



London Cycling Campaign response to the Law Commission consultation on Autonomous Vehicles

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with 20,000 supporters of whom 12,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

Key Principles

LCC shares the view of Cycling UK, the national cycling organisation, that **the advent of Autonomous Vehicles (AVs), or Advanced Driver Assistance Systems (ADAS) must not, in any way, deter the rapid and beneficial growth in cycle use** that we are experiencing in some parts of the UK and, most notably, in London where cycle trips have more than doubled in the space of 15 years to more than 730,000 per day.

AVs must reduce road danger to pedestrians and cyclists rather than maintain the current, unacceptable, level of fatalities and serious injuries (KSIs). The Mayor of London has a declared policy (Vision Zero) of reducing KSIs to zero by 2041. Legislation must ensure that AVs are designed and programmed to prevent collisions.

Given the evident need to reduce road danger by safer road design (as well as by addressing the danger from vehicle design and driver behaviour) it is also **important that rapid AV development does not lead to road design that disadvantages pedestrians and cycle users.** Installing tracks and other infrastructure for AVs, which might be required in any regulations, must not undermine the provision of new, cycle tracks, pavements and public spaces or encroach on existing ones.

We note also that the development of AVs highlights again the need to **introduce presumed liability for larger vehicles that collide with vulnerable road users**. Such civil liability in road collisions is common in virtually every European country except the UK.

Motor vehicles currently cause extensive congestion and contribute significantly to air pollution and ill health from inactivity. These negative aspects of motoring must not be exacerbated by AVs. **The regulations governing AVs and their ownership model must lead not only to improved road safety but also improved health and air quality, better public transport, reduced numbers of motor vehicles and more attractive cities.** AVs used in urban areas must be electrically powered to reduce emissions.

Dynamic road pricing trials are already being considered in London. Road pricing charges must encompass AVs, from the outset, to prevent increases in congestion, inactivity and pollution, which could result from expanded use.

Cycling UK response to Law Commission consultation response

We have considered Cycling UK's response to the Law Commission's consultation and find that its views correspond with ours notably on the principles declared above.

Rather than repeat the comments and arguments laid out by Cycling UK in answer to the Commission's questions we commend that response to the Commission and urge you to ensure that the UK's legislation in the matter of AVs and ADAS helps deliver the target set by the London Mayor's Vision Zero.