



accidents don't have to happen

Review of the Highway Code to improve road safety for cyclists, pedestrians and horse riders

RoSPA's response to the Department for Transport's consultation

Date: October 2020



Response to Department for Transport's consultation: Review of the Highway Code to improve road safety for cyclists, pedestrians and horse riders

Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport's Highway Code review to improve the safety of cyclists, pedestrians and horse riders. It has been produced following consultation with RoSPA's National Road Safety Committee, although the response does not necessarily reflect the views of all committee members.

The Department for Transport proposes amending The Highway Code to introduce a hierarchy of road users, clarify pedestrian and cyclist priority and establish safer overtaking. The aim of this is to improve safety for vulnerable road users, such as cyclists, pedestrians and horse riders.



Response to Department for Transport's consultation: Review of the Highway Code to improve road safety for cyclists, pedestrians and horse riders

Your details

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Are you responding as an individual or on behalf of an organisation?

On behalf of an organisation.

What is the name of your organisation?

The Royal Society for the Prevention of Accidents (RoSPA).



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The Highway Code review

Hierarchy of road users

Rule H1 of The Highway Code establishes a hierarchy of road users which ensures that those road users who can do the greatest harm have the greatest responsibility to reduce the danger or threat they may pose to other road users.

The hierarchy places vulnerable road users before motorised vehicles so the top of the hierarchy would therefore be:

- pedestrians, in particular children, older adults and disabled people
- cyclists
- horse riders
- motorcyclists

The objective of Rule H1 is not to give priority to pedestrians, cyclists and horse riders in every situation, but rather to ensure a more mutually respectful and considerate culture of safe and effective road use that benefits all users. This does not detract from the requirement for everyone to behave responsibly.

The proposed new text is:

"It is important that ALL road users are aware of The Highway Code, are considerate to other road users and understand their responsibility for the safety of others.

Everyone suffers when road collisions occur, whether they are physically injured or not. But those in charge of vehicles that can cause the greatest harm in the event of a collision bear the greatest responsibility to take care and reduce the danger they pose to others. This principle applies most strongly to drivers of large goods and passenger vehicles, followed by vans/minibuses, cars/taxis and motorcycles.

Cyclists, horse riders and horse drawn vehicles likewise have a responsibility to reduce danger to pedestrians.

Always remember that the people you encounter may have impaired sight, hearing or mobility, and may not be able to see or hear you.

None of this detracts from the responsibility of all road users, including pedestrians, cyclists and horse riders, to have regard for their own and other road users' safety."

Do you agree with the introduction of new Rule H1?

RoSPA response

Yes.



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Is the proposed wording easy to understand?

RoSPA response

No. RoSPA strongly agrees with the principle of the hierarchy, and welcomes the Department's efforts to clarify this fundamental principle. However, we believe that some changes are needed to simplify the wording of this rule.

We recognise that some road user groups, such as pedestrians, cyclists, horse riders and motorcyclists, are more vulnerable than those in motor vehicles, as demonstrated by the casualty rate per billion vehicle miles for each road user group, published each year by the Department. Since our inception in 1916, we have worked tirelessly to make the roads safer for all, particularly vulnerable road users. This is illustrated by our first campaign, which was to change the pedestrian rule so that walkers faced oncoming traffic.

Given our focus on the protection of vulnerable road users, we support the proposed changes to the Highway Code. We hope that these changes will improve the safety of all road users and efforts to create a more mutually respectful and considerate culture of safe and effective road use that benefits all users and will encourage all road users not only to be responsible for their own safety but that of others too. We also hope that this will encourage more people to walk and cycle where possible.

RoSPA believes that the wording of this rule should be simplified as follows:

"It is important that ALL road users are aware of The Highway Code, are considerate to other road users and understand their responsibility for the safety of others.

All road users are to have regard for their own and other road users' safety.

Those in charge of vehicles or animals that can cause the greatest harm in the event of a collision bear the greatest responsibility to avoid these events."

We also believe that the term 'hierarchy of responsibility' is preferable to 'hierarchy of road users'. This is because our understanding is that this rule is based on levels of responsibility rather than one road user group taking precedence over another.

Although these rules are guidance, the Highway Code is regularly used in court proceedings and, therefore, RoSPA would also advise that the Department ensures that the wording of rule H1 does not introduce inadvertently the concept of presumed liability. If this is to be introduced, this should be debated in Parliament.



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Clarification of right of way and stronger priorities for pedestrians

Rule H2 clarifies where pedestrians have right of way and creates clearer and stronger priorities for pedestrians, particularly at junctions. It seeks to emphasise where road users:

- SHOULD give way to pedestrians crossing a road
- MUST give way to pedestrians on a zebra crossing, and pedestrians and cyclists on a parallel crossing

It introduces a new obligation for drivers and riders to give way to pedestrians waiting to cross a junction (side road), or zebra crossing.

The proposed new text is:

"Rule for drivers, motorcyclists, horse riders and cyclists

At a junction you should give way to pedestrians crossing or waiting to cross a road into which or from which you are turning.

You MUST give way to pedestrians on a zebra crossing, and pedestrians and cyclists on a parallel crossing.

You should give way to pedestrians waiting to cross a zebra crossing, and pedestrians and cyclists waiting to cross on a parallel crossing.

Horse riders and horse drawn vehicles should also give way to pedestrians on a zebra crossing, and pedestrians and cyclists on a parallel crossing.

Pedestrians have priority when on a zebra crossing, on a parallel crossing or at light controlled crossings when they have a green signal.

Cyclists should give way to pedestrians on shared use cycle tracks.

Only pedestrians may use the pavement. This includes people using wheelchairs and mobility scooters.

Pedestrians may use any part of the road and use cycle tracks as well as the pavement, unless there are signs prohibiting pedestrians."

Do you agree with the introduction of new Rule H2?

RoSPA response

Yes.



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Is the proposed wording easy to understand?

RoSPA response

Yes, however RoSPA believes that the sentence 'Only pedestrians may use the pavement. This includes people using wheelchairs and mobility scooters.' could be worded to clarify that wheelchair and mobility scooter users are classed as pedestrians.



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Cyclists' priorities and right of way

Rule H3 clarifies cyclists' priorities. It makes clear that a driver should not cut across the path of a cyclist going straight ahead when they are:

- turning into or out of a junction
- changing direction
- changing lane

This applies whether cyclists are using a cycle lane, a cycle track, or riding ahead on the road.

It also recommends that drivers and motorcyclists should not turn at a junction if to do so would cause the cyclist going straight ahead to stop or swerve.

The proposed new text is:

"Rule for drivers and motorcyclists

You should not cut across cyclists going ahead when turning into or out of a junction or changing direction or lane, just as you would not turn across the path of another motor vehicle. This applies whether cyclists are using a cycle lane, a cycle track, or riding ahead on the road and you should give way to them.

Do not turn at a junction if to do so would cause the cyclist going straight ahead to stop or swerve, just as you would do with a motor vehicle.

You should stop and wait for a safe gap in the flow of cyclists if necessary. This includes when cyclists are:

- approaching, passing or moving off from a junction
- moving past or waiting alongside stationary or slow-moving traffic
- travelling around a roundabout"

Do you agree with the introduction of new Rule H3?

RoSPA response

Yes. However, RoSPA believe that further infrastructure may be required in areas with high volumes of cyclists to improve safety and allow all road users to move efficiently through the space.



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Is the proposed wording easy to understand?

RoSPA response

Yes.



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Rules for pedestrians

The Highway Code already advises drivers and riders to give priority to pedestrians who have started to cross the road. The proposed change is to introduce a responsibility for drivers and riders to give way to pedestrians waiting to cross:

- a junction or side road
- at a zebra crossing

For Rule 8 on junctions the proposed new text is:

"When you are crossing or waiting to cross the road other traffic should give way."

For Rule 19 on zebra crossings the proposed new text is:

"Drivers and riders should give way to pedestrians waiting to cross and **MUST** give way to pedestrians on a zebra crossing."

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

RoSPA response

	Yes	No	Don't know
Junction?	X		
Zebra Crossing?	X		

Is the proposed wording easy to understand?

RoSPA response

Yes.

Do you have any further comments about other changes to the rules for pedestrians?

RoSPA response

RoSPA welcomes the proposed changes to the Highway Code in the rules for pedestrians chapter, particularly rules 8 and 9, which clarify pedestrian priority when crossing or waiting to cross the road. We also welcome the guidance included on rule 13, which provides advice on the use of shared routes with cyclists. This recognises that



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cyclists, and horse riders or horse drawn vehicles, where permitted, should respect pedestrian safety, while highlighting that pedestrians should ensure that they do not obstruct or endanger these other road user groups unnecessarily. RoSPA hope that this will create a more mutually respectful and considerate culture of safe and effective road use that benefits all users. We also hope that these rules will help to tackle some of the safety issues pedestrians encounter or perceive when walking, thereby encouraging more people to choose walking as a mode of travel.



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Rules about animals

To ensure inexperienced or returning horse riders consider training before riding on roads we are proposing amending Rule 52 to include a suggestion that they take the [British Horse Society Ride Safe Award](#). The proposed new text is:

"If you are an inexperienced horse rider or have not ridden for a while, consider taking the Ride Safe Award from the British Horse Society. The Ride Safe Award provides a foundation for any horse rider to be safe and knowledgeable when riding in all environments but particularly on the road."

Do you agree with the proposed change to Rule 52?

RoSPA response

Yes.

Is the proposed wording easy to understand?

RoSPA response

Yes.



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Rules for cyclists

The main proposed changes to the rules for cyclists section of The Highway Code are to:

- clarify priorities
- provide guidance to encourage safe cycling

Rule 63

Rule 63 will be amended to provide guidance for cyclists on sharing space. The additional proposed text is:

"Sharing space with pedestrians, horse riders and horse drawn vehicles. When riding in places where sharing with pedestrians, horse riders or horse drawn vehicles is permitted take care when passing pedestrians, especially children, older adults or disabled people. Let them know you are there when necessary e.g. by ringing your bell (it is recommended that a bell is fitted to your bike), or by calling out politely.

Remember that pedestrians may be deaf, blind or partially sighted and that this may not be obvious.

Do not pass pedestrians, horse riders or horse drawn vehicles closely or at high speed, particularly from behind. Remember that horses can be startled if passed without warning. Always be prepared to slow down and stop when necessary."

Do you agree with the proposed change to rule 63?

RoSPA response

Yes.

Is the proposed wording easy to understand?

RoSPA response

Yes.

Rule 72

Rule 72 will be amended to provide guidance on road positioning for cyclists to ensure that they adopt safe cycling behaviours. The additional proposed text is:



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"Road positioning. When riding on the roads, there are two basic road positions you should adopt, depending on the situation.

1. Ride in the centre of your lane, to make yourself as clearly visible as possible, in the following situations:

- on quiet roads or streets – if a faster vehicle comes up behind you, move to the left to enable them to overtake, if you can do so safely
- in slower-moving traffic move over to the left, if you can do so safely, so that faster vehicles behind you can overtake when the traffic around you starts to flow more freely
- at the approach to junctions or road narrowings where it would be unsafe for drivers to overtake you

2. When riding on busy roads, with vehicles moving faster than you, allow them to overtake where it is safe to do so whilst keeping at least 0.5m (metres) away from the kerb edge. Remember that traffic on most dual carriageways moves quickly. Take extra care crossing slip roads."

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

RoSPA response

	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		



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Is the proposed wording easy to understand?

RoSPA response

Yes.

Rule 73

Rule 73 will be amended to provide guidance for cyclists on how to proceed safely at junctions, both with and without separate cyclist facilities. The additional proposed text is:

"Junctions. Some junctions, particularly those with traffic lights, have special cycle facilities, including small cycle traffic lights at eye-level height, which may allow you to move or cross separately from or ahead of other traffic. Use these facilities where they make your journey safer and easier.

At junctions with no separate cyclist facilities, it is recommended that you proceed as if you were driving a motor vehicle (see Rules 170 to 190). Position yourself in the centre of your chosen lane, where you feel able to do this safely, to make yourself as visible as possible and to avoid being overtaken where this would be dangerous. If you do not feel safe to proceed in this way, you may prefer to dismount and wheel your bike across the junction."

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

RoSPA response

	Yes	No	Don't know
Specialist cyclist facilities?	X		
No separate cyclist facilities?	X		

Is the proposed wording easy to understand?

RoSPA response

Yes.



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Rule 76

Rule 76 will be amended to clarify priorities when going straight ahead. The additional proposed text is:

"Going straight ahead. If you are going straight ahead at a junction, you have priority over traffic waiting to turn into or out of the side road, unless road signs or markings indicate otherwise (see Rule H3). Check that you can proceed safely, particularly when approaching junctions on the left alongside stationary or slow-moving traffic.

Watch out for drivers intending to turn across your path. Remember the driver ahead may not be able to see you, so bear in mind your speed and position in the road.

Be particularly careful alongside lorries and other long vehicles, as their drivers may find it difficult to see you. Remember that they may have to move over to the right before turning left, and that their rear wheels may then come very close to the kerb while turning."

Do you agree with the proposed change to Rule 76?

RoSPA response

Yes, although due to the recognised danger of cycling down the left hand side of large vehicles we would like the wording to be stronger. Rather than saying 'be particularly careful alongside lorries and other long vehicles, as their drivers may find it difficult to see you. Remember that they may have to move over to the right before turning left, and that their rear wheels may then come very close to the kerb while turning."

Change to:

Avoid riding alongside, particularly to the left of, lorries and other long vehicles, as their drivers may find it difficult to see you. Remember that they may have to move over to the right before turning left, and that their rear wheels may then come very close to the kerb while turning."

Is the proposed wording easy to understand?

RoSPA response

Yes.

Other changes to rules for cyclists

There are several other changes within the rules for cyclists section. Some of these changes are to update The Highway Code to recognise new cyclist facilities that are already in use on the highway. Other proposed



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amendments are to provide guidance on safe riding behaviour and practices. In summary, some of the changes include, but are not limited to:

- clarification on cycle tracks and their use
- riding in groups on narrow lanes
- advice on riding safely on the road and when turning
- clarification on cyclist facilities at crossings and their use

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

RoSPA response

Cycling is an excellent way to travel and therefore keeping cyclists safe on the road is a key priority. RoSPA welcomes the introduction of new infrastructure to make cycling a natural choice and the proposed amendments to the Highway Code. As per the changes to rules for pedestrians, we hope that this will create a more mutually respectful and considerate culture of safe and effective road use that benefits all users.

We are pleased that the Highway Code will be updated to include references to cycle tracks, cycle signals and new junction designs, including amending the wording on Advanced Stop Lines to ensure that all road users are aware of these features and that cyclists know how to use them.

We also particularly welcome new rules on junction priority for cyclists as this should reduce 'left hook' collisions and make it easier to maintain cycle track priority at junctions.



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Rules for drivers and motorcyclists

Rule 97 has been amended to include additional text which states that before setting off you should ensure that:

"any fitted audible warning systems for other road users, and camera and audio alert systems for drivers are all working and active (and should be used appropriately on the road)."

Do you have any comments about the proposed change to Rule 97?

RoSPA response

RoSPA agrees with the proposed wording and has no further comment to add.



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General rules, techniques and advice for all drivers and riders

Rule 123 & 124

The proposed changes to the general rules, techniques and advice for all drivers and riders section of The Highway Code include ensuring that 20mph speed limits and other local speed limits, which already exist, are recognised in The Highway Code.

For Rule 123 on the driver and the environment, the proposed new text is:

"In some local authority regions or in built up areas the limit may be reduced to 20 mph."

For Rule 124 on maximum speed limits, the proposed new text is:

"Local signed speed limits may apply, for example:

- 20 mph (rather than 30 mph) where it could be the limit across a region or in certain built-up areas such as close to schools
- 50 mph (rather than 60 mph) on stretches of road with sharp bends"

Is the proposed wording in Rule:

RoSPA response

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



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Rule 140

Rule 140 will be amended to provide advice on cycle lanes and cycle tracks, ensuring that drivers and riders know that cyclists have priority and should give way when turning across their path. The additional proposed text is:

"You should give way to any cyclists in a cycle lane, including when they are approaching from behind you – do not cut across them when turning or when changing lane (see Rule H3). Be prepared to stop and wait for a safe gap in the flow of cyclists before crossing the cycle lane.

Cycle tracks are routes for cyclists that are physically protected or located away from motor traffic, other than where they cross side roads. Cycle tracks may be shared with pedestrians.

You should give way to cyclists approaching or using the cycle track when turning into or out of a junction (see Rule H3). Be prepared to stop and wait for a safe gap in the flow of cyclists before crossing the cycle track, which may be used by cyclists travelling in both directions.

Bear in mind that cyclists are not obliged to use cycle lanes or cycle tracks."

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

RoSPA response

	Yes	No	Don't know
Lane?	X		
Track?	X		

Is the proposed wording easy to understand?

RoSPA response

Yes.



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Other changes to general rules, techniques and advice for all drivers and riders

There are several other changes within the general rules techniques and advice for all drivers section. Some of these changes are to update The Highway Code to recognise processes and practices that are already in use on the highway. In summary, some of the changes include, but are not limited to:

- providing further clarity on when drivers of motorised vehicles should give way to pedestrians, cyclists and horse riders
- making clear that those groups have priority over traffic that may be turning across their path in certain situations
- reinforcing advice around inappropriate speed

Do you have any further comments about the changes to the general rules, techniques and advice for all drivers and riders?

RoSPA response

RoSPA welcomes the revisions to this section, which clarify that the drivers of motorised vehicles should give way to pedestrians, cyclists and horse riders in certain situations, and that those groups have priority over traffic that may be turning across their path.

RoSPA is also pleased to see that advice around inappropriate speed has been reinforced. Drivers and riders who are travelling at inappropriate speeds are more likely to crash and their higher speed means that the crash will cause more severe injuries, to themselves and/or to other road users. Inappropriate speed also magnifies other driver errors, such as driving too close or driving when tired or distracted, multiplying the chances of these types of driving causing an accident. Inappropriate speed can also be intimidating and deter people from walking, cycling or riding horses.



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Using the road

Rule 163

The 'Using the road' chapter in The Highway Code provides guidance and advice on overtaking, manoeuvring at road junctions and roundabouts, and procedures at different types of crossings.

Rule 163 on overtaking will be amended to advise drivers that cyclists may pass on their right or left. It will also provide a guide of safe passing distances and speeds for passing motorcyclists, cyclists, horse riders and horse drawn vehicles. The additional proposed text is:

"Cyclists may pass slower moving or stationary traffic on their right or left, including at the approach to junctions, but are advised to exercise caution when doing so

[Give motorcyclists, cyclists, horse riders] and horse drawn vehicles [at least as much room as you would when overtaking a car (see Rules 211 to 215)]. As a guide:

- leave a minimum distance of 1.5 metres at speeds under 30 mph
- leave a minimum distance of 2.0 metres at speeds over 30 mph
- for a large vehicle, leave a minimum distance of 2.0 metres in all conditions
- pass horse riders and horse-drawn vehicles at speeds under 15 mph and allow at least 2.0 metres space
- allow at least 2.0 metres space where a pedestrian is walking in the road (e.g. where there is no pavement) and you should pass them at low speed
- you should wait behind the motorcyclist, cyclist, horse rider, horse drawn vehicle or pedestrian and not overtake if it is unsafe or not possible to meet these clearances
- take extra care and give more space when overtaking motorcyclists, cyclists, horse riders, horse drawn vehicles and pedestrians in bad weather (including high winds) and at night."

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

RoSPA response

Yes.



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

RoSPA response

	Yes	No	Don't know
Motorcyclists?	X		
Cyclists?	X		
Horse riders?	X		
Horse drawn vehicles?	X		

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

RoSPA response

	Yes	No	Don't know
Motorcyclists?	X		
Cyclists?	X		
Horse riders?	X		
Horse drawn vehicles?	X		

Is the proposed wording easy to understand?

RoSPA response

Yes.



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Rule 186

Rule 186 on signals and position will be amended to advise drivers to give priority to cyclists on roundabouts, and to take care not to cut across a cyclist, horse rider or horse drawn vehicle that may be continuing around the roundabout in the left-hand lane. The additional proposed text is:

"You should give priority to cyclists on the roundabout. They will be travelling more slowly than motorised traffic. Give them plenty of room and do not attempt to overtake them within their lane. Allow them to move across your path as they travel around the roundabout.

Cyclists, horse riders and horse drawn vehicles may stay in the left-hand lane when they intend to continue across or around the roundabout. Drivers should take extra care when entering a roundabout to ensure that they do not cut across cyclists, horse riders or horse drawn vehicles in the left-hand lane, who are continuing around the roundabout."

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

RoSPA response

	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	X		



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around the roundabout?			
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Is the proposed wording easy to understand?

RoSPA response

Yes.

Rule 195

Rule 195 on zebra crossings will be updated to include reference to parallel crossings and also amended to advise drivers to give way to pedestrians and cyclists waiting to cross at a zebra crossing or parallel crossing. This rule restates guidance in Rule 17 and reinforces Rule H2. The additional proposed text is:

"[Zebra crossings] you should give way to pedestrians waiting to cross

Parallel crossings are similar to zebra crossings, but include a cycle route alongside the black and white stripes.

As you approach a parallel crossing:

- look out for pedestrians or cyclists waiting to cross and slow down or stop
- you should give way to pedestrians or cyclists waiting to cross
- you MUST give way when a pedestrian or cyclist has moved onto a crossing
- allow more time for stopping on wet or icy roads
- do not wave or use your horn to invite pedestrians or cyclists across; this could be dangerous if another vehicle is approaching
- be aware of pedestrians or cyclists approaching from the side of the crossing.

A parallel crossing with a central island is two separate crossings."

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



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RoSPA response

Yes.

Is the proposed wording easy to understand?

RoSPA response

Yes.

Other changes to using the road

There are several other changes within the using the road section. Some of these changes are to update The Highway Code to recognise facilities and practices that are already in use on the highway. Other proposed amendments are to provide guidance on safe behaviour and practices. In summary, some of the changes include, but are not limited to:

- strengthening priority for cyclists
- road positioning at junctions to ensure the safety of cyclists and motorcyclists
- further clarity on behaviour at Advanced Stop Lines
- keeping crossings clear of traffic

Do you have any further comments about the changes to the rules on using the road?

RoSPA response

RoSPA welcomes the proposed changes to this section, particularly the emphasis that drivers have a duty of care towards cyclists, pedestrians and horse riders, and that drivers should give way to these road users; the section also establishes clear priority rules at traffic signal junctions.

RoSPA is particularly pleased to see the introduction of safe passing distances and speed limits when overtaking pedestrians, cyclists, horse riders, horse drawn vehicles and motorcyclists.



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Road users requiring extra care

The chapter on 'road users requiring extra care' in The Highway Code provides further advice on proceeding with caution around pedestrians, cyclists, horse riders and motorcyclists, as the main vulnerable user groups. It also strengthens the advice in earlier chapters on giving these groups priority in certain circumstances.

Rule 213 will be amended to advise that cyclists may ride in the centre of the lane for their safety. The additional proposed text is:

"On narrow sections of road, at road junctions and in slower-moving traffic, cyclists may sometimes ride in the centre of the lane, rather than towards the side of the road. Allow them to do so for their own safety, to ensure they can see and be seen. Cyclists are also advised to ride at least a door's width or 0.5m (metres) from parked cars for their own safety."

Do you agree with the proposed changes to Rule 213?

RoSPA response

Yes.

Is the proposed wording easy to understand?

RoSPA response

Yes.

Other changes to road users requiring extra care

There are several other changes within the road users requiring extra care. Some of these changes are to recognise facilities and practices that are already in use on the highway, or to reinforce advice stated in other rules within The Highway Code.

Do you have any further comments about other changes proposed in the chapter on road users requiring extra care?

RoSPA response

RoSPA welcomes the proposed changes to this section, building on rules H1, based on the hierarchy of road users and rule 163, which recommends safe passing distances and speeds when overtaking vulnerable road users.



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RoSPA are also pleased to see that the proposed changes to this section remind road users that horses are flight animals and can be easily startled.

Waiting and parking

Rule 239

The main change to the chapter in The Highway Code on 'waiting and parking' is the introduction of a new technique, commonly known as the 'Dutch Reach', that advises road users to open the door of their vehicle with the hand on the opposite side to the door. The additional proposed text is:

"You should open the door using your hand on the opposite side to the door you are opening, e.g. use your left hand to open a door on your right-hand side. This will make you turn your head to look over your shoulder. You are then more likely to avoid causing injury to cyclists or motorcyclists passing you on the road, or to people on the pavement"

Do you agree with the proposed change to Rule 239?

RoSPA response

Yes. RoSPA was one of the original organisations who promoted and called for the introduction of Dutch Reach and is pleased to see its inclusion.

Is the proposed wording easy to understand?

RoSPA response

Yes.

Other changes to waiting and parking

The only other change in the section on waiting and parking is to provide advice on good practice when charging an electric vehicle (also Rule 239).

Do you have any further comments about other changes proposed in the chapter on road users requiring extra care?

RoSPA response



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We welcome the introduction of the Dutch Reach to the Highway Code to avoid 'dooring' incidents. We are also pleased to see advice on charging cables for electric cars, which recommends that cables are neatly returned to charging points to prevent any obstacles for other road users as these could pose a tripping hazard.



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Annexes

The annexes to The Highway Code provide useful advice for drivers and riders. We are proposing additional new text to annex:

- 1 on 'you and your bicycle' aims to ensure that riders are comfortable with their bike and associated equipment. The proposed new text will recommend cycle training
- 6 provides useful advice to drivers of motorised vehicles on how to undertake simple maintenance checks to ensure the safety and road worthiness of the vehicle, the proposed new text will recommend daily walkaround checks for commercial vehicles

Do you have any comments about the changes proposed to:

Annex 1

RoSPA response

RoSPA agrees with the proposed wording and has no further comment to make.

Annex 6

RoSPA response

RoSPA agrees with the proposed wording and has no further comment to make.

Other comments on the Highway Code

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?

RoSPA response

RoSPA have no further comments to add.

Final comments



Response to Department for Transport's consultation: Review of the Highway Code to improve road safety for cyclists, pedestrians and horse riders

Any other comments?

RoSPA response

RoSPA welcomes the review of the Highway Code, which aims to improve safety for vulnerable road users, such as cyclists, pedestrians and horse riders.

There may be a perception amongst pedestrians that they are not road users or that the Highway Code is a document for motorists. There is an opportunity and merit in clarifying the use of imagery and language to address this misperception.

We believe there is merit in explicitly defining 'road users' in the introduction, as this term is used in many of the rules contained in the Code. Further, the introduction of design changes, for example the inclusion of pedestrians on the front cover image of the new version, could also help raise awareness of the fact that the Highway Code is written to provide rules and guidance for pedestrians as well as motorists.

Although those learning to drive or ride will need to study the Highway Code to pass their test, we are aware that some road users will not have refreshed their knowledge of the Highway Code since they passed their test, and that many users of the road may not hold a full or any licence. RoSPA believes that an extensive education campaign will be needed to make all road users aware of what could be substantial and positive change.

RoSPA would also like to reiterate that although road user behaviour and attitudes are key in preventing accidents on Great Britain's roads, the hierarchy described and the supporting rules detailed will only improve safety of vulnerable road users if they are supplemented by the appropriate infrastructure measures at scale. For example, on key routes, segregated facilities should be considered to reduce the chance of conflicts between motorists and vulnerable road users, such as pedestrians and cyclists.

RoSPA has no further comments to make on the consultation process, other than to thank the Department for Transport for the opportunity to comment. We have no objection to our response being reproduced or attributed.

