Automated vehicles: statement of safety principles

Your information

Q1. What is your name?

LINDSAY IRVINE

Q2. What is your email address?

legislation@fbhvc.co.uk

Q3. Are you responding on behalf of an organisation?

Yes

Organisational details

Q4. Your organisation's name is?

THE FEDERATION OF BRITISH HISTORIC VEHICLE CLUBS (FBHVC)

Q5. Your organisation is best described as?

Another area:
REPRESENTATIVE AND LOBBYING ORGANISATION FOR THE HISTORIC VEHICLE MOVEMENT

Q6. Where is your organisation primarily located?

UK

Proposal

Q8. Do you agree or disagree with the purpose of the statement of safety principles being t o provide guidance to the Secretary of State in considering the self-driving test?

Agree

Purpose reasoning

Q9. Why do you think this and, if relevant, what alternatives would you prefer?

The FBHVC is largely in agreement with the purpose of the statement of safety principles (SOSP) subject to the following. In response to the 2025 Consultation at paragraph 9, we suggested that an additional purpose of the SOSP should be embracing the concept of continuous improvement through reporting of issues and improvements made. We note that at page 20 of the current consultation, this was considered for inclusion but it was decided that this could be included in the authorisation conditions set out in the regulations. With that understanding, we are content with the stated purpose.

Setting the safety standard

Q10. Do you agree or disagree with the safety standard for AVs being set at equivalent to careful and competent human drivers?

Agree

Setting the safety standard reasoning

Q11. Why do you think this and, if relevant, what alternatives would you prefer?

In the 2025 Consultation we had observed that more experienced drivers and those with professional qualifications would more likely have fewer accidents and had provided examples of additional driver training. We had also agreed with the stated characteristics of the careful and competent driver. However in some respects we expected the system to exceed the capabilities of human driver for example in ”identifying hazards real and potential” and “assessing risks and planning accordingly.” Their access to a wider range of sensors than humans for example should contribute to this higher level of safety. We also conceded that total safety could not be achieved. That said we submitted that to achieve public acceptability and a low level of incidents “required the designer to aim for a level of safety standard that exceeds the normal human standard”.
We note that in setting the standard as “the careful and competent driver” the consultation recognises that it represents a higher standard than an “average human driver” which we acknowledge is in line with our submission on the issue.

Using behaviours within the SoSP

Q12. Do you agree or disagree with using behaviours as the basis for developing the principles within the SoSP?

Agree

Approach behaviours reasoning

Q13. Why do you think this and, if relevant, what alternatives would you prefer?

Since we largely attribute good and safe outcomes to the behaviours of careful and competent human drivers, this appears the best way to judge outcomes from automated vehicles.

Identifying careful and competent behaviours

Q14. Do you agree or disagree with the identified behaviour of:

	Agree	Disagree	Don't know
vehicle control	X		
hazard anticipation, perception and reaction		X	
obeying traffic rules	X		
interaction with other users	X		
adaptability to road conditions	X		

Why do you think this?
Having regard to the submissions we made at the 2025 consultation, we consider that the behaviours listed largely cover the elements we put forward. However we submit that “hazard recognition” should be added to the behaviour "anticipation, perception and reaction” for the reasons set out below.

Q15. In your view what, if any, other behaviours do you think are missing and why?

As indicated above we consider “hazard recognition” should be added. We note that in raising the issue of the interaction of automated vehicles with historic vehicles in all their different guises in the 2025 consultation, we said “a careful and competent human driver may immediately recognise an “old” historic vehicle and make allowances for its performance accordingly”. We consider it debatable that “anticipation and perception” sufficiently describe or replace the necessary process that must take place for safe interaction and note that hazard “recognition” was used in the DVSA Guide to Driving. Without adequate recognition of the nature of the hazard, the reaction to it might be inappropriate and this may be particularly the case in relation to automated vehicles.

Overall improvement in road safety

Q16. Do you agree or disagree that the proposed principles on improving road safety for all and interacting safely with other road users provides sufficient protection for all road users?

Agree

Principles reasoning

Q17. Why do you think this and, if relevant, what alternatives would you prefer?

We do agree subject to the comments about individual principles below.

The safety principles

Q18. Conceptually do you agree or disagree with inclusion of:

	Agree	Disagree	Don't know
principle 1	X		
principle 2			X
principle 3	X		
principle 4	X		
principle 5	X		
principle 6		X	
principle 7	X		
principle 8	X		
principle 9	X		
principle 10	X		

Q19. Do have any comments, including textual amendments, for:

principle 1	-
principle 2	We note that the wording is similar to the mandate to human drivers at Paragraph 149 of the Highway Code which in turn is a summary of the provisions in sections 2 and 3 of the Road Traffic Act 1988. However the principle uses the word “over” after “control” whereas the Highway Code uses “of”. Whilst it may be a difference without a distinction, we do query whether there was any significance in the difference which might merit an explanation.
principle 3	-
principle 4	-
principle 5	-
principle 6	The FBHVC would suggest that the headline statement of Principle 6 is not in itself a “principle” but simply a restatement of section 2(2)(b) of the Automated Vehicles Act and a repeat of the aim or intended outcome of the Statement of all the Safety Principles themselves. If the statutory mandate for the SOSP is to improve road safety for all, then it is surely superfluous to make it one of the principles. Whilst we would largely agree with the description of how it should achieve the aim, we also query why the qualification of “disproportionate” is inserted. We would suggest that this is inconsistent with the mandate for improved road safety which is surely founded on there being no increase in risk to any group of road users. The corollary is that a proportionate increase in risk to a group would be acceptable which would need some further exploration and justification. We suggest the wording is altered as follows: “Self-driving vehicles should seek to minimise risk to its their occupants and other road users. They should avoiding any disproportionate increase in risk to any group of road users. When safety risks occur the self-driving vehicle should seek to minimise the potential for harm.”
principle 7	We had previously submitted that historic vehicles should be recognised as a specific category of legacy road users which the automated vehicle must safely interact with. Whilst noting that they have not been included, we consider the current wording sufficiently inclusive as to embrace them.
principle 8	-
principle 9	-
principle 10	-

Principles and behaviours not included

Q20. In your view, should any of the currently excluded areas be included in the SoSP?

Yes

Including excluded areas

Q21. Which areas and why?

In the September 2025 consultation we had advocated that to maintain and enhance safety, one of the purposes of the SOSP should be to ensure the AV learned from incidents and near incidents so that it could improve it safety standards on a continuous basis. We do not consider this is implicit in the existing principles and should be included as an additional principle.

Continuous Improvement:

The safety principles should expressly embrace the concept of continuous improvement. Meeting the initial type approval standards for the deployment phase and continued compliance with those standards is the minimum legal requirement. However the evidence gathered and issues and problems identified in service should drive amendment and modification of the authorisation standards as necessary and this should be embedded in the safety principles. The following principle is suggested:

• Self driving vehicles should be subject to continuous review of their performance to prompt amendments or modifications to enhance the safety and effectiveness of the system

Costs and benefits

Q22. In your view what, if any:

costs do you think should be taken into consideration when assessing the impact of the SoSP	So long as historic vehicle users and other legacy users are not subject to any restrictions or other compromises to accommodate the implementation of the SOSP the FBHVC does not identify any immediate "cost" to the movement.
benefits do you think should be taken into consideration when assessing the impact of the SoSP	-