To: UK Government, Department of Transport

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Dear Sir/Madam,

Changes to the Highway Code

I am writing as an individual in response to your ongoing consultation on changes to the Highway Code rules to:

- 1. Make cycling and walking safer in Towns and Villages
- 2. Call for greater consideration by car and HGV drivers in the countryside for pedestrians and cyclists
- 3. Call for commercial vehicles to use 'commercial sat navs' to avoid them travelling along unsuitable lanes or through the narrow streets of many of ancient and older towns

In responding, I am drawing on my experience of the roads as someone who cycles and drives to get around.

About me:

I have been a driver since I was 17, over 50 odd years ago. I am 74 years of age and I continue to drive a car regularly in the UK and in Europe. Also I am an active walker & cyclist. In making these comments I am using my experience as previously being a parish, district and county councillor in Kent and Sussex.

My main way of getting around is by car for longer distance and by bicycle and walking for shorter routes. I also cycle & walk for recreational purposes, mainly in England but also in France & Spain.

As a car driver I support changes to improve safety for:

- Pedestrians of all ages especially children, older folk and mothers with prams/toddlers
- Mobility users
- Cyclists

Also I would like to stress the importance of traffic calming on the many thousands of miles of narrow lanes in our countryside which do not have cycleways or footpaths but nevertheless are used by walkers and cyclists or by children and pedestrians in villages.

Why? Because cars weighing around a tonne and all the vehicles up to a 40 tonne HGV can easily do an awful lot of damage to pedestrian, cyclist and other non-vehicle users at speeds as low as 15 or 20 miles an hour, let alone at 50 or 60 miles an hour. By simple and careful considerate driving many lives can be saved.

Make cycling and walking safer in Towns/Villages and the countryside

Firstly, I want to give my support to 10 rule changes Cycling UK have identified as vital to improving road safety for vulnerable road users (https://tinyurl.com/HC-ten-changes), particularly the three that they have highlighted as being the most important, namely:

- The 'hierarchy of users' or 'hierarchy of responsibility' (Introduction and New Rule H1)
- Priority to people and vehicles going straight ahead at junctions (New Rule 76)
- A guideline minimum safe overtaking distance of 1.5m (Rule 163).

Junctions are the most dangerous place on the road for cyclists, so giving priority to those going straight ahead will make our junctions much safer for people cycling and walking, and is entirely consistent with the proposal for a hierarchy of responsibility - where those in charge of the largest vehicles have the greatest responsibility to reduce the danger they pose to others who are more vulnerable.

Beyond these three key changes, I welcome in particular the proposed changes which put the 'Dutch Reach' into The Highway Code (Rule 239). Car-dooring poses a serious danger for people cycling, and this new rule could reduce the number of cyclists injured when someone opens a car door without looking.

I also strongly support the new wording relating to Advanced Stop Lines (Rule 170). Advance Stop Lines often leave cyclists positioned in the 'blind spot' of large vehicles, so it's good to see a requirement that drivers of such vehicles leave enough space to be able to see waiting cyclists.

Call for greater consideration by car and HGV drivers in the countryside for pedestrians and cyclists

The existing Highway Code asks road users to have due regard for pedestrians, cyclists & horse riders etc. The reminders are contained in Rule 204 (General), Rule 205 to 210 (Pedestrians) Rule 215 (Horse riders and horse-drawn vehicles). Rule 218 (Home Zones and Quiet Lanes). However, it's clear that car and lorry drivers have either forgotten these reminders or have not read them as many country lanes are highly dangerous for these vulnerable users.

The Government report 'Facts on Road Fatalities' (June 2015) say rural roads carry 40% of road traffic, but account for 62% of road fatalities. It goes on to say accidents that occur on rural roads are more likely to be of a fatal nature than those on urban roads and that rural roads have a much higher average speed than urban roads. This problem continues to be the case in recent years. The Rospa say in their report of 2018 say "More deaths occur on rural roads than on urban ones. In 2016, there were 1,015 fatal accidents on rural roads compared to 593 on urban roads".

The problem of deaths on rural roads comes into sharper focus when we consider that only 17% of the population live in rural areas. See <u>Defra Official Statistics Rural population 2014/15 (Updated 27 August 2020)</u>.

Something has to be done to protect pedestrians, cyclists and horse riders in rural areas. The Highway Code muddles up the guidance for cities and towns with that for rural areas. This ignores the fact that speed limits and traffic speeds generally are much higher in rural areas than in cities and towns, which often benefit from a 30 mph speed limit or even 20 mph. Many rural roads don't have a speed limit, meaning that drivers are entitled, irrespective of the narrowness of the road to drive at 60 mph!

The Highway Code should have a section dedicated to rural areas, – possibly entitled the '**Countryside Safety Code'**. Guidance and rules appertaining to the safety of pedestrians, cyclists and horse riders should be drawn together under this heading with a <u>specific focus on addressing car and lorry drivers</u>. This focus requires a <u>new rule –</u> one of the 'duty of care'.

Call for commercial vehicles to use 'commercial sat navs'

The current Highway Code gives no guidance on the use of satellite navigation and yet its use is commonplace for commercial and lorry vehicle drivers. As you may know the <u>Local Government Association (LGA)</u>, which represents more than 370 councils in England and Wales have called for all lorry drivers who use satnavs to be compelled to use **commercial** sat nav models. The LGA say "Villages and rural communities across the country have been blighted by a recent spate of lorry smashes".

Lorry drivers who get wedged in narrow roads or under bridges not only endanger themselves, other road users and pedestrians, but also cause massive disruption. This has a significant impact on local economies, particularly in rural areas. Rural communities are fed-up with lorries ignoring weight and width restrictions and using country lanes like trunk roads.

Obviously new legislation is required, but in the meantime, the Highway Code could include guidance specifically focusing on the importance of using the correct type of satellite navigation when driving in the countryside or through our villages and towns. Clear advice and guidance needs to be included in the Highway Code, focusing commercial and freight lorry vehicle drivers onto the <u>use of correct navigation</u> devices.

The Freight <u>Transport Association (LOGISTICS UK)</u> has advice on this matter going back to 2009 and they even advocate the use of satnav's which include <u>cycle alert</u> <u>systems</u>

I'm glad to see that you are considering changes which will make cycling and walking safer, as it's absolutely crucial that more is done to enable people of all ages and abilities to feel safe and confident to cycle and walk for all or part of everyday journeys. This will, in turn, bring many benefits to individuals and to the country as a whole, including better health outcomes, reduced congestion and air pollution and, in the context of Covid-19, it will help reduce pressure on public transport.

These proposed changes could significantly improve the safety of our roads, enabling many more people to feel confident enough to choose to cycle and walk more regularly, and I'm glad to see they are being considered by the Department for Transport.

I hope that they will all be included in The Highway Code once the consultation is complete.

Yours faithfully,

Victor S Ient, MSc.,