

Automated Vehicles Team  
Law Commission  
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Ref: TF/D49

06 January 2020

Dear Sir/Madam,

**THE LAW COMMISSION,  
Highly Automated Road Passenger Services, HARPS**

Thank you for the opportunity to comment on the proposals for the introduction of Highly Automated Road Passenger Services.

GoBike, is a voluntary organisation campaigning in the Strathclyde area of west central Scotland, around Glasgow for better infrastructure, policy and political support for cycling. Cycling should be a safe, efficient, healthy and attractive form of active travel for people of all abilities and ages and using every variety of cycle. The comments which follow are made in the context of GoBike's campaign aims, and of the need to create conditions which make cycling the natural way of getting around for the large numbers of people for whom it currently seems much too risky.

It is in the light of our aims that we are extremely concerned about your proposals and we cannot accept that such vehicles can operate on the public road. We were very sceptical of the proposals in your Consultation Paper 1 and we are far from reassured by the wording of Consultation Paper 2. There is no mention of vulnerable road users such as people on foot, on a cycle or in a wheelchair in the paper, although you do mention that a vehicle might freeze if confronted by a plastic bag blown by the wind (2.10 (2)).

We dispute your claim that HARPS will reduce dependency on car ownership (2.5). We maintain the view that the way to reduce dependency on the private car is to massively improve public transport, using the models we currently have in Edinburgh and London as the base and to provide good, extremely good, cycling and walking routes. Door-to-door motorised transport is contributing significantly to the obesity epidemic and to other health problems.

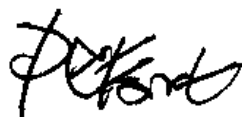
HARPS are not a viable alternative to taxis or to buses. Public transport is a social medium and contact with the driver and/or other onboard staff is a prerequisite. People need to feel safe and no amount of CCTV can replace the human contact that so many people need when travelling.

We fail to see how you can assert that the introduction of HARPS will reduce accidents and this was not clear either in your previous Consultation paper. How will these vehicles cope with cycles, of all types, with prams and buggies, with people running across the road in front of them to catch a bus, with potholes, with other vehicles being erratically driven or with other vehicles whose drivers do not obey traffic signals and signage?

Your survey questions assume that people accept the principles of HARPS; we do not, although we can see that such vehicles have a possible use on a segregated system. For many reasons the public roads of the UK are not yet the place for highly automated road passenger services and you do not explain how our public roads will be adapted to make them the place.

Should you require clarification of our views please do contact us.

Yours sincerely

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

Tricia Fort  
for Consultations, GoBike