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Ref: TF/SI

05 February 2019

Dear Sir/Madam,

AUTOMATED VEHICLES CONSULTATION, GOBIKE'S CONCERNS

GoBike is a cycle campaign group based in Glasgow with members in and around Glasgow. We enjoy cycling for many reasons: getting from A to B, commuting, shopping, touring and general leisure purposes. We want others to be able to enjoy this excellent mode of travel and we campaign for good quality cycle infrastructure so that as many people as possible will join us.

It is with the above in mind that we respond to the current consultation, which causes us great concern. The clauses we reference are from the Summary Document.

- 1.3 states that "The key objective is safety" yet there is no mention at all of cycles of any type and the first mention of people walking in the street is in 9.6.
- 5.14 states that you propose no mandatory training for users-in-charge of these vehicles, yet you accept that a user-in-charge might be checking emails. Drivers of standard vehicles are regularly to be seen on their mobile phone or are otherwise distracted from the task of driving. How would an observer distinguish between the two?
- 5.15 – 5.18 In these clauses you question the need for an Accident Investigation Branch. Such a body is most definitely required in our view and should investigate all road traffic accidents of a serious nature, and all incidents involving automated vehicles. Road Traffic Accidents occur daily on the roads of the UK, causing death and injury and all attempts should be made to reduce these incidents.
- 7.14 You accept that speeding offences may still occur. One of the main justifications for reducing the default speed limit in our towns and cities from 30 to 20mph is that road deaths and injuries are reduced in number and severity at lower speeds.
- 7.18 You **tentatively** (my emphasis) propose that it should be a criminal offence for a user-in-charge not to hold a driving licence, plus you go on to list 5 other misdemeanours for consultation as to whether or not they should be a criminal offence. This is an astonishing dereliction of duty. Road deaths and injuries are everyday occurrences in the UK and yet you pose the question as to whether someone completely unfit to drive could be a user-in-charge.
- 9.6 This is the first mention of human interaction with people outside the automated vehicle but then you ask whether there are circumstances where automated vehicles may mount the pavement or exceed the speed limit. Again, this is astonishing; you appear to have no cognisance of the death and injury caused to people who are walking or cycling by vehicles that mount the pavement and/or exceed the legal speed limit.

In addition I wish to draw your attention to this article:

<https://www.sciencedaily.com/releases/2019/01/190131125930.htm> that was reported in The

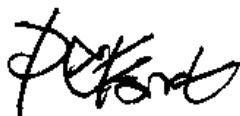
Herald newspaper on Saturday 02 February 2019 where it is stated that driverless vehicles will cruise the streets at very low speeds to avoid incurring parking charges.

In addition, Christian Wolmar, a respected transport journalist, writing in the current CyclingUK magazine, quotes a recent boss of Nissan, who told journalists in 2016 "The (driverless) car is confused by (cyclists) because from time to time they behave like pedestrians and from time to time they behave like cyclists." Mr Wolmar goes on to say that the first pedestrian to be killed by a vehicle that was in autonomous mode was a woman who was wheeling a bicycle with shopping bags hanging on its handlebars.

Admittedly there might have been improvements in the last 3 years but such current news stories are not reassuring in any way for those of us who walk and cycle. CyclingUK has further information on driverless cars on its website at: <https://www.cyclinguk.org/driverless-vehicles>

Thus until there are adequate, and robustly demonstrated, safeguards in place for those of us, young and old, able-bodies and disabled, who walk and cycle in our towns, villages and countryside, we oppose the introduction of Automated Vehicles on our streets and we consider that the controls on them be considerably strengthened from those proposed in your consultation documents.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tricia Fort', written in a cursive style.

Tricia Fort
for Consultations, GoBike