

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

Introduction

Thank you for responding to our consultation on The Highway Code. Your views will assist in helping us to update The Highway Code to improve safety for cyclists, pedestrians and horse riders.

We suggest you read the full consultation document which contains the background information and proposals in full.

The closing date for this interim review of The Highway Code consultation is 11:59pm on 27 October 2020.

Print or save a copy of your response

When you get to the end of this questionnaire, you will be offered the chance to either print or save a copy of your response for your records. This option appears after you press 'Submit your response'.

Save and continue option

You have an option to 'save and continue' your response at any time. If you do that you will be sent a link via email to allow you to continue your response where you left off.

It's very important that you enter your correct email address if you choose to save and continue. If you make a mistake in the email address you won't receive the link you need to complete your response.

Confidentiality and data protection

The Department for Transport (DfT) is running this consultation on The Highway Code as part of its [Cycling and walking safety review](#). Your views will assist in helping us to update The Highway Code to improve safety for cyclists, pedestrians and horse riders. The consultation will run until midnight on 27 October 2020.

Your consultation response and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. Any information you provide that allows individual people to be identified, including yourself, will be protected by data protection law and DfT will be the controller for this information.

[DfT's privacy policy](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

In this consultation we're asking for:

- your name and email address, in case we need to ask you follow-up questions about your responses (you do not have to give us this personal information, but if you do provide it, we will use it only for the purpose of asking follow-up questions)
- whether you are representing an organisation and, if so, the name of that organisation

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Additionally as an individual we are asking for your main method of travel in order to better understand how your:

- opinions may be influenced towards
- situation may be affected by

the changes to The Highway Code.

Your information will be kept securely and destroyed within 12 months after the closing date. Any information provided through the online questionnaire will be moved to our internal systems within 2 months of the funding period end date.

Your details

Your (used for contact details only):

name?

email?

Are you responding: *

- as an individual? (Go to main method of travel section)
- on behalf of an organisation?

Organisation details

What is the name of your organisation?

(Go to The Highway Code review)

Main method of travel

Do you identify mainly as a:

- vehicle driver?
- motorcyclist?
- cyclist?
- pedestrian?
- mobility scooter user?

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horse rider?

other?

Wheelchair User, Adapted Non standard cycle users.

The Highway Code review

This interim review of The Highway Code focusses on:

- cyclists
- pedestrians
- horse riders

It is specifically considering:

- overtaking
- passing distances
- cyclist and pedestrian priority at junctions
- opening vehicle doors
- responsibility of road users

There are 3 main changes that are being proposed through this consultation:

1. introduction of 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 others
2. clarifying existing rules on pedestrian priority on pavements and that drivers and riders should give way to pedestrians crossing or waiting to cross the road
3. establishing guidance on safe passing distances and speeds when overtaking cyclists or horse riders, and ensuring they have priority at junctions when travelling straight ahead

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:

1. pedestrians, in particular children, older adults and disabled people
2. cyclists
3. horse riders
4. motorcyclists

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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?

- Yes (Go to Hierarchy of users wording)
- No
- Don't know? (Go to Hierarchy of users wording)

Disagree with hierarchy of users

Why not?

We believe that there should be five categories of road users at most risk as below, in priority order:

- Children, older adults and disabled people, then:
- Pedestrians,
- Horse riders,
- Cyclists, (including people using non-standard/adapted bikes and road mobility scooters)
- Motorcyclists.

Hierarchy of users wording

Is the proposed wording easy to understand?

- Yes (Go to clarification of right of way and stronger priorities for pedestrians)
- No
- Don't know? (Go to clarification of right of way and stronger priorities for pedestrians)

Disagree with hierarchy of users wording

Why not?

If the wording was put in hierarchal order as bullet points or numbers points in order of priority it would be easier to understand and not simply a list in a paragraph.

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

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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?

- Yes (Go to stronger priorities for pedestrians wording)
- No
- Don't know? (Go to stronger priorities for pedestrians wording)

Disagree with stronger priorities for pedestrians

Why not?

Stronger priorities for pedestrians wording

Is the proposed wording easy to understand?

- Yes (Go to cyclists priorities and right of way)
- No
- Don't know? (Go to cyclists priorities and right of way)

Disagrees with stronger priorities for pedestrians wording

Why not?

There are too many should and must phrases: We believe that Vehicles **must** give way to pedestrians waiting to cross the zebra crossing and pedestrians and cyclists waiting to cross a parallel crossing as well as **must** give way to pedestrians on the zebra crossing and pedestrians and cyclists on a parallel crossing. In other words, vehicles **must** give way to pedestrians or pedestrians and cyclists whether they are waiting at the zebra crossing or on the zebra crossing.

We believe that the same principle should apply for horse riders and horse-drawn vehicles.

There is insufficient clarity in the statement, 'pedestrians have priority when on a zebra crossing, on a parallel crossing on light controlled crossings when they have a green signal'. The paragraph should read: 'pedestrians have priority when on a zebra crossing, on a parallel crossing or light controlled crossing when pedestrians have a green signal'. We believe that this small change of wording brings clarity to the statement.

Paragraph 6 should read: cyclists **must** give way to pedestrians on shared use cycle tracks, and not cyclists **should** give way to pedestrians on shared use cycle tracks.

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?

- Yes (Go to cyclists priorities and right of way wording)
 No
 Don't know? (Go to cyclists priorities and right of way wording)

Disagree with cyclists priorities and right of way

Why not?

Cyclists priorities and right of way wording

Is the proposed wording easy to understand?

- Yes (Go to rules for pedestrians)
 No
 Don't know? (Go to rules for pedestrians)

Cyclists priorities and right of way

Why not?

For the sake of clarity in Rule H3 the word **must** should be used and not **should**.

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:

	Yes	No	Don't know?
junction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
zebra crossing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If no, why not?

Once again, there should not be any distinction made whether a pedestrian is on a crossing or waiting to cross the road whether at a junction or at a crossing. Both should read that drivers and riders **must** give way to pedestrians.

We are a little at pains to understand why only zebra crossings are being included. We believe that the wording should also be included for controlled crossings, even though controlled crossings are addressed in the rule 71.

Is the proposed wording easy to understand?

- Yes (Go to rules for pedestrians further comments)
- No
- Don't know? (Go to rules for pedestrians further comments)

Disagrees with rules for pedestrians wording

Why not?

As with our comments above the wording should read **must** and not **should**.

Rules for pedestrians

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

If the highway code directs riders and drivers of vehicles that they **must** give way to pedestrians this then brings Britain into line with most other countries where pedestrians have an automatic right of way. This would mean that as soon as any driver or rider sees a pedestrian waiting cross then they would have a duty to stop to allow the pedestrian safe passage.

Compliance with the Rule 1 is likely to cause confusion as it may not be possible to avoid being next to the kerb if that person has a sight impairment and uses a long cane to find their way, especially if there is a no build line to follow. Further, some long cane users use the edge of the pavement as a wayfinding method instead of the build line or shoreline.

We noticed that there seems to be an assumption that paths and pavements are only in urban areas? There are many paths and pavements in rural areas where there is no build line, in these circumstances the wording **shore line** should be used.

Further, in Rule 1 there seems to be an assumption that there will be a path of pavement on each side of the road, this is not always the case and where the path of pavement is only on one side of the road it is not possible to avoid being next to the kerb with one's back to the traffic.

The wording in Rule 13 states, 'cycles should respect your safety (Rule62) but you should also take care not to obstruct or endanger them unnecessarily'. By using the word unnecessarily there is an implication that there could be times when cyclists are entitled to endanger pedestrians, remove the word unnecessarily.

Again, in the last paragraph in rule 13 the word unnecessarily has been used indicating that there are times when safety and endangerment is acceptable, the word unnecessarily must be removed.

In rule 19 the last paragraph states that pedestrians must keep looking both ways and listen in case a driver of a vehicle has not seen you. This statement has no longevity and is already somewhat redundant because with the introduction of electric and other non-combustion powered vehicles that are silent it is not possible for pedestrians to hear of these vehicles. This is a general problem with non-combustion propelled vehicles that has yet to be solved but is nevertheless a problem that can endanger a Disabled, Deaf, Deafblind or Sight Impaired pedestrian who cannot hear a vehicle approaching

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 to the proposed change to Rule 52?

- Yes (Go to rules for animals wording)
- No
- Don't know? (Go to rules for animals wording)

Disagrees with rules for animals

Why not?

Rules for animals wording

Is the proposed wording easy to understand?

- Yes (Go to rules for cyclists)
- No
- Don't know? (Go to rules for cyclists)

Disagrees with rules for animals wording

Why not?

Similar to our comments regarding cyclists passing pedestrians we would suggest that a minimum distance of 2 m should be left as a safe distance when horses and horse riders are passing a pedestrian. The reason for 2 m for horse riders is that they are more likely to be passing pedestrians on rural roads where a distance of 2 m is achievable.

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 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.

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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?

- Yes (Go to rule 63 for cyclists wording: shared spaces)
- No
- Don't know? (Go to rule 63 for cyclists wording: shared spaces)

Disagrees with Rule 63 for cyclists: shared spaces

Why not?

Rule 63 for cyclists wording: shared spaces

Is the proposed wording easy to understand?

- Yes (Go to Rule 72 for cyclists)
- No
- Don't know? (Go to Rule 72 for cyclists)

Disagrees with Rule 63 for cyclists wording: shared spaces

Why not?

Rule 59 states that you **should** wear a cycle helmet. We would strongly suggest that this wording should state that cyclist **must** wear a cycle helmet.

Rule 61 states that cycle lanes are marked by a white line. This is not always the case and consequently we see cycle lanes in white, yellow, blue and in some cases even in red or pink. Guidance and legislation must be changed in other documents to enable the continuity of the colour of all cycle lanes across the country.

Nowadays we regularly see advertisements instructing drivers that they must keep at least 2 m distance from cyclists on the road. Unfortunately, there is no such rule for cyclists, or horse riders, when passing pedestrians on shared footways. A minimum distance of 1m should be made the mandatory distance to leave for the safety of and to avoid endangering pedestrians.

The reason that we suggest 1m is that the minimum width of any pavement of pathway is supposed to be 2 m, a clear space of 1m Will leave enough space for the cyclist to pass a pedestrian within the minimum 2m space, any wider space than 1m would not be possible on a 2 m wide shared pathway..

However, on newer and wider pavements and pathways that are 3 m wide or more a distance of 1.5m should be left for any cyclists or horse riders passing pedestrians.

As a Non-Departmental Public Body working to ensure accessible transport and transport infrastructure for disabled people, we regularly hear about disabled pedestrians having near misses, and indeed collisions, with cyclists who refuse to leave adequate space as to not endanger disabled pedestrians and older people.

Rules for cyclists

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:

"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:

	Yes	No	Don't know?
in the centre of your lane on quiet roads?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
in the centre of your lane in slower moving traffic?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
in the centre of your lane when approaching junctions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
at least 0.5 metres away from the kerb on busy roads?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If no, why not?

Is the proposed wording easy to understand?

- Yes (Go to Rule 73 for cyclists)
- No
- Don't know? (Go to Rule 73 for cyclists)

Disagrees with Rule 72 for cyclists: road positioning

Why not?

As quieter roads are more likely to be in the rural areas we would suggest that cycling in the centre of the road has a propensity to put the cyclist in more danger from vehicular traffic, especially if that cyclist is disabled and can take longer to manoeuvre from the centre to the left side of the road when the road is more likely to have sharper twists and bends. Roads with sharper twists and bends any vehicle driver is likely to see a cyclist at a later time than they would on a busier, longer and straighter road. We also need to consider that disabled people using adapted or non-standard bikes and trikes may need to take a central position on the road has any drainage element on the side of the road is likely to cause instability and where any drainage element on the side of the road is likely to cause instability and wheel pull.

Rules for cyclists

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:

	Yes	No	Don't know?
special cyclist facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
no separate cyclist facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If no, why not?

Is the proposed wording easy to understand?

- Yes (Go to Rule 76 for cyclists)
- No
- Don't know? (Go to Rule 76 for cyclists)

Disagrees with Rule 73 for cyclists wording: junctions

Why not?

Rule 74 it states that cyclists **should** give way to pedestrians crossing, we believe that this should read that cyclists **must** give way to pedestrians crossing.

Rules for cyclists

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?

- Yes (Go to rule 76 for cyclists wording: going straight ahead)
- No
- Don't know? (Go to rule 76 for cyclists wording: going straight ahead)

Disagrees with Rule 76 for cyclists: going straight ahead

Why not?

Rule 76 for cyclists wording: going straight ahead

Is the proposed wording easy to understand?

- Yes (Go to rules for cyclists further comments)
 No
 Don't know? (Go to rules for cyclists further comments)

Disagrees with Rule 76 for cyclists wording: going straight ahead

Why not?

Rules for cyclists

There are several other changes within the rules for cyclists section (and we recommend reading the chapter before answering). 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 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?

At present there seems to be no speed limit for cyclists, this can be extremely frightening for disabled people, older people, those with sensory loss or impairment and those with neuro diversity. We believe that cyclists should be limited to the maximum speed as indicated for other vehicles on any particular road and should not exceed 20 mph on a shared pedestrian/cycle way for the safety of disabled pedestrians who may be using a mobility aid.

We further believe that cyclists should obey the speed limit imposed for any particular road for their own safety. It is not unusual to witness cyclists travelling at speed greater than vehicles and tend to pass on the inside where it is more difficult for drivers to see the cyclist.

As already mentioned earlier, we hear many reports of disabled pedestrians and other 'at risk' groups being frightened by cyclists not leaving enough space between themselves and the pedestrian, and minimum distance of 1m must be left between the pedestrian and passing cyclist.

A particular problem that is ever increasing is regarding floating bus stops where more often the pedestrian has to cross a cycle way to get to the bus. We would strongly recommend that cyclists **must** give way to pedestrians when the pedestrian is crossing the cycleway. This situation has become more prevalent in the last few months when interventions to widen pavements because of COVID19 have been introduced. Allowances must be made on such interventions for the safety of pedestrians and disabled pedestrians and other 'at risk' groups as many of the interventions will be likely to remain post COVID-19 pandemic.

It is difficult to understand why cyclists are allowed to cycle in bus lanes, surely buses and cyclists simply do not mix and we are aware of some accidents where the bus has ran over the cyclist because they were passing the bus on the inside. Not allowing cyclists into bus lanes would be the simplest method of curing this problem. Even though cyclists are not supposed to pass the buses on the inside we nevertheless should not be adding to the percentage of the population that are disabled people by allowing cyclists into bus lanes to improve road safety statistics.

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?

General rules, techniques and advice for all drivers and riders

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:

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"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:

	Yes	No	Don't know?
123 easy to understand?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
124 easy to understand?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If no, why not?

Although the wording in your rule 123 is easy to understand we, nevertheless, disagree that a parked vehicle can keep its engine running for even a couple of minutes. In our desire to live in a greener and more environmentally friendly country we would argue that when a vehicle has been parked, even if it is attended, the engine should be switched off to avoid excess emissions. In fact, in some cities one can face a fine if a vehicle is kept running for any length of time in a parking space.

General rules, techniques and advice for all drivers and riders

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:

	Yes	No	Don't know?
lane?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
track?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If no, why not?

Is the proposed wording easy to understand?

- Yes (Go to general rules, techniques and advice for all drivers and riders further comments)
- No
- Don't know? (Go to general rules, techniques and advice for all drivers and riders further comments)

Disagrees with Rule 140 on general rules, techniques and advice for all drivers and riders wording: cycle lanes and cycle tracks

Why not?

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 (and we recommend reading the chapter before answering). 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?

Using the road

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?

- Yes (Go to using the road rule 163 overtaking speeds)
- No
- Don't know? (Go to using the road rule 163 overtaking speeds)

Disagree with using the road: passing on the right or left

Why not?

Cyclists passing vehicles on the left put the cyclists in more danger than usual. Cyclists are often observed travelling much faster than the allowable road speed passing on the left side of vehicles which puts the cyclist in more danger than they would otherwise be if they had to comply with the same road speed as other vehicles. As some bicycles become lighter and with the introduction of E bicycles they are becoming much faster but should still need to adhere to the designated road speed that they are travelling on.

Using the road

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

	Yes	No	Don't know?
motorcyclists?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
cyclists?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
horse riders?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
horse drawn vehicles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If no, why not?

Cyclists should comply with the given speed limit on any particular road the same as any other vehicle.

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

	Yes	No	Don't know?
motorcyclists?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
cyclists?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
horse riders?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
horse drawn vehicles?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If no, why not?

MACS believes that a minimum distance of 1.5 m at speeds under 30 mph is not sufficient and that a standard distance of a minimum of 2 m in all cases should be applied

Is the proposed wording easy to understand?

- Yes (Go to using the road rule 186)
- No
- Don't know? (Go to using the road rule 186)

Disagrees with Rule 163 for using the road wording: overtaking

Why not?

The wording of rule 163 seems overly complicated. Whereas, if a standardised minimum passing distance of 2 m was used the wording could be simplified. The use of plain English at all times would be helpful, especially when we recognise that not everyone has the ability to read more complicated wording.

An easy read version of the highway code should be made available for those who have difficulty in reading the written word.

Using the road

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:

	Yes	No	Don't know?
you do not overtake cyclists within their lane?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
you allow cyclists to move across your path?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
cyclists may stay in the left lane when continuing across or around the roundabout?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
horse riders may stay in the left lane when continuing across or around the roundabout?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
horse drawn vehicles may stay in the left lane when continuing across or around the roundabout?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If no, why not?

Is the proposed wording easy to understand?

- Yes (Go to using the road rule 195)
- No
- Don't know? (Go to using the road rule 195)

Disagrees with Rule 186 using the road wording: signals and position

Why not?

The wording is rather complex and again simple English would be an advantage. As mentioned above an easy read version of the highway code should be made available for those who have difficulty in reading the written word.

Using the road

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?

- Yes (Go to using the road Rule 195 wording: zebra and parallel crossings)
- No
- Don't know? (Go to using the road Rule 195 wording: zebra and parallel crossings)

Disagrees with Rule 195 using the road: give way at parallel crossings

Why not?

The second bullet point should not give drivers the opportunity by way of they **should** give way, it should read that they **must** give way.

In instances where pedestrians or cyclists are waiting to cross, drivers **must** stop and should not simply give way.

Using the road Rule 195 wording: zebra and parallel crossings

Is the proposed wording easy to understand?

- Yes (Go to using the road further comments)
 No
 Don't know? (Go to using the road further comments)

Disagrees with Rule 195 using the road wording: zebra and parallel crossings

Why not?

Using the road

There are several other changes within the using the road section (and we recommend reading the chapter before answering). 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?

In the document you referred to equestrian crossings. An equestrian crossing is called a **Pegasus** crossing, similar to using the named crossings for pedestrians it would be appropriate to use the appropriate wording for a crossing designed for equestrian use. Using the correct terminology is important.

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?

- Yes (Go to rule 213 road users requiring extra care: cycling on narrow roads)
- No
- Don't know? (Go to rule 213 road users requiring extra care: cycling on narrow roads)

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

Why not?

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

Is the proposed wording easy to understand?

- Yes (Go to road users requiring extra care further comments)
- No
- Don't know? (Go to road users requiring extra care further comments)

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

Why not?

Road users requiring extra care

There are several other changes within the road users requiring extra care section (and we recommend reading the chapter before answering). 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?

The highway code should recognise that disabled pedestrians and disabled cyclists will require even more extra care than abled cyclists. However, there is no mention of disabled cyclists or disabled pedestrians, older people and pedestrians more 'at risk' requiring that extra consideration and even more care from other road users, including cyclists, horse-riders and horse-drawn vehicles.

Waiting and parking

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?

- Yes (Go to rule 239 waiting and parking: Dutch reach)
- No
- Don't know? (Go to rule 239 waiting and parking: Dutch reach)

Disagree with Rule 239 waiting and parking: Dutch reach

Why not?

Bullet point 6 should also include pedestrians.

Bullet point 7 Could be difficult for disabled people to open the door with one's left hand especially if this driver is a wheelchair user. We would suggest that due diligence is adhered to at all times, whether driving or getting in and out of the vehicle, we would therefore question whether point 7 is necessary?

The last paragraph concerning electric vehicle charging points parking close to the charger is simply not possible for many disabled people. For example, a wheelchair user using an EV charging point needs to leave sufficient space if the vehicle charges from the front.

Rule 239 waiting and parking: Dutch reach

Is the proposed wording easy to understand?

- Yes (Go to waiting and parking further comments)
- No
- Don't know? (Go to waiting and parking further comments)

Disagree with Rule 239 waiting and parking wording: Dutch reach

Why not?

Some of the wording seems very convoluted especially in point 7 and the final paragraph, please use simple English and do not overly convolute the message that you're trying to convey.

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 the other change proposed to Rule 239 on waiting and parking?

Bullet point 1 it states, 'do not park facing against the traffic flow'. This is not always possible if the driver of the vehicle is a disabled person as it is much safer to get out of the vehicle on the pavement side. No consideration has been given to the needs of disabled drivers in this statement.

Bullet point 3 is too generic if considering the needs of disabled people, parking too close to a vehicle displaying a blue badge in an Off-Street carpark is insufficient, a distance of 1200 mm must be left to enable a disabled person to get in and out of the vehicle. The statement needs to be more descriptive.

Good accessibility to EV charging points has not yet been adequately defined. MACS is still working with the providers and installers of EV charging points to determine good practice in accessibility required. The actual charging cables, especially the fast charge cable, are quite difficult for disabled people with dexterity problems to use, engagement is currently underway to try to solve these problems. In this respect we would suggest that the final paragraph is a little premature

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? We would strongly suggest that the bell **must** be fitted to a bicycle and not should be fitted to a bicycle.

annex 6? This form would have been much easier to complete if it had been made available in other formats other than text read and PDF. Even though we converted it to a Word document it's still caused more barriers to engagement than was necessary. More consideration should be given to ensuring consultation documents are available in varying formats.

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?

Any other comments?

We would ask if an Equality Impact Assessment (EqIA) has been carried out both on the content of the consultation and on the format of the consultation, including the Executive Summary? There is a requirement for this consultation to be considered under the Public Sector Equality Duty of the Equality Act 2010.