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A regulatory framework for automated vehicles

Thank you for the opportunity to respond to this consultation.

We are not able to comment in detail on the proposed regulatory framework for the safe deployment of automated vehicles in the UK. We do have some general comments on automated vehicles which we feel might help with the context of the discussion.

The starting point in any consideration of this should be “how will we ensure that our response to this makes our villages, towns and cities better for the people who live and work there?”. We should aspire to places and communities that place people at the centre of planning, design, and regulation.

We consider that walking, wheeling, cycling and sustainable transport should be at the heart of our approach to this issue and that the adoption of the transport hierarchy included in Transport Scotland’s National transport strategy is central to this.

The Summary Document makes no mention of walking, wheeling, cycling or sustainable transport. This appears to be a serious omission.

There may be a misplaced optimism in technological quick-fixes - technology does not necessarily address the transport issues that we have – electric or automated vehicles are still traffic. Autonomous vehicles are still vehicles, and they impact on the quality of places for people.

There should be a presumption in favour of solutions that have a better impact on people and places – including congestion, air quality, public health, etc. Walking, wheeling, cycling and public transport address this. Investment in infrastructure and behaviour change work to better support walking and cycling is almost certainly a better investment than adapting our streets for autonomous vehicles.

The legal framework that we develop must enhance the ability of people to travel actively and ensure that it does not make that a less attractive option. There is a substantial body of evidence to support the benefits of walkable places.

Paths for All

Paths for All is a Scottish charity founded in 1996. We champion everyday walking as the way to a happier, healthier Scotland. We want to get Scotland walking: everyone, everyday, everywhere.

Our aim is to significantly increase the number of people who choose to walk in Scotland - whether that's for leisure or walking to work, school, the shops or to a nearby public transport hub. We want to create a happier, healthier Scotland where physical activity improves quality of life and wellbeing for all. We work to develop more opportunities and better environments not just for walking, but also for cycling and other activities, to help make Scotland a more active, more prosperous, greener country.

Our work supports the delivery of the Active Scotland Delivery Plan, National Walking Strategy, The Cycling Action Plan for Scotland and the Long-term Vision for Active Travel in Scotland, community and workplace health walking, path network development and active travel policy development. We are a partnership organisation with 30 national partners. Our funders include the Scottish Government, Transport Scotland, Nature.Scot, and The Life Changes Trust.

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