RNIB’s response to DfT’s “Review of The Highway Code to improve road safety for cyclists, pedestrians and horse riders”

## About RNIB:

We are the Royal National Institute of Blind People (RNIB), the UK’s leading sight loss charity and the largest community of blind and partially sighted people. Everyday 250 people begin to lose their sight. RNIB has a crucial role to play in creating a world where there are no barriers to people with sight loss. We want society, communities and individuals to see differently about sight loss.

## Our response

Blind and partially people consistently tell us that barriers to journey-making, including streets and transport, are one of the biggest issues they face. This is why RNIB campaign for the right of blind and partially sighted people to maintain independence and dignity in all journeys.

We welcome the opportunity to respond to this consultation on a review of The Highway Code. Blind and partially sighted people tell us that being able to make walking journeys is fundamental to maintaining independence, getting exercise, staying connected with family and community, and accessing work and key services such as healthcare.

Indeed, 81 per cent of respondents to our travel survey told us that it is important or very important to them to be able to make walking journeys independently, without a sighted guide.

Given the clear importance of walking journeys for blind and partially sighted people we welcome this “robust review of The Highway Code focussing on changes that could be made to improve safety for vulnerable road users.”

We welcome the principle of the ‘Hierarchy of Road Users’ that means that “in any interaction between road users, those who can cause the greatest harm have the greatest responsibility to reduce the danger or threat they pose to others”.

We welcome that in the proposed **Rule H1** it states that “The road users most likely to be injured in the event of a collision are pedestrians, in particular children, older adults and disabled people,” and that it specifically says that other road users should “Always remember that the people you encounter may have impaired sight, hearing or mobility, and may not be able to see or hear you.”

We welcome the proposed **Rule H2** which states “You should give way to pedestrians waiting to cross a zebra crossing,” This stronger pedestrian priority is likely to make blind and partially sighted people feel more confident to use zebra crossings. We are pleased that this is given further weight **Rule 19** “Drivers and riders should give way to pedestrians waiting to cross and MUST give way to pedestrians on a zebra crossing”.

We are pleased to read specific references to the importance of journeys made by disabled pedestrians like the proposed new **Rule 63** says “Remember that pedestrians may be deaf, blind or partially sighted and that this may not be obvious.” and the proposed **Rule 66** “be considerate of other road users, particularly blind and partially sighted pedestrians”. We would like to see this point highlighted more prominently in stronger terms throughout the code.

We are concerned that no mention is made of priority at ‘Bus Stop Borders’ or ‘Bus Stop Bypasses’. In our view neither of these designs enable blind and partially sighted people to navigate with confidence. Blind and partially sighted people tell us that they often experience negative interactions with cyclists where they are forced to cross a cycle lane to access public transport, and this review would be a useful opportunity to clarify priority.

Video analysis of cyclist and pedestrian behaviour at bus stop bypasses carried out by the Transport Research Laboratory for Transport for London in 2018 found even with a zebra crossing, priority was not always understood and where there is an interaction between a cyclist and a pedestrian, many cyclists do not give way. Even with a zebra crossing “There was a small but significant increase in the proportion of cyclists giving way at the crossing, from 33% (uncontrolled crossing) to 40% (zebra crossing)” [1].

The report also found that “factors judged to be important in higher level interactions with cyclists were pedestrian inattentiveness, local features that constrained pedestrian movements or reduced inter-visibility, crowding and lack of space for manoeuvring”. It is clear from references to “pedestrian inattentiveness” and “inter-visibility” that success in using bus stop bypasses safely depends significantly on the pedestrian’s ability to see cyclists coming. For many blind or partially sighted people this is out of the question.

We feel that stronger priority for pedestrians similar to **Rule H2** and **Rule 19** should be given when crossing or waiting to cross bus stop borders and bypasses, both with or without a zebra crossing, and that this should be made explicit in the Highway Code.

We support the aim of this review to promote considerate behaviour and instill a culture where vulnerable road users are accepted as having priority. While we understand the desire not to penalise road users unnecessarily, we feel it is important that these new rules are taken seriously and where they are not followed appropriate enforcement measures are consistently taken.

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## References

[1] Greenshields S, Chowdhury S, Jones P, PUBLISHED PROJECT REPORT PPR854 Bus Stop Bypasses Analysis of pedestrian and cyclist behaviour via video, available at https://trl.co.uk/uploads/trl/documents/PPR854%20-%20Bus%20Stop%20Bypasses%20-%20Analysis%20of%20Pedestrian%20and%20Cyclist%20Behaviour%20via%20Video.pdf (accessed 27 October 2020) piii