



An open letter to Kaya Burgess
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cc all supportive MP's

28 February 2012

Dear Kaya,

Cycle Safety - The "Lightmare"

Your campaign to enhance the safety of cyclists in The Times is truly commendable and we fully support your [eight point manifesto](#).

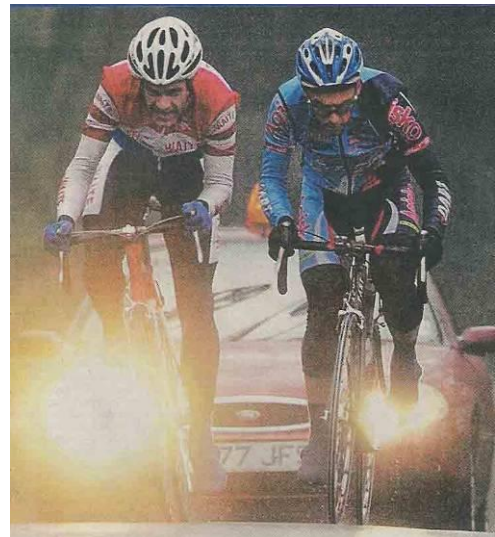
However, we urgently wish to suggest a ninth point - dangerously blinding and distracting vehicle lights and the misuse of these, often deliberately, thus making cyclists and pedestrians much harder to detect.

Advanced driving instructors instil in their pupils that a driver's positive frame of mind is equally important to any safety device.

But how can a driver feel safe if deliberately aggravated by a plethora of punitive measures whilst having their vision impaired by the selfish negative attitude that "my car has brighter lights than yours so I'm safe"?

The psychology of driving to combat stress, anger and road rage is paramount to safe driving - ref. "Mind How you Go" by ex Police Grade 1 driver Adrian Shurmer - see addendum.

The authorities (including Mike Penning and his DfT colleagues) maintain that these new blinding BiXenon High Intensity Discharge Lights (HID-Xenon) and High Power Light Emitting Diodes (LED's) comply with EU and UNECE global technical regulations (these have superseded UK regulations).



Picture extracted from The Times

BUT would you believe that the research bodies such as SWOV of the Netherlands headed by Dr. Fred Wegman, TNO and TRRL in the UK used by the EU and UNECE to test and certify these lights did not consult with ophthalmologists?

These flawed EU funded studies used meta-analysis (meta-analysis are studies of studies - see www.dadrl.org.uk/DRLstudies) plus laboratory tests using photographic slides which cannot portray the intense glare to justify 1,200cd Daytime Running Lights (DRL). In contrast the equivalent Japanese organisation conducted real world tests and recommended 200cd - about the intensity of bright sidelights.

With HID-Xenon headlamps, their tests were in darkened rooms with static lamp displays. In the real world vehicles accelerate, react to uneven road surfaces and even illegally blind you over road humps. No matter how detailed the specification for beam pattern for dipped HID-Xenon headlamps (or LED daytime lights) it is clear to anyone that drives, that they will have been repeatedly dazzled and momentarily blinded by these lights.

In the moments whilst your attention is diverted, and your eyes take time to recover, you could have hit a cyclist or a pedestrian on a crossing - in Vienna since these blinding lights were introduced, more cyclists and pedestrians on crossings have been killed and injured.

The Highway Code states: **Rule 114** You **MUST NOT**

- use any lights in a way which would dazzle or cause discomfort to other road users, including pedestrians, cyclists and horse riders

So why are auto manufacturers permitted to break the Highway Code under the guise of safety?

Have you noticed how much easier it is to see in twilight until a vehicle with blinding lights comes along?

The fad for driving with headlamps on in daytime started in 1967 when Sweden changed from driving on the left to the right; this was also taken up by Canada. When a country is covered in snow four months of the year and has low summer sun angles, headlights are probably necessary in these northern climes.

But why have lights become a marketing and fashion gimmick simply to sell cars on so called "safety" at the expense of the lives of vulnerable road users?

Like Hans Christian Anderson fable The Emperor's New Clothes people are being deceived.

For any machine it is good to have a light on when it is running, but why should the LED intensity be set to a blinding 1,200 candelas (cd) simply to combat the power of the sun on a bright sunny day thus at all other times motorists are blinded? - Boris Johnson please take note with your busses.



Daytime Running Lights are deliberately designed to beam blinding light directly into driver's eyes (extract from Hella data)

The UK intensity limit for dipped headlights used to be 800cd - now, at the behest of lamp manufacturers (presumably to enhance the market for HID-Xenon lamps) it is a blinding 2,500cd, and the frontal area of these lamps have mostly been reduced to less than half the area of the previous standard, thereby increasing the brightness of the aspect of these lights for other road users.

Why have these lamp frontal areas been reduced? We can only conclude that it is to pander to the aesthetic design of the vehicle's profile. It's about selling cars; it is not about road safety.

Many ophthalmologists will say that the human eye should not be directly exposed to the beam from LEDs: See <http://www.autolatest.ro/news-cars/led-lights-are-they-dangerous-for-our-eyes>

We quote "Their findings are rather disturbing since the LED would present an actual danger to the eyes, particularly those of children. The blue light needed to obtain white LEDs (especially used for daytime running lights on new cars) leads to a "toxic stress" to the retina. Moreover, their highly directional lighting and the quality of light emitted (up to 1000 times higher than conventional bulbs) could lead to risk of glare"

So why when life safety is at risk are LED and HID-Xenon lamps permitted on our vehicles?

As people age, ophthalmologists will tell you that the eye takes longer to recover from being blinded by light and you are probably aware that there are a greater proportion of older people driving now.

Cyclists try to retaliate by fitting powerful flashing unfocussed LED cycle lights at handlebar height beamed directly into a driver's eye, but little do they realise that flashing light destroys a driver's perception of depth of field putting them even more at risk.

Rear lights are a growing hazard since the advent of LEDs - there is no intensity limit so manufacturers are making them as nearly as bright as the red rear fog lights thus adding to the "Lightmare".

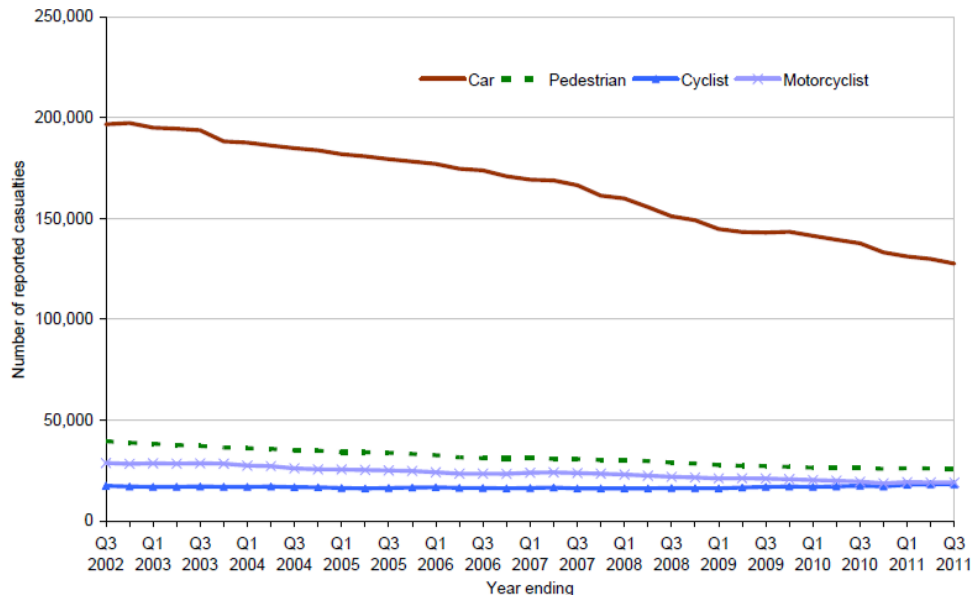
Cornering lights - a gimmick too far? In good daylight at a mini-roundabout a BMW driver nearly collided with a Mercedes because a lamp flashed on to indicate he was turning left. However the Mercedes carried on into the roundabout and a right lamp came on as it turned right. Fortunately the BMW driver braked hard to avoid a collision - but whose fault would it have been?

This is not a political issue - we have cross party support: Lib-Dems - Norman Baker, Green Party - Caroline Lucas, Tories - John Redwood, Labour - John Prescott. Plus thousands of comments from drivers, motorcyclists, cyclists and pedestrians including doctors, scientists and driving instructors.

Critically on this issue, we have the support of Roger Geffen Campaigns & Policy Manager CTC and Terence Bendixson President of FEPA and Living Streets.

Mike Penning and his officers simply quote the EU regulations; we have a DfT letter 07 Feb 2012 repeating the EU propaganda "evidence suggests that Daytime Running Lights (DRL) could reduce multi-vehicle accidents by up to 6% including those with cyclists and pedestrians."

As DRL became mandatory on new cars a year ago and many others now use headlights, as statistically proven in Austria, this 6% appears mythical. In view of this supposed 6% claim why has there not been a measurable step reduction in car casualties? Why have pedestrian casualties stopped falling? Why are cyclist casualties increasing?



Accident statistics DfT
Reported Road
Casualties in Great
Britain:

Quarterly Provisional
Estimates Q3 2011

Statistical Release
02 February 2012

DRL may save a few crumpled bumpers BUT this is gained at the expense of cyclists and pedestrians lives.

Why is the government permitting drivers cocooned in air bag cushioned crumple zone protected steel boxes are trying to gain an illusory safety advantage at the expense of vulnerable less conspicuous road users?

Kaya, please may we implore you to add a ninth requirement to your manifesto:

- The government should commission a report into the safe light levels for driving by Expert Ophthalmologists not self interested lamp and motor manufacturers or EU committees influenced by manufacturers or UNECE committees dominated by Canadians
- A police crackdown on illegal use of foglights, illegal HID conversions and daytime running lights at do not reduce intensity when headlamps are on
- The EU has ridden roughshod over the genuine concerns of pedestrians, cyclists, motorcyclists and drivers using reports that have flawed methodology to justify their actions. Immediately, pending the outcome of the Expert Ophthalmologists report, the UK government should require all vehicles to have DRL masked with absorbing filters to limit light to 200cd (as recommended by Japan) and HID-Xenon headlights not to be fitted to any more new vehicles

Although you are probably aware of some criticism that your campaign is too city-focussed, may we make the point that dealing with blinding lights is just as important in the country side.

We look forward to your response and if you have time please see the short BBC documentary by Sangita Myska at <http://www.bbc.co.uk/news/uk-13143206>

Yours sincerely,

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Lightmare are worldwide a voluntary group of experienced motorists including scientists, engineers, mathematicians, lawyers and ophthalmologists supported by the leading pedestrian, cycling and motorcycling organisations who are committed to improving road safety by reducing glare and other distractions in the driving environment.

Addenda

Extracts from **Mind How You Go** by Adrian Shurmer

www.driver-awareness.com

The slogan 'Speed Kills' was a memorable one. The effect it had was to inspire the ill thought-out traffic calming measures introduced by local authorities over the years.

It was naive to think that the only solution to the high accident numbers was to slow traffic down by placing additional hazards in the way of drivers, particularly when those very drivers are already colliding with existing ones. Adding another hazard is simply adding another danger.

Traffic calming measures come in all shapes and sizes. There are chicanes, the narrowing of lanes, additional paving build-outs into the road and cycle lanes that disappear as suddenly as they start. Whichever method is chosen, the idea to try and reduce vehicle speed by adding more hazards to an already potentially dangerous situation brings with it new problems.

The majority of these projects produced two negative effects. Firstly, they brought road users closer together and secondly, they have brought traffic and pedestrians closer together.

Some of the initiatives are ludicrous and inconsistent.

When the police train their own drivers, the instruction given to the driver is always to give cyclists a side-on wobble distance of six feet (two metres) whilst overtaking them.

Why then do the authorities allow the councils to paint cycle lanes on many of our roads that are less than four feet wide?



Authorities in need of education

With the current proliferation of speed cameras and the reduction of traffic patrols on our roads, some motorists are getting away with reckless and dangerous driving, which manifests itself in bad manners and inappropriate road behaviour.

It is clear that those in authority, such as council officials, senior policy decision making police officers and members of our so-called road safety groups do not recognise, or choose to ignore, the human element.

As this book demonstrates, there is a *new way*; a very effective and successful way to approach road safety matters.

Should the government eventually address the true cause of road accidents (crashes) by introducing a well informed, effective driver education programme to deal with the problems caused by inattentive driving, aggressive attitudes and the real dangers of decision making based on 'assuming' how other road users will behave, you will know that it is serious about reducing death and serious injury on our roads.

Once this education programme is in place, the authorities can then follow up with a firm law and order policy because people will know what they are doing and will not be in a position to complain. It will be a matter of 'It's not what you do; it's knowing what to do.'

Improvements in road safety cannot happen overnight, but if the government (which is ultimately responsible for safety on our roads) was to base its programme on the techniques outlined in this book, our roads would become much safer and the number of crashes would decrease dramatically.

The objective of this book is not primarily to confront authority, but to highlight the dreadful mess this country has descended into as a result of many of the current road safety practices.

Who can now doubt that there is an urgent need for change, and a fresh direction?

If the authorities do not recognise the need for proper driver education, it is they who are in need of education.

"Building hazards in front of drivers who are already colliding with hazards is a nonsense"



Blinding bus lights



Illegal use of fog lights



Cyclists at risk



How can a pedestrian safely check for traffic if he has just been blinded?



Illegal HID-Xenon conversion kits



Footbrake on when stopped creates light pollution at high level directly into a driver's eye

Reference

Fight to end menace of dazzling xenon headlights by Joseph Dunn - needs Times membership to access
<http://www.thesundaytimes.co.uk/sto/ingear/cars/Driving/article619373.ece>

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Our Ref: ID 30730

7 February 2012

Dear Mr Perham

ROAD SAFETY

Thank you for your email addressed to Theresa Villiers, regarding road safety. Your letter has been forwarded to the International Vehicles & Safety Division as we have policy responsibility for road safety.

As you know it became a requirement from February 2011 for all new types of vehicles to be fitted with Daytime running lights. These must meet European legislation intended to ensure that they are sufficiently bright to be visible during the daytime but not so bright so as to cause dazzle. At night they turn off when the driver switches on their headlamps to prevent dazzle and steps are underway to ensure that in future all cars have features to either turn the headlights on automatically at night or prompt the driver to do so to minimise the risk of driving at night on DRL alone. Evidence suggests DRL could reduce multi-vehicle daytime accidents by up to 6%, including those with cyclists and pedestrians.

Moving on to Xenon headlamps. These must also comply with European legislation intended to minimise dazzle while maximising driver vision. Due to the brightness it is important that they are correctly aimed cars are fitted with features to help ensure this. We are aware that some people convert halogen headlamps into Xenon. These conversions inevitably result in headlamps that produce a lot of glare and in our view they do not comply with the lighting regulations. We have produced guidance on this matter which I have attached for your information.

Yours sincerely



Fran Simpson (Mrs)