



## **Response of the Road Haulage Association to Department for Transport**

### **Cycling and Walking Investment Strategy safety review: Call for Evidence**

**23 May 2018**

#### **Summary**

1. The Department for Transport has stated that “making journeys by physically active means such as cycling and walking has huge potential benefits both for individuals and for our wider society”. The Government’s Cycling and Walking Investment Strategy, published in April 2017, set out its aim to make cycling and walking the natural choices for shorter journeys or as part of a longer journey.
2. The DfT has decided to review safety measures with a view towards making cycling and walking safer.
3. DfT are looking for ideas, for evidence of what works, for examples of good practice from other countries, for innovative technologies, and for imaginative solutions.

#### **Background about the RHA**

4. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 250,000 HGVs, range from single-truck firms to those with thousands of vehicles. These companies provide essential services on which the people and businesses of the UK depend.
5. We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training.
6. We would like to thank The Department for Transport for the call for evidence and the opportunity to comment on the issues raised.
7. In addition to answering the questions directly we have added further comments on related issues where we feel these are relevant.

## Broad RHA view

8. The Road Haulage Association is strongly committed to road safety. Most of the regulation of operators, drivers and vehicles in the road haulage sector is focused on supporting road safety for all road users. This is something we actively support ourselves with our members and the industry as a whole.
9. Related to this, we see adherence to the Highway Code as a fundamental and essential building block in making roads as safe as possible for all road users. We believe that the current Highway Code is an excellent and fit for purpose document as it is clear and simple for **all road** users to follow consistently.
10. The RHA is becoming concerned that lobbying by some cycling interests is undermining adherence with, and confidence in parts of the Highway Code – in particular where the Highway Code deals with cycling on the road. The clearest example of this is the recent campaign led by British Cycling advocating changes to the Highway Code to give special right of way to cyclists overtaking or undertaking turning vehicles. Our view is that the suggestion is dangerously misguided.
11. The current Highway Code is well constructed. The cycling rules for junctions (rules 72 to 75) are clear and helpful. RHA members especially highlight S59 regarding cyclists wearing visible clothing.
12. It is imperative that all road users adhere to the Highway Code. This makes driving safer as all road users can more easily predict the behaviour of others. Many of our members believe there is a trend in urban areas for some cyclists to aggressively disregard the Highway Code, causing danger to themselves and stress for road users and pedestrians.
13. The RHA supports the move to active travel and the accompanying health benefits are without doubt. If active travel is safe it also impacts congestion and thus, health, safety and welfare of all.
14. We would like to remind policy makers that roads need to perform many practical and essential functions for all road users. The movement of freight is essential, not optional. The food we eat, the houses we live in and the clothes we wear are delivered by road freight. Road infrastructure must be designed for all uses, including road freight for the largest vehicles.
15. Let us also not forget that we have an enviable road safety record in GB – yes, there are incidents that lead to fatalities but thankfully they are small and reducing.

## **In Answer to the Consultation**

### **Q1. Do you have any suggestions on the way in which the current approach to development and maintenance of road signs and infrastructure impacts the safety of cyclists and other vulnerable road users? How could it be improved?**

Signs such as those on a post at the roadside or are paint on the road itself are essential. They provide important information so must always be clear and well maintained.

There are issues with ongoing maintenance. Examples of issues include zebra crossings which have black and white markings on the road (but no stop/go lights function) where these have faded away, and signs obscured by vegetation.

Higher levels of visibility for on-road markings should be considered – perhaps at pedestrian crossings these should be coloured red to make the zone stand out more?

Newer light controlled crossings sometimes have count down signs to indicate to pedestrian how long they have and these appear useful.

Carriageway maintenance is a serious issue – our members report poor carriageway conditions are widespread. This damages vehicles and puts cyclists and motor cyclists in particular into dangerous and vulnerable positions.

Carriageways need to be designed to accommodate all road users – with sufficient space so that safe operation is possible for all road users and pedestrians.

Shared pavements are something that need to be addressed in the long term if they are to be used more extensively, moving facilities to paved areas as suggested recently is not a good idea as they rarely make good any work carried out correctly.

We believe that any safety measures required for walking and cycling should be made a legal requirement at the planning stage of any new development and include all road users.

### **Q2. Please set out any areas where you consider the laws or rules relating to road safety and their enforcement, with particular reference to cyclists and pedestrians, could be used to support the Government's aim of improving cycling and walking safety whilst promoting more active travel?**

We spoke about how relevant the Highway Code is to all Road Users and should continue as it is presently. Consideration should be given to producing a version aimed directly at the

needs of cyclists - so they have more accessible information on the behaviours of all road users.

Consideration should be given to the compulsory training and education of cyclist. Much is already done, however there is evidence of poor practice. All children should be taught during school curriculum the importance of the High Way Code and Road Safety.

Compulsory visibility standards for cyclists should be considered. High visibility equipment will make cyclists stand out better and reduce the risk of collisions.

The issue of vehicle driver training is dealt with in a later question.

**Q3. Do you have any suggestions for improving the way road users are trained, with specific consideration to protecting cyclists and pedestrians?**

Compulsory school cycle and road user training would be an ideal start.

Bikesafe for motorcycles was/is a good way to encourage riders of powered two wheelers to think about their riding a little more encouraging them to take further training. If more schemes like that could be run for cyclists it might encourage more thoughtful road use.

HGV drivers will have already passed a standard car test before approaching the HGV classes. Driver CPC training requires 5 modules of training, at least 35 hours every 5 years – many firms include cycle safety, vulnerable road user, hazard perception and the Highway Code in this requirement. Consideration could be given to making such a vulnerable road user module a compulsory element of the Driver CPC.

**Q4. Do you have any suggestions on how we can improve road user education to help support more and safer walking and cycling?**

As above in Question 3, training and education are linked and whatever is done as training should be followed up with continued education.



**Q5. Do you have any suggestions on how Government policy on vehicles and equipment could improve safety of cyclists and pedestrians, whilst continuing to promote more walking and cycling?**

Vehicle standards are appropriately set internationally. The Government should continue to work internationally to ensure vehicle safety standards are set for the benefit of vehicle operators and other road users.

The use of new technology – automated emergency breaking for example – should be part of the Governments consideration. Vehicles work internationally – more so with Heavy Goods Vehicles. This means that local standards become difficult and expensive to comply with. International standards are ideal, if not international standards then national standards might be appropriate. Local vehicle standards are inappropriate and should be avoided.

**Q6. What can Government do to support better understanding and awareness of different types of road user in relation to cycle use in particular?**

Promote school liaison between road user organisations and police such as the lorry blind spot truck.

Everything starts at school so compulsory cycle and road user training will embed a lifelong need to keep updated with the High Way Code.

All road users that use a variation of transport should be made to undergo training that is relevant to the equipment or animal being used.

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