

Consultation Question 3.

2.65 We provisionally propose that the decision whether a vehicle is sufficiently safe to “safely drive itself” should be made by the Secretary of State, as informed by advice from a specialist regulator. Do you agree?

Yes, to ensure conditions pertaining to the PROW network in Great Britain can be addressed.

Consultation Question 6.

2.68 We welcome practical suggestions for how AV regulators can fulfil their public sector equality duty.

Members felt that it is important that the risks involved in the use of Automated Vehicles on the Public Rights of Way system should be widely discussed with vulnerable user groups at an early stage. Risks associated with an AV recognising the presence of an animal, either wildlife, unfenced cows, or ridden horses for example. Furthermore, it was felt that there is a need for the characteristics of a horse to be given a definition.

Consultation Question 8.

3.12 We seek views on whether an approval authority that intends to use a scenario database as part of the testing procedure should consult road user groups on the range of scenarios to be included.

Yes, especially with regard to vulnerable users on the PROW network. Particular concern was in the area of mapping of PROW routes where they cross or link with the Highway System. These features should be subject to electronic signalling, and not visual.

Consultation Question 16.

3.41 We seek views on whether the regulator that classifies vehicles as self-driving should have power to allow their deployment in limited numbers, so as to gather further data on their safety in real world conditions.

Public Rights of Way should not be accessed for deployment of vehicles until after their safety is assessed on other road networks. Only then should access to PROWs be permitted, and further data relating specifically to vulnerable users on PROWs gathered.

Consultation Question 21

4.31 What formal mechanisms could be used to ensure that the regulator administering the scheme is open to external views (such as duties to consult or an advisory committee)

The regulator should have a formal duty to consult vulnerable user groups with regard to PROW use.

Consultation Question 23.

4.42 We provisionally propose that the regulator which assures the safety of AVs in-use should have powers to impose the following sanctions on ADSEs: (1) informal and formal warnings; (2) fines; (3) redress orders; (4) compliance orders; (5) suspension of authorisation; (6) withdrawal of authorisation; and (7) recommendation of attendance at a restorative conference. Do you agree?

Yes, a restorative conference would give an injured vulnerable user the opportunity to make a change to the system which could save lives in the future.

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Yes, a restorative conference would give an injured vulnerable user the opportunity to make a change to the system which could save lives in the future.

Consultation Question 24.

4.43 We provisionally propose that the legislation should provide the regulator with discretion over: (2) the steps which should be taken to prevent re-occurrence of a breach. Do you agree?

Yes, this could ensure that a safety change is enforced upon the ADSE.

Consultation Question 25.

4.48 We provisionally propose that a specialist collision investigation unit should be established: (1) to analyse data on collisions involving automated vehicles; (2) to investigate the most serious, complex or high-profile collisions; and (3) to make recommendations to improve safety without allocating blame. Do you agree?

Yes.

Consultation Question 26.

4.53 We provisionally propose that the UK Government should establish a forum for collaboration on the application of road rules to self-driving vehicles. Do you agree?

Yes. The interests of users of PROWs and access issues should be included in the forum.

Consultation Question 35.

5.32 We provisionally propose that the user-in-charge should be liable for criminal offences which do not arise from the dynamic driving task, including those related to: (4) duties following accidents to provide information and report accidents to the police;

Do you agree?

Yes, it is particularly important in rural locations that incidents are reported in a timely manner.

Consultation Question 53.

9.9 We provisionally propose that measures should be put in place to compensate the victims of accidents caused by uninsured AVs. Do you agree?

Yes.

Consultation Question 55.

10.17 We provisionally propose that:

(1) for a vehicle to be classified as self-driving, it needs to record the location as well as the time at which the ADS is activated and deactivated;

(2) the Government should work within the UNECE to ensure data storage systems for automated driving record these data; and

(3) any national system to approve an ADS should require this data to be collected, subject to safeguards. Do you agree?

Yes.
