# BusinessLDN response to the London Assembly Transport Committee investigation: Autonomous Passenger Vehicles in London

## Consultation Response

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### INTRODUCTION

1. BusinessLDN welcomes the opportunity to contribute to the London Assembly Transport Committee's investigation into autonomous passenger vehicles (AVs).

2. BusinessLDN is a business membership organisation with the mission to make London the best city in the world to do business, working with and for the whole UK. We work with the support of the capital's major businesses across sectors including housing, commercial property, finance, transport, infrastructure, professional services, ICT and education.

3. London has a long and proven track record of leading transport innovation. From the world's first underground railway to Oyster and contactless ticketing, the Congestion Charge and the Ultra Low Emission Zone, the capital has consistently demonstrated its ability to adopt and scale transformative technologies in ways that improve mobility, support growth and enhance quality of life.

4. AVs represent the next major evolution in urban mobility. They offer an opportunity for London to improve road safety outcomes, accelerate progress toward net zero transport, and strengthen the efficiency of the city's transport system. At the same time, they provide a platform for London to reinforce its position as a global leader in innovation, attract high-value investment, and help shape international standards for the safe and sustainable deployment of emerging technologies.

5. AVs also have the potential to improve the functioning of London's economy by strengthening first- and last-mile connectivity, improving access to employment and services, supporting shift workers and late-night travel, and increasing resilience during periods of transport disruption. As transport infrastructure, they can help employers, workers, customers and visitors move around the capital more efficiently.

6. While AVs are not a silver bullet for London's transport challenges, they are an inevitable and fast-developing part of the future mobility mix. The key question is therefore not whether they arrive, but how London chooses to embrace their deployment in a way that maximises public benefit.

7. London has a clear opportunity to demonstrate that it can move beyond discussing AI and frontier technologies to deploying them responsibly at scale. A clear, proportionate and predictable route to market will strengthen London's international competitiveness while maintaining the high standards of safety and regulation expected by Londoners.
8. In response to the Committee's questions, our views are set out below.

**DETAILED COMMENTS**

***Who is responsible for licensing autonomous passenger vehicles in London and what role do the Mayor and TfL play?***

10. The legislative framework for autonomous vehicles is set nationally via the Automated Vehicles Act 2024. In addition, the Automated Vehicles (Permits for Automated Passenger Services) Regulations 2026 came into force, creating a targeted legal framework that allows organisations to deploy commercial passenger services - such as robotaxis and automated shuttles - with or without a human safety driver

11. However, the Mayor and Transport for London (TfL) play a decisive role in shaping how autonomous passenger services operate in practice, including the issuing of permits and consenting powers.

12. As the capital's strategic transport authority, TfL already regulates taxis and private hire services, manages the road network, and oversees delivery of the Mayor's Transport Strategy (MTS). It is therefore well placed to ensure autonomous mobility strengthens, rather than fragments, London's integrated transport system.

13. BusinessLDN believes London should take a proactive, strategic approach to AV deployment. Rather than adapting reactively, TfL and the Mayor should actively shape the conditions under which autonomous services are introduced to ensure they deliver safer, more efficient and more inclusive mobility outcomes.

14. TfL should establish a clear framework ensuring autonomous services:
    • Support Vision Zero and strengthen road safety outcomes;
    • Contribute to the decarbonisation of London's transport system;
    • Integrate effectively with public transport, particularly first-and-last-mile journeys;
    • Reinforce, rather than undermine, mode-share targets in the MTS;
    • Make efficient use of constrained road space;
    • Meet robust and verifiable accessibility standards; and
    • Provide high-quality operational data to support monitoring of congestion, safety and network performance.

15. TfL should also establish a structured forum bringing together operators, boroughs, businesses, accessibility groups, emergency services, training providers and local communities to oversee deployment, identify operational issues and share evidence as services expand.

16. Businesses can contribute practical insight by identifying underserved travel patterns, supporting appropriate pick-up and drop-off locations, and helping shape workforce transition and skills development alongside operators and training providers.

17. This should be supported by clear assessment criteria, indicative decision-making timelines and outcome-based regulation that provides operators and investors with confidence while allowing innovation to develop.

18. The objective should be to actively design the conditions for success, ensuring autonomous mobility strengthens London's competitiveness while delivering tangible benefits for residents and businesses.

***How close are commercial operators to deploying autonomous passenger vehicles for hire in London?***

19. In London, limited trials are already underway, with further pilots expected to expand in the near term. The timing of fully commercial "robotaxi" deployment will depend on successful trial outcomes, national regulatory development, and approval from both UK Government and TfL.

20. London is unlikely to experience a rapid transformation in mobility. Instead, initial deployment will be phased, geographically targeted, and use-case specific. We support this staged approach as it allows innovation to be introduced safely and responsibly while building public trust over time. Cities that plan early and in a structured manner will be best placed to benefit as deployment accelerates globally.

21. While a phased approach is appropriate, prolonged uncertainty, fragmented decision-making or unnecessary restrictions risk deterring investment and encouraging operators to prioritise deployment in other international cities. London should aim to provide clarity as early as possible while maintaining robust safety oversight.

22. London should therefore be both cautious and ambitious: cautious in ensuring safety and governance, but ambitious in positioning itself as a leading global hub for autonomous mobility, AI-enabled transport systems and urban innovation.

***Are autonomous passenger vehicles compatible with the Mayor's Transport Strategy?***

23. Yes - provided they are deployed in a way that actively reinforces, rather than competes with, the objectives of the Mayor's Transport Strategy.

24. Properly integrated, AVs can strengthen London's transport system by:
    - Improving late-night and shift worker travel;
    - Supporting staff access to airports, hospitals, universities and hospitality venues;
    - Improving connectivity in outer London where public transport is less comprehensive; and
    - Reducing reliance on private car ownership.

25. AVs should be viewed as complementary to, not a substitute for, London's high-capacity public transport network. The Underground, buses and rail will remain the backbone of urban mobility.

26. International experience - particularly in cities such as San Francisco - demonstrates the value of integrating autonomous services with public transport, including linking ride-hailing journeys to rail and metro networks. London has an opportunity to build on and improve these models.

***What are the principal risks associated with autonomous passenger vehicles in London, and can they be mitigated?***

27. The principal risks relate to congestion, safety, public trust, accessibility and labour market transition. However, these are manageable through early and coordinated policy design.

28. Without appropriate controls, AVs could increase congestion through empty running, inefficient repositioning and clustering in high-demand areas. In a constrained road environment like London, this makes proactive management essential from the outset.

29. Safety considerations are central. While AVs have strong potential to reduce collisions caused by human error, they must be rigorously tested in complex urban environments. Public confidence will depend on transparency, accountability and consistently high safety standards.

30. At the same time, AV systems present a credible opportunity to significantly reduce road harm over time, particularly where human error is a contributing factor in collisions. For example, a Waymo-Swiss Re study in the United States found significantly lower rates of insurance claims for property damage and bodily injury when comparing Waymo's autonomous service with a geographically matched human-driver benchmark. [1] However, comparisons should be interpreted carefully because autonomous vehicles currently operate in more constrained conditions than human drivers.

31. Labour market impacts will also need careful management. While AVs may reduce demand in some driving roles, they will also create new opportunities in fleet operations, software systems, maintenance and remote supervision.

32. London's transition is therefore best managed as a phased evolution of the workforce rather than abrupt displacement. A hybrid model, where autonomous and human-driven services coexist, provides the most stable pathway for workers, operators and users. Evidence from the United States suggests this approach can also support driver utilisation and earnings.[2] In San Francisco and Los Angeles, where drivers compete against AV-only networks, driver utilisation and hourly earnings declined, with one autonomous vehicle estimated to undertake the work of around four drivers. By contrast, in hybrid markets such as Austin, Atlanta and Phoenix, where autonomous vehicles and drivers operate through the same platform, trip volumes have increased while driver earnings have remained broadly stable. While labour market impacts will differ between operators and markets, the experience to date suggests that hybrid deployment can support workforce transition while maintaining driver earnings during the early stages of adoption.

33. These risks can be mitigated through:
    - Strong controls on empty vehicle mileage;
    - Comprehensive data-sharing between operators and authorities;
    - Clear operational protocols for incidents and roadworks;
    - Effective kerbside and space management; and
    - Continuous monitoring of system-wide impacts.

34. As highlighted in BusinessLDN's response to the Government's consultation on Electric Vehicle Excise Duty (eVED), there is also a strong case for evolving more dynamic and integrated road pricing mechanisms to reflect congestion, demand and scarcity of road space more accurately.

***To what extent are autonomous passenger vehicles accessible to all Londoners?***

35. AVs present a major opportunity to expand accessibility and independence, particularly for disabled and older Londoners, but only if accessibility is embedded from the outset.

[1] Waymo, New Swiss Re Study: Waymo is safer than even the most advanced human-driven vehicles, December 2024

[2] Uber, Unlocking the Promise of Autonomy, 2026

36. London should work closely with operators, disability organisations and transport providers to ensure services are inclusive by design. Collaboration between Waymo and the Royal National Institute of Blind People demonstrates the potential of co-design approaches to deliver genuinely accessible autonomous mobility.

37. Accessibility is not limited to vehicle design. Human assistance will continue to be necessary for some users, reinforcing the importance of a hybrid transport ecosystem combining autonomous and staffed services.

38. There is also a risk that market-led deployment could concentrate services in higher-demand or wealthier areas. A clear policy framework will be required to ensure equitable access across inner and outer London, particularly to support access to employment, education and healthcare.

***Are there any benefits that autonomous passenger vehicles could offer in London, and how likely are those benefits to be realised?***

39. If deployed effectively, AVs could deliver significant benefits for London, including:
    - Improved road safety over time;
    - Greater accessibility and mobility choice;
    - Enhanced first-and-last-mile connectivity;
    - More efficient use of road space;
    - Progress toward net zero through electrified fleets; and
    - Economic gains through innovation, productivity and investment.

40. The London Growth Plan positions London as a global leader in AI, frontier technologies and the wider innovation economy. Autonomous vehicles (AVs) are a key part of this ecosystem, sitting at the intersection of AI, data, connectivity and advanced software. If London is serious about becoming a world-leading hub for frontier technologies, it cannot overlook one of their most significant real-world applications. Supporting AV deployment would stimulate investment across a much wider ecosystem than software alone, including fleet operations, vehicle maintenance, charging infrastructure, depots, roadside assistance, cyber security, engineering, customer support and local supply chains. These are precisely the kinds of high-value activities London should seek to attract as part of its wider growth strategy. These activities would support highly skilled employment, strengthen London's innovation ecosystem and create opportunities across local supply chains.

41. Other leading global cities are already moving from trials to commercial deployment. London should aim to remain among the cities setting the benchmark for responsible autonomous mobility rather than adopting approaches developed elsewhere.

42. A major proportion of road collisions are linked to human factors such as distraction, fatigue and impairment. AV systems offer the potential to reduce exposure to these risks through consistent rule adherence and continuous sensor-based awareness. However, these benefits are not automatic. They will depend on robust regulation, high-quality data, effective enforcement and integration with wider transport policy.

43. Many London businesses have ambitious net-zero commitments covering their operations, employee travel and vehicle fleets. Fully electric autonomous passenger services could provide

an additional low-emission mobility option for journeys that are less well served by public transport while supporting investment in charging infrastructure.

44. For employers, the benefits extend beyond transport itself. Better first- and last-mile connections, more reliable late-night travel and improved connectivity in outer London can widen labour markets, improve access to customers and increase resilience during planned and unplanned disruption to the transport network.

45. With the right conditions in place, London has a strong opportunity not only to realise the benefits of AVs but to set global standards for their safe and effective deployment.

***What lessons can London learn from trials and deployments elsewhere?***

46. Three key lessons have emerged from international deployments:
    • AVs work best when integrated into wider transport systems rather than operating in isolation.
    • Public trust is essential and must be built through transparency, accountability and clear safety standards; and
    • Cities must proactively manage impacts on congestion and road space from the outset.

47. London should build on these lessons while recognising its own unique operating environment.

***What role should TfL and the Mayor play in the development and oversight of autonomous passenger vehicles?***

48. TfL and the Mayor should play a clear leadership and system-shaping role. Rather than simply regulating after deployment, they should actively design the framework within which AVs operate. This should include:
    • Setting clear expectations for operators;
    • Ensuring alignment with the Mayor's Transport Strategy;
    • Coordinating boroughs and stakeholders;
    • Establishing robust data-sharing frameworks;
    • Managing road space allocation; and
    • Monitoring system-wide impacts.

49. A proactive approach will ensure London remains both globally competitive and locally accountable in the development of autonomous mobility.

***What do Londoners think about autonomous passenger vehicles?***

50. Public attitudes remain cautious but are not fixed. International experience suggests confidence grows as people experience well-regulated services operating safely in real-world conditions. Polling nevertheless shows that safety and trust remain the principal barriers to acceptance. For example, in an October 2025 YouGov poll 79% of Britons say they trust driverless taxis "not very much" (35%) or "not at all" (44%), while 85% would choose a taxi with a human driver over a driverless one.[3] In a recent HPI survey, Londoners were the most trusting of self-driving technology of any UK region. However, 79% of Londoners still said they would not trust a driverless car or feel comfortable travelling in one, with only 21% saying they would.[4]

[3] YouGov, Do Britons trust driverless taxis and autonomous vehicles, October 2025

[4] HPI, Driverless Cars Research UK: Shifting Public Attitudes Towards Autonomous Vehicles, February 2025

51. Acceptance is strongly dependent on demonstrated safety performance and clear regulatory oversight. As such, trust will be built through transparency, consistent safety outcomes and clear accountability frameworks.

52. Londoners are likely to support AV deployment if it is affordable, safe and reliable. Public engagement must therefore be continuous and embedded throughout deployment.

**CONCLUSION**

53. BusinessLDN supports a credible route to the safe, accessible and fully electric deployment of autonomous passenger services in London. London businesses stand ready to work with the Mayor, TfL and operators to identify priority use cases, support successful deployment and help ensure autonomous mobility strengthens the capital's productivity, connectivity and global competitiveness.

54. The Mayor and TfL should now provide the clear, proportionate and predictable framework needed to realise these opportunities while maintaining London's high standards for safety, accessibility and public confidence.

55. London has repeatedly shown that it can lead the world in transport innovation. Autonomous passenger services present the next opportunity to do so.