

## Highway Code consultation: response from ADEPT

### Introduction

ADEPT is a professional association that represents executive 'directors of place' from county, unitary and combined authorities, along with directors of local enterprise partnerships, sub-national transport bodies and corporate partners drawn from key service sectors. More than two thirds of households in England rely on services provided by ADEPT members including housing, environmental and regulatory services, planning, development, culture, and highways and transport. ADEPT represents its members' interests by proactively engaging Government on emerging policies & issues, promoting initiatives aimed at influencing government policy, and through the sharing of best practice, professional networking and development opportunities. Our strategic priorities include climate change and the environment, infrastructure and communities; and place-based funding.

### Summary

ADEPT welcomes the proposed revisions to the Highway Code, with the change in emphasis and clarification of existing rules to guide road user responsibility. We note that this could be seen as a move towards presumed liability and recommend that further consultation should be undertaken before any further moves in this direction. It is vital that the final version of the Highway Code is widely publicised so that the clarification of, and revision to, the rules is noted by all road users. Current lack of knowledge of the existing rules contributes to unsafe road user behaviour. Revisions to the Highway Code without dissemination of the new rules would be a lost opportunity for road safety improvement.

### Our specific comments are as follows:

- Rule H1: The hierarchy of road users reflects how many local highway authorities already operate and is supported. The wording is clear.
- Rule H2: This clarifies existing responsibilities and supports safe behaviour.
- Rule H3: this reminds powered road users that cycles are also traffic and should reduce the likelihood of left hook type collisions. Additional clarification over the need to give way to cycle tracks where they cross side roads may be needed.
  
- Rules for pedestrians: the proposed changes reflect Rule H1.
  - Rule 13: Clarifies that pedestrians should not obstruct riders of cycles or horses on shared facilities.
  - Rule 19: This reflects current good practice of riders and drivers to give way to pedestrians waiting to cross a zebra crossing.

- Rules about animals: the addition of horse drawn vehicles is welcomed.
  - Rule 52: The encouragement of further training is welcomed, although there is concern that a lack of training should not be seen as a fault on the part of a rider or horse drawn vehicle driver as it is not a legal requirement. Is the British Horse Society the only training organisation available?
  
- Rules for cyclists: The changes are generally supported with the following comments:
  - Rule 66: riding in single file creates a longer overtake for drivers; on two lane carriageways any overtake should use the opposite lane to pass in which case riding two abreast will make for an easier overtake. On narrower lanes, single file can make passing safer. The original wording is preferred.
  - Rule 67: A doors width is greater than 0.5m. A minimum of 1.0m would be recommended to clear doors or pedestrians stepping into the road.
  
- Rules for drivers and motorcycles:
  - Rule 97: the clarification is supported.
  
- General rules, etc.: The changes are generally supported with the following comments:
  - Rule 140: This clarifies that cycle riders can choose not to use cycle lanes and where they have a right of way. This will need to be well publicised.
  - Rule 151: allowing pedestrians or cycle riders to cross is welcomed. This will need to be well publicised.
  
- Using the road: The changes are generally supported with the following comments:
  - Rule 160: the link to Rule H1 is supported.
  - Rule 163: clarification over filtering and passing distance guidance is welcomed.
  
- Road users requiring extra care: The changes are generally supported with the following comments:
  - Rules 211/212/213: The clarification of cycle rider position is welcomed; the door width comments as with Rule 67.
  
- Waiting and parking:
  - Rule 239: the use of the Dutch reach is welcomed.
  
- Annexe 1: bicycle
  - The promotion of Bikeability is welcomed; funding to support additional training would enable wider support from local authorities.

- Further comments:
  - Additional training for motorised riders and drivers is available; this has been recommended for horse and cycle riders and should be promoted to motorised users.
  - Organisations such as IAM Roadsmart ([www.iamroadsmart.com/](http://www.iamroadsmart.com/)) or RoSPA's RoADAR ([www.roadar.org.uk](http://www.roadar.org.uk)) can provide further training, as can many ADIs.
  - Improvements to the standard of motorised road users would have a positive impact on overall road safety.