

**Response to Law Commissions' second consultation on Automated Vehicles
(Law Commission Consultation Paper 245; Scottish Law Commission Discussion Paper 169)**

Please note that this consultation response has been reproduced from information entered on the Citizen Space online portal.

Any personal email addresses and phone numbers have been excluded from this document.

Unanswered questions have been deleted from this document.

What is your name?

Kushagra Bhargava

What is the name of your organisation?

Costain Ltd

Are you responding to this consultation in a personal capacity or on behalf of your organisation?

[Respondents chose from the following options: Personal response; Response on behalf of your organisation; Other.]

Responding on behalf of organisation

CHAPTER 7: REGULATORY TOOLS TO CONTROL CONGESTION AND CRUISING

Traffic regulation orders

Consultation Question 29 (Paragraph 7.23): We seek views on whether the law on traffic regulation orders needs specific changes to respond to the challenges of HARPS.

For HARPS to drive safely, the law would require to be updated ensuring secure digitalisation of traffic regulation orders (TRO). As HARPS will not be driven by humans, the TRO relayed to the vehicles is required to be standardise and implemented across the country such that it's accessible to all the HARPS and on all the routes. In cases where digital TRO is capable of dynamic updates, such as emission zones, dynamic speed limits or parking zones, suitable provisions and protocols would require to be identified to monitor and enforce them. As an example, if an emission zone is regulated dynamically then digital TRO would require to relay that information to HARPS based on a timestamp. It would then be imperative to ensure that TRO is enforced appropriately for the HARPS already in the zone or about to enter the zone based on the timestamp.

CHAPTER 8: INTEGRATING HARPS WITH PUBLIC TRANSPORT

The current system of bus regulation: HARPS as mass transit

Consultation Question 38 (Paragraph 8.109): We seek views on a new statutory scheme by which a transport authority that provides facilities for HARPS vehicles could place requirements on operators to participate in joint marketing, ticketing and information platforms.

We agree with MaaS as a digital platform and collaboration between local authorities and HARPS operators, as proposed by the paper. A couple of schemes that we have identified that could help facilitate the collaboration are:

- 1) HARPS to provide road conditions, providing geolocations for damaged TRO or roadside assets and in return transport authorities ensure road and other static or digital assets are maintained and repaired promptly, especially in suburban and rural areas.
- 2) HARPS operators to share travel movements of people (as per GDPR) with transport authorities such that future business cases or increased services could be ascertained, e.g. in newly built areas. This could also include travel information for vulnerable and disabled people which could then help provide appropriate service or infrastructure by transport authorities to improve user experience.