

Changes to The Highway Code: improving safety for cyclists, pedestrians and horse riders

Your details

Q1. Your (used for contact details only):
name? David Davies
email? david.davies@pacts.org.uk

Q2. Are you responding:
on behalf of an organisation?

Organisation details

Q3. What is the name of your organisation?
Parliamentary Advisory Council for Transport Safety (PACTS)

Hierarchy of road users

Q5. Do you agree with the introduction of new Rule H1?
Yes

Hierarchy of users wording

Q7. Is the proposed wording easy to understand?
No

Disagree with hierarchy of users wording

Q8. Why not?

We strongly support the principle that those road users who can do the greatest harm have the greatest responsibility.

However, the reference to a hierarchy is problematic. No hierarchy is actually shown and it is not clear that all users can be neatly fitted into a linear hierarchy. Its polarity is confused; we are told the most vulnerable are at the top - but those who should take most care are (presumably) at the base. It is a hierarchy of vulnerability but used to indicate a hierarchy of responsibility.

It is already causing confusion and bad feeling - being interpreted to mean that some users are more important than others. The principle does not require a hierarchy.

Clarification of right of way and stronger priorities for pedestrians

Q9. Do you agree with the introduction of new Rule H2?

Yes

Stronger priorities for pedestrians wording

Q11. Is the proposed wording easy to understand?

Yes

Cyclists priorities and right of way

Q13. Do you agree with the introduction of new Rule H3?

Yes

Cyclists priorities and right of way wording

Q15. Is the proposed wording easy to understand?

Yes

Rules for pedestrians

Q17. Do you agree with the proposed change to give way to pedestrians waiting at a:

	Yes	No	Don't know?
junction?			X
zebra crossing?	X		

If no, why not?

We support the principle that pedestrians should be able to proceed more easily and safely.

We also support the clarification and strengthening of the rule that vehicles should give priority to pedestrians who are crossing a side road.

Requiring vehicles to stop for pedestrians waiting to cross side roads makes side roads equivalent to a zebra in this respect - but without any markings or safety features. We think this could be potentially unsafe, particularly at busy junctions and those where vehicles turn quickly. There are no indications that this rule would not apply to roads with higher speed limits.

We are unclear how children and others would be taught to use such crossings safely.

If this rule goes ahead, signage should be developed to indicate the new pedestrian priority. A major information campaign will be required to communicate this to all drivers - particularly experienced drivers who may never read the Highway Code. It should be closely monitored to see if it is operating safely. We did consider opposing the change on safety grounds but, on balance, it would have introduced an inconsistency to make the other changes but to leave this one out.

Q18. Is the proposed wording easy to understand?

Yes

Rules about animals

Q21. Do you agree to the proposed change to Rule 52?

Yes

Rules for animals wording

Q23. Is the proposed wording easy to understand?

Yes

Rules for cyclists

Q25. Do you agree with the proposed change to rule 63?

Yes

Rule 63 for cyclists wording: shared spaces

Q27. Is the proposed wording easy to understand?

Yes

Rules for cyclists

Q29. Do you agree with the proposed change to Rule 72 to ride:

	Yes	No	Don't know?
in the centre of your lane on quiet roads?	X		
in the centre of your lane in slower moving traffic?	X		
in the centre of your lane when approaching junctions?	X		
at least 0.5 metres away from the kerb on busy roads?	X		

Q30. Is the proposed wording easy to understand?

Yes

Rules for cyclists

Q32. Do you agree with the proposed change to Rule 73 at junctions with:

	Yes	No	Don't know?
special cyclist facilities?	X		
no separate cyclist facilities?	X		

Q33. Is the proposed wording easy to understand?

Yes

Rules for cyclists

Q35. Do you agree with the proposed change to Rule 76?

Yes

Rule 76 for cyclists wording: going straight ahead

Q37. Is the proposed wording easy to understand?

No

Disagrees with Rule 76 for cyclists wording: going straight ahead

Q38. Why not?

We agree that turning vehicles should give way and not cut across cyclists who are going straight ahead. Equally, cyclists should not be encouraged to undertake vehicles that are ahead and about to turn. This has been a major source of cyclist deaths in London - now much reduced due to engineering and education. We are concerned that the proposed rule may confuse. When a turning vehicle is clearly ahead and about to turn, a cyclists should not try to then undertake. The proposed wording may be taken to imply that cyclists can catch up with and undertake a turning vehicle.

Rules for cyclists

Q39. Do you have any further comments about other changes to the rules for cyclists?

this will require careful communication to riders and drivers.

General rules, techniques and advice for all drivers and riders

Q41. Is the proposed wording in Rule:

	Yes	No	Don't know?
123 easy to understand?		X	
124 easy to understand?		X	

General rules, techniques and advice for all drivers and riders

Q42. Do you agree with the proposed changes to Rule 140 on giving way to cyclists using a cycle:

	Yes	No	Don't know?
lane?		X	
track?		X	

Q43. Is the proposed wording easy to understand?

Yes

Using the road

Q46. Do you agree that cyclists may pass slower moving traffic on their right or left as detailed in Rule 163?

Yes

Using the road

Q48. Do you agree with the proposed speed limits detailed at Rule 163 for overtaking:

	Yes	No	Don't know?
motorcyclists?	X		
cyclists?	X		
horse riders?	X		
horse drawn vehicles?	X		

Q49. Do you agree with the proposed passing distances detailed at Rule 163 for overtaking:

	Yes	No	Don't know?
motorcyclists?	X		
cyclists?	X		
horse riders?	X		
horse drawn vehicles?	X		

Q50. Is the proposed wording easy to understand?

Yes

Using the road

Q52. Do you agree with the proposed changes to Rule 186 that:

	Yes	No	Don't know?
you do not overtake cyclists within their lane?	X		
you allow cyclists to move across your path?	X		
cyclists may stay in the left lane when continuing across or around the roundabout?	X		
horse riders may stay in the left lane when continuing across or around the roundabout?	X		
horse drawn vehicles may stay in the left lane when continuing across or around the roundabout?	X		

Q53. Is the proposed wording easy to understand?

Yes

Using the road

Q55. Do you agree with the proposed change to Rule 195 to give way to pedestrians and cyclists waiting to cross at a parallel crossing?

Yes

Using the road Rule 195 wording: zebra and parallel crossings

Q57. Is the proposed wording easy to understand?

Yes

Road users requiring extra care

Q60. Do you agree with the proposed changes to Rule 213?

Yes

Rule 213 road users requiring extra care: cycling on narrow roads

Q62. Is the proposed wording easy to understand?

Yes

Waiting and parking

Q65. Do you agree with the proposed change to Rule 239?

Yes

Rule 239 waiting and parking: Dutch reach

Q67. Is the proposed wording easy to understand?

Yes

Other comments on The Highway Code

Q71. Do you have any further comments regarding the proposed amendments to The Highway Code which focus on safety improvements for cyclists, pedestrians and horse riders?

Two other issues:

Rule 192 (Advice for drivers - Pedestrian crossings) states

In queuing traffic, you should keep the crossing clear.

We would like this rule to be strengthened. It is widely disregarded and not adequately enforced.

Rule 103 Signals. Too many drivers fail to signal sufficiently early, if at all. Many signal as they are making the turn - which is of no help. There is also a tendency for drivers at the front at traffic signals to turn left without signalling, or signalling as they start to turn.

All this is hazardous to a cyclist who may be on the left of the driver assuming the driver will go straight ahead.

Final comments

Q72. Any other comments?

These changes will need good, clear communication to all road users. They compliance and safety outcomes must be monitored. They may require support by road markings and engineering.