

Proposals to support advanced driver assistance systems and automated vehicle technologies~ Response from Campaign for Better Transport

We welcome the opportunity to contribute to the Centre for Connected and Autonomous Vehicles' consultation on proposals to support automated vehicle technologies.

We see the potential benefits from autonomous vehicles safety by reducing or removing driver error, increasing mobility options for isolated individuals and communities, and making more efficient use of congested corridors. Connected vehicles have great potential to facilitate better integration of transport options and better travel planning by individuals and organisations, managing existing road space more effectively and facilitating trip sharing and load sharing.

However, we believe there remain many unanswered questions on safety both operational and from hacking which require a precautionary approach and the need to retain human oversight and responsibility.

An upsurge of autonomous vehicles in urban centres could make congestion worse by replacing more efficient modes, particularly buses, while there may be challenges to their economic viability in rural areas, especially given the anticipated high insurance and warranty costs.

We are particularly concerned about the impacts of HGV platooning, not least on congestion and safety, given the risk of catastrophic technical failures and the operational challenge of the number and frequency of exits and emergency refuges on most motorways.

If successful, platoons could seriously undermine the economics of rail too given that drivers constitute a third of their costs, with knock on adverse impacts on carbon reduction, pollution and congestion if freight shifts from rail to road.

We welcome the leading role the UK is playing in transport technology innovation and look forward to practical applications that will cut pollution, improve safety and contribute to an enhanced sustainable transport network. However this innovative work should not be at the expense of everyday transport.

Simply replacing today's vehicles with autonomous ones will not solve the challenges of carbon reduction, pollution, congestion, and obesity: for that, the emphasis needs to remain on better public transport, rail freight, walking and cycling.

Many of the questions lie outside our policy scope; however we do have the following comments:

Question 1C: In the first tranche of regulatory change, with the exception of insurance, should we only consider those advanced driver assistance systems or automated vehicle technologies that are likely to come to the UK market in the next 2-4 years?

Yes: we do not support over commitment of scarce resources to long term speculative work at the expense of everyday transport.

Enabling platooning in the UK

Question 3B: Do you agree with the proposition to allow platooning by relaxing Highway Code rule 126 (which recommends a 2 second gap between vehicles)?

Question 3C: What, if any, other restrictions should be considered regarding use of platooning technologies, and why?

We do not believe that Highway Code rules should be relaxed to allow HGV platooning until more research and analysis is carried out to evaluate whether platooning is viable in the UK for the following reasons:-

Whilst the aim of platooning is to reduce adverse impacts of HGVs it will not fundamentally reduce these adverse impacts or improve the current lack of internalisation of HGVs charges. If freight costs are reduced for road haulage operators, there is a danger that the same freight will be transported further, with increased external costs.

Whilst platooning could be viable in some other countries, there are serious obstacles to HGV platoons being practical in the UK. The UK's road network is already very congested, with frequent motorway exits close together, and it is unclear how platoons will interact with other road users or how vehicles will overtake and enter and exit junctions safely.

There are still many technical questions unanswered, such as what would happen if a vehicle in the platoon breaks down, how to tackle the threat of cyber-crime or how these platoons will perform in bad weather. Furthermore, there are insurance issues to be resolved.

HGV platooning should not be seen as a panacea for reducing freight congestion and emissions or reducing road crashes. There is a compelling case for rail freight as part of an integrated multimodal solution. We believe that rather than aiming to reduce carbon dioxide emissions by 10 per cent through platooning, the Government could be cutting emissions by three quarters by switching more freight to rail.¹

Platooning is being promoted as a way to reduce hauliers' costs, but this fails to acknowledge the increased costs to society and the economy if more sustainable transport modes are undermined further. Reducing HGV costs is likely to lead to more lorry miles as freight is carried further. Large HGVs are 160,000 times more damaging than the average car. If rail freight is undermined, these external costs will go up.

This has huge cost implications for the taxpayer: recent research both here and in Europe has shown that HGVs are only paying around 30% of their external costs.² This market distortion makes it difficult for rail to compete. If platooning reduces HGV costs further, it will make it even harder for rail freight to compete and could result in trainloads of freight going back onto the UK's congested road network.

There are also unanswered questions on safe working time rules for platoon rear drivers to avoid fatigue-related failures.

Freeing the driver to make best use of their automated vehicle

Question 3D: Do you agree with the proposition that specific and implied driver distraction restrictions are not relaxed at this time?

Yes: for safety reasons, even if the vehicle is in autonomous mode, the driver should be concentrating on the road and able to resume operation at any time.

Question 3F: What are your views on amending Regulation 109 to allow drivers to view TV/display screens displaying information that is not related to the driving task, while driving?

Do not amend: for safety reasons, even if the vehicle is in autonomous mode, the driver should be concentrating on the road and able to resume operation at any time.

September 2016

Bridget Fox

Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX

Registered Charity 1101929. Company limited by guarantee, registered in England and Wales: 4943428

¹ Rail freight produces 76 per cent less carbon dioxide emissions than normal HGVs. DfT Logistics Perspective December 2008 p10

² Latest Government figures show that HGVs are paying less than a third of the costs they impose on society
<http://www.freightonrail.org.uk/HotTopicsDangerousDirty&Damaging.htm>