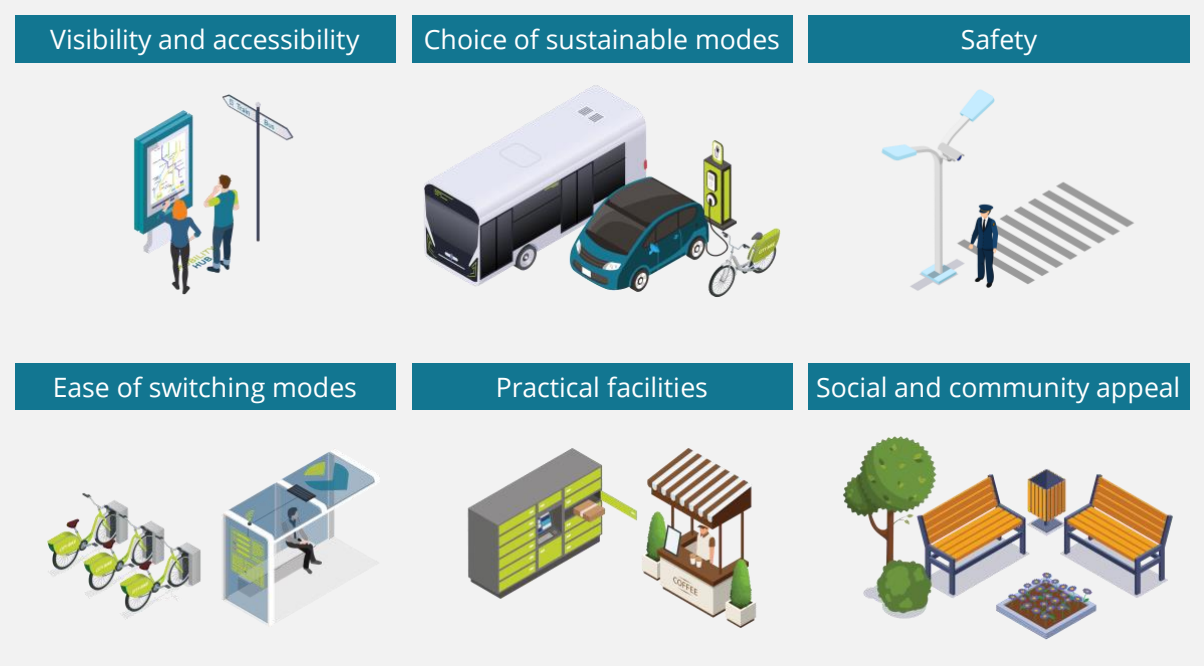

Figure 1. Infographic showing the six success factors of mobility hubs

As mobility hubs continue to be delivered at scale across the UK, it is vital that AVs integrate with other modes of transport rather than in isolation. When considering the potential relationship between AVs and mobility hubs, there are two avenues of opportunity. Firstly, "customer facing" mobility hubs can be thought of as those designed in accordance with CoMoUK accreditation standards, where individuals can interchange from one mode to another. A core benefit of mobility hubs is providing the

[37] CoMoUK: Mobility Hub Accreditation

information and facilities to make switching modes a seamless and enjoyable experience. AV operators should support this goal by, for example, highlighting nearby mobility hubs on their apps and programming vehicles to dwell at or near mobility hubs when not in motion. Autonomous shuttles and other forms of public transport have a high potential for integration.

Secondly, there is the question of what form AV depots will take. Given that almost all vehicles are electric, they will need a site to be charged at regular intervals. AV depots have the potential to support the EV transition that is central to the UK government's transport decarbonisation approach, and specifically provide locations for charging electric car club vehicles. The world we don't want to see is one where AV depots have the same impact as car parks, occupying land that could be used for sustainable purposes. While AV depots will never be accreditable hubs by the CoMoUK standards, they should be designed in such a way that supports the six success factors shown in figure 1. For example, they should include space for shared, public and active transport options, and delivering public realm improvements at the same time.

Our vision and policy recommendations

As discussed earlier in this white paper, we believe that there is a need for a clearer vision regarding the role of AVs within a future transport mix, and that in the absence of one there is a risk of missed opportunities and unintended consequences. Below, we set out the three principles that we believe should be front and centre of a vision, and in call out boxes throughout we make policy recommendations.

Our vision

As discussed in the section on the policy context, we believe that there is a glaring policy gap relating to the vision for the role of AVs in the future transport mix. Clarity and direction are needed from the UK government on how AVs will be introduced, and who will benefit from their introduction. Our vision for the role of AVs is built upon three key principles. We want AVs introduced into the UK transport network in a way that:

- is integrated alongside shared, public and active travel.
- is a sustainable mode of transport, supporting decarbonisation and a reduced dependency on the private car.
- is equitably distributed to target demographic groups most affected by transport inequalities.

Integrated: Working with sustainable modes, not against

At the core of our work on mobility hubs is the principle of integration. Year-on-year, our published annual reports show that users of shared transport are more likely to use public transport and active travel than the average population of the UK. Mobility hubs, as covered previously, can be seen as a policy tool for integrating AVs with other modes, facilitating multi-modal trips and ease of access to public transport interchanges.

Sustainable: Supporting a just transition and reduced private car dependency

The transport sector accounted for 29% of UK emissions in 2023[38], and a significant decarbonisation is required for net zero targets to be reached. AVs, which are overwhelming electric, can support these goals but only if their introduction results in a net decrease of vehicles on the roads. To this end, we want to see AVs that are shared by default, with genuine incentives for users to ride with others.

[38] Greenhouse gas emissions from transport in 2023 (DfT, 2025)

Equitable: Prioritising use cases with the greatest social value

Trials of automated vehicles focused on public good use cases have taken place and new trials continue to receive funding through the CAM Pathfinder programme.[39] When discussing the value of AVs and their use cases, we want to see a focus that is more broad than urban ridehailing services and should include exploration of the potential role of a range of automated services in suburban and rural areas.

Our policy asks

To introduce AVs to the UK in a way that delivers on the ambitions set out above, we make the following set of policy recommendations:

1. Set a clear vision to ensure that AVs are introduced to the UK in an integrated way, that prioritises sustainable and equitable use cases.
2. Prioritise the shared use of AVs, which for robotaxis could involve trialling differentiated price modes for trips shared with another rider. Personal safety concerns must be noted and addressed.
3. Pilot AV services that follow existing car club models of delivery, with corresponding trip types such as longer distance, return journeys.
4. Prioritise the use of funding such as CAM Pathfinder for use cases with the greatest social value. Including shared mobility options, other vehicle types and geographic areas with lower public transport provision.
5. Explore different ways of physically integrating AVs with sustainable transport modes, drawing upon the mobility hub approach to facilitate multimodal journeys.
6. Investigate measures to reduce the impact of AVs on congestion, such as single-occupancy levies for robotaxi journeys made in central urban environments, or setting geofenced areas to restrict the areas AVs can travel in.
7. Engage as transport authorities with Disabled Peoples' Organisations to define accessibility standards for both potential users of AVs and those in their surrounding environment.

[39] Eight self-driving studies scoop £1.4m in UK funding (ZAG Daily, 2026)

Contact us

We would welcome opportunities to discuss the content of this white paper further, and to explore ways of working together to make stronger calls for an integrated, sustainable and equitable introduction of AVs. Please don't hesitate to reach out to us via email at info@como.org.uk.