



accidents don't have to happen

**Response to**

**Department for Transport**

**Consultation Paper**

**“Allowing Learner Drivers**

**To Take Lessons on Motorways”**

6 February 2017



## Response to Allowing Learner Drivers to Take Lessons on Motorways

### Introduction

This is RoSPA's response to the Department for Transport's consultation paper, "Allowing Learner Drivers to Take Lessons on Motorways". It has been produced following consultation with RoSPA's National Road Safety Committee.

Despite significant reductions in the number of people killed and injured on Great Britain's roads over the last decade, young (17 to 24 year old) drivers remain one of highest risk groups and are statistically over-represented in road accidents compared with drivers aged over 25 years. 120 young car drivers were killed in road crashes in 2015, with 80% of these deaths occurring on rural roads, 16% on urban roads and 4% on motorways. Many other people were killed or injured in these crashes.

Motorways are the safest roads despite being high speed because they are designed and built to higher design standards, traffic is segregated by a central reservation (so head on collisions are rare), lanes are wider, there are fewer junctions, which are usually accessed by slip road (reducing the likelihood of junction collisions) and vulnerable road users, such as pedestrians and pedal cyclists, are prohibited from using them. However, when collisions do occur on motorways they are often severe because of the high speeds involved.

Driving on a motorway is very different from driving on other roads and requires different skills and a proper understanding of the rules for motorway driving. Due to the high speed of traffic, drivers need to scan the road much further ahead than on other types of road, and situations can change rapidly so drivers need to be able to plan their manoeuvres and positioning well in advance.

Many newly qualified drivers are intimidated by the thought of driving on motorways and so avoid using them. While they can take motorway lessons (for example, Pass Plus) after they have passed their driving test, very few drivers do so. This means new drivers generally do not get any practical motorway driving experience until they start using motorways unsupervised for the first time, which they find stressful.

Therefore, the Government is proposing to amend the law that currently prohibits learner drivers from driving on motorways, so that motorway driving can be incorporated into learner driver training. This would allow learner drivers to drive on motorways while accompanied by a fully qualified Approved Driving Instructor (ADI) in a car which has dual-controls. The aim is to enable learner drivers to gain experience on motorways and develop a practical understanding of how to use them safely.

The proposal concerns car drivers only and would not apply to learner motorcyclists.



## Response to Allowing Learner Drivers to Take Lessons on Motorways

### Question 1

**Do you think that learner drivers should be allowed to take lessons on motorways, subject to certain safeguards?**

#### RoSPA Response

Yes, RoSPA agrees that learner drivers should be allowed to take lessons on motorways, subject to the safeguards outlined in the consultation paper.

Allowing learner drivers to train on motorways under the supervision of a professional Approved Driving Instructor (ADI) and to practise entering and exiting a motorway, and overtaking other vehicles, will help to prepare them for this type of driving, which they will inevitably face at some point after they have gained their full licence.

Newly-qualified drivers can take a Pass Plus course, which includes a module on motorway driving, but uptake of the scheme is low. In 2015/16 more than 700,000 learner drivers passed their driving test, but only a little over 21,000 Pass Plus certificates were issued, suggesting that only around 3% of new drivers take Pass Plus. As only such a small percentage of new drivers currently take further training after passing their practical driving test, incorporating motorway lessons into learner driver training would be a more practical way of providing the experience of motorway driving in the safety of supervised driving.

The fact that 80% of young car driver deaths occur on rural roads may partly be due to young drivers using rural roads (which are often higher risk) rather than motorways, because they do not gain experience of motorway driving as a learner.

The ADI must be responsible for deciding when the learner has reached a consistent level of competence and is ready to start motorway lessons. The skills needed for motorway driving can initially be taught on dual carriageways, many of which have the national speed limit of 70 mph. RoSPA recommends that ADIs be encouraged to provide lessons on dual carriageways before taking their learners on a motorway. This would reduce risk when learners use motorways, and enable learners to fit in with the flow of traffic and be less likely to contribute to congestion, during motorway lessons.

### Question 2

**Do you think that lessons on motorways should be optional for learner drivers?**

#### RoSPA Response

RoSPA thinks that lessons on motorways should be optional for learner drivers; they should not be mandatory.

It is certainly important that learners gain experience on higher speed roads as they will face these conditions after their test, and speed related crashes are a common feature of novice driver accidents. However, there are parts of the country where access to a motorway is impractical for learner drivers and, especially in rural parts of Wales or Scotland, would require much longer and more expensive lessons. So making motorway lessons mandatory would discriminate against these learner drivers.

However, as motorway-type driving (using slip roads to join and leave high speed roads, driving on multi-lane roads, longer observation and more advanced planning) can often be done on dual-carriageways, using these roads as an alternative should be strongly encouraged. If there are no motorways within reach in a particular area, dual carriageway driving at least provides experience of high speed roads similar to motorway driving.



## Response to Allowing Learner Drivers to Take Lessons on Motorways

### Question 3

**Do you think that motorway lessons for learner drivers should only be provided by a fully qualified approved driving instructor?**

#### RoSPA Response

Yes, RoSPA thinks that motorway lessons for learner drivers should only be provided by a fully qualified approved driving instructor.

Fully qualified ADIs have the required skills to teach people to drive, having passed a dedicated training process and a test of their ability to instruct pupils. They are expected to follow the National Standards for Driver and Rider Training and are assessed on 17 areas of competencies at a Standards Check, which they are required to attend or face removal from the ADI register.

Allowing other supervising drivers, such as parents, to take learner drivers onto motorways would increase the risk given the more difficult driving circumstances of motorway traffic. They are unlikely to have dual control cars, and would not know how to use dual controls safely without training. We do not feel that they would have the skills and experience to teach someone else how to drive safely on a motorway. Given the higher speeds, any mistake could have severe consequences given higher speeds usually involved in motorway driving.

### Question 4

**Do you agree that trainee driving instructors (potential driving instructors) should not be allowed to provide learner driver motorway lessons?**

#### RoSPA Response

It might be possible to allow PDIs to give motorway lessons if they are supervised by a fully qualified ADI for the total duration of any motorway lesson. Most PDIs are only supervised for around 20% of the lessons they give, which in these circumstances would not be acceptable.

PDIs have passed the ADI tests part 1 and 2 and are allowed, with a trainee licence, to give lessons for a period of up to 6 months to gain experience of instructing pupils in preparation for taking the ADI part 3 test of instructional ability. Therefore, they have not yet successfully demonstrated their total instructional ability, and there is the potential they may fail the ADI Part 3 test if they do not meet the required standard. However, there is an argument that if the PDI does not gain the experience (under supervision of a fully qualified (ADI) of teaching people to drive on the motorway their skill set will not be fully realised.

### Question 5

**If you are an ADI, do you feel that the current training and testing system provides sufficient grounding for you to provide pre-test motorway lessons? If not, where should it be strengthened?**

#### RoSPA Response

RoSPA is not an ADI.



## Response to Allowing Learner Drivers to Take Lessons on Motorways

### Question 6

**Are there any specific issues you think should be included in guidance to ADIs?**

#### RoSPA Response

Guidance for ADIs on giving motorway lessons should include when to incorporate motorway driving and how to assess that the learner is ready for motorway driving, the length of lessons and proximity to a motorway, and the consideration of appropriate conditions for a motorway lesson, such as, weather or traffic conditions.

ADIs must ensure that each learner is sufficiently competent to progress onto the motorway, and have a good understanding of the rules of motorway driving before going onto a motorway. The guidance should also encourage ADIs to teach the higher speed driving skills on dual carriageways, especially those which have the national speed limit, before starting motorway lessons with a learner. It should also advise ADIs, to avoid using motorways during busy periods in the morning and evening (especially in early motorway lessons) where possible. Urban motorways often carry a considerable amount of local drivers who are using the motorway for a few junctions. It seems likely that this is how learners would also use such motorways, and therefore, it may noticeably increase congestion.

### Question 7

**Do you agree that ADIs should exercise their discretion in providing a motorway lesson to a learner driver with whom they have had no previous contact?**

#### RoSPA Response

Yes, RoSPA agrees that ADIs should exercise their discretion in providing a motorway lesson to a learner driver with whom they have had no previous contact.

They should conduct a detailed assessment drive first, even if the learner driver has given an explanation of the driving experience they already have had. It should be the responsibility of the ADI to ensure the safety of both occupants and to decide whether or not to proceed.

The guidance for ADIs discussed in question 6 should provide advice on this situation, and advise that they conduct at least one lesson on other roads, preferably including a dual carriageway, with any learner they do not know, before taking them onto a motorway.

### Question 8

**Do you agree that learner driver motorway lessons must only take place in a car where the accompanying ADI has a dual control brake (and clutch in manual vehicles)?**

#### RoSPA Response

Yes, RoSPA agrees that learner driver motorway lessons must only take place in a car where the accompanying ADI has a dual control brake (and clutch in manual vehicles). With a dual controlled car the ADI also has the ability to slow or stop the vehicle in an emergency, as well disengage the cruise control (if fitted, and used). Dual controlled cars do not usually have an additional accelerator pedal as they are not allowed in vehicles used for practical driving tests.

We also feel that a supplementary interior mirror should be mandatory during motorway lessons to ensure the ADI has suitable vision around the vehicle, especially when overtaking or negotiating slip roads.



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### Question 9

**If people learning to drive in specially adapted vehicles wish to take motorway lessons, should those vehicles be fitted with dual controls? If yes, should this be advisory or mandatory?**

#### RoSPA Response

RoSPA thinks that fitting specially adapted vehicles with dual controls should be strongly advised, but not mandatory.

Some ADIs have specially adapted vehicles that are dual controlled and wherever possible these should be used. However, where significant adaptations have been made to a learner driver's own vehicle, dual controls may not be possible, or would be very expensive. In these circumstances, making dual controls mandatory might discourage the learner from taking motorway lessons.

However, the ADI should be confident that dual controls would not be required and also ensure the vehicle is fit for purpose. Again, this topic should be covered in the ADI guidance discussed in question 6

### Question 10

**Do you agree that motorway lessons for learner drivers who are provisional licence holders should only be permitted in motor cars?**

#### RoSPA Response

Yes, RoSPA agrees that motorway lessons for learner drivers who are provisional licence holders should only be permitted in motor cars.

Learner motorcyclists may only have completed a Compulsory Basic Training (CBT) course, which is a basic off-road introduction to motorcycling. Although learner motorcyclists are expected to take further on-road practical training after their CBT, many do not. It is not possible for a motorcyclist trainer to intervene and if necessary take control of the vehicle, in the same way as an ADI can do in a dual control car. Therefore, we do not feel it would be safe for learner motorcyclists to be able to take motorway lessons.

In general, vehicles should meet the DVSA minimum test vehicle standard, have good rear vision and be capable of reaching the maximum motorway speed limit of 70 mph, in order to be used for motorway lessons.

### Question 11

**Do you agree that there is an increased risk using a top box on a motorway lesson and they should therefore be removed?**

#### RoSPA Response

Although top-boxes are generally rated up to 70mph, high winds or buffeting from large vehicles on motorways could cause them to be damaged or detached. If this were to happen on a motorway, the consequences could be significant. However, they are permitted to be used on dual carriageways, many of which have 70 mph speed limits. Therefore, we suggest that further investigation with manufacturers and ADIs is needed to assess whether top boxes that are rated at 70 mph are more likely to become loose at motorway speeds. Where top boxes are removed, L-plates should be fitted in a place that does not obscure the driver's or ADI's view.



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**Question 12**

**Do you have any comments on the potential impact of the proposal to allow learner drivers to take lessons on motorways? If yes, please specify who you consider will be affected and provide examples of any costs where applicable.**

**RoSPA Response**

Even with the addition of motorway lessons to learner driver training, RoSPA believes that ADIs and DVSA Examiners should continue to encourage post-test training.

RoSPA thanks the Department for Transport for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.





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