



The Right Honourable Patrick McLoughlin MP
Secretary of State for Transport
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Please reply to
roy@lightmare.org

12 October 2015

Dear Mr. McLoughlin,

Vulnerable road user accidents - a crisis worse than VW

May we introduce ourselves, Lightmare are 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. Your officers are familiar with our campaign.

We have no political agenda and no financial support; all costs are met from our personal resources.

I'm sure you and your colleagues at the DfT are concerned about the recent 2014 statistics depicting an increase in road accidents particularly to vulnerable road users. May I append an article to be published this week containing expert medical opinion proving that blinding lights are the cause with proposed solutions.

Since 1997 we have made representations to the DfT and EU warning that blinding lights are dangerous submitting thousands of comments from drivers as evidence.

Your department and past ministers have made placatory comments simply reiterating the flawed EU mantra that these lights do not affect drivers and that they would reduce accidents.

The tragic 2014 accident statistics prove this to be false.

It is time for the UK to stand up to the EU/UNECE rule makers to stop this escalating madness from blinding light by the automakers.

There is cross party support; we urge you to act immediately to save the lives of all road users.

Yours sincerely,

Roy Milnes

roy@lightmare.org

This open letter is published at www.lightmare.org

cc

Lilian Greenwood MP Shadow Transport Minister
Ruth Cadbury All Party Cycling Group
Adam Coffman All Party Cycling Group
Ben Moseley All Party Cycling Group
Maria Eagle
Nigel Farage UKIP
Adrian Burrows DfT
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Blinding Lights blamed for soaring crash rate

A gimmick too far?

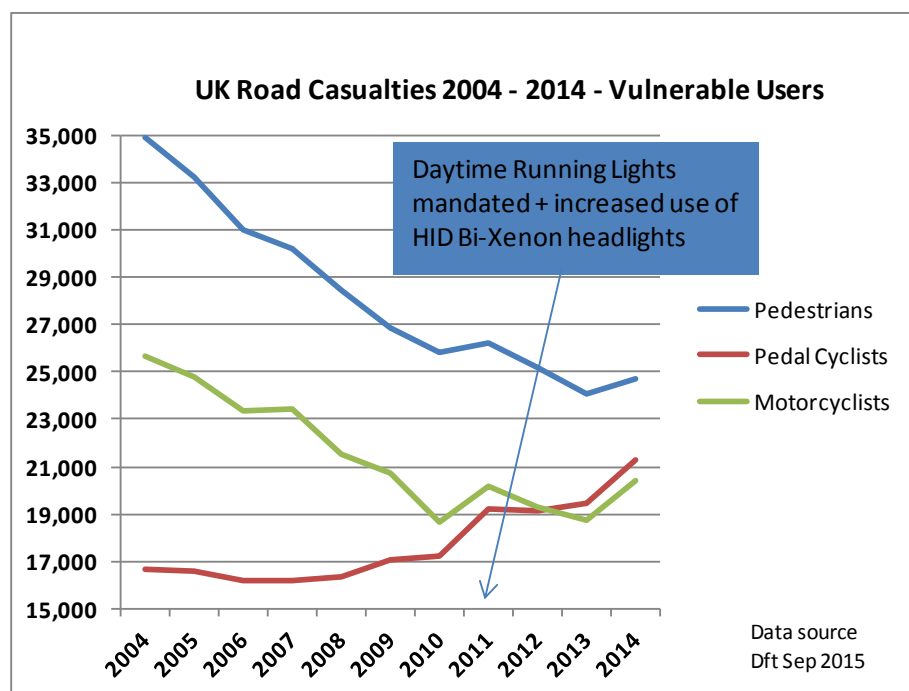
Roy Milnes www.lightmare.org

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The VW diesel NO_x testing crisis is nothing compared to what the automakers have deliberately inflicted upon us with blinding headlights and daytime lights.

Indirectly some deaths may be attributable to Nitrous Oxides (NO_x) from VW's but these will be very difficult to pin directly upon VW, overall global NO_x must be compared to emissions from power stations, industry, diesel ships, trains, buses and trucks.

However the auto industry could be held directly responsible for deaths from blinding lights, the steady year on year decline in casualties has been halted and is now increasing in proportion to the use of blinding light.



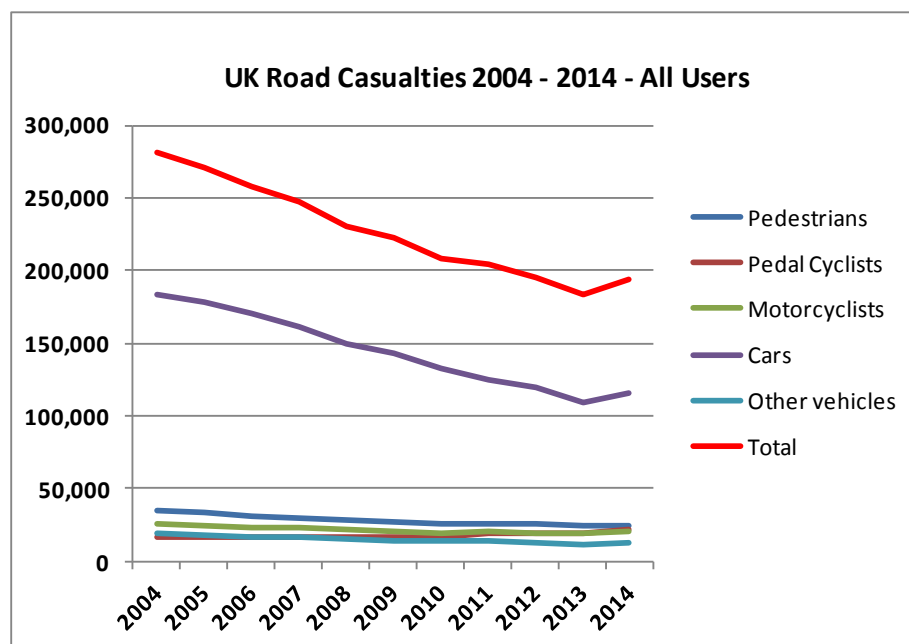
Some press reports suggest that the increase in casualties is attributable to in-car gadgets, this may be partly true, a driver trying to peer at a smeary touch screen on a sunny day could easily be distracted. However this is speculation.

Notice the jump in 2010 and increases since 2013?

In-car gadgets did not suddenly appear in 2010.

Whilst cyclist distance travelled has increased by 10%, there has been a 30% increase in cyclist casualties.

Pedestrians and motorcyclist accidents have also increased.



What did happen was that the EU mandated from February 2011 that all cars should have blinding Daytime Running Lights (DRL).

Simultaneously many auto makers started introducing blinding Bi-Xenon High Intensity Discharge (HID) headlights.

The UK DfT and EU road safety experts (SWOV Netherlands) predicted a 6% reduction in accidents from daytime lights.

Lightmare warned them accidents would increase due to reduced perception of hazards caused by light distraction.

Thousands of people have complained about the detrimental effect of these lights.

Lightmare and associated international organisations comprising scientists and experienced drivers have campaigned since 1999 but the authorities would not listen.

The EU's road safety experts only did laboratory tests (a bit like diesel) and they did not consult with ophthalmologists about the detrimental effect on the eye.

Instead, as with the VW crisis, the automakers club ACEA ruled the roost dominating the EU and UNECE rulemaking committees.



All of the EU has been affected: **European Transport Safety Council: "2014 was a bad year for road safety"** *Progress on reducing road deaths in the EU slowed to just -0.6% last year, the worst annual reduction since the first common EU target was set in 2001, according to new analysis published today by the European Transport Safety Council. EU member states now need to cut deaths by almost 8% each year until 2020 to meet the target set in 2010 to halve deaths within a decade.*

The EU/UNECE initially proposed an intensity of 400 candelas (cd) for DRL but at the behest of automakers they finally mandated blinding 1200cd DRL and 2500cd headlights.

1200cd DRL may be needed in brilliant sunlight but at all other times they blind you.

This gimmick gave the automakers something to market as "safety sells" - many car adverts make a feature of bright lights.

A spin off is that boy racers think its OK drive around with foglights on in good conditions (it's illegal but the police seem powerless).

Only the Japanese conducted real world tests, in 2003 they recommended 200cd for DRL - about the intensity of bright parking lights.



LEAN VS MEAN.



When it was just Swedish cars, people tended to put up with the annoying distraction from oncoming vehicles or in your mirror as an irritating quirk, but now as most cars have blinding lights, any so called safety benefit is negated.

(Sweden introduced continuous headlights initially dimmed because they changed to driving on the right in 1967 and they suffer a more extreme climate than most of Europe).

Blinding lights may save a few fender benders for drivers cocooned in an airbag cushioned safety cage; however the national accident figures for vulnerable road users continue to rise.

Technology is outpacing regulation, automakers are introducing brighter and brighter lights, most DRL are Light Emitting Diodes (LED).

LED headlights are becoming common and some BMW and Audi's now use a laser beam bounced off a reflector so headlights blast out even more blinding light.



Cree Inc. are a major manufacturer of LED and state:-

"Regardless of LED color, Cree advises users to not look directly at any operating LED component"

So why do automakers install increasingly fancy arrays of unshielded LED beamed directly into a driver's eyes?

Extract from Hella DRL data sheet:



According to Peter Heilig Professor of Ophthalmology at the University of Vienna (Europe's leading eye institute) moving light stimuli, inevitably distract. In his publication Impaired Perception in Driving and Sport he states:

"When exceeding critical numbers and intensities, blinding light causes cognitive and perceptual disturbances.

The capacity of our cognitive processing has a natural limit. Newer research suggests that activities requiring 'knee-jerk' reactions may trigger adequate reactions at retinal circuit levels already, before more time consuming and complex cognitive processing can take place in higher visual pathways and centres. Once reaction of this sort takes place, a second one concurrently - a third one may be, but there is a natural limit. Blinding light causes damaging phototoxic effects on the retina via temporal summation. Any stimulus above a threshold (even low light intensity) will be processed in neuronal CNS-circuits. Overstimulation (number plus intensity of stimuli) may cause cognitive deficits e.g.

Inattention Blindness, Visual Short Term Memory Loss and Capacitive Dysfunction all affecting a driver's perception of hazards.

Immediately DRL should be reduced in intensity to 200cd (as determined by the Japanese in practical tests) and dipped (or low beam) headlights should be redesigned so the light source and reflector are not visible to other road users (or limited to the original UK limit of 800cd) and a chromacity nearer the safe yellow end of the spectrum.

It's a Lightmare out there - how many more lives have to be sacrificed due to an automakers marketing gimmick?

References:-**UK Dft Accident statistics 2014 - Summary reports:-**

www.gov.uk/government/uploads/system/uploads/attachment_data/file/438040/reported-road-casualties-in-great-britain-main-results-2014-release.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/437436/rrcgb-main-results-2014-infographic.pdf

UK Dft Accident statistics 2014 RAS3004 data

www.gov.uk/government/publications/reported-road-casualties-in-great-britain-main-results-2014

EU/UNECE Working Party on Lighting and Light-Signalling (GRE WP29):-

Regulation No. 48 Uniform provisions concerning the approval of vehicle with regard to the installation of lighting and light-signalling devices E/ECE/324 E/ECE/TRANS/505

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:42011X1206%2803%29&from=EN>

Regulation No. 87 Uniform provisions concerning the approval of daytime running lamps for power-driven vehicles E/ECE/324 E/ECE/TRANS/505 <http://www.unece.org/fileadmin/DAM/trans/main/wp29/wp29regs/r087r2e.pdf>

SWOV Factsheet: Daytime Running Lights http://www.swov.nl/rapport/Factsheets/UK/FS_DRL.pdf

Dft Letter 07 Feb 2012 to Ken Perham Lightmare claiming 6% reduction in accidents from lights

<http://www.lightmare.org/docs/Dft%20Fran%20Simpson%20to%20Ken%20Perham%2007Feb2012.pdf>

Cree Inc. Eye Safety With LED Component CLD-AP34 rev 14

http://www.cree.com/-/media/Files/Cree/LED%20Components%20and%20Modules/XLamp/XLamp%20Application%20Notes/XLamp_EyeSafety.pdf

European Automobile Manufacturers Association (ACEA) www.acea.be

European Transport Safety Council <http://etsc.eu/eu-road-safety-targets-at-risk-as-deaths-increase-in-france-germany-and-uk/>

Impaired Perception in Driving and Sport - Professor P Heilig

http://www.lightmare.org/docs/Impaired_Perception-Driving_and_Sport_P.Heilig_Aug_2010en.pdf

www.lightmare.org

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Lightmare

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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)



Mr Roy Milnes

HOUSE OF COMMONS
LONDON SW1A 0AA

Lightmare

Dear Mr Milnes

I thank you for your email of the 28th February and fully support the campaign that you are running.

It's absolutely true that blinding lights are extremely dangerous, and is even worse when elderly people are confronted with blinding lights which can often lead to serious accidents.

I have no hesitation in supporting this very good

cause. Yours sincerely

A handwritten signature in black ink on a light-colored background, appearing to read 'Elwyn Llwyd'.

The Rt Hon Elwyn Llwyd
MP Dwyfor Meirionnydd

7/3/12

In February 2012 we wrote a similar letter in support of The Times Cyclesafe campaign and copied 80 MP's who attended the Cyclesafe meeting. We received 16 positive responses:

Alison Seabeck, Lab, Plymouth, Moor View;	alison.seabeck.mp@parliament.uk
Ben Bradshaw, Labour, Exeter, Patron of All-Party Parliamentary Cycling Group;	bradshawb@parliament.uk
Jeremy Corbyn, Lab, Islington North;	corbynj@parliament.uk
Jo Swinson, Lib Dem, East Dumbartonshire;	jo.swinson.mp@parliament.uk
Jonathan Lord, C, Woking;	jonathan.lord.mp@parliament.uk
Kerry McCarthy, Lab, Bristol East;	kerry.mccarthy.mp@parliament.uk
Ben Mosely	mosleyb@parliament.uk
Lilian Greenwood, Lab, Nottingham South;	lilian.greenwood.mp@parliament.uk
Maria Eagle, Lab, Garston & Halewood, Shadow Transport Minister;	eaglem@parliament.uk
Mike Penning, C, Hemel Hempstead, Minister for Road Safety;	penningm@parliament.uk
Richard Graham, C, Gloucester;	richard.graham.mp@parliament.uk
Simon Kirby, C, Brighton, Kempton;	simon.kirby.mp@parliament.uk
Tom Brake, Lib Dem, Carshalton & Wallington, Vice-Chair of All-Party Parliamentary Cycling Group;	braket@parliament.uk
Elfyn Llwyd	elfyn.llwyd.mp@parliament.uk
Caroline Lucas	caroline.lucas.mp@parliament.uk
John Redwood	john.redwood.mp@parliament.uk

This was a typical response:

From: EAGLE, Maria [<mailto:maria.eagle.mp@parliament.uk>]

Sent: 03 April 2012 13:28

To: Roy

Subject: RE: Cycle Safety - the Lightmare

Dear Roy,

Thank you for contacting me regarding the safety of cyclists following the launch of The Times' *'Cities Fit for Cycling'* campaign, and with your concerns regarding the issue of lights dazzling road users.

Cycling is good for improving health, helping the environment by cutting vehicle journeys and emissions and reduces congestion for those that need to drive. It cannot be right that people have to fear their friends and relatives getting on a bike, particularly in our cities. We have got to do more to prevent cyclists being killed or seriously injured on our roads and The Times is absolutely right to raise awareness and launch a campaign for cycle safety.

Despite the importance of cycling proficiency and awareness, we must never give the impression that the responsibility to prevent collisions simply rests with cyclists. That is why The Times is right to highlight the importance of measures such as improving road junctions, creating alternative cycle routes and improving safety equipment on HGVs.

It is a real concern that the numbers of cyclists being killed or seriously injured is going up. It is not good enough for the Road Safety Minister to dismiss as 'rubbish' the concerns that his government's decisions have made our roads less safe for cyclists.

One of the very first thing that the current government did after the election was to axe £150million of funding to local authorities which the previous Labour government had allocated to support schemes including improving facilities for cycling. In addition, the government axed £37million in Road Safety grants. These cuts were before the spending review even took place. In the spending review that followed, it was reckless for the government to cut road safety budgets still further – especially to do so without carrying out any assessment of the impact on road collisions these cuts would have. These cuts included axing of funding for speed cameras, cutting the funding for the highly effective THINK! road safety campaign. It was also a huge mistake to abolish Cycling England, and to discontinue the Cycling City and Towns pilots which were demonstrating just what could be achieved with targeted support for cycling. These should have been rolled out to the rest of the country rather than discontinued by the present government.

The decision to end national targets to cut deaths and serious injuries on our roads risks reducing the focus across government to improving safety on our roads. To make matters even worse for cyclists, Ministers have allowed longer

HGVs onto our roads, which has real implications for safety as HGVs are three times as likely to be involved in fatal accidents compared to all other vehicles.

Labour is now looking seriously at each of the ideas that have been proposed in The Times 'Cycling for Cities' cycling safety campaign, including new rules on HGVs, improvements to dangerous junctions, the wider use of 20mph speed limits and how much of our spending on roads is designated to ensure they are safe for cyclists to use.

As a result of Labour's Policy Review, we have immediately backed three specific proposals that could make a major difference to the safety of cyclists, particularly in our towns and cities:

First, a proportion of existing government funding for roads should be sent aside to be spent on building new cycle ways, improving junction design and installing traffic light phasing to give cyclists a head start.

Second, the government's trial of longer HGVs should be axed and income from the proposed HGV road charging scheme used to support the road haulage industry in upgrading safety measures and training.

Third, the national targets to reduce deaths and serious injuries on Britain's roads, axed by the government, should be reinstated.

Alongside our opposition to the decisions that the government has taken which we believe have set back the progress on road safety that was made over the previous decade, these measures, are a start. However, we recognise that we need to go further to develop a detailed set of proposals to improve the safety of cyclists.

Labour held a Cycling Summit at Westminster on Thursday 1 March, which brought together cyclists and cycling organisations along with representative from motoring organisations, road hauliers and road designers. A very useful discussion on the Times manifesto and many other ideas took place. The consensus from all the groups present was that more needed to be done to improve the safety of cycling, and Labour will continue to work to see both the current Government do more on this, and to further develop our own policies.

Thank you once again for contacting me on this important issue.

Yours sincerely,

A handwritten signature in black ink that reads "Maria Eagle". The signature is written in a cursive, flowing style.

Maria Eagle MP
Shadow Transport Secretary

We have petitions with thousands of signatures and receive vehement complaints about these lights but we cannot persuade the authorities to act. The Press seem reluctant to take up our cause as they fear upsetting motor manufacturers and losing advertising revenue - notice how many adverts feature flashy lights.