House of Commons
Transport Committee

The new European motorcycle test

Sixth Report of Session 2009–10

Report, together with formal minutes, oral and written evidence

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The Transport Committee

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Contacts

All correspondence should be addressed to the Clerk of the Transport Committee, House of Commons, 7 Millbank, London SW1P 3JA. The telephone number for general enquiries is 020 7219 6263; the Committee’s email address is transcom@parliament.uk
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1 Introduction

1. In April 2009, a new testing regime for motorcyclists was introduced. The new test was based on European legislation, the Second EU Driving Licence Directive, originally adopted by EU Member States in 1991, and subsequently amended in 2000. Member States were required to transpose the Directive into national legislation and implement it fully by September 2008. The UK was unable to meet the deadline for implementation because of a failure to complete the required number of test centres on time. When the new test was finally introduced, it was met with intense criticism and safety concerns from motorcyclists and the rider training industry. It was reported that the test requirements were unrealistic and unhelpful and most importantly, that it put test riders’ safety at risk. The number of tests taken dropped dramatically in the first few months, and the industry suggested that the new test regime would threaten many small businesses and jobs.

2. Against this background, we held a short inquiry into the new European motorcycle test. We were concerned to establish not only whether the new test had gone wrong and how the problems could be rectified, but also to ensure that lessons are learnt before the implementation of the Third EU Driving Licence Directive. We present our conclusions in the chapters below. We are most grateful to all those who submitted written evidence as well as those who appeared before us to answer our questions.

2 Motorcycle training and testing in context

Learning to ride a motorcycle—Compulsory Basic Training (CBT)

3. In 1990, a new system of basic training for motorcyclists and moped riders was introduced in response to the poor safety record of inexperienced riders. Under this system motorcyclists and moped riders must complete a Compulsory Basic Training (CBT) course before riding unaccompanied on the public highway. The CBT does not involve a riding test, but riders have to complete the five elements of the CBT satisfactorily before being awarded a certificate of completion, a DL196.1 The certificate of completion is required to obtain a provisional licence which entitles riders to use a motorcycle of less that 125 cc or a moped of less than 50 cc using L-plates on public roads for up to two years.3 After two years, learner drivers have to take a moped or motorcycle driving test—or re-take their CBT. Only instructors certified by the Driving Standards Agency (DSA) can teach CBT at an approved training body (ATB).

1 The five elements are: 1) introduction; 2) practical on-site training; 3) practical on-site riding; 4) practical on-road training, and 5) practical on-road riding. Riders have to be at least 16 years old to obtain a CBT. See: http://www.direct.gov.uk
2 D-plates in Wales.
3 http://www.direct.gov.uk
Motorcycle tests

4. Once the CBT has been completed, riders can proceed to take a test to become a fully licensed motorcycle or moped rider. As illustrated in Table 1, there are different levels of motorcycle tests, depending on the age of the rider and the type of machine he or she wishes to use. Under the Second EU Driving Licence Directive, the minimum licence was set as an A1. The UK obtained a derogation so as to create the ‘P’ licence category for those who only wish to ride a moped. For riders under the age of 21, access to licences to ride more powerful machines is staged, as illustrated in Table 1. 80% of all tests taken come under the Direct Access Scheme, where riders are over the age of 21 and proceed directly to the A licence, enabling them to ride the most powerful categories of motorbikes straight away. This system of staged and direct access has been in place for more than a decade.

Table 1: Current motorcycle and moped licences and the minimum age requirements

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
<th>Minimum age</th>
</tr>
</thead>
<tbody>
<tr>
<td>P</td>
<td>Mopeds with an engine size of up to 50 cc and a maximum speed of up to 50 km/h</td>
<td>16</td>
</tr>
<tr>
<td>A1</td>
<td>Light motorcycles with an engine size of up to 125 cc and a power output of up to 11 kW (14.6 bhp)</td>
<td>17</td>
</tr>
<tr>
<td>A</td>
<td>Medium-sized motorcycles up to 25 kW (33 bhp) and a power to weight ratio of up to 0.16 kW/kg</td>
<td>17</td>
</tr>
<tr>
<td>A</td>
<td>Motorcycles with a sidecar and a power to weight ratio of up to 0.16 kW/kg</td>
<td>17</td>
</tr>
<tr>
<td>A</td>
<td>Any size motorcycle, with or without a sidecar. Can be obtained by completing the large motorcycle Direct Access Scheme, or if the candidate has held a licence for a medium-sized motorcycle for at least two years.</td>
<td>21</td>
</tr>
</tbody>
</table>

Source: http://www.direct.gov.uk

The two European Directives

The Second EU Driving Licence Directive

5. The Second EU Driving Licence Directive was adopted by the then 12 EU Member States in 1991, and subsequently amended in 2000. The amendments served, among other things, to raise the requirements in motorcycle tests by introducing more demanding practical manoeuvres. Based on advice from examiners, the objective of these changes was to reduce the disproportionate number of deaths and serious injuries among motorcyclists. In the UK, motorcyclists make up 1% of road users, but account for 19% of deaths and serious injuries. Whilst deaths and serious injuries have fallen by nearly 50% among other road users since the mid 1990s, the decline has only been 9% among motorcycle users. The British Government abstained in the vote in the Council of Ministers as it was not

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5 Ev 64
6 Department for Transport, Transport Statistics Bulletin Q3 2009
persuaded of the cost effectiveness of the proposed test requirements, but the amendments were passed nonetheless. In 2001 and 2002, the Driving Standards Agency (DSA) consulted on the implementation of the new requirements, and on options for off-road and on-road testing.

6. The bulk of the provisions in the EU Directive were transposed into British legislation in 1996 and 1997, but implementation was only complete with the introduction of the new motorcycle tests in April 2009. The deadline for full implementation by Member States was September 2008, but as it became clear, in 2008, that the number of UK operational test centres fell short of what was required to ensure acceptable geographic coverage, the introduction of the new test in the UK was put back to April 2009, and the test requirement to carry out all elements of the practical test in one go and at one location was scrapped.

**The Third EU Driving Licence Directive**

7. The Third EU Directive was adopted in 2006. Its provisions must be transposed into national legislation by early 2011, but has to be implemented fully only in early 2013. The Directive makes new provisions for the training and testing of drivers of a range of vehicles, including mopeds and motorcycles, for driving examiners as well as for the administration of driving licences. As regards motorcycles and mopeds, most provisions in the Directive will only apply to tests taken after the Directive has entered into force in 2013. In relation to mopeds and motorcycles, the most important changes will be:

a) changes to size categories of motorcycles, including a new medium-sized category;

b) an increase from 21 to 24 in the minimum age for motorcyclists gaining direct access to the most powerful motorbikes, and

c) a new formal test, or a training programme, for younger motorcyclists wishing to progress in stages to the larger and more powerful machines (currently, unlimited access to all motorcycles is gained automatically after two years’ experience on less powerful machines).

8. The DfT and the DSA indicate that they have taken a minimalist approach to the implementation of the Third Directive, making changes only where absolutely necessary, or where changes were planned anyway. In November 2009, a consultation on proposals for the implementation of the Directive was launched by the Department for Transport (DfT) and the Driving Standards Agency (DSA).

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7 Ev 64
8 Ev 64
9 Ev 64
11 Q 100
12 Department for Transport, Driver Testing, Training, Examining and Licensing: Implementing New European Union Requirements: (Directive 2006/126/EC—the third Directive on driving licences), November 2009, para 1.3.1; see also Q125, Paul Clark MP, Parliamentary Under Secretary of State for Transport
3 The new motorcycle test

9. The changes to the motorcycle test introduced on 27 April 2009, based on the Second Directive, did not affect the categories of licences and vehicles or the age at which learners can ride particular types of machine, but focused on the skills required to complete the test successfully. Existing theory and road driving tests were supplemented with a new off-road driving test. Motorcycle tests therefore now comprise the following three elements:

a) Theory test;

b) Practical test—Module 1—a specified off-road manoeuvres test, and

c) Practical test—Module 2—a road riding test including an eyesight test and safety questions.

The following manoeuvres which are required by the EU Directive will, in the UK, be tested in the off-road Module 1 test:

a) at least two manoeuvres executed at slow speed, including a slalom;

b) at least two manoeuvres executed at higher speed, of which one manoeuvre should be in second or third gear, at a speed of at least 30km/h (18.75mph) and one manoeuvre avoiding an obstacle at a minimum speed of 50km/h (31.25mph), and

c) at least two braking exercises, including an emergency brake at a minimum speed of 50km/h (31.25mph).  

10. The EU Directive does not require any of these manoeuvres to be taken off-road, and Member States have had significant latitude in designing the specific manoeuvres required in the tests. A few Member States have opted to include these manoeuvres in the road test so that the equivalent of the UK Modules 1 and 2 are taken as one test on the public highway.

11. The evidence received for this inquiry was predominantly critical of the new motorcycle test, and the handling of its introduction by the Driving Standards Agency (DSA) and the Department for Transport (DfT). Some aspects of the new test, notably Module 2 of the practical test, which is performed on the public highway, were received positively.  
However, a common criticism was that the UK has gold-plated the requirements in the EU Directive so as to create a hazardous test which also requires many candidates to travel unacceptably long distances to the new Multi Purpose Test Centres (MPTCs). Criticism of the test itself focused on the exercises in Module 1 of the practical test, the new off-road test. Many trainers, examiners and motorcyclists argued that the exercises are unrealistically difficult and that, particularly in poor weather conditions, the test is dangerous. They claim that the number of incidents and accidents occurring since the introduction of the new test supports this view.


15  Q 24
Module 1—the off-road practical test

12. The off-road test is performed on a circuit, as illustrated by the diagram in the Appendix. Motorcycle interest groups have voiced strong opposition to Module 1 of the new motorcycle test.\(^\text{16}\) The test is criticised for being unnecessarily difficult to the point of being dangerous, not only in terms of the manoeuvres which need to be carried out, but also in terms of the layout of the test track and the impact of poor weather on the proficiency required to carry out some exercises.

The swerve and brake manoeuvre

13. Concerns about the safety of the ‘swerve and brake’ manoeuvre in the off-road Module 1 test (see diagram in the Appendix) were particularly prevalent in the evidence received by the Committee. The Department explains the origins of this test thus:

> The new standards specified in the Directive require the practical motorcycling test to include specified manoeuvring exercises on slow speed control (slalom, figure of eight, riding a curve in 2nd or 3rd gear) and three manoeuvres (obstacle avoidance, controlled stop and emergency stop) which must be carried out at least at 50 km/h (31.5 mph). The Directive does not specify administrative details about how the standards are implemented. Member States have flexibility which allows the tests to be organised and delivered in a way that best suits prevailing local conditions.\(^\text{17}\)

Furthermore,

> Extensive trials with motorcycling interest groups investigated different sizes and layouts of areas needed to conduct assessments of the manoeuvres […] A large number (over 300) of volunteer riders, including trainers and representatives from motorcycling industry bodies, with varying skill levels from complete beginner to expert rider took mock tests in a variety of weather conditions and on different sized motorcycles. The feedback and research from the trials confirmed that the manoeuvring area was ‘fit for purpose’ and that the cone configurations (including distances apart) did not need to be modified or changed.\(^\text{18}\)

14. Whilst the directive specifies that three manoeuvres—obstacle avoidance, controlled stop and emergency stop—must be performed at a minimum speed of 50 km/h, it does not stipulate how those manoeuvres should be performed in relation to one another. The Government has opted to combine the obstacle avoidance and controlled stop elements, a decision which is widely seen as unsafe, and for which it is impossible for instructors to prepare candidates.\(^\text{19}\) Black Country Motorcycle Training explained that “the DSA require this manoeuvre to be performed firstly by accelerating to the prescribed 50 km/h around a 180-degree circuit area of 57.5 metres, then performing a swerve followed by a controlled stop.” In their view, it would be unsafe to attempt to practise such a manoeuvre on any public highway, and the space required for the manoeuvre is such that even DSA approved.

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\(^{16}\) See for example: Ev 25, 27, 30, 33, 36, 37, 47, 48, 50, 77

\(^{17}\) Ev 64

\(^{18}\) Ev 64

\(^{19}\) See for example: Ev 27, 36, 47, 77
training areas cannot accommodate it. Gordon Kemp, an ex-police motorcycle instructor, argues that the design of the test exemplifies the fact that the DSA has failed to understand, let alone appreciate, the importance of the counter-steering technique in preventing motorcycle accidents. The North West Federation of Approved Driving Instructor Associations said that it is too difficult for riders to regulate their speed whilst accelerating hard and, at the same time, performing the manoeuvres. They proposed that the exercise could be improved by a green light speed indicator on the track, removing the need to look down at the speedometer. Steven Manning of the Motorcycle Industry Trainers Association (MCITA) concurred, highlighting that nervous test candidates found it near impossible to manage several things simultaneously: “no amount of training is going to stop them panicking and grabbing a big handful of front brake, if they are thinking about two things at once, which a lot of them are”.

15. Others suggested that it was unhelpful to ask riders to do the opposite of what they would (and should) do in real life situations on the road, namely to accelerate hard towards an obstacle that they then subsequently have to slow down for, as is required in the test. The British Motorcycle Riders’ Federation (BMF) acknowledged that the views of trainers and instructors had originally been divided on the efficacy of the ‘swerve to avoid’ test. The BMF itself had consistently opposed the combined manoeuvre on the grounds that it was too difficult to perform. Craig Carey-Clinch representing the Motorcycle Industry Association (MIA) argued that in many ways, the new off-road Module 1 test represented a return to the pre–1990 motorcycle test which had been replaced by Compulsory Basic Training in order to focus on real-life situations on the road rather than technical exercises performed in an artificial off-road environment.

16. The DfT and the DSA admitted that some incidents had occurred during Module 1 “swerve to avoid” tests. In the Department’s view, incidents occurred not because the test itself is unreasonably dangerous, but because some candidates are inadequately prepared for the test. It argued that the skills tested by the swerve test are critical in helping them to avoid accidents in real life:

This exercise reflects the situation that could occur when a motorcyclist is faced with an obstruction, for example a car door being opened. Such situations often account for crashes involving motorbikes. Braking and steering at the same time is contrary to good riding practice and should be properly covered during pre-test training. Unless the motorcycle has been returned to an upright and stable position before the rider applies firm but progressive and balanced braking, the outcome of heavy
braking while steering risks loss of control of the machine and this is one of the main causes of serious casualties on our roads.27

17. The DSA also argued that the level of familiarity of motorcycle trainers with the new test arrangements and the off-road track is vital in enabling them to prepare their students adequately for the test. The DSA offered a wide variety of guidance and a free DVD which demonstrated and explained the test. Since December 2008, trainers have had the opportunity to try out the test for themselves, free of charge. However, very few trainers have chosen to take advantage of these opportunities—during December to April only 4.7% of available slots were taken up. It is notable that at the locations where the incidents on Module 1 test occurred there had been very little or no use made of this opportunity in advance of the test being introduced.28

**The 50 km/h test requirement**

18. Many submissions and witnesses were critical of the requirement for parts of the off-road test to be undertaken at 50 km/h, 31.07 miles per hour. It was argued that the British Government could have obtained a derogation from the EU Directive, permitting 30 mph to be used in place of the 50 km/h requirement in the UK. The absence of a derogation meant that manoeuvres which could easily have been tested on quiet side roads could now never be done in that way.29 Gordon Kemp, an ex-police motorcycle instructor wrote:

> I am concerned by the need to adhere exactly to 31.6 mph. As the majority of UK speed limits are thirty miles per hour, I would have felt it prudent for the DSA to have asked the EU for derogation of this speed to 30 mph allowing students to be taught a manoeuvre consistent with road speeds and normal use of vehicles on the road. A 30 mph requirement would make more educational sense.30

Others have argued that the British Government did not seek a derogation in order to bolster the justification for building Multi Purpose Test Centres (MPTCs).31 The Motorcycle Action Group suggests that a derogation may have left more room for options other than building multi-million pound test sites that other EU countries do not appear to have found necessary. It would certainly have avoided that situation where riders in Britain are failing the test only because they achieved 49 [km/h] during the swerve or brake test—even though this equates to a speed above the standard urban speed limit in the UK and would thus have satisfied the intent of the Directive.32

19. Another concern relating to the 50 km/h minimum speed requirement for elements of Module 1 of the test is that the test track is of insufficient size for some riders to achieve the
required speed in a safe manner. One motorcyclist, who had failed the Module 1 test twice, explained that with a combined weight of man and machine of 325 kg, he found it very difficult to accelerate his 125 cc motorbike fast enough to reach the speed required for the exercises within the space provided on the track. He was now considering using a bigger bike simply to pass the test. Karen Cooke from the Motorcycle Industry Association (MCI) concurred, noting that the heavier learner riders had to accelerate very hard indeed, then swerve, followed immediately by a stop. In her view this is unnatural, and as a result many learners now wanted to do their tests on larger machines. Mr Manning added that he believed many of the accidents during Module 1 tests had occurred where larger bikes had been used “where people have the ability to go a lot faster, so they are coming round trying to meet the minimum speed, giving it too much gas and then they are going so fast that they physically cannot stop in time”. The MCI also suggested that had a derogation from the 50 km/h requirement been achieved, it might have been possible to reduce the size of test sites, and therefore avoid the problems with identifying test sites (see chapter 4 below).

20. Despite our repeated attempts to get an answer, the Minister, Paul Clark MP, did not engage with the question as to why the Government had refrained from acquiring a derogation from the 50 km/h requirement. He said that “I think the issue about whether it is 50 km per hour or whether it was 30 mph is not an issue. The issue overriding this is about safety and well-trained motorcyclists”.

21. It is difficult to see why the Government failed to obtain a derogation from the 50 km/h speed requirement for certain elements of the Module 1 test. Testing riders at a speed which exceeds the standard limit in built-up areas is both inconvenient and confusing for candidates. Requiring test candidates to drive according to a scale of measurement not widely used in the UK is bizarre. Furthermore, the absence of a derogation serves to limit the options available to future Governments, who will not be able to merge the Module 1 test elements into the Module 2 on-road test, should they wish to follow the example set by some other EU Member States. It is unacceptable that the Minister was unable to offer any satisfactory explanation for the Government’s decision not to seek a derogation.

The relevance of the Module 1 off-road test

22. Some industry representatives argued that the off-road test was unlikely to contribute to meeting the objective of reducing casualties among motorcyclists. Some went as far as to suggest that it might serve to lower road safety standards among motorcyclists because they would spend part of their training practising manoeuvres which are not pertinent to every day driving on the road. In their view, the key skills to practice and test were the on-

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33 Ev 91; see also Ev 30 and 33
34 Q 10
35 Q 9
36 Q 113
37 Q 26
38 Q 26
road skills, such as situational awareness, which is tested only in Module 2 of the practical test:

If you have five days to educate a rider and you spend those five days teaching them how to do figure of eights and to go through a slalom, that is five days you could have spent on the road teaching them how to negotiate junctions and roundabouts, et cetera.39

23. When giving oral evidence, the Deputy Chief Driving Examiner, Lesley Young, rebutted such views, arguing that:

One of the main causes of accidents for motorcycles is loss of control. Even today about 15% of all accidents are as a result of loss of control, and that is equal to failure to look properly. The test had to meet the Directive. It was interpreted by the UK in a way that tested the areas of most concern. Controlling a motorbike is really very, very important. Unlike cars, which have a lot of technology that get people out of trouble when they do things like brake inappropriately, or brake from high speed, motorcycles do not have that kind of help. If a motorcyclist gets it wrong, the consequences are that they will come off the bike and could end up killed or seriously injured. So the way we interpreted that in the design of the off-road element of the test was to specifically tackle those areas where we know motorcyclists are at risk. One of them is in avoidance, which I think we are all agreed upon. The other challenge is that the braking exercise linked to that is unnecessary but, clearly, the main part of dealing with the incident is to maintain control of the motorcycle. It is no good to swerve out of the way of something and then not be able to control the consequences of that in terms of speed or when you should brake in terms of how the bike is performing. We are confident, knowing statistics and the reasons for the accidents on the road today, that the off-road element is crucial to preparing people better for the road. It is not the be all and end all but, as a new motorcyclist, basic control is very, very important. We come on to the on-road bit, which clearly is about dealing with other traffic, and the test is significantly longer for that element. So we are very confident that the combination in the design of the test will meet what we know to be high-risk areas, and that is the reason we have introduced it.40

24. The new off-road test, combined with the extended on-road test (Module 2), could be an important step towards improving the skills and judgement of motorcyclists on our roads. Module 1 tests agility, control and assessment of speed, distances and braking scenarios, and we think it is appropriate that this should take place in the comparative safety of the off-road environment. Module 2 tests the rider’s ability to assess real situations on the road as well as the interaction with other road users. It is, however, important to take account of concerns expressed by the motorcycle industry, and consider what adjustments might be required.

39 Q 27
40 Q 118; see also Q 85
Safety of the Module 1 test

25. The Department for Transport accepted that the number of incidents taking place during Module 1 tests was relatively high immediately after the introduction of the new test, but highlighted that the number of incidents had subsequently returned to more acceptable levels (see Table 2 below). When questioned, the Chief Executive of the DSA, Ms Thew, indicated that it was not possible to compare these incident levels to the rate under the old test regime. The old test had taken place exclusively on the road, and any incidents would have been registered simply as road traffic accidents, and the fact that it took place during a test would not have been recorded.41

Table 2: Incidents occurring during Module 1 motorcycle tests

<table>
<thead>
<tr>
<th>Month</th>
<th>Module 1 tests conducted</th>
<th>Tests not completed</th>
<th>Incidents</th>
<th>Incident rate %</th>
</tr>
</thead>
<tbody>
<tr>
<td>27–30 April 2009</td>
<td>818</td>
<td>72</td>
<td>8</td>
<td>0.9%</td>
</tr>
<tr>
<td>May 2009</td>
<td>5146</td>
<td>332</td>
<td>22</td>
<td>0.42%</td>
</tr>
<tr>
<td>June 2009</td>
<td>5781</td>
<td>324</td>
<td>16</td>
<td>0.27%</td>
</tr>
<tr>
<td>July 2009</td>
<td>6297</td>
<td>411</td>
<td>25</td>
<td>0.39%</td>
</tr>
<tr>
<td>August 2009</td>
<td>5725</td>
<td>404</td>
<td>20</td>
<td>0.34%</td>
</tr>
<tr>
<td>September 2009</td>
<td>6266</td>
<td>396</td>
<td>30</td>
<td>0.47%</td>
</tr>
<tr>
<td>October 2009</td>
<td>5728</td>
<td>384</td>
<td>33</td>
<td>0.57%</td>
</tr>
<tr>
<td>November 2009</td>
<td>4439</td>
<td>462</td>
<td>48</td>
<td>1.08%</td>
</tr>
<tr>
<td>December 2009</td>
<td>2149</td>
<td>254</td>
<td>7</td>
<td>0.32%</td>
</tr>
<tr>
<td>January 2010</td>
<td>1223</td>
<td>404</td>
<td>3</td>
<td>0.25%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>43,572</strong></td>
<td><strong>3,039</strong></td>
<td><strong>212</strong></td>
<td><strong>0.49%</strong></td>
</tr>
</tbody>
</table>

Source: Department for Transport, Ev 64 and 93

26. As illustrated by Table 3 below, it is clear that the avoidance manoeuvre and the emergency stop are the two exercises which have given rise to almost all the incidents recorded. These two exercises account for almost 92% of all incidents, and given that both manoeuvres test essential skills, it is difficult not to conclude that training of these particular skills needs to improve. The rate of incidents and accidents occurring in Module 1 tests need to be monitored carefully, and the DSA needs to react without delay if incident levels do not decline. The DSA must be prepared to make adjustments.

41 Q 126

42 Driving Examiner reports attribute reasons for tests not being completed. The ‘Tests not completed’ column comprises: Mechanical failure, Documents not produced, Vehicle not suitable or no vehicle for test, No ‘L’ plates, DSA motorcycle breakdown, No interpreter, Accident—unable to complete test, Candidate under the influence of drugs/alcohol, Candidate taken ill on test, DSA Module 1 equipment failure during test, Candidate failed to attend at test centre, Late cancellation by candidate / school, Candidate late arriving for test, Test cancelled due to examiner being ill, Test cancelled due to examiner being absent, Test cancelled as unable to start test on time, Bad weather at Driving Test Centre, Bad weather at candidate’s home, Candidate refused to sign residency declaration, Candidate chose to stop test, not already failed, Test terminated due to alleged illegal activity by candidate.
to the test design if required, and it must work closely with the industry to ensure that candidates only attempt the test when they are genuinely ready for it. This requires a culture shift, and the DSA must help and encourage the industry in every way possible to achieve this.

Table 3: Incidents in Module 1 tests—manoeuvre in which incident occurred

<table>
<thead>
<tr>
<th>Month</th>
<th>Avoidance manoeuvre</th>
<th>Emergency stop</th>
<th>Other/unknown</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>27–30 April 2009</td>
<td>6</td>
<td>1</td>
<td>1</td>
<td>8</td>
</tr>
<tr>
<td>May 2009</td>
<td>13</td>
<td>8</td>
<td>1</td>
<td>22</td>
</tr>
<tr>
<td>June 2009</td>
<td>7</td>
<td>9</td>
<td>0</td>
<td>16</td>
</tr>
<tr>
<td>July 2009</td>
<td>10</td>
<td>13</td>
<td>2</td>
<td>25</td>
</tr>
<tr>
<td>August 2009</td>
<td>7</td>
<td>13</td>
<td>0</td>
<td>20</td>
</tr>
<tr>
<td>September 2009</td>
<td>13</td>
<td>13</td>
<td>4</td>
<td>30</td>
</tr>
<tr>
<td>October 2009</td>
<td>18</td>
<td>12</td>
<td>3</td>
<td>33</td>
</tr>
<tr>
<td>November 2009</td>
<td>14</td>
<td>32</td>
<td>2</td>
<td>48</td>
</tr>
<tr>
<td>December 2009</td>
<td>1</td>
<td>2</td>
<td>4</td>
<td>7</td>
</tr>
<tr>
<td>January 2010</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Total</td>
<td>90</td>
<td>104</td>
<td>18</td>
<td>212</td>
</tr>
</tbody>
</table>

Source: Department for Transport, Ev 93

27. Unlike some organisations which indicated that the appropriate reaction to safety concerns should be modifications to the test, PACTS emphasised that, if the rate of accidents during tests was found to be too high, the reaction needed to be “to ensure that adequate training is given to learners and to instructors for whom the testing is new”. The new “testing procedure should encourage longer, more technical training.”43 There is no doubt that training and instruction for the motorcycle test needs to develop and change to reflect the new test requirements. This is not a bad thing. It provides an opportunity to raise standards and develop a culture where good training is encouraged and valued.

The impact of poor weather conditions

28. The EU Directive specifies the speed at which particular exercises in the test should be performed, but does not specify the amount of space candidates should be given to carry out these manoeuvres. The amount of space is, however, specified by the DSA, and no allowances are made for weather conditions or reduced tyre grip.44 Whilst braking distances and the space required to swerve is significantly greater in the wet, candidates are barred from adapting their behaviour to take precautions as they would on the open road,

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43 Ev 87
44 Q 17; see also Ev 92
either by lowering their speed or by using more space. Many submissions highlighted the risk of serious accidents when tests are performed in wet weather or in other circumstances where tyre grip is less than optimal. Trevor Wilbourn, owner of an approved motorcycle training business explained:

[...] because the DSA have incorporated the avoidance exercise and braking exercise there is a dimension in which to perform the stop after swerving. This dimension is 31 metres from the avoidance cones which are being swerved around. The braking distance, as given by the Highway Code for a wet surface, is 28 meters at 30 mph. However, the avoidance cones are mid-swerve as obviously you have to begin the swerve before them and straighten after them in order to then brake in control and stop in the one-metre box. So in the wet they have allowed three metres leeway to get straight and brake, and that would be at 30 mph. The exercise has a minimum speed of 50 [km/h] (32 mph) but you can’t swerve and watch the speedo so the speed is likely to be nearer 35mph. This now means that in the wet, in order to stop in the box a rider has to start braking whilst swerving which brings an increased risk of skidding and subsequently crashing. This is not the case in the dry because of higher grip levels.

Another example arises where tests are carried out at ‘casual’ or VOSA sites, where surfaces often are of a lower grade than at MPTCs, or perhaps are contaminated by oil or other substances. Four industry organisations reported that, as a result, tests were often cancelled due to poor weather conditions. The off-road motorcycle test effectively bars candidates from adapting their riding to reflect the prevailing weather, road and other circumstances affecting their stopping distances. This cannot be appropriate, and we urge the Government to amend the regulations on this point as soon as possible. We note that it is the Government’s implementation rather than the EU Directive which has caused this problem. It should therefore be straightforward to rectify.

4 Multi Purpose Test Centres (MPTCs)

The British Government opted to create new Multi Purpose Test Centres (MPTC) for the off-road Module 1 of the motorcycle test. Where 235 driving test centres had offered motorcycle tests before, the number of sites offering the test was set to reduce to 66 larger MPTCs following the introduction of the new test. The intention had been to have all 66 sites available by September 2008, but by that time, only 44 centres were operational, and
as a result, the introduction of the new test was delayed.\(^{52}\) The design of the test was also amended so that only Module 1 of the practical test has to take place at an MPTC, and Modules 1 and 2 can now be taken on different dates.\(^{53}\) When the new test was finally introduced at the end of April 2009, there were still only 44 MPTCs, supplemented by a number of VOSA test sites, casual hire sites and driving test centres (see Table 5 below) where the test could be taken.\(^{54}\)

31. The decision to create MPTCs gave rise to the most consistent criticism in the evidence we received. Many submissions alleged that the new centralised system of larger, but fewer test centres is an expensive white elephant which leaves trainers and students no choice but to travel long distances to tests, wasting both time and money, with little apparent benefit in return.\(^{55}\) It is claimed that there is a shortage of available test slots, the cost of taking the test has increased unnecessarily, and some submissions suggest that the DSA has used the new European Test requirements as an excuse to pursue their own agenda of closing down smaller, but convenient test sites in favour of a centralised network of large sites. Charles Owens suggested that, had the UK obtained a derogation on the speed requirements in the EU Directive, these sites simply would not have been necessary.\(^{56}\)

**Are Multi Purpose Test Centres necessary?**

32. The Government told us that since the Driving Standards Agency did not have sites suitable for the new test in its existing estate, it was necessary to acquire new sites across the country.\(^{57}\) It also said that “to provide improved customer service and to maximise utilisation of the new facilities the Agency chose, where possible, to develop these sites as multi-purpose test centres (MPTCs) delivering other types of practical test.”\(^{58}\) The Minister highlighted that very large sites were required in order to offer a choice of left-hand as well as right-hand manoeuvres, whilst retaining the necessary safety margins.\(^{59}\) The Department for Transport noted that most other European countries had opted to implement what is Module 1 of the test as an off-road test (see Table 4 below) and explained that:

> to minimise the risk of incidents the special manoeuvres must be conducted in safe off-road environments. Discussions with other Member States about their delivery methods showed that countries with similar heavy traffic levels to the UK had also decided to deliver the manoeuvres off-road. CIECA (the international commission for driving testing authorities) research also confirmed that most western EU nations had expressed a preference for conducting the special manoeuvres off-road.\(^{60}\)

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52 Ev 64  
53 Ev 64; see also Ev 79  
54 HC Deb, 1 July 2009, col 254W; For the regional distribution of sites available, see HC Deb, 7 May 2009, col 327W; see also Ev 64  
55 See for example: Q 11; Ev 36, 47, 50, Ev 77; Q 6  
56 Ev 96  
57 HC Deb, 8 June 2009, col 705–6W  
58 Ev 64  
59 Q 137  
60 Ev 64
### Table 4: The implementation of new manoeuvres: on-road or off-road

<table>
<thead>
<tr>
<th>Country</th>
<th>On-road or private ground?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>Both are possible, depending on the facilities available in the area in question</td>
</tr>
<tr>
<td>Belgium</td>
<td>Off-road</td>
</tr>
<tr>
<td>Estonia</td>
<td>Off-road</td>
</tr>
<tr>
<td>Finland</td>
<td>Off-road</td>
</tr>
<tr>
<td>Germany</td>
<td>Both are possible, but only on public roads with very little traffic</td>
</tr>
<tr>
<td>Great Britain</td>
<td>Off-road</td>
</tr>
<tr>
<td>Hungary</td>
<td>Off-road</td>
</tr>
<tr>
<td>Iceland</td>
<td>Off-road</td>
</tr>
<tr>
<td>Ireland</td>
<td>Public roads, apart from the slalom (to be carried out on a CPC compound</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>Off-road</td>
</tr>
<tr>
<td>Netherlands</td>
<td>Public roads</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>Off-road</td>
</tr>
<tr>
<td>Norway</td>
<td>Off-road</td>
</tr>
<tr>
<td>Slovenia</td>
<td>Off-road</td>
</tr>
<tr>
<td>Spain</td>
<td>Off-road</td>
</tr>
<tr>
<td>Sweden</td>
<td>Off-road</td>
</tr>
</tbody>
</table>


33. Whilst many of our witnesses accepted that Module 1 of the test should be taken off-road, they questioned the efficacy of constructing MPTCs, either because of the requirements enshrined in the EU Directive, or for reasons of road safety, customer service or the effectiveness of the test. A few EU countries allow the test in its entirety to be taken on the road, sometimes using car parks or very quiet side roads to perform test manoeuvres. Like the UK, however, the majority of countries have opted for a split test with special manoeuvres tested off-road whilst traffic and road handling skills are tested on the road (see Table 4 above). Importantly, industry representatives have highlighted that these countries are using significantly smaller test sites, making it much easier to identify suitable sites or to use existing sites. In many cases, the sites used are not bespoke motorcycle test sites. It was argued that the particular test designed by the DSA contains a number and a combination of manoeuvres not required by the EU Directive, and this in
turn means that the test requires a larger test area than is used in other European countries.62 Had the DSA taken a much more pragmatic approach to the design of the test, existing, smaller test sites as well as car parks, VOSA sites and other tarmac areas could have been used.63

The motive for introducing MPTCs—another agenda?

34. A number of submissions suggested that, despite warnings as early as 2003 that the idea of MPTCs was “fundamentally flawed”,64 the Government had effectively used the new European motorcycle test requirements as a cover for a long-standing ambition to rationalise and centralise motorcycle test provision. One driving instructor told the Committee that:

I have been in this job for 12 years. When I started there was talk of “super test centres” like the hospitals. The EU directive was the perfect excuse to implement these test centres and call them MPTCs. The main reason I have heard for opening these is that they had to follow the EU directive. It is more likely that the directive fitted their vision.65

35. The Motorcycle Action Group also highlighted a perceived underlying agenda on the part of the DSA. In their view, the DSA had identified the introduction of the new test as “an opportunity to realise financial and organisational advantages to the agency. These would accrue from disposing of part of the portfolio of high-street test centres to centralise staff and facilities at fewer, larger sites”.66

36. The Driving Standards Agency countered this view by arguing that the introduction of MPTCs did not result in any savings on staff resources, and only modest capital gains, totalling less than £1.1 million by the end of October 2009, from the disposal of existing small test sites.67 Furthermore, it is the “blacktop”, the particular tarmac required for test sites which accounts for most of the site cost, and therefore,

in order to maximise the investment, the DSA did decide […] that to make best use of the sites, we ought to run other tests from them as well. So in all but two sites we do run car testing as well as motorbike testing and we have LGV—that is large goods vehicles—in some sites as well.68
37. The expected capital cost of constructing the new Multi Purpose Test Centres was £71 million, but until all 66 centres have been constructed, we cannot know what the actual cost will be. By the beginning of July 2009, £1.72 million had been spent on adapting VOSA and casual hire sites for the test.69

The number of MPTCs required and the delay in delivery

38. According to the original DSA plan, 66 MPTCs should have been completed by September 2008. Complemented by “casual hire sites”, these were supposed to replace the then approximately 180 sites.70 The prediction was that 83% of the population would live within 45 minutes’ travel of a test site and 96% would have less than one hour’s travel to a site, had all 66 MPTCs been built. This standard “was felt to achieve a reasonable balance between cost and travel-to-test distances”.71 The DfT argued that:

the number of service delivery points represents a compromise between the costs of providing more test centres and the potential inconvenience of longer travel-to-test journeys. The set-up costs would initially need to be met from public funds but would then be recovered from fees charged to test candidates.72

39. Even with the completion of the planned number of sites, many in the industry believe test site provision would be inadequate.73 The number of test sites is not in dispute, but many submissions do not appear to believe the Department’s calculation that 88% of the population currently live within 45 minutes of a test site. Many provide anecdotal evidence from their local areas, in which students and trainers have had to travel up to 200 miles for a test.74 Particular concerns are expressed in relation to riders from rural areas,75 and to the safety of inexperienced drivers who have to undertake lengthy journeys to test sites and back.76 Some also questioned whether casual and VOSA test sites, introduced as temporary test centres until the 66 MPTCs are completed, should be counted at all, due to their limited availability and suitability.77

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69 HC Deb, 1 July 2009, col 255W
70 Qq 134–135
71 Ev 64
72 Ev 64
73 See for example Ev 29, 30, 35, and 47
74 See for example Ev 24, 27, 28, 29, 30, 50, 79, 83
75 For example Ev 47
76 See for example Ev 35
77 Q 13
Table 5: Numbers of test centres delivering Module 1 and Module 2 tests (31 August 09)

<table>
<thead>
<tr>
<th>Centres providing Module 1 (off road) tests</th>
<th>Centres providing Module 2 (on road) tests</th>
</tr>
</thead>
<tbody>
<tr>
<td>Multi-Purpose Test Centres</td>
<td></td>
</tr>
<tr>
<td>44(^{78})</td>
<td>43</td>
</tr>
<tr>
<td>Driving Test Centres(^{79})</td>
<td></td>
</tr>
<tr>
<td>-</td>
<td>62</td>
</tr>
<tr>
<td>VOSA sites (weekend testing only)</td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>-</td>
</tr>
<tr>
<td>Casual hire sites</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>1</td>
</tr>
<tr>
<td>Module 2 low use sites in Scotland</td>
<td></td>
</tr>
<tr>
<td>-</td>
<td>30</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
</tr>
<tr>
<td><strong>66</strong></td>
<td><strong>136</strong></td>
</tr>
<tr>
<td>Percentage of population within 45 minutes’ travel time</td>
<td></td>
</tr>
<tr>
<td><strong>88%</strong></td>
<td><strong>97%</strong></td>
</tr>
</tbody>
</table>

Source: Department for Transport, Ev 64, Appendix 4

40. As illustrated by Table 5 above, the situation has been exacerbated because only 44 MPTCs have been operational since the introduction of the new test in April 2009, supplemented by 22 VOSA and casual hire sites. The delay in completing the estate of new MPTCs is caused in part by difficulties in identifying suitable sites, and in part by difficulties in gaining planning permission for sites. Planning permission proved difficult to obtain partly because of opposition from local residents, and partly because “local authorities felt these centres were not direct generators of employment”.\(^{80}\) By July 2009, nine planning applications had been rejected, and three formal applications had been withdrawn after discussions with local planning authorities. Many other sites had been under consideration, but had been abandoned following informal discussions with planning authorities.\(^{81}\) However, as one submission argued,

The DSA have known about MPTCs programme for a number of years. They should have had a team capable to oversee the project. They left it very late to start the programme which they needed for the 66 designated locations across the country. As time was slipping away and desperation began to set in, sites were located more for site availability, rather than suitability of location to suit the requirements of the customer.\(^{82}\)

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78 Includes Module 1 tests being delivered from DSA’s Training and Development Centre at Cardington, Bedfordshire; see Ev 64.
79 Driving Test Centres were not suitable for delivery of the originally planned single event test; see Ev 64.
80 Ev 64
81 HC Deb, 1 July 2009, col 255W
82 Ev 96
The use of casual VOSA sites

41. To make up the shortfall in sites, the DSA negotiated the use of casual as well as VOSA test sites for motorcycle testing on a temporary basis. In order to enable a test which normally requires a larger site to be taken at such smaller ad hoc sites, a modified version of the Module 1 test was designed:

A ‘hockey stick’ configuration has been developed that enables candidates to demonstrate all the manoeuvres adequately and safely within the confines of some VOSA sites. Remedial work has been undertaken as necessary to ensure surfaces are oil free and safe.83

It is alleged, however, that such sites often have very restrictive opening hours, typically only being open for motorcycle tests at the weekends, or in some cases, Sunday only,84 and there is no possibility for candidates to practice on the site.85

42. The justification for the introduction of Multi Purpose Test Sites (MPTCs) is weak. It has not enabled the DSA to make significant savings, and only a very small capital gain has been realised. Instead, it appears to have caused significant cost and inconvenience to test candidates and trainers, with little apparent gain. The way in which the DSA weighted the convenience of consumers relative to other considerations was flawed.

43. The fact that it has been possible to adapt the new motorcycle test to be performed at much smaller casual sites clearly suggests that the test could have been designed for smaller sites. Other countries in Europe have been able to implement the new motorcycle test without resorting to ‘super test sites’.

44. The implementation of the decision to develop MPTCs has been inept. Despite a very lengthy lead-in, it appears to have come as a surprise to the DSA that there were difficulties in getting planning consent for the large test sites. The delay in launching the test and the scramble to implement temporary measures, including a modified test suitable for much smaller test sites has undermined the case for MPTCs in the first place. It has also severely damaged the trust of the motorcycling community in the DSA. It will take a long time and much resource to mend what has been broken, but the Government and the DSA now need to take urgent action to establish a way forward in collaboration with the industry.

83 Ev 64
84 Ev 50
85 Q12
5 Wider impact of the new test

The impact of the new test on motorcyclists and on business

Costs

45. Apart from the capital cost of more than £70 million to build Multi Purpose Test Centres, a key concern for many witnesses was the rise in costs for candidates and trainers resulting from the new tests. The test fees have increased—in September 2008, the old practical test cost £60, but by October 2009, the cost of the two components of the new practical test stood at £90.50. Some believe that trainee riders are inclined to save money on training to compensate for the additional cost of tests. The North West Federation of Approved Driving Instructor Associations told us that, to save money, candidates who have passed Module 1 often do not want to do any more training before Module 2, even when advised that they need it: “higher costs discourage training, and encourage a ‘scrape through’ mentality”. This is an argument that the Department and the Driving Standards Agency (DSA) rebut forcefully:

the argument that the higher fee is a major disincentive to compliance appears weak. The fee increase associated with the new test (a fee of £15.50 for a Module 1 test and £75 for a Module 2 test, from £10 and £70 respectively in October 2009) is only a small part of the total training and testing costs of obtaining a full licence to ride a motorcycle, which is typically around £750.

46. The Government admits that the original decision that Module 1 and Module 2 should be taken on the same day, at the same location, was based partly on concerns about costs expressed by industry representatives. The subsequent decision to decouple the two modules because insufficient test sites were available may have resulted in increased costs because time needs to be set aside for tests on two separate occasions, and additional training may be required in between.

47. There are also other associated costs to the industry. The DSA has offered free access to test sites for instructors to familiarise themselves with the requirements of the test as well as practice access for candidates. This should enable instructors to optimise their training and the advice given to learner riders. During the five months prior to the introduction of the new test, however, only 4.7% of the free slots on offer were taken up. Industry
representatives argued that many instructors had found it difficult to take up this offer because it meant spending time that they would otherwise have used on chargeable teaching work. The loss of revenue and the cost of travelling to a test site could amount to a significant and unrealistic cost for instructors in an industry which is still “very much in its infancy”.96

**Demand**

48. The Driving Standards Agency has indicated that there was a surge in demand for the practical motorcycle test before the introduction of the new test regime in April 2009. The Agency expects this surge, combined with the impact of modular testing to result in reduced demand throughout 2009 and 2010. It does not, however, expect the new test arrangements to have any permanent impact on the demand for tests.97

[...] levels of demand for practical motorcycling test (82,000 per year) have increased by 19% in 2007–08 and 27% in 2008–09. There was a surge in demand of around 40,000 tests. This may have been aggravated by campaigning by some motorcycling interests to encourage candidates to take their practical test before the new, more demanding test was introduced. We are now [...] seeing a reduction in demand for tests. DSA expects to see test numbers of around 20,000–30,000 below normal levels for each module in 2009–10. We predict that demand for tests will level out in 2011–2012.98

49. Whilst recognising that the recession had had some impact, motorcycling organisations highlighted that instructors across the country had seen a consistent decline in demand after the introduction of the test, with “all trainers [...] reporting a severe downturn in business, with the lowest reported at 40% down and the highest 65%”.99

50. The Motorcycle Action Group (MAG) has acknowledged that the surge in demand prior to changes in test arrangements and the subsequent decline in demand in 2009 is similar to the pattern experienced in 1996, when, the first round of significant changes to test arrangements resulting from the Second EU Driving Licence Directive were implemented. MAG argues, however, that the ‘trough’ is much deeper now than in 1996. Whilst it also acknowledges the potential impact of the recession on the demand for tests, it nonetheless maintains that structural issues, such as the “the lack of opportunity to get to an MPTC, the greatly increased cost of the test and the widely reported inadequacy of the DSA test booking systems [...] threaten to continue to suppress the demand for training and testing in future”.100

51. The four industry groups, the Motor Cycle Industry Association (MCI), the Motor Cycle Industry Trainers Association (MCITA), the Motorcycle Rider Trainers Association (MRTA), and the Motorcycle Retailers Association (MRA) allege that the DSA is

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96 Q42; see also Q 11
97 Ev 64
98 Ev 64; see also Q 123
99 Ev 50
100 Ev 79
disingenuous in claiming that “the industry’s ‘Now’s The Time’ campaign, prior to the introduction of the new motorcycle test is somehow responsible for the severe downturn in the number of tests being taken”.\textsuperscript{101} We do not have evidence to judge whether such campaigns influenced significant numbers of motorcyclists to take the test earlier than they otherwise would have done.

**The impact on businesses**

52. Many motorcycle trainers and their organisations have indicated that the economic impact of the new test on business has been severe. It is impossible to determine whether the deterioration of business has been caused by the recession or the new test regime, but together, the two factors have clearly hurt at least parts of the industry badly. An instructor from Wales told us that his income had dropped by 80\% when comparing the May to August period of 2008 to the same period in 2009.\textsuperscript{102} Others told us of redundancies and fear for the survival of their businesses.\textsuperscript{103}

53. Our evidence also highlighted the amount of time lost by instructors when having to accompany students to the new test centres, and noted the impact of this on their businesses.\textsuperscript{104} The BMF noted that some training schools had felt the need to purchase large training areas, at significant expense, so as to be able to offer training facilities equivalent to those used at test sites.\textsuperscript{105} MAG observed that the reduction in the number of test sites and the distance trainers and riders now had to travel to centres was challenging the viability of many motorcycle instructors’ businesses. Whilst some instructors and training schools have been able to invest in buses and trailers to transport their learner riders to and from test centres, others have either not been able to do so, or have found that it was not economically viable for them. The peaks and troughs of demand in connection with the introduction of the new test have only exacerbated the situation, and some have had to cease trading.\textsuperscript{106}

54. Few positive opportunities were identified in the evidence we received. However, several hinted at the need for an attitude shift to motorcycle training, and PACTS indirectly pointed to an opportunity for the industry, highlighting that the new “testing procedure should encourage longer, more technical training”.\textsuperscript{107}

55. **There is no doubt that the introduction of the new motorcycle test and Multi Purpose Test Centres has had a significant impact on the motorcycling industry in the UK. So far, this impact has been primarily negative.** Although we have no reason to believe that the decline in demand for training and tests is permanent, the temporary dip in demand is critical to parts of the industry. The Government needs to support the

\textsuperscript{101} Ev 50  
\textsuperscript{102} Ev 47  
\textsuperscript{103} Ev 47  
\textsuperscript{104} See for example Ev 83  
\textsuperscript{105} Ev 77  
\textsuperscript{106} Ev 79  
\textsuperscript{107} Ev 87
industry better in alleviating these problems, and assist it in developing and harnessing the opportunities that also arise from the new test regime.

**Impact on motorcycle road safety**

56. The objective for the introduction of the new test was to improve road safety among motorcyclists by reducing the exceptionally high rate of deaths and serious injuries in this group of road users. Whilst casualties among other road users have declined massively over the past 15 years, the improvement has been much less significant among motorcyclists, as illustrated in Table 6. It is too early to tell whether the new test will help in meeting this objective, and the outcome is likely to depend on the handling of the new regime from here on. If the number of unlicensed drivers on our roads simply increases, and the motorcycle training industry shrinks, then the impact on road safety is likely to be negative. If the industry is able to develop training standards, and the average skill level of riders on the roads is increased, there could be a significant positive impact on safety.

| Table 6: Reported road casualties: provisional figures ending third quarter 2009: GB |
|---|---|---|---|---|---|
| | Killed or seriously injured | | Slightly injured | |
| Motorcycle users | 6,475 | 5,920 | -9% | 17,547 | 15,150 | -14% |
| All other road users | 41,181 | 21,570 | -48% | 254,725 | 180,340 | -29% |

Source: Department for Transport, Transport Statistics Bulletin Q3 2009

57. It is important not to expect the new test regime alone to produce dramatic changes in the road safety of motorcyclists. Nich Brown of MAG emphasised that the majority of motorcycle accidents resulted from collisions with cars, most frequently caused by car driver error.108 Whilst one in five motorcycle casualties was likely to be caused by rider error, almost one in six was caused by road design. Given these statistics, Mr Brown highlighted the importance of widening our perspective rather than focusing narrowly on the motorcyclist. In his view, “there is very little understanding of the dynamics of motorcycle control, the situations that riders face, and how to engineer roads and how to share roads with motorcyclists in a way that is going to reduce collisions.”109 Responding in part to this point, Ms Thew of the Driving Standards Agency noted that awareness of motorcyclists is taught to trainee car drivers as part of the theory test.110 Mr Carey-Clinch of the Motorcycle Industry Association (MIA) emphasised the importance of taking a holistic view of motorcycle safety and the need for co-ordination between the training and testing policies of the DSA, with the wider road safety strategy led by the DfT. He argued

108 Q 25
109 Q 29
110 Q 87
that the DfT, rather than the DSA, should take charge of key policy decisions on motorcycle training and testing.\textsuperscript{111}

58. The Parliamentary Advisory Council for Transport Safety (PACTS) suggested that whilst it is too early to draw conclusions about the road safety impact of the new test, it is, in principle,

   vital that skills are adequately tested before riders become fully qualified. It therefore seems appropriate that the new test place higher demands on the learner rider, preparing him/her for what we already know to be high risk conditions on the road. The greater the level of exposure to risk within the controlled conditions of learning, the better prepared a rider will be once s/he has gained a full licence.\textsuperscript{112}

PACTS emphasised that, if the rate of accidents during tests was found to be too high, the reaction needs to be “to ensure that adequate training is given to learners and to instructors for whom the testing is new”.\textsuperscript{113}

59. The development of better awareness of motorcyclists among other road users is crucial to the improvement of motorcycle safety. Whilst a significant proportion of motorcycle accidents are solo incidents, the high number of collisions with other road users should not be neglected. The DSA has already made good progress in incorporating this issue into the driving theory test, and we expect this approach to be developed further over the next few years.

\textit{The quality of motorcycling training}

60. The importance of developing the quality and consistency of motorcycle training (as opposed to testing) was raised by several witnesses. Mr Manning from the Motorcycle Industry Trainers Association (MCITA) noted that the industry is still in its infancy,\textsuperscript{114} and called for better support and oversight by the Driving Standards Agency (DSA). With reference to Compulsory Basic Training, he argued that,

   with more resource maybe the DSA could put people out to go and oversee Compulsory Basic Training on a much more regular basis. At the moment it is very piecemeal and very random as to which instructors get tested on what they teach their pupils. It is very, very piecemeal.\textsuperscript{115}

61. The Parliamentary Advisory Council for Transport Safety (PACTS) questioned whether the quality and availability of training for instructors is adequate to enable them to teach the new test requirements to learner riders. PACTS noted that the absence of a syllabus or framework for motorcycle training made it difficult to make any assessment of the quality of training given.\textsuperscript{116} The registration of motorcycle instructors with the DSA is

\textsuperscript{111} Q 31
\textsuperscript{112} Ev 87
\textsuperscript{113} Ev 87
\textsuperscript{114} Q 42; see also Q 64
\textsuperscript{115} Q 21
\textsuperscript{116} Ev 87
voluntary, and Mr Gifford from PACTS pointed to mandatory registration along with better support for trainers from the DSA as potential first steps in raising standards, turning instructors into teachers rather than trainers going through a mechanical exercise.\textsuperscript{117} In its response to our 2007 report, The Government’s Motorcycling Strategy, the Government indicated that registration of motorcycle instructors would become mandatory in due course.\textsuperscript{118} The voluntary registration of motorcycle instructors should now be made mandatory.

62. Mr Tuffery, representing Road Safety GB, highlighted that motorcycle training has to do more than simply teach learner riders how to carry out a series of manoeuvres safely. Coaching new motorcyclists to develop the right attitudes is equally important.\textsuperscript{119} Mr Gifford of PACTS concurred, noting that past research had demonstrated that “you can give motorcyclists terrific skills but if they do not have the right attitude, they will still die, unfortunately.”\textsuperscript{120}

63. \textit{It is important to get the test for new motorcyclists right, but the crucial objective of reducing deaths and serious injuries among motorcyclists is unlikely to be met without renewed emphasis on the way learner riders are trained. The Driving Standards Agency (DSA) needs to focus on developing the consistency and quality of training in the Compulsory Basic Training, and beyond. The development of good skills and judgement of situations on the road is important, but training needs to focus equally on developing the attitudes of riders. The DSA needs to take the lead in raising training standards by developing strategies to support the training industry rather than simply imposing additional burdens on it.}

\textbf{Unlicensed riding}

64. Black Country Motorcycle Training (BCMT), among others, has argued that the new test is likely to result in significantly more moped and motorcycle riders riding without a licence. To do this they simply retain their L plates and they are able to ride a 125 cc motorbike purely on the basis of their Compulsory Basic Training (CBT) for two years. After two years, they can re-take their CBT, and then ride a further two years without a full licence:

we have seen a huge decrease in the number of people attempting to take the DSA test at all. Prospective candidates have been discouraged by the new test and have therefore found riding a 125 cc machine, having completed only the CBT training, to be a cheaper and easier option. We have also seen an increase in the amount of illegal riders with candidates taking the CBT training then riding a machine over 125cc without having taken any further training.\textsuperscript{121}

\begin{itemize}
\item \textsuperscript{117} Q 64
\item \textsuperscript{119} Q 70
\item \textsuperscript{120} Q 71
\item \textsuperscript{121} Ev 33; see also Ev 48
\end{itemize}
65. Representatives from several of the large industry organisations, however, accepted that it was too early to tell whether the rate of unlicensed drivers has increased as a result of the new test.\textsuperscript{122} The DSA has recognised concerns that raising the test standard and increasing the cost might cause increases in unlicensed riding, but argues that the cost increase is too minor to have this effect on demand, particularly in light of the cost of acquiring a motorbike.\textsuperscript{123} As we discuss on page 29 below, the Government needs to ensure that adequate data is collected on issues such as unlicensed riding so that trends can be appropriately monitored. The Government needs to collect the necessary data and monitor very carefully whether there is an increase in unlicensed motorcycle riding. If such riding were to increase, the best way forward is not to relax the requirements of the motorcycle test, but rather to strengthen enforcement.

**Gold plating the European Directive?**

66. As indicated in evidence quoted in earlier chapters, there is a widely held view that the British Government has gold-plated the implementation of the EU directive. The British Motorcyclists’ Federation commented that:

> the off-road motorcycle tests go above and beyond what is actually required by the directive. The DSA claim that this is not ‘gold plating’; however, they cannot escape the fact that the motorcycle test now includes at least four low speed manoeuvres (not including any occurring on-road) as opposed to the two mandated and various other manoeuvres, such as the swerve and controlled stop, coupled together in such a way as to make them more difficult.\textsuperscript{124}

67. Many other submissions, including the joint submission from the MCIA, MCITA, MRTA, and MRA echo these concerns. With particular reference to Module 1 of the test, the four industry organisations claim that the new UK test exceeds EU requirements by including both additional and duplicated manoeuvres, and that it is only because of the specific test design produced by the DSA that an off-road test is required at all, and that the off-road test site needs to be so large so as to create planning problems.\textsuperscript{125}

68. There is little doubt that the Government has exceeded what was necessary to comply with the EU Directive in terms of motorcycle testing. It is less easy, however, to judge whether other objectives can justify the approach taken. There is no question that the current rate of deaths and serious injuries among motorcyclists requires decisive Government action. In doing so, the Government has to balance measures to reduce road deaths with the need to ensure the continued health of the motorcycle training industry. We believe the Government was right to go beyond the minimum requirement of the Directive in some aspects of the test, including the addition of an off-road test (Module 1) to the expanded on-road practical test (Module 2). It is the development of Multi Purpose Test Centres which represents the least effective element of the implementation of the Directive.

\textsuperscript{122} Q 6 and Q 34
\textsuperscript{123} Ev 64
\textsuperscript{124} Ev 77
\textsuperscript{125} Ev 50
6 Handling by the Driving Standards Agency and the Department for Transport

69. Some of our witnesses voiced criticism of the way in which particular issues have been handled by the DfT or the DSA in connection with the training and testing of motorcyclists.

Consultation and collaboration with industry and interest groups

70. Parts of the motorcycling community are critical of the DSA because they feel the Agency has failed to engage constructively with the community in optimising the new test arrangements:

   MAG and others have made suggestions as to alternative arrangements and, most crucially, the need to demonstrate sound methodology in devising safe and appropriate tests that are meaningful in both wet and dry conditions. These have been dismissed.\textsuperscript{126}

The Motorcycle Industry Association (MCI) indicated that they had held regular monthly meetings with DSA representatives during the test planning phase, but that subsequently promises made to test suggested alternative manoeuvres had not been fulfilled.\textsuperscript{127} Karen Cooke of the MCI also highlighted, however, that in some contexts, collaboration and consultation with the DSA had worked well.\textsuperscript{128} Craig Carey-Clinch from the Motorcycle Industry Association (MIA) suggested that the DSA generally does a good job, but that the implementation of the Second Directive had left a stain on an otherwise good record.\textsuperscript{129}

71. The development of Multi Purpose Test Centres (MPTCs) has been beset by a range of problems, not least the shortage of sites and the distances which instructors and candidates have to travel to the sites. Some witnesses also suggested that the DSA had been unacceptably slow in dealing with problems at the centres themselves, for example shortages of examiners, long waiting times for tests, problems with the test booking systems.\textsuperscript{130}

72. The centralised system for booking motorcycle tests comes in for heavy critique from parts of the industry. Trainers cannot book 'usable blocks' of tests, the computer system has thrown up a series of problems and errors, and the system is inflexible and difficult to use.\textsuperscript{131} The system also proved incapable of handling the split Module 1 and Module 2 tests

\textsuperscript{126} Ev 79
\textsuperscript{127} Q 5
\textsuperscript{128} Q 30
\textsuperscript{129} Q 38
\textsuperscript{130} Ev 34; see also Ev 50 and 79
\textsuperscript{131} Ev 50; see also Ev 30
which resulted from the shortage of test centres.\footnote{Ev 50} When appearing before us, the Minister, Paul Clark MP, said that the booking system was under review.\footnote{Q 101}

73. Nich Brown of Motorcycle Action Group (MAG) argued that it could be helpful to break the DSA’s monopoly on test examinations, leaving the agency to concentrate on regulating and enforcing regulations across the industry:

> there is no competition in examining motorcycle riders for licence. Whereas it might seem natural for one single government executive agency to determine whether somebody has passed a test, there are lots of professional areas, for instance lawyers, doctors, teachers and so on, where it is not the government department itself or an executive agency of it that decides whether somebody is fit to practise. If we want to truly professionalise the rider training industry and to give a more professional way of riding to new riders, I actually think it would be better if the DSA focused on setting standards and ensuring they were met in examinations that were offered by a range of providers who could bring innovation and more efficient ways of doing things to the motorcycle examination process.\footnote{Q 36}

74. The joint submission from the MCIA, MCITA, MRTA, and MRA praises Ministers for their handling and interventions when it became apparent that there was going to be insufficient geographical coverage of Multi Purpose Test Centres, and a delay to the introduction of the new test had become inevitable. They continue: “It seems that greater Ministerial oversight could be provided when it comes to the DSA’s handling of motorcycle testing and training, providing greater accountability to Ministers, senior officials, and the motorcycle community.”\footnote{Ev 50}

75. Overall, the Driving Standards Agency and the Department for Transport have handled the introduction of the new European Motorcycle test less well than we would have hoped. Relations with parts of the industry and interest groups have been strained. The introduction of MPTCs has been very poor, and the failure speedily to rectify problems with the test booking service also served as an irritant to an industry already suffering the inevitable spikes in demand for training and tests either side of the introduction of a new test regime. Such experiences damage trust and mutual respect, and the DSA cannot afford to let the current situation run for long.

### The availability of statistics

76. Sound evaluations of the impact of the new test as well as the wider training regime for motorcyclists on road safety will depend on the availability of robust and reliable data. Our questioning of witnesses revealed that key data simply is not collected. For example, there is no data on the rates of accidents among motorcyclists who have taken only the Compulsory Basic Training (CBT) and never passed a test.\footnote{Q 74} Neither is data collated on the

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\footnote{Ev 50} Ev 50
\footnote{Q 101} Q 101
\footnote{Q 36} Q 36
\footnote{Q 50} Q 50
\footnote{Q 74} Q 74
length of time between motorcyclists taking their CBT and proceeding to take a test. The Government’s assurances that data exists on the number of people who take the CBT and the number who take the motorcycling tests does not help us to establish the relative safety of people riding with and without taking a test, nor does it give us any indication of the number of people who are riding on the public highway without ever having passed the test. The DfT’s supplementary evidence did not shed further light on this issue either. As Mr Gifford of PACTS observed with good common sense, “we need to know more about what the problem is before we can know what the solution is.”

As we have said in different contexts before, the collection of robust and reliable road safety statistics is crucial. The Government needs to look urgently at the data required to make sound, evidence-based decisions about the motorcycle training and testing required to meet the objective of reducing deaths and serious injuries among motorcyclists. Current data is insufficient, and the DfT should ensure that changes are implemented quickly to ensure that adequate data is collected.

7 Conclusion

78. The introduction of the new European motorcycle test in the UK has not gone smoothly and efficiently, despite a very long lead-in period. An opportunity to work closely with the industry to improve road safety for motorcyclists and other road users through better motorcycle training and testing has, at least in part, been missed.

79. We broadly support the approach the Government has taken to the test itself. We do not agree with some witnesses that the EU Directive has been ‘gold-plated’ by the inclusion of too many, or too taxing exercises in the UK version of the test. We are confident that, in itself, the new test could help to improve the standards of motorcycling, but by failing to obtain a derogation from the EU Directive on the speed requirement and by insisting on the introduction of Multi Purpose Test Centres, the Government has failed to apply common sense and work flexibly with the industry. If the result is that more riders refrain from taking the test, either riding illegally or continuing to ride on the basis of their CBT the new test could yet turn out to be a retrograde step. We do not yet know whether this is the case, but the data, which will eventually be able to tell us either way, needs to be collected.

80. Other EU countries have implemented the new motorcycle test without any need for large test sites, equivalent to Multi Purpose Test Centres (MPTC). It is tempting to conclude that other priorities may have coloured the Government’s decision to implement MPTCs in the UK. This has been an expensive adventure, but the Government now needs to look forward and make the best of it. The focus on large ‘super-sites’ should be accompanied by a renewed emphasis on customer convenience and value for money. This
will probably mean retaining some smaller test sites, which in turn may require the retention of a modified version of the test which can be performed at comparatively small sites.

81. The Driving Standards Agency (DSA) has done some good work in relation to the new motorcycle test, but the dogmatic approach to some issues as well as the failure to introduce the test smoothly and on time is a matter of great concern to us. We expect to see rapid progress on the development of a more customer-focused approach to the booking and delivery of tests. This has implications for the number and geographical spread of test sites, site opening hours, practice sessions and test booking systems.
Conclusions and recommendations

The new motorcycle test

1. It is difficult to see why the Government failed to obtain a derogation from the 50 km/h speed requirement for certain elements of the Module 1 test. Testing riders at a speed which exceeds the standard limit in built-up areas is both inconvenient and confusing for candidates. Requiring test candidates to drive according to a scale of measurement not widely used in the UK is bizarre. Furthermore, the absence of a derogation serves to limit the options available to future Governments, who will not be able to merge the Module 1 test elements into the Module 2 on-road test, should they wish to follow the example set by some other EU Member States. It is unacceptable that the Minister was unable to offer any satisfactory explanation for the Government’s decision not to seek a derogation. (Paragraph 21)

2. The new off-road test, combined with the extended on-road test (Module 2), could be an important step towards improving the skills and judgement of motorcyclists on our roads. Module 1 tests agility, control and assessment of speed, distances and braking scenarios, and we think it is appropriate that this should take place in the comparative safety of the off-road environment. Module 2 tests the rider’s ability to assess real situations on the road as well as the interaction with other road users. It is, however, important to take account of concerns expressed by the motorcycle industry, and consider what adjustments might be required. (Paragraph 24)

3. The rate of incidents and accidents occurring in Module 1 tests need to be monitored carefully, and the DSA needs to react without delay if incident levels do not decline. The DSA must be prepared to make adjustments to the test design if required, and it must work closely with the industry to ensure that candidates only attempt the test when they are genuinely ready for it. This requires a culture shift, and the DSA must help and encourage the industry in every way possible to achieve this. (Paragraph 26)

4. There is no doubt that training and instruction for the motorcycle test needs to develop and change to reflect the new test requirements. This is not a bad thing. It provides an opportunity to raise standards and develop a culture where good training is encouraged and valued. (Paragraph 27)

5. The off-road motorcycle test effectively bars candidates from adapting their riding to reflect the prevailing weather, road and other circumstances affecting their stopping distances. This cannot be appropriate, and we urge the Government to amend the regulations on this point as soon as possible. We note that it is the Government’s implementation rather than the EU Directive which has caused this problem. It should therefore be straightforward to rectify. (Paragraph 29)

Multi Purpose Test Centres (MPTCs)

6. The justification for the introduction of Multi Purpose Test Sites (MPTCs) is weak. It has not enabled the DSA to make significant savings, and only a very small capital
gain has been realised. Instead, it appears to have caused significant cost and inconvenience to test candidates and trainers, with little apparent gain. The way in which the DSA weighted the convenience of consumers relative to other considerations was flawed. (Paragraph 42)

7. The fact that it has been possible to adapt the new motorcycle test to be performed at much smaller casual sites clearly suggests that the test could have been designed for smaller sites. Other countries in Europe have been able to implement the new motorcycle test without resorting to ‘super test sites’. (Paragraph 43)

8. The implementation of the decision to develop MPTCs has been inept. Despite a very lengthy lead-in, it appears to have come as a surprise to the DSA that there were difficulties in getting planning consent for the large test sites. The delay in launching the test and the scramble to implement temporary measures, including a modified test suitable for much smaller test sites has undermined the case for MPTCs in the first place. It has also severely damaged the trust of the motorcycling community in the DSA. It will take a long time and much resource to mend what has been broken, but the Government and the DSA now need to take urgent action to establish a way forward in collaboration with the industry. (Paragraph 44)

Wider impact of the new test

9. There is no doubt that the introduction of the new motorcycle test and Multi Purpose Test Centres has had a significant impact on the motorcycling industry in the UK. So far, this impact has been primarily negative. Although we have no reason to believe that the decline in demand for training and tests is permanent, the temporary dip in demand is critical to parts of the industry. The Government needs to support the industry better in alleviating these problems, and assist it in developing and harnessing the opportunities that also arise from the new test regime. (Paragraph 55)

10. The development of better awareness of motorcyclists among other road users is crucial to the improvement of motorcycle safety. Whilst a significant proportion of motorcycle accidents are solo incidents, the high number of collisions with other road users should not be neglected. The DSA has already made good progress in incorporating this issue into the driving theory test, and we expect this approach to be developed further over the next few years. (Paragraph 59)

11. The voluntary registration of motorcycle instructors should now be made mandatory. (Paragraph 61)

12. It is important to get the test for new motorcyclists right, but the crucial objective of reducing deaths and serious injuries among motorcyclists is unlikely to be met without renewed emphasis on the way learner riders are trained. The Driving Standards Agency (DSA) needs to focus on developing the consistency and quality of training in the Compulsory Basic Training, and beyond. The development of good skills and judgement of situations on the road is important, but training needs to focus equally on developing the attitudes of riders. The DSA needs to take the lead in
raising training standards by developing strategies to support the training industry rather than simply imposing additional burdens on it. (Paragraph 63)

13. The Government needs to collect the necessary data and monitor very carefully whether there is an increase in unlicensed motorcycle riding. If such riding were to increase, the best way forward is not to relax the requirements of the motorcycle test, but rather to strengthen enforcement. (Paragraph 65)

14. There is little doubt that the Government has exceeded what was necessary to comply with the EU Directive in terms of motorcycle testing. It is less easy, however, to judge whether other objectives can justify the approach taken. There is no question that the current rate of deaths and serious injuries among motorcyclists requires decisive Government action. In doing so, the Government has to balance measures to reduce road deaths with the need to ensure the continued health of the motorcycle training industry. We believe the Government was right to go beyond the minimum requirement of the Directive in some aspects of the test, including the addition of an off-road test (Module 1) to the expanded on-road practical test (Module 2). It is the development of Multi Purpose Test Centres which represents the least effective element of the implementation of the Directive. (Paragraph 68)

Handling by the Driving Standards Agency and the Department for Transport

15. Overall, the Driving Standards Agency and the Department for Transport have handled the introduction of the new European Motorcycle test less well than we would have hoped. Relations with parts of the industry and interest groups have been strained. The introduction of MPTCs has been very poor, and the failure speedily to rectify problems with the test booking service also served as an irritant to an industry already suffering the inevitable spikes in demand for training and tests either side of the introduction of a new test regime. Such experiences damage trust and mutual respect, and the DSA cannot afford to let the current situation run for long. (Paragraph 75)

16. As we have said in different contexts before, the collection of robust and reliable road safety statistics is crucial. The Government needs to look urgently at the data required to make sound, evidence-based decisions about the motorcycle training and testing required to meet the objective of reducing deaths and serious injuries among motorcyclists. Current data is insufficient, and the DfT should ensure that changes are implemented quickly to ensure that adequate data is collected. (Paragraph 77)

Conclusion

17. The Driving Standards Agency (DSA) has done some good work in relation to the new motorcycle test, but the dogmatic approach to some issues as well as the failure to introduce the test smoothly and on time is a matter of great concern to us. We expect to see rapid progress on the development of a more customer-focused approach to the booking and delivery of tests. This has implications for the number and geographical spread of test sites, site opening hours, practice sessions and test booking systems. (Paragraph 81)
Appendix: Module 1 test circuit layout

MOTORCYCLE
MANOEUVRING
Left Circuit
1 On and off the stand
2 Wheel the machine
3 Slalom
4 Figure of eight
5 30 kph / 19 mph circuit ride
6 50 kph / 32 mph avoidance
7 Controlled stop
8 U-turn
9 Slow ride
10 30 kph / 19 mph circuit ride
11 50 kph / 32 mph emergency brake

MOPEDS
For all mopeds, speed requirements are 30 kph / 19 mph
MOTORCYCLE MANOEUVRING
Right Circuit
1 On and off the stand
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MOPEDS
For all mopeds, speed requirements are 30 kph / 19 mph
Formal Minutes

Wednesday 10 March 2010

Members present:

Mrs Louise Ellman, in the Chair

Rt Hon Jeffrey Donaldson  Mr Eric Martlew
Mr Philip Hollobone  Graham Stringer
Mr John Leech

Draft Report (The new European motorcycle test), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 81 read and agreed to.

A Paper was appended to the Report.

Resolved, That the Report be the Sixth Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

Written evidence was ordered to be reported to the House for printing with the Report.

Written evidence was ordered to be reported to the House for placing in the Library and Parliamentary Archives.

– Streetwise Motorcycle Training

[Adjourned till Wednesday 17 March at 2.30 pm]
Witnesses

Wednesday 14 October 2009

Mrs Karen Cooke, Director of Safety, Motorcycle Industry Association (MCI); Mr Craig Carey-Clinch, Public Affairs Advisor, Motorcycle Industry Association (MCI); Mr Steven Manning, Vice Chairman, Motorcycle Industry Trainers Association (MCITA); Mr Nich Brown, General Secretary, Motorcycle Action Group (MAG); and Mr Chris Hodder, Government Relations Executive, British Motorcyclists' Federation (BMF)

Mr Robert Gifford, Executive Director, Parliamentary Advisory Council for Transport Safety (PACTS); and Mr Gareth Tuffery, Motorcycle Advisor, Road Safety GB

Mr Paul Clark MP, Parliamentary Under Secretary of State for Transport; Ms Rosemary Thew, Chief Executive, and Ms Lesley Young, Deputy Chief Driving Examiner, Driving Standards Agency (DSA)

List of written evidence

1  Donald Cambell  Ev 24
2  Mrs D Bennett  Ev 24
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6  Ken Taylor  Ev 29
7  Road Safety GB  Ev 29
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15  The North West Federation of Approved Driving Instructor Associations  Ev 48
16  Motor Cycle Industry Association (MCI) and Motor Cycle Industry Trainers Association (MCITA), Motorcycle Rider Trainers Association (MRTA) and Motorcycle Retailers Association (MRA)  Ev 50, 57
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23 Warrington Independent Professional Driving Instructors Association Ev 85
24 Parliamentary Advisory Council for Transport Safety (PACTS) Ev 87, 89
25 Neil Hopkins Ev 91
26 Christopher Owens Ev 92
27 Trudi O’Connell Ev 92

List of unprinted evidence

The following written evidence has been reported to the House, but to save printing costs has not been printed and copies have been placed in the House of Commons Library, where they may be inspected by Members. Other copies are in the Parliamentary Archives (www.parliament.uk/archives), and are available to the public for inspection. Requests for inspection should be addressed to The Parliamentary Archives, Houses of Parliament, London SW1A 0PW (tel. 020 7219 3074; email archives@parliament.uk). Opening hours are from 9.30 am to 5.00 pm on Mondays to Fridays.

Streetwise Motorcycle Training
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Oral evidence

Taken before the Transport Committee
on Wednesday 14 October 2009

Members present
Mrs Louise Ellman, in the Chair
Mr John Leech
Mr Eric Martlew
Mark Pritchard
Ms Angela C Smith
Sir Peter Soulsby
Graham Stringer
Sammy Wilson

 Witnesses: Ms Karen Cooke, Director of Safety, Mr Craig Carey-Clinch, Public Affairs Advisor, Motorcycle Industry Association; Mr Steven Manning, Vice Chairman, Motorcycle Industry Trainers Association; Mr Nich Brown, General Secretary, Motorcycle Action Group; and Mr Chris Hodder, Government Relations Executive, British Motorcyclists Federation, gave evidence.

Chairman: Good afternoon and welcome to the Transport Select Committee. Could I ask Members if they have any interests to declare?
Ms Smith: Member of Unison and the GMB.
Graham Stringer: Member of Unite.

Q1 Chairman: Louise Ellman, member of Unite and the co-chair of PACTS. Could I ask our witnesses to identify yourselves for our record?
Mr Manning: My name is Steve Manning, I am Vice Chairman of the Motorcycle Industry Trainers Association. I also run a motorcycle training school down at Gatwick Airport.
Mr Carey-Clinch: Craig Carey-Clinch, Public Policy Advisor to the Motorcycle Industry Association.
Ms Cooke: Karen Cooke, Director of Safety for the Motorcycle Industry Association.
Mr Hodder: Chris Hodder, Government Relations Executive for the British Motorcyclists Federation.
Mr Brown: Nich Brown, the General Secretary of the Motorcycle Industry Trainers Association.

Q2 Chairman: You say that the new test in Britain contains more manoeuvres than are required by the EU Directive. Could you tell us briefly exactly what those manoeuvres are and could you also say whether you regard that Directive as something that is a minimum standard or something that has to be a maximum? In other words, why is it wrong to make something more than the Directive says? Does that mean better?
Mr Carey-Clinch: I can answer the second point. The Directive is regarded as a minimum standard. European countries had great leeway in how they chose to implement that Directive and certainly it is felt by the motorcycle community and the training industry that an opportunity was lost in terms of improving the current test and instead choosing to go with a very complicated arrangement which introduced a number of question marks over its suitability for the type of environment that riders face in this country.
Mr Manning: What is different? The test itself is designed to test people’s ability on a motorcycle, which is a good thing, but what we have ended up with is two modules to the test which has seriously complicated the issue of actually obtaining a licence in the first place. This matching of tests is an issue. The actual manoeuvres that are carried out in the off-road areas, in what we are call now Module 1, there is a little bit of gold-plating gone on with how many manoeuvres we have done. We are not calling into question everything. It is just that when the test was trialled over the previous three or four years, as we are led to believe, I do not believe there was actually enough trialling of the cross-section of people that you are going to get taking the motorcycle test, as in you cannot factor in the fact that people are nervous or apprehensive about taking the test. I think we ended up with quite a lot of more experienced motorcyclists trialling the manoeuvres for the test in the first place, which is why it has led to a lot of people having a little bit of a fear of actually taking the test now because bad reporting has led to a lot people believing that the test is actually dangerous, which is questionable; it is not dangerous but it is certainly harder.

Q3 Chairman: When there is such a high accident and death rate amongst motorcyclists, could this not be seen as a good thing to have a test that is stringent and perhaps difficult to pass?
Mr Brown: I think from a rider’s point of view our members are extremely aware of the most common form of accident that involves a motorcycle, which is around a junction and normally is precipitated by a car pulling out from the junction, so on that basic testing, a rider’s ability to avoid that kind of situation in itself is not a bad idea. I think where our members feel extremely aggrieved is that there does not seem to be any kind of equal pressure put on new car drivers. For instance, if we introduce something as simple as asking candidates in the car test to utter the words “think bike” at every junction, so that it put them in mind of bicyclists and motorcyclists and the possibility that they might run into them if they do not look correctly, or indeed if car drivers were being asked to prove that they could safely perform an emergency stop from 30 mph. Most car drivers do not even attempt an emergency stop as part of their
car test, as far as I understand it. When you add into that the increased cost and complexity and the completely inadequate number of test centres that motorcyclists can go to, they see a picture that has emerged where a relatively sensible addition to the test that we all know, which is largely unchanged, has resulted in something that has made things massively more expensive and more difficult to access and, frankly, does not seem to them to address the root of the problem, which is drivers at junctions not necessarily looking carefully enough for cyclists and motorcyclists.

Q4 Chairman: Do you see no value at all in the “swerve to avoid manoeuvre”? Is that not designed to deal with motorcyclists not colliding with car doors, for example, which does cause accidents?

Mr Brown: The car door is actually something of a red herring. There are extremely few recorded accidents that involve motorcyclists striking a car door. As I say, I think this is one for proportionality. We do not object in principle to being tested that we can avoid those sorts of hazards. What we are saying is that when you look at the majority of the sources of those hazards that it requires car drivers also to be tested in the same way.

Mr Carey-Clinch: Taken together with the new testing Module 1 test, what we are seeing is a replication in many ways of the old part one test which was abolished in 1990 and replaced with Compulsory Basic Training, for very good reasons, one of those being that replicating things that physically happen on the road was not being adequately done under that old regime, and if you look at something like coupling the brake and swerving manoeuvre together, which is not called for in the Directive, there are very few, if any, situations when a serve would be done followed by an emergency stop. A swerve is normally done to avoid a hazard rather than for an emergency stop straight after.

Mr Manning: The biggest point of contention about Module 1 is that we are having to perform the avoidance manoeuvre at the set 50 kph and then immediately afterwards having to come into a controlled stop and it is a very prescriptive test in that it makes no allowances for wet weather conditions or dry weather conditions, the stopping distance is exactly the same. This is where we are led to, if candidates who are nervous or apprehensive coming through, they have got to perform in their mind two things at the same time. They have to change direction and then think about stopping immediately, and no amount of training is going to stop them panicking and grabbing a big handful of front brake, if they are thinking about two things at once, which a lot of them are.

Q5 Chairman: What discussions have you had with the Driving Standards Agency about the swerving manoeuvre?

Ms Cooke: We have been having regular meetings with the Driving Standards Agency. They started meeting us on a monthly basis with the planning of the test, which was very good and we all met together, but when accidents started to happen with the test, we were obviously concerned and put forward some considerations. At that last meeting we were told that the Driving Standards Agency would go away and consider possibly testing some of the manoeuvres that we had suggested as alternatives and we left the meeting hoping that that would happen. Unfortunately it did not for one reason or another. I think the Driving Standards Agency wanted to collect more data before they thought about it.

Q6 Graham Stringer: Can I go back to what Mr Manning was saying about motorcyclists being reluctant to take the test because of its reputation. Is there any evidence that that is leading to more motorcyclists driving without licences?

Mr Manning: I think it could be, yes. It is probably too early to say. We have not got any figures of more people driving illegally but with the lack of availability of test centres and the amount of tests that we can actually do, which is definitely going down, you have to say in the future is that going to lead to more people not taking the test and just taking a bike without a licence? If you reduce the amount of training companies that are actually out there able to earn a living then there are fewer training companies able to offer the Compulsory Basic Training in the first place.

Mr Carey-Clinch: Can I just add something here. The splitting of the original proposal into Module 1 and Module 2 tests on the face of it is something we support and there is still quite a lot of support for that concept out there. Our main concern was that the flexibility shown at that point—I should add with the assistance of ministers and also with the desire of DSA officials to make it work—unfortunately did not result in the kind of flexibility that would have meant that we could remove the logjam that the lack of availability of Module 1 test sites represented. The number of tests has fallen, depending on where we are: 66% down in GB as a whole and in Scotland and Wales it is in excess of 70% down. If you look at the downturn in the economic climate and the reduction of bike sales that cannot account for such a large fall so we are seeing people out there who are meeting that logjam of not being able to get a test and are obviously choosing to continue to ride on L-plates, which is really not a very good situation.

Q7 Graham Stringer: Or not using L-plates as the case may be?

Mr Carey-Clinch: Yes.

Q8 Graham Stringer: Is the real problem in arriving at this situation that the Government did not look for a derogation from the 50 kph standard? Had they used 30 mph what difference would that have led to in terms of the test? Could the test still have been done on roads?
**Mr Carey-Clinch:** It is a very debatable point but certainly with that freedom to use 30 mph limits to conduct certain aspects of the test we may not have needed such a radical interpretation of what has actually happened. We have in fact collated what has gone on in the rest of Europe and we will be pleased to submit that to the Committee after this and, as you can see, adaptations of existing tests, the use of car parks and quiet areas is more the path that other European countries have taken. The lack of derogation means that we are actually restricted in what we can do. Clearly you could use a 40 mph limit for certain manoeuvres but some of those roads are a little bit quicker in terms of traffic so that may not be deemed as appropriate. However, our lack of room for manoeuvre because of the lack of that derogation has been a major factor, yes.

**Q9 Graham Stringer:** You say you have collated all the different European examples. What would be the model? Which is the country that has done it best? Where is it best to be a learner motorcyclist?

**Mr Carey-Clinch:** Germany’s road safety record traditionally has been a great deal better in certain circumstances. That is one to look at. It is difficult to tell because there is subjectivity on how motorcycles are used in different countries, the regime which people have been brought up in in their motorcycling careers, the types of usage of bike. As you know, there is much more urban usage for commuting and things like that. For Germany, to give an example, they do the entire test on road. The braking test is done at the prescribed speed in the Directive in quiet areas like car parks or on quiet roads and they do not necessarily monitor the speed as precisely as we do. It is the examiner’s judgment that counts and, to return to a point that Mr Manning has made, that is really key with what is going on; the examiner is allowed that degree of judgment. They do not do a high-speed slalom and there is no off-road element to the test. The examiner on the day will decide whether the braking manoeuvre is safe. And there is no brake or swerve equivalent so they clearly separate those two elements to meet the spirit of the law of the Directive.

**Ms Cooke:** This is a particular problem. Even the manufacturers are concerned about their 125cc motorcycles with a large rider on. It is quite a big ask for a learner. They have to accelerate very, very hard in second gear and then swerve, as Mr Manning was saying. Out on the road you would not be accelerating hard and then swerving and then trying to stop within a given distance. We believe it is putting riders off taking the test on the smaller bikes, which is actually better if they start on a smaller bike and build up, but now a lot of riders seem to be more interested in taking it on the larger bikes because it will be much easier to get to the speed. They do not feel so intimidated by trying to get to the speed in a very short space of time.

**Mr Manning:** I believe a lot of the accidents that have actually been recorded with candidates on the collision avoidance and controlled stop manoeuvre have been on the larger bikes where people have the ability to go a lot faster, so they are coming round trying to meet the minimum speed, giving it too much gas and then they are going so fast that they physically cannot stop in time.

**Q11 Sammy Wilson:** Can I just ask about the intensity of the land use and the fact that large sites are required, and having gone to one of the test centres in Northern Ireland and tried the manoeuvres—and I have been driving motorcycles since I was 17—I can confirm what you are saying about the inadequacy of the distance you have (and I do not think I am too heavy) trying to get a 125cc up to the speed that is required, et cetera, you are pushing it, and the experienced rider might be able to do it but an inexperienced person might be put off by it. Have you found the same, as we have in Northern Ireland, that when it actually comes to training riders that because of the amount of land that is needed that it really is quite difficult for training schools to find somewhere where it is still economical for them to train riders and how have you got round that problem or indeed has it been got round?

**Mr Manning:** A lot of training schools out there have been disadvantaged again because they are not within a close enough distance to be able to utilise the multi-purpose test centres. The DSA allows us to book a couple of hours at a time for free, which is great, but you have then got to take your pupils out twice so that they can practise at the test centre. We set up the test with cones and timing equipment at our little local aerodrome and it just does not have the same effect because people are not doing it at the test centre. We found they are much better prepared if they can actually practise at the test centre itself with the proper high-grip Tarmac and with the cones and everything there. When we then take them back for the test they are much better prepared but we can only use the multi-purpose test centres on a Sunday. They are not being opened up to us seven days a week.

**Q10 Graham Stringer:** You mention the size of the test centres. Are they big enough for the heavier rider on a smaller bike to get up to 50 kph?

**Q12 Chairman:** Is that everywhere? Is that the general rule?
Mr Manning: Everywhere, yes.

Ms Cooke: The temporary VOSA sites are not available for practice at all so any of the trainers that rely on those can only test on some Saturdays and all day Sunday and there is no spare capacity there for them to utilise those sites for practice so the trainers in those areas using those sites have no chance to practise at all.

Mr Brown: Could I just say something about rural areas, not just Wales and Scotland which seem to be very badly served by multi-purpose test centres but large parts of rural England, the distance that a rider under training needs who wants to practise at a multi-purpose test centre would need to travel just in order to have a go as part of their training is colossal in some cases. We have a member of ours who runs a training school in Wales who has clocked up hundreds of miles trying to get three trainees through their test because of the sheer distance he has to go to find a suitable multi-purpose test centre. He has nowhere locally that is suitable for training that gives them any idea of what it is they are dealing with.

Q13 Sammy Wilson: Can I ask one other question then related to that. Are there any parts of the current manoeuvres that you believe could be taken out that would resolve some of those issues insofar as you would not require those large areas for testing and for training riders and therefore make that training more accessible, as you say, in rural areas or in parts of Scotland and Wales?

Mr Carey-Clinch: Yes, we believe so. In 2005 in a highly prophetic submission to the DT in the consultation the MRTA illustrated a number of ways in which they could demonstrate that much of the new test was probably pre-existing and how the Directive could be interpreted and designed in such a way that what could not be delivered on road could be delivered on a much more suitable site in terms of finding land and gaining permissions and some of the other issues which have been faced in trying to gain sites. Just another quick note on the VOSA side of it. We hear a lot of figures about coverage and how much is there or not there or whatever, and the DSA has its own view on this, but the figures on coverage tend to include the VOSA sites. Bearing in mind their general lack of availability and in many cases unsuitability, they really should be taken out of the equation when it comes to judging what coverage we have around the country.

Q14 Ms Smith: You mentioned earlier the statistics in relation to the numbers of incidents that have been experienced as a result of the new off-road test. Can you give us an indication of the numbers perhaps?

Mr Hodder: I requested some data from the DSA recently and I got it back. In the four months effectively from the beginning of the test until the end of August there were 96 accidents on motorcycle tests. In the previous year, so from January 2008 to January 2009, there were 69 for the whole year, so given that test numbers have dropped off dramatically and accidents have gone up dramatically, I would say it is a fairly safe bet to say it is a dangerous test.

Q15 Ms Smith: How have the numbers taking the test dropped off, to what extent have the numbers dropped off?

Mr Hodder: By about two-thirds.

Q16 Ms Smith: Any idea in your statistics there of the kinds of accidents that have been experienced?

Mr Hodder: I did not request that but anecdotal feedback is that it is people in wet conditions panic braking or braking too hard on swerve manoeuvres and things like that.

Q17 Ms Smith: Any really serious injuries as opposed to what had happened in the year previous?

Mr Brown: The first test of the first day at the Rotherham multi-purpose test centre saw a rider break several bones trying to do one of the manoeuvres. One of the points that we have made is that the Directive dictates the minimum speed at which the manoeuvre must be tried, but the DSA is dictating the amount of space. There is nothing in the Directive that says how the cones should be laid out and how much space should be given, and in wet weather the DSA were advising people to allow themselves more space for braking and for turning because there is less tyre grip. Our members cannot understand why it is that when the weather is wet and tyre grip is reduced, an organisation like the DSA responsible for understanding motorcycle safety cannot see that the amount of space that is allowed for the swerve manoeuvre in particular, and then if we are going to stay with this coupled braking manoeuvre afterwards, that the space in between those different parts should be greater to allow for less tyre grip.

Q18 Ms Smith: In some of the other European countries such as Germany, and I believe Ireland to some extent and Holland, you have got tests on public roads. The Directive has been implemented in the context of an on-road test. Can you give us any idea of how it has been implemented when it is on road? In other words, how does it make allowances for wet weather in an on-road test?

Mr Carey-Clinch: There was a note here on Germany for example which talked about the discretion of the examiner to decide whether certain manoeuvres are safe.

Q19 Ms Smith: Because it is on road?

Mr Carey-Clinch: Yes. From a very quick flick I cannot see too many other references but clearly this has been gathered recently and we are happy to do more work on this table and submit it to try and gain some further information.
Q20 Ms Smith: Do you have any idea at all as to why some countries have chosen the on-road test and countries like Britain and Finland (which has very high standards in terms of driving tests all round) have chosen the off-road test?

Ms Cooke: I represent about 150 associated training bodies as well and none of our members would be comfortable with doing the entire test on road. The idea of doing a slalom in the middle of a public road does not really appeal to us, to be honest. We are very concerned about safety but we are also concerned about provision and illegal riding and all those sorts of issues too. Perhaps in the countries where they are doing it all on road they are not following the Directive to the letter, would probably be a fair way of putting it. They are looking at the spirit of it rather than maybe the letter of the Directive. We do support doing some of the manoeuvres off road. It is just the problems that we have had through having very large sites and the problems with bookings because it is now a two-part test instead of one, so it is just the knock-on effects really. We would never advocate doing everything on the public roads.

Q21 Ms Smith: So which parts of the test would you like to see on road?

Ms Cooke: I would like to see as much as possible of the test on the road because that is where riders are facing different challenges. Every time they go out they will have a pedestrian or a bus or a dog, something different that will make them react to real world riding.

Mr Manning: A lot of the basic manoeuvres as well like the slalom and the figure of eight and the slow ride and the emergency stop, that is all covered in the Compulsory Basic Training that people have to go through before they can even get on the qualification ladder towards a motorcycle licence. Fair enough, that is being done in front of instructors and not DSA examiners but with more resource maybe DSA could put people out to go and oversee Compulsory Basic Training on a much more regular basis. At the moment it is very piecemeal and very random as to which instructors get tested on what they teach their pupils. It is very, very piecemeal.

Ms Cooke: As Mr Manning was saying, the slalom and the figure of eight are already tested on CBT sites. That means there are some 600 sites already available large enough to actually look at those and see riders doing them. If we had managed to have a derogation and if we had done more on road there could have been the potential to use the CBT sites or lots more land just to do that.

Q22 Ms Smith: If I could test that a little so what you are saying really is one of the reasons why we are moving towards these big multi-purpose test centres is because we have decided to do so much off road?

Ms Cooke: Yes.

Q23 Ms Smith: And that has restricted options?

Mr Carey-Clinch: I believe you do raise an important point here. A number of the manoeuvres were carried out as part of the old test with a good safety record. If we are looking ahead, I think we need to look at this in the context of the fact that we are about to be hit with a third Directive on driving licences and we will need to start to think about how to implement that, and with the growing body of evidence showing that machine control is only one part of the training, and attitude is a key part of it, then it makes very clear sense that we should be incorporating the broadest and widest number of manoeuvres possible from off road to on road so we can start to address key issues under the third Directive to do with rider and driver attitude.

Q24 Mark Pritchard: Do you have any objection in principle to the greater harmonisation of road safety tests in this country in line with the European Union?

Ms Cooke: In principle anything that does improve road safety is of great interest to us. We would not advocate taking it all on to the road for that reason. We like the new road part of the test; it is a bit longer and we see more of it. There is a good side to the Directives and as long as the Directives are implemented well and in consultation with the stakeholders who are dealing with the issues day-in day-out and have expertise, then I think if we could work together to actually develop Directives to the benefit of road safety and motorcycle safety in particular in Great Britain then, no, we do not particularly have any issue with it. It is how these things are implemented and developed.

Mr Brown: Our organisation is a member of a European federation of similar motorcycle rider organisations and our members span from the Scandinavian countries right down to the south in the Mediterranean. The weather conditions are completely different. We span from the west of Europe to the east of Europe where the inheritance of road safety is completely different, the culture is completely different. If we are going to harmonise then we have to recognise that there are vast differences between different European Member States. The harmonisation has to be done within a framework that allows each country to find the best solution for itself, and this situation that we are in at the moment seems to riders to be very much a case of Great Britain having taken a very rigid view of what the Directive says. Frankly, for an organisation in the DSA that has its own organisational cultural purposes, and bear in mind we are talking about an organisation here that delivers examinations and mostly delivers them to car drivers in very different circumstances, their culture is very different. There has been a lack of innovation. There has been a lack of understanding, we believe, of their customers on two wheels. The thing that concerns us and our European colleagues whenever we are talking about harmonisation is (a) whether there is enough latitude
there for each country to exercise its own subsidiarity and (b) whether the national authority in each country is really taking a sensible and practical approach to the goal of making roads safer across Europe.

Q25 Mark Pritchard: Can I ask what are the most common types of accidents involving motorcycles, and forgive me if that has been answered?  
Mr Brown: The most common is a collision between a car and a motorcycle, usually in an urban area, and by far and away the most common cause of that is a car emerging from a side road when the motorcycle has right-of-way and is travelling within the speed limit. Junctions, bends and overtakes are the most common situational places where motorcycle accidents happen. About a fifth of motorcycle accidents happen around bends, which is where we get this stereotype of motorcycles going too fast into a bend and the rider coming to grief with nobody else involved. The vast majority involve the actions of another road user precipitating the event and that is shown clearly in the DfT statistics.

Q26 Mark Pritchard: So what do you think the role of the new test would be in contributing to reducing that figure or do you think it may not have any impact or effect?  
Mr Brown: I do not think the new motorcycle test, apart from indicating an ability to make a swerve manoeuvre, addresses that fundamental problem at all.

Mr Hodder: I think it probably exacerbates it to some extent because the rider spends an awful lot of time learning how to do a particular manoeuvre many times rather than spending that equivalent time on the road learning about situational awareness.

Q27 Mark Pritchard: In what way, can you elaborate?  
Mr Hodder: If you have five days to educate a rider and you spend those five days teaching them how to do figure of eights and to go through a slalom, that is five days you could have spent on the road teaching them how to negotiate junctions and roundabouts, et cetera.

Q28 Mark Pritchard: So are you saying the new test is likely to have an impact whereby we see more people being injured or killed in the type of collisions outlined by Mr Brown?  
Mr Hodder: It is purely speculation but that is a suggestion I would be willing to make.

Mr Manning: I think the danger is, as I said earlier, because the test itself, the Module 1, is so prescriptive, we are being told we have to ride round the bend at the top of the site at 19 mph, come through the collision avoidance, come through the timing gates at 31.06 mph, change direction to the left or the right and then bring the machine to a controlled stop with the front wheel within a metre-square box, training organisations out there are going to focus a lot more on performing that prescriptive exercise rather than actually teaching people on public roads because if they cannot do that bit they are never going to get through the test in the first place. They are not going to be able to book their Module 2.

Q29 Mark Pritchard: That is quite a revelation. I will put it in my own terms: this test could lead to the deaths of more motorcyclists—and having had somebody very close to me killed in a motorcycle accident that is of grave concern to me. My final question is to Mr Brown and anybody else who wants to chip in. I am a Shropshire MP and it is one of the largest land-locked rural counties in England and every weekend we have motorcyclists killed pretty much, sadly. What generic advice would you give to those seeking to reduce road death and injuries in Shropshire? Do you feel, notwithstanding your earlier comments, this new motorcycle test will address those issues that cause those casualties in rural areas?  
Mr Brown: The fundamental issue with motorcycle safety is that people always focus on the rider. As a society and as professionals working with the road environment, there is very little understanding of the dynamics of motorcycle control, the situations that riders face, and how to engineer roads and how to share roads with motorcyclists in a way that is going to reduce collisions. About 15% of rider casualties have been put down to the road itself, the design of the road and the features of the road, which is a fairly substantial chunk. I have already outlined the sort of proportion of accidents that other road users seem to precipitate and there is that large chunk of around about 20% of motorcycle accidents where nobody else is involved, and clearly that is down to the rider’s ability to read the road and to make correct decisions. As an advanced driver and a rider of 30 years who has talked to an awful lot of riders and their trainers, I would say that, in common with my colleague’s comments about the new test, it is so prescriptive and so unreal world that it is not preparing riders for making those quality decisions and reading the road correctly.

Q30 Mark Pritchard: Do you think transport ministers should look again at this?  
Ms Cooke: I would like them to have a look again at it. I do see the benefit of the longer extended test on the road. A lot of people are feeling that that is preparing riders better, so maybe the shortfall of what you are learning in Module 1 may in some cases be picked up a bit out on the road in Module 2. What I would say in answer to your specific question about keeping the riders in your area safer, once you have passed your test, it is only the beginning with riding and the DSA has an excellent scheme, the ERS scheme, developed in conjunction with stakeholders, the ERS scheme, for riders to actually bring on their riding to an advanced level from there. We have covered that area nicely in conjunction with the agency and it is an example of how it can work well when we work with agencies. I would urge them to have a look at the test and see if we can make it a
Q31 Mark Pritchard: A final point, do you think that your association could do more, or indeed vice versa, with HM Coroner? After a recent incident in Shropshire, the coroner made a recommendation for a road to be looked at after a serious accident. It was not involving a motorcyclist on that occasion but there had been previous accidents. Could a lot more be done to ensure that coroners (i) identify roads as an issue and (ii) make recommendations to local authorities and the Highways Authority and local police in these matters?

Mr Carey-Clinch: What you are suggesting is taking a holistic view of motorcycle accidents which is something I think we have all supported and called for for quite some time. I believe the suggestion that you are making does link quite strongly with the need for ministers to take a more hands-on approach with this whole issue. On the whole, ministerial interventions in the issue of the second Directive, when we have needed them, have been helpful and useful and resulted in action being taken. Looking strategically and more broadly at the longer term and the linkage between the issues raised as part of this inquiry and also the Select Committee’s ongoing look at the National Motorcycle Strategy, it would seem appropriate that policy decisions and the main discussion on the main aims and objectives of motorcycling training and testing should come under the auspices of a suitable body at the Department for Transport. Without meaning to be over-critical, it is fair to say that the DSA has developed its own culture since it became a government agency. We feel more interaction between what the DSA are trying to achieve with training and testing and the broader issues of policy and road safety would be entirely appropriate and we would hope that the Committee would make such a recommendation.

Ms Smith: I am just wanting on the basis of the further questioning to clarify one key point. Is it the European Directive per se that is perhaps making motorcycling testing less safe or is it the implementation of the Directive that is the problem? It is a straight question that just requires a straight answer.

Q32 Chairman: Who is going to give the straight answer?

Mr Carey-Clinch: Implementation.

Mr Manning: Implementation.

Mr Brown: Both!

Q33 Ms Smith: Some say both, some say implementation. It is quite important for us to know to have a view.

Ms Cooke: I would not go so far as Mr Hodder as to say we may be making things less safe than they already are but my members are concerned about the implementation without considering what effect that may have on the riders and the trainers and everybody else.

Mr Carey-Clinch: Just to return quickly on that, I would reiterate Mr Brown’s points on Framework Directives, they are meant to be just that; frameworks. There is a lot of interaction, particularly with motorcyclists travelling and tourism across British and Europe these days, so there is a great deal of sense in looking at not necessarily a rigid common set of standards but certainly a broad framework, and we believe that the DSA should try and bear that in mind.

Q34 Chairman: Has the number of unlicensed drivers increased since the introduction of the test?

Mr Brown: I think there is no way of saying for sure.

Mr Carey-Clinch: It is too early to tell.

Mr Brown: By definition, you are looking at something that is not there that is difficult to measure. Certainly we have not heard from the Department for Transport of any major changes but the test has been in place for relatively few months for that to show up.

Q35 Chairman: How do you rate the importance of the Driving Standards Agency? How do you rate its performance?

Mr Brown: Its performance? Well!

Q36 Chairman: You cannot all suddenly be shy!

Mr Brown: No, let me be bold then. Let me start by saying that they have a very difficult job to do because they are the experts that the Government employs to advise it on correct implementation of Directives but they are also the agency that not only oversees standards but also delivers the examination. I said before I thought that they lacked innovation. That stems from the fact there is no competition in examining motorcycle riders for licence. Whereas it might seem natural for one single government executive agency to determine whether somebody has passed a test, there are lots of professional areas, for instance lawyers, doctors, teachers and so on, where it is not the government department itself or an executive agency of it that decides whether somebody is fit to practise. If we want to truly professionalise the rider training industry and to give a more professional way of riding to new riders, I actually think it would be better if the DSA focused on setting standards and ensuring they were met in examinations that were offered by a range of providers who could bring innovation and more efficient ways of doing things to the motorcycle examination process.

Q37 Chairman: Has the agency engaged with you on the third European Directive?

Mr Brown: They have gone very quiet since the Committee announced its inquiry into the Second Driving Licence Directive. I am sure they will not mind me saying that. We have concerns about it but I think perhaps it would muddy the waters if we
rehearsed some of the concerns we have with that. I certainly think we are watchful for further signs of
gold-plating.

Q38 Chairman: Has the agency approached you? Have they listened to your concerns?
Mr Carey-Clinch: They have approached us but whether they are listening to our concerns—it is too
early to judge that with the third Directive. To add
to the points made with the second Directive, there
were a lot of meetings, a lot of contact, there still is,
and working relationships with the DSA are good, I
would say. We do get to tease out the issues with
them but the issue is what happens after we leave the
meeting and what goes on next. A lot of suggestions
put forward have unfortunately been ignored. In the
broader sense, the DSA is an extremely important
agency. Its work is vital and valuable. They are a
team of dedicated people, as far as we can see, to
their particular task. I mentioned before that an
overall culture has developed, the silo mentality,
which seems to have forgotten some of the more
strategic elements when it comes to motorcycling.
The 2DLD record is a very sorry stain on what is
overall an agency that has demonstrated fitness for
purpose and we hope will do so again, provided we
can sort out some of these issues.

Q39 Chairman: What proportion of motorcycle
trainers have practised off-road manoeuvres so that
they can get a better understanding of the test
requirements?
Mr Manning: As in the amount of motorcycle
training schools that have access to a facility large
enough?

Q40 Chairman: How many have tried to do that?
Ms Cooke: I do not believe very many have taken up
the DSA’s offer of free places.

Q41 Chairman: They did say that they have offered
free places.
Ms Cooke: They have, yes.

Q42 Chairman: They are saying they have gone out
of their way to make it easier.
Mr Manning: They have offered places.
Ms Cooke: They have offered places free of charge if
you have to travel a lot of miles or free of charge if
you have to give up your weekend business, which is
usually Compulsory Basic Training, to take your
candidates for test practice. It does not become free
any more. If it costs you to turn away business and
it costs you for instructors to go there, it actually
becomes quite expensive, and those costs would
have to be passed on either to customers or be met
by the training providers. I think the test has gone up
significantly as well. So really, we have come to a
point where we may get back to Mr Stringer’s point
about the illegal riding. If the costs get too high, then
people will be less likely to ride. I believe,
unfortunately, that a lot less of these free test slots
have been taken up than we would like ideally but I
can understand why that is the case.

Mr Manning: The motorcycle training industry, the
professional motorcycle training industry. I always
say is very much in its infancy; we have probably
only been about since the introduction of
Compulsory Basic Training in 1990 and a lot of the
culture is people want to train at weekends, and that
still exists; we do a lot more of our work at weekends
and if we have to run people a 100 or 150-mile round
trip to go and practise their Module 1 in the
afternoon, we cannot then run Compulsory Basic
Training courses, which we try and do as many of as
we can every weekend because, as you appreciate, we
are a seasonal business: eight months of the year we
are really, really busy; four months of the year we do
not get a lot of work, so we try and make maximum
efficiency throughout the summer to take us through
the winter. I do have to say I believe next year is
going to be very tough for the motorcycle trainers,
come the spring. I think a lot of them will be falling
by the wayside.

Q43 Chairman: Has the new test driven up costs?
Mr Manning: Yes, massively.
Ms Cooke: Yes.

Q44 Chairman: In a big way?
Mr Manning: At September 2008 the original
motorcycle test, the old one, if I can call it that, was
£60. Today, if you want to do both parts of your
motorcycle test or both modules, it is £90.50.

Q45 Chairman: What has the consequence of that
been?
Mr Manning: That puts the price up for people
wanting to take it but, again, because we have a
Module 1 and a Module 2, if we cannot get both
modules on both days, it means people have to come
back and see us twice. It costs them for another
day’s training.
Mr Brown: From the rider’s point of view, it is not
simply the cost of booking the test; it is also the fact
that, if you have to travel any distance or if you need
extra tuition for the off-road elements, you are
buying more of a trainer’s time. A trainer’s time
comes expensive to the consumer, so the knock-on
costs of the new way of conducting the test are
adding a lot of burden to riders who are now not
training for a single test but for two tests some time
apart from each other.

Q46 Chairman: When I asked you before if the
changes meant fewer people were actually taking the
test, you did not know.
Mr Brown: With respect, I think we do know. I have
some figures to say that during the month where we
have figures from the DSA, the most recent month,
which is August of this year, if we compare August
of this year to August of last year, the number of tests
seems to have fallen across Great Britain by two-
thirds. The interesting thing is that in Scotland the
number of tests has fallen by 78% and in Wales by
70%, which again underlines the difficulty in rural
areas, and in those rural areas that is probably where the riders are facing the biggest hurdle and where the trainers are facing the biggest financial hardship.

Mr Manning: It is fair to say if people need more preparation before they are ready to take the test, it is going to cost them more money but, because we have so many problems with getting the amount of tests that we need, and, more importantly, both parts of the test on the same day at a test centre that is not too far to travel to, people are being forced to come back twice, which is increasing the cost to them even more.

Chairman: Thank you very much. That is very interesting evidence.

Witnesses: Mr Robert Gifford, Executive Director, PACTS, and Mr Gareth Tuffery, Motorcycle Advisor, Road Safety GB, gave evidence.

Q47 Chairman: Good afternoon. Could our witnesses identify themselves, please, for our records?

Mr Gifford: Good afternoon, Mrs Ellman. I am Robert Gifford. I am Executive Director of PACTS, the Parliamentary Advisory Advisory Council for Transport Safety.

Mr Tuffery: Good afternoon, Mrs Ellman. My name is Gareth Tuffery. I represent Road Safety Great Britain and I am the Motorcycle Advisor for them.

Q48 Chairman: Has the European Directive been gold-plated in the UK?

Mr Gifford: As far as we have been able to identify, no. The two countries with which we have been most able to compare ourselves are Germany, where it is broadly the same, and France, where the interpretation has actually been tougher than here. So I think the DSA has probably got it about right.

Q49 Chairman: In what way has it been tougher, just very briefly?

Mr Gifford: I have the detail in French, unfortunately, which I do not propose to translate for the Committee.

Q50 Chairman: No, just in general terms, so we have an idea of the areas where it is different.

Mr Gifford: In broad terms, it has certainly been tougher in terms of the circumstances in which the test should be undertaken, in terms of the speed, and in terms of the interpretation of the Commission’s manoeuvre. So we would suggest that it is tougher in France, and about the same in Germany as over here.

Q51 Chairman: Mr Tuffery, do you agree that the Directive has not been gold-plated?

Mr Tuffery: I think I agree with Rob. It does not appear to be. I think it is a difficult question for Road Safety GB to answer because we tend to just look at the voice of our members and we do not tend to look outside Great Britain in this type of detail for this type of question.

Q52 Sammy Wilson: If I can just follow on from that, it may be regarded as less gold-plated if you compare it with a country where you say the standards are tougher, though there is some dispute about that but, generally speaking, across the European Union, have we gold-plated the test? To get a comparison, we really need to look at all the European countries, not just those who you feel have interpreted it more vigorously.

Mr Gifford: We tried to get the answer from the European Commission actually, that was where we started from. I understand entirely the drift of your question. We are not able to make a comparison with all 27 countries of the EU; we are only able to make a comparison with those countries for which we had the relevant information, which was supplied to us by either the Commission or by our partner European organisation, the European Transport Safety Council. I have to say that I do not think anybody has done the absolute comparison that you are talking about. I was merely saying, in terms of the information that I have been able to get in a fairly short space of time, the only hard information I was able to get was with regard to Germany and France, and there I can make a legitimate comparison but I cannot make a legitimate comparison with Greece or Spain or Portugal because I just do not know, and I do not know whether anybody else knows either because our contact at the European Commission was not able to give us any more than that.

Q53 Sammy Wilson: The Irish Republic certainly carry on most of this on road and do not actually carry out quite the same range of manoeuvres or at the same speed.

Mr Tuffery: Can I just say, more of a personal understanding is that I would imagine that, for the new Member States to be able to complete this type of testing in an appropriate way would be more difficult than for the more established members of the European Community, and it might be that that is why we end up having very good data for the older, established communities than for the new Member States, and that is in quite a lot of areas of work, not just to do with motorcycling.

Q54 Sammy Wilson: The evidence we received earlier on was that the more you concentrate on off-road testing, the less you actually subject new riders to the real conditions on road and therefore there is bound to be—whether it can be quantified or not is another matter—some implication in terms of road safety and in terms of how well prepared riders are for going into real-life situations once they go out on the road. Do you have any view on the merits of off-road as opposed to on-road testing, and indeed from
your own experience whether it is likely to lead to the kinds of outcomes which were suggested by the earlier evidence?

Mr Tuffery: I think that is a very good question, and actually, in road safety in all our areas of work we value practical training, which I think is what you are saying, over theoretical training. Therefore, being in the live situ, being tested on the road with an extended test, I think is far more valuable than testing someone on a series of manoeuvres that may demonstrate someone’s capability of riding a machine but it does not test their attitude or their perception skills or their ability to interact with what is happening, what is going on around them. As a road safety professional, and on behalf of my members, I know that we would welcome more practical training.

Q55 Sammy Wilson: So if it were a choice between the kind of gold-plating of the EU Directive so that we have all of the extensive off-road training that we have at present, or perhaps lowering that a little so that more emphasis could be placed on practical, off-road training, what would your view be of that? We probably cannot have both.

Mr Tuffery: Yes, I fully understand that. I think I would welcome more of a leaning to practical training. As a road safety professional, and also personally, I feel we know from experience in other areas of working with vulnerable road users that practical training gives us the greatest benefits and the best return.

Q56 Ms Smith: You said earlier, Mr Gifford, that the French test is tougher. Could you explain how and why?

Mr Gifford: I think what I would like to do is to read in detail the French and translate it into English and, if I might, to actually send you a substantive note to that effect. My understanding from the information I have been given is that it is primarily about the speed at which the manoeuvres are undertaken. I know that our motorcycling colleagues were commenting specifically at 31.06 miles an hour or whatever. The French are actually more wide ranging in the speed, because it is in kilometres rather than miles. There may also have been a tougher interpretation of the weather conditions element but I would prefer, I think, before being absolutely categorically—and I do not want to mislead the Committee in any way—double-check that.

Q57 Chairman: Perhaps you could send the Committee a note.

Mr Gifford: Yes, I will, and I will send you a translation of the French, if I may.

Q58 Ms Smith: The point you made about the weather conditions is interesting because in the earlier evidence we heard that a test that may be done in, say, Finland, where you have very severe winter conditions, would not be appropriate for, say, Greece, because the weather conditions, the roads, everything is really different. Does that not make it hard in many ways to make judgements about how the Directive has been implemented in various countries?

Mr Gifford: It does, and I think that is why also I was attempting to draw the comparison with the two countries that are more similar to us than those extremes, if you see what I mean, France and Germany. Now, I entirely accept that there was a very interesting question about what is the most appropriate practical test to have for 27 countries that are very different geographically and meteorologically and, indeed, in terms of the amount of daylight that is available. The point made towards the end of the evidence session about the majority of training being undertaken in the summer months here is interesting. Whether we also compare easily in terms of the demography of our motorcycling with other European countries is quite interesting. Certainly, our casualty figures are very much skewed towards the 40- to 49-year-olds. That is where our deaths are occurring now.

Q59 Chairman: What types of incidents are these motorcycle deaths?

Mr Gifford: There are two main incidents. One your previous witnesses rightly identified, which is the interaction between a motorcyclist and a car. In 2008 there were 10,770 collisions between motorcycles and cars, and 27% of those collisions resulted in death or serious injury for the motorcyclist. There is a second big number, which is single-vehicle collisions. There were 3,090 of those, 44% of which resulted in death or serious injury. So in numerical terms, it is a car and a motorcycle hitting each other. In severity terms, it is single-vehicle motorcycle accidents where the rider will unfortunately kill or seriously injure him or herself.

Q60 Chairman: How many of those deaths and injuries do you think the new test might prevent?

Mr Gifford: That is a really good question and I do not know that I remember seeing the cost benefit analysis that the DSA must have done to accompany that. Certainly, cost benefit analysis now is intended to identify at least some deaths and serious injuries that would be prevented. I would like to hear the DSA or the Minister’s answer to that question, Chairman. I generally do not know.

Chairman: You know a lot of answers to these things so I thought I would just try.

Q61 Ms Smith: I was listening to the comment you made about the meteorological or geographical differences between countries and indeed within countries, because the south of France is very different from the north of France. Then you had the light levels that you mentioned. Does all of this not make it difficult to make an assumption that, just because our test is pitched at, say, the same level of severity as Germany, perhaps slightly less difficult than the test on offer in France, that we have got it about right? Is that not a very difficult and dangerous judgement to make? Saying we have got it about right because one country has made it tougher
and another has made it easier does not necessarily add up, in my mind, given all these variations that have on the table.

Mr Gifford: It is, but equally, we only have six months of experience to go on. Clearly, having referred to the number of deaths and serious injuries among motorcyclists, those are people from the previous training and testing regime, especially if they are in the 40-49 age bracket. I take your point and, without wishing to sound flippan, I think it was Mao Tse-tung who said of the French Revolution 150 years after it happened that it was too early to tell the effect of it. Now, I am not suggesting that we need to wait 150 years for this test but I do think we have two combined problems. We clearly had a lot of people entering the previous test in advance because they wanted to get qualified. Therefore, it is not surprising that we have seen the number of candidates fall since it was introduced. I think we also cannot ignore the impact of the recession; many of the people who are learning to ride are 35-45 years old, are going to buy a motorcycle—I do not want to use the phrase “born-again bikers” because I do not think it is very helpful but they are either going back to or first time into motorcycling. Those people are less likely to do that at a time of economic concern. So I think drawing too many conclusions from six months’ experience is a risky option. I am not saying it will not have made a difference but I am saying I am not sure that we can absolutely tell at this stage.

Q62 Ms Smith: Earlier evidence suggested that the numbers of accidents suffered by motorcyclists taking the test have gone up substantially in this first period. Does that not give cause for concern?

Mr Gifford: Sure. I thought, certainly in terms of parliamentary questions, as of mid-June there had been 9,000 off-road Module 1 tests with 33 incidents, which was 0.4% of tests involving an incident. I do not have a comparative figure with the number from the previous regime but even though there may be a question about the number having gone up, we are still, I think, talking about a very small number of incidents.

Q63 Ms Smith: But the extent of those injuries is something that would have to be taken into account in that context.

Mr Gifford: Sure.

Q64 Chairman: You have said, Mr Gifford, that you would like to see a framework which ensures that trainee motorcyclists get adequate support. What exactly do you mean?

Mr Gifford: I think one of the key points which the witness from the motorcycle training group pointed out was that this is actually a very young industry. My understanding, again, is that the DSA has a register of trainers but it is voluntary. Clearly, what one really needs to get to is a position where there is a much better structure for the trainers of motorcyclists so that they are properly registered with the DSA, so that if I am learning to ride a motorbike, I know I am going to get good quality. I entirely accept a number of the witnesses were commenting that it is very much an industry that is driven by economy: people will think about how cheaply they can qualify rather than the quality of the qualification. I think it is a bit chicken and egg there. Somehow, we need to raise the quality of the trainer, turning them much more into a teacher rather than simply a purely mechanical exercise of training, and that is going to require a better kind of motorcycle trainer and it is going to require, I think, more assistance from the DSA in helping them to raise their game.

Q65 Chairman: Has the DSA done enough?

Mr Gifford: I think they recognise that that is a problem and I think they are recognising that they need to go in that direction, yes.

Q66 Chairman: There does not seem to be any independently verified data on crashes and accidents during tests. Do you think that is an indictment of the Agency?

Mr Tuffery: I think it is, if you like, an opportunity missed. I think they should be keeping data, and I think this also links back to the type of candidates being presented to test, whether they are ready and whether they are eligible to take the test. We have also heard from previous witnesses that nerves on the day and some of the things that they are required to perform might be creating some of the situation but we, as RSGB, would welcome further research into the tests. I agree with Rob that the period we have had so far is perhaps a bit early to be making any sort of concrete decisions, but we should be looking for indicators as to what we could be doing better or what we could be doing more of.

Q67 Chairman: Mr Gifford, you have argued that it is safer to have the Module 1 test off road. A lot of the other evidence we have takes the opposite view to that. Could you tell us why you take that view?

Mr Gifford: I suppose it is a matter of judgement more than anything, which is that if you are asking somebody to undertake certain manoeuvres, do you want them to undertake it in the middle of moving traffic, thereby potentially exposing them to more risk, or do you want to undertake it off road, in a more controlled set of conditions? My personal view would be that it is much better to do it off road under more controlled conditions rather than exposing candidates, who may be nervous on the day as well, to much more fluid traffic conditions, if I can put it like that.

Q68 Chairman: The Department argues that the road environment is unsuitable because of heavy traffic. Do you have a view on that?

Mr Tuffery: I think, from the road safety officer’s point of view, we have met this argument before in another sphere, with parents allowing young children to cross the road or to go out on their own. It is a similar type of situation. As a road safety officer, I believe that the sooner we get people into an environment and interacting with it, the quicker they
gathering the tools to deal with it and develop their own strategies to keep themselves safe. That is my answer I think really.

**Q69 Chairman:** Has the number of unlicensed drivers increased since the new test was introduced?  
**Mr Tuffery:** We know that is not an easy one to work out. There are too many other elements and factors to have a clear indication of that.  
**Mr Gifford:** I do not think we have any evidence on that one way or the other yet. Clearly, that is a concern. That would be an unintended consequence of the policy change, I think, for something that is supposed to be toughening up the system actually to result in more people riding unlicensed or uninsured. I do not think we can tell so far.

**Q70 Chairman:** How important is it for trainers to have tried out the test for themselves?  
**Mr Gifford:** In principle, very important, I think. Clearly, there is a question about whether you merely train the candidate to the test or whether you try and take them further than that. That is a perennial debate for anybody involved in anything educational but I honestly would have thought that, if I were a trainer, I would want to have had my own practical experience of undertaking that test, although I do take the point that the economic circumstances of the trainers may make that more difficult.  
**Mr Tuffery:** I think we are missing the point here. The idea of the training is to promote safety and the right attitudes. I know of situations where someone is very good on a motorbike and can pass the test easily but whether they ride responsibly on the roads is another question altogether. What I always envisage training to be is the material to enable us to put an impression on new riders so they develop safe attitudes towards themselves, which hopefully will then be reflected when they take their test. That is how I personally would like to see that system working.

**Q71 Sir Peter Soulsby:** If I may follow up that point, the rider’s actual behaviour on the road is this combination of skill and attitude. I just wonder to what extent you are saying that the approached that is being adopted is one that puts sufficient emphasis on attitude and awareness as against the development of skills?  
**Mr Tuffery:** It falls firmly into the road safety camp. My members spend a lot of their time working with different outside partnerships to promote attitudes and to make people aware of strategies and responsibility. I think there is a very strong link between having the right attitude and being able to pass the test and, once again, I would say that for me the emphasis must be on training and attitude, and that should be demonstrated within the test.  
**Mr Gifford:** I think you are entering very big territory there, and I absolutely agree with Gareth that attitude is more important. That is certainly the case. There was an in-depth study of motorcycle fatalities by the Transport Research Laboratory a few years ago which concluded that you can give motorcyclists terrific skills but if they do not have the right attitude, they will still die, unfortunately. I am sorry to put it as crudely as that. It did lead to a long engagement in emails with various motorcyclists who thought I was suggesting they did not need training at all. I was not saying that. I was saying we need to get inside the head. To be honest, I am not sure that any of our driver or rider training is really going for those higher-order attitudinal issues. As I say, that is much bigger than just these recent changes to the motorcycle test because I think that cuts straight to the heart of the whole process of learning to drive in this country.

**Q72 Sir Peter Soulsby:** It strikes me that it is possible for a new rider to pass this test and still be very dangerous once they get out on the road by themselves, with an open road ahead of them and the temptations that go with that. To what extent do you feel that is reflected in the way in which the test is designed, and, more importantly than that, whether there is sufficient research into what actually makes a difference to the attitude and behaviour once they get beyond the test?  
**Mr Gifford:** If I can partly answer that, and I know Gareth wants to answer it as well, when the second European Directive was being developed is quite a long time ago now, and actually, I think there is a much better model, which is known as Goals for Driver Education, which is now informing European policy, where you do not just focus on, if you like, the skill, whether the person can brake quickly, whether they can turn the steering wheel or whatever. You actually try and suggest to them that it is more important to think, “Why am I driving? What is the purpose of this journey? Which route shall I take?” So you focus much more on the strategic thinking behind riding or driving. As I say, because, in a sense, this test is a result of thinking some ten, 15 years ago, we are dealing with something rather old that would be different if we were starting today.

**Mr Tuffery:** The point I would like to make is that passing the driving test is the start of your driving career. You are at the bottom rung, not at the top. As road safety professionals, we have worked very hard to promote further training once someone has taken the test. We believe you need to polish your skills for life. We keep saying you need to polish up your skills to keep yourself safe for life.

**Q73 Chairman:** Is it reasonable that motorcyclists can ride on the public highway for two years with just their CBT and without taking a test?  
**Mr Tuffery:** That is a very difficult question. As an RSGB professional, I would encourage any system that promotes training and is accessible, and that is very important, so it allows people to be able to undertake that training without a large cost. That is the point I am trying to make. You might have better systems but they might be inhibitive to people on low income. I need to ensure that all motorcyclists can accept training.
Mr Gifford: The other answer to that question is you would have to look at the accident rates involving motorcyclists who were riding just on L-plates. It may be that some people will need two years to build up that experience in order to feel certain that they can qualify, and actually, of course, the longer they are riding, the more experienced they are getting, and therefore that may prevent them from undertaking risky activity if they pass their test within six months.

Q74 Chairman: Do you have any information on that? Does it exist?
Mr Gifford: I do not think it is collected under the STATS19 regime. It is possible to identify the number of motorcyclists, it is possible to identify whether they are under 50 cc, up to 125 cc, but I do not know that I have ever seen the number who are riding under L-plates.

Mr Tuffery: Can I just say that we have been talking about Europe. If you go to a country like Belgium, their young riders are riding mopeds without number plates or any type of insurance, so there is a totally different mentality there as well, just to throw into the mix.

Q75 Ms Smith: Just a quick question related to your last one. Do you think it would be a sensible idea to actually start collating proper statistics on how long it is taking motorcyclists to move from the Compulsory Basic Training to the full test, and by doing that, we can also measure how effective or ineffective this new motor cycling test is?
Mr Gifford: Yes, I do. There was a report from the Advisory Group on Motorcycling some four years ago about research into training regimes and accident rates. I do not know whether that research has actually ever been published but I think it would begin to answer the kind of question that you are thinking about, which is that we need to know more about what the problem is before we can know what the solution is.

Q76 Ms Smith: The second question relates to this attitudinal aspect, the need to look at attitude on the road as well. I live in an area where there is a very high accident rate for motorcyclists. I live in a very hilly area, near the Peak District. It seems to me to be a very sound principle that the more young motorcyclists or trainee motorcyclists are exposed to those conditions, the better the chances are of them developing the right attitude in terms of their long-term behaviour on the roads. Is that right, that they need to be exposed to a variety of driving contexts in order to be considered safely trained as motorcyclists?

Mr Tuffery: It is quite a difficult one to answer really. You are sort of saying for a motorcyclist to be safe, he needs a lot of experience but he cannot get that experience if he is not riding his bike. I think that is what you are saying to me. I am not sure. Certainly, the area that you have identified is an area road safety officers have looked at; we have looked in great detail around Matlock and the Peak District and that type of area. I still believe that proper training and the right attitudes would improve the situation.

Q77 Ms Smith: Would not part of that training be useful if carried out on some of those very difficult roads?
Mr Tuffery: I think, again, with the correct attitude, yes, that type of environment would help but actually, any environment; it is more the attitude that you are bringing in rather than where you are riding the motorbike. You can ride a bike responsibly anywhere or irresponsibly anywhere, I think.

Q78 Graham Stringer: I apologise for not being here at the start of your session, but earlier we heard that there had been an almost precipitate drop in the number of people taking the test. Have you any evidence that there are more motorists driving without L-plates and without licences on the roads at the moment?
Mr Gifford: No, I think it is too early to tell actually. To repeat part of the answer I gave earlier, I think it is not surprising that we saw the precipitate drop, for two reasons. One, because of course a lot of people tried to get in before the change in the test regime, understandably, and secondly, we cannot overlook the impact of the recession, in terms of these people might well have been thinking about buying a bike but are not going to at the moment because economic circumstances suggest that they should refrain.

Q79 Graham Stringer: Will we know, and how will we know?
Mr Gifford: In terms of more riding unlicensed, one way of finding that out would be through police automatic number plate recognition, which does of course pick up the unlicensed or uninsured driver or rider. To date I have not heard anything from individual police forces about that as an issue but I am more than happy to keep my ears to the ground with those police forces with whom I have regular contact. Often one of the weaknesses, I think, of road safety is that it does take a long time for data to come through. Sometimes we do not know we have a problem until it has emerged, and therefore I would say it is going to be at least the end of this year before we could even remotely answer that.

Chairman: Thank you very much for coming and giving evidence.
Witnesses: Paul Clark MP, Parliamentary Under Secretary of State for Transport, Ms Rosemary Thew, Chief Executive, and Ms Lesley Young, Deputy Chief Driving Examiner, Driving Standards Agency, gave evidence.

Q80 Chairman: Good afternoon, and could I ask witnesses to introduce themselves for our records, please?

Ms Thew: I am Rosemary Thew. I am the Chief Executive of the Driving Standards Agency.

Ms Young: I am Lesley Young. I am the Deputy Chief Driving Examiner from the Driving Standards Agency.

Paul Clark: I am Paul Clark, Minister for Road Safety.

Q81 Chairman: Minister, can you tell us why the In Depth Study of Motorcycle Training report has not been published in advance of the new test being introduced? That report has been a long time coming.

Paul Clark: That is currently being worked on, and I will ask Rosemary to add to this. We have been working on this. In terms of bringing in the new test, it needed to be brought into being. We actually secured, after discussions with stakeholders, a delay in the introduction of the test. Can I say at the outset, in terms of all of this, my overriding remit is indeed safety. That has been the overriding, underlying basis of our operation in terms of the issue about the test and introducing it. I do not know whether Rosemary wants to add anything further about the report.

Q82 Chairman: Could you tell us when the In Depth Study of Motorcycle Training report is actually going to be produced? It was commissioned in 2003 by the Department of Transport. It is looking at the very issues you are identifying.

Ms Thew: I am sorry. This goes a bit outside the DSA’s remit but I believe that is due to be reported next year.

Paul Clark: It is part and parcel of the review that is going on and that will be coming forward with a new strategy and so on for 2010, if I am correct, in terms of that. But in terms of the test and making provisions for the test as part of the overriding need for safety, that needed to be introduced, as I am sure you are aware, Chairman, in April of this year, after various consultations—and delays indeed—in terms of bringing that in with a three-year delay agreed by the Commission, as well as another six months that was negotiated by my predecessor, the member for Poplar & Canning Town, Jim Fitzpatrick.

Q83 Chairman: Is the UK the only country that is insisting on more manoeuvres than the Directive contains?

Paul Clark: No, the Directive was very clear in terms of the requirements that were laid down. The Directive was about setting minimum requirements and about raising standards for modern requirements on today’s roads. It was very clear what needed to be undertaken in terms of various manoeuvres at minimum speeds, including avoidance manoeuvres. I believe that we still have an issue to deal with. Whilst the number of deaths has fallen by some 14% in the last year, the issue about motorcycle deaths, some 493 deaths in 2008, is still too high and we need to make sure that we have good, effective training there for motorcyclists to be able to reduce that figure still further. So I do not think we have over-egg it. I think what we have introduced are the requirements laid out by the Directive.

Q84 Sammy Wilson: Just on the requirements of the Directive, Minister, if the manoeuvres which we have included in the test now are, as you have said, what you believe is the minimum required under the Directive, how does that explain that, for example, in the Irish Republic and in other European countries the same manoeuvres are not required, and indeed, some of the test is still carried on on the road, with lesser requirements than we have here in the United Kingdom? Really, it is not a minimum interpretation that we have. Is it not, as some people have said, that we have gold-plated the arrangements?

Paul Clark: Let me just answer that first of all and perhaps I will ask Rosemary to add to this. I do not think we have gold-plated it. There is one manoeuvre, I accept, which we have additionally, which is the manoeuvre at slow speed, with the examiner walking at the side, which we think is right, about learning about control of the machine that you have. I do not think we have gold-plated it at all. In terms of the hazards and so on that are out there, those are hazards which we know, you know, will be faced by motorcyclists in their day-to-day going about, whether it is for leisure, whether it is for business or whether it is for visiting Aunt Maud. Those are the issues, and I want to make sure, as I said right at the beginning . . . Britain has—we are very fortunate—for the work that has been done on the strategy over the last ten years by many professionals, many town halls and so on across the country, the joint safest roads in the world. I want that to remain the same but I know there are still areas where we have to focus. Part of that is about types of transport routes, such as rural single carriageways; part of it is about groups of road users, and motorcyclists are one of the biggest areas of given users that we need to make sure we do all that we can to support and to reduce the dangers that they face as individuals out there on the roads.

Q85 Sammy Wilson: The last evidence we had from people who are equally concerned about road safety standards and how we raise the level of safety on the
roads indicated to us that the priority should be, and the important way of approaching this, is to put people into real-life situations. The emphasis on the off-road testing actually puts greater emphasis on taking people to a point where they are trained to do a test in unrealistic circumstances, not faced with the real-life hazards on the road, and less emphasis on on-road training. In realising your goal, is this not seen as a retrograde step, that you finish up with a set of training requirements which are less likely to prepare people for the hazards they are going to face?

Ms Thew: Certainly, I do not accept that that is the case. Just to be absolutely clear, Module 1, which is off road, is designed to replicate some of the real-life conditions that people will experience as riders, but then there is the second part of the test, which is on road, and that of course is whatever is thrown at a rider at a particular time and in a particular set of circumstances. So I really do not accept that it is a retrograde step.

Sammy Wilson: First of all, if it is divided as it is at present, more time is going to be spent, by definition, because half of the test, an important part of the test, the part which enables you to move to the second module, is off road. It is a series of predetermined manoeuvres which you can train people for and perhaps exclusively concentrate on that. Some manoeuvres do not coincide with real life. For example, when you swerve to avoid something, you do not automatically stop afterwards, which is part of the swerve requirement. We could go through some of the other ones. So first of all, they are not totally related to what a rider would face on the road but, secondly, the emphasis is on predetermined manoeuvres is likely to lead to people being trained to do certain manoeuvres rather than to become aware of the issues they will be faced with on the road.

The Committee suspended from 4.20 pm to 4.29 pm for a division in the House.

Q86 Ms Smith: I just wanted to ask the Minister about the approach that the Government takes to improving safety standards for motorcyclists and also in terms of its strategy for reducing the numbers of deaths and serious injuries amongst motorcyclists. Would it not also be important to take account of the role of car drivers and drivers of other vehicles when putting together such strategies? As an ex-cyclist, I know how dangerous it is for cyclists and motorcyclists on the road when, for instance, car drivers come out of junctions or when they catch the bars of a bike or a motorcycle. Really, it is down to the drivers of other vehicles as well as motorcyclists themselves. How much does Government strategy take that into account?

Paul Clark: May I just say one thing about the question before, which I know Rosemary had answered, but I want to also add that you only need to look at the report that was done in 16 countries within Europe, and indeed, the vast majority of those actually operate on private ground, as we do for Module 1, to actually get that training into being.

I have to say about learning how to control yourself and the machine when suddenly a door is opened by a car driver because he or she is not thinking, I think it is important to know how you are going to control your machine if that eventuality happens, and to do that in the safety, clearly, of a private site rather than on the main road, with the consequences that could then happen if you fall off, I think is the right way, because you still have Module 2, which does indeed cover the real roads. In terms of the issues to do with other users, it is absolutely right; everyone who uses a transport corridor—and I deliberately say that rather than “road” because immediately everyone thinks of what is on the road—whether you are a pedestrian, a cyclist, a motorcyclist or a car driver, we all have a responsibility to act in a sensible way and to respect the rules of the road. People just stepping off pavements, for example, without any thought of what may be on the road are irresponsible, as well as those that are excessively speeding through high streets and so on. So you are absolutely right that it is not just down to motorcyclists to act responsibly; it is for us all. That is why we have invested money, for example, in the “Think” campaigns that I am sure Hon Members and Rt Hon Members are aware of, which are aimed not only at motorcyclists to think but indeed at car drivers to think about what they are doing, so that you do push that message across as much as possible, covering not just motorcyclists, as I say, but other users of the road as well.

Q87 Ms Smith: Is there an argument though for including within elements of the driving test for car users aspects which look at being responsible with regard to other users of the road, with the specific mention of motorcyclists, so, for instance, opening car doors or pulling out of junctions? Should this not be part of the driving test?

Ms Thew: I wonder if I could just expand a little on what the Minister has said. Other things, such as the Highway Code, of course, are directed at car drivers and their responsibilities but one of the parts of the test for car drivers is the theory test and the theory test does include awareness of motorbikes. We think it is very important indeed that car drivers do understand and respect their responsibility for bikes.

Q88 Ms Smith: Are you monitoring the effectiveness of the theory test and the practical test on car drivers to make sure to update it regularly, every now and again?

Ms Thew: Absolutely. We do, yes, and in fact, we are changing that at the present time to include case studies. Again, we will think about whether or not that ought to specifically include motorbikes.

Q89 Ms Smith: That is the theory test?

Ms Thew: The theory test, yes.

Q90 Ms Smith: So you are thinking of including case studies. When will your work on that be complete?
**Ms Thew:** The first case study actually was introduced at the end of last month, at the end of September, and we intend to look at the effectiveness of that and then to extend beyond that.

**Q91 Ms Smith:** What does the first case study look at?

**Ms Thew:** The first case study is looking at somebody going through the training process, then questions are based on what the case study is showing, and then there are other questions which the theory test covers which are not based on the test study.

**Ms Young:** In addition to that, we do have a hazard perception test which is part of the theory test, which gives us a lot of opportunity to test awareness in the manner you have mentioned. That is also under development to consider using 3-D animation, which would give us a great deal more flexibility going forward. Vulnerable road users is already a key part of that but we will clearly need to be focused on that in the future.

**Ms Smith:** Can I move on to statistics, because one thing that has emerged from this afternoon’s evidence is that the keeping of statistics is not necessarily perhaps as rigorous as some of us would like it to be. For instance, statistics about how long it has taken for motorcyclists who have done the Compulsory Basic Training to get from there to the motorcycle test itself; those statistics are not available to us. Is the Department giving some consideration to perhaps sharpening up its keeping of statistics generally?

**Q92 Chairman:** Do these figures exist? Is the information being collected?

**Ms Thew:** I do not think that they exist, unless Lesley tells me differently. What we have is a position under which Compulsory Basic Training certificates last for two years, during which time the candidate presents for a test.

**Q93 Ms Smith:** Yes, we know that. You do not keep these statistics and would you consider starting to keep them?

**Ms Thew:** So you are looking for the number of people who have CBT certificates?

**Q94 Ms Smith:** No, no. We are looking for stats which allow us to establish how long it is taking motorcyclists who have Compulsory Basic Training certificates to move through to the motorcycle test.

**Ms Thew:** We do ask that question in our customer surveys but it would not be comprehensive, I have to say.

**Q95 Chairman:** Do you collect the answers to that question?

**Ms Thew:** Yes, we do, but we do not survey everybody routinely.

**Q96 Ms Smith:** Why is it not possible to collect this information on the basis of the numbers who have done the Compulsory Basic Training and the numbers who have taken the test?

**Ms Young:** We would know how many people have done the Compulsory Basic Training. We would know how many people take a test in a given time but not everybody who does Compulsory Basic Training goes on to take a test.

**Q97 Ms Smith:** That is precisely the point. So you do collate that information; you do have those statistics somewhere?

**Paul Clark:** You obviously would have the numbers that take the CBT. You obviously have the number of people taking the test. There will be a difference between those figures. There is bound to be, because some of those do not follow through.

**Ms Smith:** So why are those figures not being made available in a way that is presentable to a Committee like this?

**Q98 Chairman:** Is that something that you could look out and send us?

**Paul Clark:** We can certainly provide the Committee with figures, and we will do that.

**Q99 Ms Smith:** Just one more question: the new test is now in force. There is a third Directive on its way, as I understand. Is there a review period built in for the new test now in force, or is that going to be bound up with the introduction of the third Directive?

**Paul Clark:** The third Directive—We have until 2011.

**Q100 Ms Smith:** 2013.

**Paul Clark:** I am sorry: I was going to say we have until 2011 to transpose the provisions and, you are right, until 2013 for those changes to be brought to practise. So there clearly is a period of time where we have the new test in being but it will be reviewed. Like any new provision, obviously there is a monitoring that will go on with all the stakeholders that are involved and clearly assessing, for example, pass statistics of those at Module 1 and Module 2, the effect that that is having over that period of time, and obviously reports back from trainers and customer surveys, as we have already indicated.

**Q101 Ms Smith:** What is the timetable for the review, please?

**Paul Clark:** In terms of a timetable of review, since April of this year we have started the process of the new test. Indeed, there is some work going on, for example, with trainer provisions and so on, in terms of reviewing their requirements and so on. The training booking system is being reviewed and standards of quality assurance programmes are constantly under review to ensure that we are achieving the levels we want. I have to say, in terms of pass rate statistics, we are monitoring those, clearly, on a monthly basis as to how that is going, how they actually compare with the pre-modular test system. So all that is part of that review that is ongoing.
Q102 Ms Smith: Normally, you do a review of a new, in this case, test and, because it is a fairly significant change from the previous system, you review it, you have an end date in terms of that review, and then perhaps adjust the new system if necessary. I am just looking for end dates and I am looking for a commitment from the Minister to be personally focused on ensuring that any material that arises out of the review, any concerns, are rigorously addressed.

Paul Clark: Let me just say, we have set up a number of mechanisms to consult, to listen, and to get the feedback, and we will take that on board. In terms of any specific dates and so on, let me ask Rosemary.

Q103 Chairman: Do you have a specific timescale laid down?

Ms Thew: I wonder if I could just explain a little bit of background about the review that the Minister is referring to here. We met stakeholders from the industry in May. By that time the test had been live only for four weeks and they did suggest a number of changes to the test. What we wanted to do though was to take stock of the way the test was working. We believed it was far too early for us to make changes of the sort that were being asked for, and we undertook that we would monitor the test in all types of weather conditions and at all sites, and that work is going on. We have undertaken to feed that back to stakeholders within about six months, that is, by the end of this calendar year.

Q104 Sir Peter Soulsby: That was dealing with what is happening now but I would like, if I may, to take you back to the Chairman’s opening question. I am not sure I understood your answer to that—it is probably my fault, not yours. She asked you about the In Depth Study of Motorcycle Training, which as I understand it was commissioned by the Department in 2003, and she asked about the progress with that. Can you just explain to us what is happening with that study?

Paul Clark: My understanding of that work is that it formed part of the strategy that we have for motorcycling and, as I said in the original answer, that review is currently going on with provisions for 2010. Equally, at the same time, there were requirements in terms of the Directive and Directive 56 that actually required changes to the testing regime, and those we then consulted on, worked on, and undertook consultation in 2002 with stakeholders. There was then further work that happened in 2004, and then in 2005 a number of Member States, including the UK, said to the EC that we did not believe it was possible to meet the timescales required, hence there was a delay in implementation from 2005 to 2008, actually to 30 September 2008, and it was on 3 September 2008 when stakeholders and members of the industry actually met with my predecessor to say, “Look, we are concerned about availability. We think there are issues here that need to be looked at still further,” and that is when my predecessor decided to bite the bullet and say, “Let’s delay for another six months,” and we had to ask the EC to be able to delay for six months to April of this year, and that is what we did.

Chairman: Minister, can I stop you there? The question is not about the test. The question is about the In Depth Study of Motorcycle Training.

Q105 Sir Peter Soulsby: If I may follow on, clearly, it sounds as if we are talking completely at crossed purposes here. As I understand it—correct me if I am wrong—the Department commissioned in 2003 what was described as an In Depth Study of Motorcycle Training—am I right?

Paul Clark: Yes.

Q106 Sir Peter Soulsby: The original report, which I understand some consultants worked on with you, was due to be completed in October 2007—am I right?

Paul Clark: Certainly a report to be worked on. Whether it was 2007 I cannot tell you.

Q107 Sir Peter Soulsby: All right, but some time ago?

Paul Clark: Yes.

Q108 Sir Peter Soulsby: According to the Department’s website, this was going to look at key competencies of riders, skills that should be taught at each level, whether training should vary according to bike type, what post-test training courses there should be to attract riders, and a variety of other things but those things were within it—am I right?

Paul Clark: Yes.

Q109 Sir Peter Soulsby: In reply to a Parliamentary Question on 16 July 2009 you said, “The study was largely completed by early 2008. Provisional results were taken into account by the Driving Standards Agency in the design of the test,” and you concluded, I think, by telling the House that you intended to publish a report by the end of October 2009—am I right?

Paul Clark: That is correct in terms of the response.

Q110 Sir Peter Soulsby: To come back to my initial question, what has happened to it and why has it not been published?

Paul Clark: Part of that answer was there, that some of that work was taken into account in terms of the testing regime. In terms of October 2009—Sir Peter Soulsby: It is a very simple question.

Q111 Chairman: Let us not go on diverging things. Can you just give us a straight answer: when is it going to be published? If you do not know, please say so.

Paul Clark: In terms of October 2009, I was just about to say, I will check in terms of timescales and I will write to you accordingly. That is exactly what I was going to say.

Q112 Sir Peter Soulsby: I do not need to labour the point. It is very obviously an inadequate answer to the question. It is something so fundamental to the
design of the test and the work that the Department has been doing since that time. Would you not accept, Minister, that it would have been very helpful, to say the least, if the findings of this study, initiated well over five years ago, had been available to stakeholders as a public study before the test had been introduced?

**Paul Clark:** Substantial consultation was undertaken in terms of the run-up to the testing process and the changes were done. That was in consultation with exactly the people within the industry who obviously had an interest and great knowledge, and indeed, there were talks about whether it should be delivered in other ways and other options rather than DSA, for example.

**Chairman:** Minister, I am not going to allow this to go round and round. There was a question put to you about the publication date. You are going to write to us about that. There was a further comment from Sir Peter about whether it would have been better if it had happened before. You are now talking about something different. I think we should leave that one as it is and we will draw our conclusions. Is there any other point?

**Sir Peter Soulsby:** No, I think the point has been made actually.

**Q113 Graham Stringer:** Why did we decide not to derogate into imperial units and go in metric units? Why did we use the 50 km per hour figure and not ask for a derogation to 30 mph so we could have done more on road?

**Paul Clark:** Can I say, I think the issue about the speed—and I know this has been an issue that has been argued on a number of occasions and people wanted to push this as a major part. What this is about, the 50 is side from the fact that what we need to do is make sure the test is robust and meeting the requirements of today’s modern roads and what is required by motorcyclists. Frankly, that is not the overriding issue in terms of whether it is 50 or whether it is actually 48 or 30. It is about meeting the requirements of today. That did not make the difference about whether we are off road or on road. The off-road provision was indeed in the consultations in 2001 and 2004. The industry and the stakeholders actually said that they thought that the test should be carried out on designated sites rather than on road. I think the issue about whether it is 50 km per hour or whether it was 30 mph is not an issue. The issue overriding this is about safety and well-trained motorcyclists.

**Q114 Graham Stringer:** That is interesting, because in your evidence you have claimed that there is an overwhelming support from the motorcycling fraternity and industry for off-road testing. That is not the evidence we are receiving in this Committee at the present time. It is nothing like the evidence we are receiving.

**Paul Clark:** Obviously, I will not speak for what other people have said other than that I will say that all the reports and discussions that went on in 2001 and in 2004 were very much that it should be on off-road sites. At that time the industry was saying that they still wanted a single test at that stage but believed that it should be off-road. Clearly, colleagues here were involved as well at that time but that was the case. It was when we came to 3 September 2008, literally 27 days away from vesting day, when in fact we had in place multi-purpose test centres, which was part of the discussion that happened within the industry, and 70% of the population were already covered by 30 September to be within the standard criteria of access to the test. It was all in place. Then on 3 September there were concerns from the industry which, as I say, my predecessor listened to, which said they were worried about access rather than the business about the two tests and so on.

**Q115 Graham Stringer:** Do you believe our test is better than the German test? Do you think qualified motorists in this country are better prepared or not as well prepared as they are in Germany, where it is an on-road test?

**Paul Clark:** There is actually a choice with the on-road testing that is done in Germany. It is on very quiet roads, as I understand it, and the rest will be actually on off-road sites. So actually in Germany they have a split. If I look at the statistics in terms of accidents, serious injuries and deaths, I would say our roads are safer, and that would be for a combination of reasons, one in terms of our tests and skills that we place on all users of the roads. On that count I would say the answer is yes, they are safer. I want to make sure, as I said at the beginning, that we remain that way, as I am sure Honourable Members do.

**Q116 Graham Stringer:** My suspicion, looking at the evidence we are getting—and I had not thought about this before we started this inquiry—is that about eight years ago the Government were committed to multi-purpose test centres and you have gone in that direction, irrespective of what motorcyclists and the industry were saying, which brings me to Sir Peter’s point, that actually, we need to see the evidence. The Government is committed to evidence-based policy making, yet that evidence is not being shared with us, so how do we know that you have not just started out saying you like these multi-purpose test centres, off-road, and have just gone ahead with it? Where is the evidence?

**Paul Clark:** We needed to set out how to meet the requirements of a process that had been undertaken in terms of the standards required, common across Member States, to have safe motorcyclists across the board, the minimum requirements.

**Q117 Graham Stringer:** Can I interrupt you? I understand there is a Directive, fairly widely drawn, and we have to go with that. We have implemented it in a particular way in this country, and I want to see how that implementation relates to the evidence of training, improving skills and road safety and access, and we just do not have that evidence before us.
**Paul Clark:** The ultimate test of that, of course, will be in us being able to reduce the deaths and serious injuries on our roads.

**Q118 Chairman:** Minister, we are all agreed on that objective and we want to see progress. However, there are still major problems in relation to motorcyclists, with a very high rate of deaths and injuries. The question is, what is the evidence in relation to the way in which we have implemented this Directive which would show how many deaths and injuries amongst motorcyclists and people associated with them are going to be prevented? Do we know how many deaths and injuries will be prevented? Is there any evidence or any work that has been done?

**Paul Clark:** Let me answer in terms of the work that was done in preparing this. I will ask Lesley.

**Ms Young:** One of the main causes of accidents for motorcycles is loss of control. Even today about 15% of all accidents are as a result of loss of control, and that is equal to failure to look properly. The test had to meet the Directive. It was interpreted by the UK in a way that tested the areas of most concern. Controlling a motorbike is really very, very important. Unlike cars, which have a lot of technology that get people out of trouble when they do things like brake inappropriately, or brake from high speed, motorcycles do not have that kind of help. If a motorcyclist gets it wrong, the consequences are that they will come off the bike and could end up killed or seriously injured. So the way we interpreted that in the design of the off-road element of the test was to specifically tackle those areas where we know motorcyclists are at risk. One of them is in avoidance, which I think we are all agreed upon. The other challenge is that the braking exercise linked to that is unnecessary but, clearly, the main part of dealing with the incident is to maintain control of the motorcycle. It is no good to swerve out of the way of something and then not be able to control the consequences of that in terms of speed or when you should brake in terms of how the bike is performing. We are confident, knowing statistics and the reasons for the accidents on the road today, that the off-road element is crucial to preparing people better for the road. It is not the be all and end all, but as a new motorcyclist, basic control is very, very important. We come on to the on road bit, which clearly is about dealing with other traffic, and the test is significantly longer for that element. So we are very confident that the combination in the design of the test will meet what we know to be high-risk areas, and that is the reason we have introduced it.

**Q119 Chairman:** Has any assessment been made of how many lives will be saved and injuries prevented by the new test?

**Ms Young:** Clearly, we will have to wait in the longer term for statistics but, as I say, historically—

**Q120 Chairman:** Has any assessment been made?

**Ms Young:** Well, you could make an assessment on the basis—

**Q121 Chairman:** Has it been made?

**Ms Young:** It cannot be at the moment, until we see the end results.

**Chairman:** So the answer is it has not been.

**Q122 Graham Stringer:** I understand those assertions. It would be good to have seen that evidence so that we could look at it thoroughly. If there is not a buy-in from people who are learning to ride motorbikes, as there appears not to be at the present time—there has been a dramatic decline in people going to test centres—it could result in more motorcyclists—there are always some—driving when they have not passed the test, without having plates on at all. That could be one of the consequences, could it not?

**Paul Clark:** I do not accept the premise you start from that there is not a buy-in from individuals or from groups. I do not accept that that is the case. The second thing is, of course there has been a decline, as there is in the period running up to any new scheme that comes in—it does not matter what it is—as I am sure Members know, Chairman. There was a rush of numbers, and in fact the number that we are monitoring now going through—and in fact some 30,000 up to September have taken Module 1—is very much on the scale that was there before, going back to 2006-07, before we started to have a mad rush to get in before the new test. It is back there. So I do not believe (a) the underlying premise that there is not the buy-in and (b) the decline that is there, would be expected because of the mad rush that there was before the vesting day in April of this year. I think we do have to wait to see what the conclusion is over this year, with the settling down. Obviously, that would be one of the things that we would want to do, as the Committee would want us to do, to monitor that exactly the point does not happen as has been suggested.

**Q123 Graham Stringer:** That evidence is in direct contradiction to the oral evidence we had earlier, where witnesses said even when you take into account the increase in demand there was to get through the old test and the recession, less bikes being bought, the number of people taking tests is still low. The other factor that must come into it is the availability of time for people to train cyclists because they are travelling so far to the new centres; it must reduce the training time available from trainers.

**Paul Clark:** Can I just say, obviously, we have had a big increase. At the end of the day, there is a pot of people at any given time that will want to take a test, whatever it is, in this case the motorcycle test. If they had rushed to beat a deadline, then clearly afterwards there is going to be a reduction, which might mean the figure is lower than the level it will ultimately settle at. That is what I am saying. Obviously, the numbers just would not be there. At any given time there is a given pot. I do not know whether Rosemary would want to add anything further on the figures.
Ms Thew: I wonder if I can just say what the numbers are actually. We saw a 40% increase in people taking the test before the introduction of the new test in April this year. The figures were 88,000 tests conducted in 2007-08 and 105,000 tests conducted in 2008-09. That level of increase is one that we would have expected to have seen in the run-up to the new test. In fact, in September 2008 twice as many people took the test as in September 2007. We had planned the take-up of the test for this year and demand is running absolutely the way that we expected it was going to run. We anticipate that in 2011-12 we will be back to the levels of demand that we expected it was going to run. We had planned the take-up of the test for this year and demand is running absolutely the way that we expected it was going to run. We anticipate that in 2011-12 we will be back to the levels of demand that we saw before the introduction of the new test.

Q124 Graham Stringer: Will you contact the Home Office and police forces and ask them to check on motorbikes so that we can have an objective basis of evidence to find out? You can use number plate recognition, can you not, to find out if people are insured or licensed? Will you be asking your colleagues in the Home Office to ask police forces to check on this to see if there has been a resistance and that there are more people driving without motorbike licences?

Paul Clark: It is certainly one of the things we could look to do. I will certainly undertake to do that. In addition, I will also undertake to send you the actual statistics by month of the people that have been taking Module 1 and Module 2 so that you actually have those figures as well.

Chairman: That would be helpful.

Q125 Graham Stringer: This is a question that was asked before. I do not understand, like Sir Peter, and it may be my fault, what changes are likely to be brought in by the third European Directive. Can you explain that to us?

Paul Clark: I certainly can. In terms of the changes that are actually there, there are a number of areas. I have already indicated the timescale that is involved in answer to an earlier question. It does bring mopeds into Europe into the driving licensing for the first time—this is in terms of Europe; in the UK that is already there. It will revive some of the minimum ages for some categories of motorcycles and also set a higher minimum age of 24 for direct access to obtaining a full licence for some of the more powerful machines. There is unlikely to be any significant change in the UK because most of the direct access candidates are older anyway, but we will be consulting. We are working through that currently and we will be consulting in terms of the provisions of the Directive with interested stakeholders.

Q126 Chairman: Is there any independently verified information on the number of incidents during the new test compared with the situation before the new test?

Ms Thew: If I could perhaps say a little bit about that, previously the test was done on road and we did not collect the incidents if there was any sort of issue. They were regarded as road traffic accidents, so very seldom were those incidents collected. May I just put incidents as far as the new test into perspective, please? As the Minister says, we have done 30,000 Module 1 tests. We have had less than 100 incidents, so that is 0.3%. Within that, whilst any incident is regrettable, 80% of them have had only minor bruises, scratches, or no injury at all.

Q127 Chairman: Who collected the information?

Ms Thew: The DSA collects that information. Every incident is reported to us centrally in Head Office and it is collected by our examiners.

Q128 Chairman: Has the Health and Safety Executive been involved in developing the new test?

Ms Thew: Yes.

Q129 Ms Smith: Can I just ask whether or not the Directive could have been implemented without centralising test facilities in multi-purpose test centres?

Ms Thew: Again, if I could just explain a little bit of background here, as the Minister has said, we consulted widely in 2001 and again in 2002, and the overriding view was that testing ought to be done off road. If it is done off road, it means a very significant investment, particularly in blacktop—that is the tarmac of these sites. That is actually what costs the money and, in order to maximise the investment, the DSA did decide at that time, in 2002, reporting in 2004, that to make best use of the sites, we ought to run other tests from them as well. So in all but two sites we do run car testing as well as motorbike testing and we have LGV—that is large goods vehicles—in some sites as well.

Q130 Ms Smith: How many test centres will be closing as a result?

Ms Thew: Again, may I describe a little bit of the background here? DSA has well-established criteria for its location of driving test centres. Essentially, they are within 20 miles of most of the population. For rural areas it is 30 miles and for urban areas it is seven miles. In those centres where we have a multi-purpose test centre, we have relocated 52 driving test centres within those criteria that I have described. As more multi-purpose test centres come on stream—and there are still more in the tail—we would relocate other driving test centres that fall within the criteria. Those criteria were the result of other sets of consultation, most recently in 2005.

Q131 Ms Smith: Would it be possible to provide the evidence in terms of minimum distances or maximum distances that people will have to travel to reach a multi-purpose test centre?

Ms Thew: Is that the driving test centre relocation?

Q132 Ms Smith: No, in terms of how far motorcyclists will have to travel in order to access a multi-purpose test centre. You suggested seven miles for urban areas on average, greater distances for rural. It would be very nice to have the detailed evidence laid before this Committee.

Ms Thew: Just to explain, for motorcyclists the criteria are a little different from cars.
Q133 Ms Smith: I was not talking about cars. This is a motorcycling inquiry.

Ms Thew: As far as motorcyclists are concerned, the criteria are that most candidates should be within 30 or 45 minutes of a test centre or 20 miles. We have 90% of the population within those criteria.

Q134 Ms Smith: What were the average distances before the rationalisation, in other words, when you had a greater number of test centres and a greater number of locations?

Ms Thew: Previously we had about 180 driving test centres which were offering motorbike testing, and, plainly, there would have been more local centres for the vast majority of the population, but we do nonetheless still have 90% within our customer service criteria.

Q135 Ms Smith: So two-thirds of the test centres are closing down?

Ms Thew: No, what we have are 66 Module 1 sites and 137 sites from which we do Module 2, that is, the on-road part of the test. That was to allow greater flexibility for customers.

Q136 Ms Smith: Yes. To be accurate, I am talking about the off-road part of the test, in terms of closing down the facility for the off-road part of the test.

Paul Clark: That was the result of the discussions -road part of the test. That was to allow greater flexibility because there was concern expressed by stakeholders about accessibility. To separate out and have a module approach in terms of Module 1 and Module 2 was a decision that was taken to actually get greater access. Indeed, as Rosemary has indicated, nearly 90% are within the standard criteria of access to the centres for Module 1.

Q137 Chairman: What about the days they are open?

Paul Clark: Let me say that where some people have raised concerns in terms of some of the sites that we have been using that are temporary sites to help meet some of the requirements, most of the sites are available on Saturday afternoon and Sundays. We have also been making some of those slots available for practice and so on as well. So we are taking that on board. As Rosemary has already indicated, we are still working to actually get more sites, multi-purpose test centres, available but there are obviously complications that happen with planning requirements, about meeting the criteria and so on that are required. It is quite a large area that is required as well, so that we can actually make sure that you have the choice of left and right hand and the proper facilities, that work, of a sufficient size to be able to have adequate safety margins for the safety of those taking the test.

Q138 Ms Smith: One last question: what are the resource implications for the DSA of producing the multi-purpose testing centres and reducing the availability of other centres for the off-road test? Are there any savings identified?

Ms Thew: We have almost the same number of driving examiners who do motorbike tests as we had previously, and what we have done is to relocate some of our examiners.

Q139 Ms Smith: I am not talking about that. I do not want to know the detail. I just want to know whether there are any savings identified as a result of implementing this strategy in terms of test centre availability.

Ms Thew: There are no savings as far as staff resources are concerned but if we have disposed of driving test centres, plainly, there are savings coming from that.

Q140 Ms Smith: Could those savings be made available to the Committee, the estimated savings for the DSA?

Ms Thew: We can certainly make the Committee aware, with pleasure, of the money that we have had out of disposals of driving test centres that we have closed, yes.

Q141 Chairman: The test has been blamed for a catastrophic drop in motorcycle training. Do you accept that?

Paul Clark: No. I think this goes back partly to the premise of the earlier question. We do not accept there has been a catastrophic drop. What I believe is that, obviously, there is a fall in comparison to where we were in the run-up to the new testing process. We have now been monitoring those that are taking tests, and the numbers of approved training bodies remains fairly static. We are monitoring that to see that exactly the point that you are raising is not the case. Certainly all indications at the moment are that that is not the case but we continue to monitor it.

Q142 Chairman: Have there been a lot more unlicensed drivers since the test was introduced?

Paul Clark: Not to my knowledge. There is no evidence of that. I took on board the point that was made in discussions with Home Office colleagues and sources there, which is a point we will take away from the Committee.

Q143 Graham Stringer: Can I just follow up on a slightly different question? You said that the Health and Safety Executive had been involved in helping you set up the test centres. Can you expand on that a bit and tell us what kind of advice Health and Safety were concerned with. Was it the examiners or the people being tested?

Paul Clark: Just let me say in terms of the consultations in terms of taking this forward, it involved many stakeholders, including the Health and Safety Executive, and their concern, I have no doubt, was for all those that are using those sites, whether that be those that are training and examining or the trainees.
Ms Young: The Health and Safety Executive is obviously involved in all the information with regard to the incidents that we are required to report through that process.

Q144 Graham Stringer: What advice did they give you in terms of setting up the test centres?  
Ms Young: The Health and Safety Executive has been involved in the incidents. Our own health and safety internal recommendations have been taken on board in terms of the design of the site, and also in Ireland they had an independent Health and Safety Executive input into that, which recommended that our site was entirely appropriate, and that is available for you to see.

Q145 Chairman: Ms Thew, is the DSA a service provider or a business?  
Ms Thew: We are a trading fund, so plainly, we get no money from government and therefore we do need to cover our costs through the fees that we obtain, but essentially we are a service provider.

Q146 Chairman: Are you content with the DSA’s performance in introducing the new test and in conducting consultations about it?  
Ms Thew: There are always things that one can look back on and think we could do better but the answer to that has to be yes. We have operated in a very, very difficult climate here. It has been very difficult to get sufficient land. We have run into planning difficulties. We have run into remediation problems with multi-purpose test centres. We have designed a test which accords with the European Directive. The European Commission actually looked at this test and found it to be fit for purpose. It replicates the issues that people would see on the real road and there is then a 40-minute Module 2 test. I believe actually that DSA has delivered what is required by this Directive.

Q147 Chairman: Minister, do you agree with that?  
Paul Clark: Yes, I do. We obviously monitor, and of course, DSA reports annually in terms of meeting their criteria and targets. In terms of the delivery of this requirement, I believe the DSA has, in what has been described as difficult times, been able to take this forward and, in times of finding sites that meet the requirements that all of us would want for safe operation of a test, I think they have been able to achieve that, but there is still further work to be done.

Q148 Sir Peter Soulsby: I would like to follow up your question about unlicensed riders. The other thing that was suggested to us in evidence as a likely result of the new regime was an increase in the numbers of riders choosing to take the Compulsory Basic Training and then just go for two years riding a bike under 125 cc, and they just do it again and again. Do you monitor that? Are you able to demonstrate the trends for that in the past and what is happening now?

Ms Young: Significant numbers of our tests, about 80%, are direct access into motorcycling, which are those people on the bigger machines. About 20% therefore are the smaller, 125, riders, which I think you are referring to. At the moment that balance has not changed. It is something that we would clearly monitor going forward.

Q149 Sir Peter Soulsby: You do actually monitor the numbers who never bother to present themselves with a full licence but just make do with the provisional?
Paul Clark: We actually agreed earlier on that we would send you the figures of those that take CBT and go on to the test regimes, so that we can clearly see the difference in those numbers.

Q150 Sir Peter Soulsby: It is the ones that do not go on that I was interested in.  
Paul Clark: Obviously, that would be something we would want to monitor, whether that could be a consequence of this or something else. That is what we need to follow through.

Q151 Graham Stringer: Did you have to retrain all your examiners?  
Paul Clark: Examiners have to be trained. Provision was made. Examiners had to be retrained but provision was also made for trainers to be able to have free slots and so on to go along for briefing sessions and practical sessions in the run-up to this, and indeed, I think again in November we made available further free slots.

Q152 Graham Stringer: How much did it cost to retrain the examiners?  
Paul Clark: I do not know offhand.

Q153 Graham Stringer: If it is easier to do it in time rather than cash . . .  
Ms Thew: We can certainly let you have an estimate of the time that has been invested.

Q154 Graham Stringer: I just wondered if it is an hour or if it is a day or how long it takes.  
Ms Thew: We can send you a note on that.

Q155 Chairman: You had considerable difficulties getting planning permission for the centres.  
Ms Thew: Very much so, yes.

Q156 Chairman: Did you anticipate a problem?  
Ms Thew: We have done a lot to try to work round this. The planning permission problems have arisen largely because local authorities do not feel that we bring in new employment to an area through a multi-purpose test centre, although what we have done is try to stress the value as far as the training bodies and so on are concerned, and also the fact that we have examiners on site. We have also run into problems with local residents, who have objected to what they see as local pollution and similar because of bike testing. We have done a great deal to try to work round that. We have involved training bodies, we have asked them for help in planning appeals and
14 October 2009  Paul Clark MP, Ms Rosemary Thew and Ms Lesley Young

similar. Nonetheless, there have been real problems in about 15 of the sites that we have had. Just one anecdote, if I may. In Haverford West, as one example, the local authority offered us some land but when it went to planning, the local Planning Committee of the same authority turned us down. We went to appeal but it was still rejected. That has happened in a number of places.

Q157 Chairman: Did you anticipate these problems?
Ms Thew: We anticipated that there would be problems that we tried very hard to work round them, as I say, through working through local training bodies and similar. I am not sure what else we could have done though. 1884 ceased to exist before this programme came on.

Q158 Ms Smith: You mentioned local authorities and job creation. Could you elaborate on that a little, in terms of locating new multi-purpose test centres and getting planning permission.

Ms Thew: Local authorities, when they are considering planning applications, often want to have satisfaction that large numbers of new jobs are being created.

Q159 Ms Smith: That is not a planning ground. It is not a criterion.
Ms Thew: It is often a criterion that local authorities do apply, and we have had numbers turned down on that basis.

Q160 Chairman: You are saying that is a major reason?
Ms Thew: We have had numbers turned down on that basis.

Q161 Chairman: Thank you very much for coming and answering our questions, and we look forward to receiving the various pieces of paper.
Paul Clark: We certainly will, Chairman, and thank you very much.
Written evidence

Memorandum from Donald Cambell (EMT 01)

I understand you have requested interested parties to respond as regards the new motorcycle test and test centres, I cannot comment on the actual content of the new test, as I have not yet tried it.

I would however like to comment on the fact that where I live is about 90 miles from the nearest test centre for the part one of the test, (off road), as a novice the instructors are advising it could take about five days to be trained for both parts, and as the distance is considerable, this would incur a large amount of time and expense.

I am dismayed that, as my purpose was to try and save fuel, and save parking space at work, to keep a small motorbike on the road you have to overcome a mountain of obstacles.

If anything this has put me off going for a motorcycle licence, which defeats the whole purpose of the scheme, which was to gain more instruction and experience, instead I have three choices, run a car, re sit the CBT (compulsory basic test)—allows a person to ride a 125cc motorcycle with L plates for two years), or use a moped (30mph max), and have large vehicles breathing down my neck in the 60mph area.

We do not even have a CBT instructor in the Skye and Lochalsh area, and again have to go to Inverness and spend a very long day there to complete this basic course.

In conclusion please can I ask that some respite be given to remote areas such as ours.

August 2009

Memorandum from Mrs D Bennett (EMT 02)

Please see below a description of my unfortunate experience attempting the Module 1 part of the new motorcycle test.

On Friday 31 July I took my Module 1 off road motorcycle test at the DSA test centre at Burton Upon Trent in the fenced off area of their new facility. I crashed at 20 MPH, badly bruising my left foot, (my foot was X rayed at A&E but thankfully no bones were broken), I tore skin from my left hand and bruised my knees, my head hit the ground scratching my visor and tearing parts from my crash helmet. On two previous occasions I had tried to pass this test but failed both times. The first failure was for not achieving 50 KPH in the speed trap and for locking the back wheel on the emergency brake test. Failure on the second test was for not reaching 50 KPH in the speed trap on the avoidance manoeuvre—I did however achieve 53 KPH through the trap for emergency braking on this occasion.

I am a 51 year old woman, married with three children. I have been learning to ride my motorcycle for 18 month's I have ridden for 5,000 miles without any problems on my L plates. I have toured Snowdonia and The Peak District on my motorcycle and loved every second doing it, I have never fallen off my motorcycle on public roads.

On the day I crashed I was determined to succeed and set out in full optimism. However it is well understood that a 125 cc motorcycle is at the limits of its’ performance in terms of acceleration, cornering and breaking for this test. Yet I was still confident, I had practiced for hours and hours getting my machine up to the required 50 KPH for the speed trap and then emergency breaking and practicing the avoidance manoeuv. This was all done along a long straight little used country road.

All was good on test day until I started the “avoidance” part of the test, I rounded the first bend, and as I came out of it I felt I was going too fast so I braked slightly , then I was on the floor with my foot trapped under my motorcycle. I tried to get out from under the bike, but I had to wait for the examiner to get my bike off me.

Motorcycling is dangerous like lots of other things we choose to do in life such as cars, aeroplanes, sitting on a bus, walking up and down stairs, getting out of bed, everyone has the choice to do these things.

The difference is that the Module 1 off road part of the motorcycle test is forcing me to do something dangerous, the proof that it is dangerous is the fact people are getting hurt doing it.

This new off road test has been risk assessed by its’ designers and they have chosen to put my safety in jeopardy.

The old test was within the laws of the highway code and carried out on public roads, following traffic at a safe distance, not exceeding speed limits etc. but the new test in a caged off pound is different, it requires and compels me to perform stunts that are measured by the numbers, this infringes my human rights by taking me away from everyday road use which is what the test is for. It forces me to ride a motorcycle as though I am a competitor on a racetrack.
I choose to go on the road on a motorcycle, but I have no choice with regards to performing the DSAs’
stunts in their caged off pound. I am compelled to do it if I want to continue riding motorcycles on the road.

I am dissatisfied with this test and I think it should be reviewed and redesigned.

*August 2009*

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**Memorandum from David Harvey (EMT 03)**

1. Has the DSA interpreted the EU Second Driving Licence Directive correctly and applied it appropriately?

1.1 I believe not. The EU directive states: “… The special manoeuvres mentioned under points 6.2.3 to 6.2.5 have to be implemented at the latest five years after entry into force of this Directive…” The original deadline would have expired in September 2005 but I understand that at least one extension was secured. The DSA has had sufficient time to implement the new directive but many test centres have yet to be built.

1.2 The EU directive allows (but does not require) the special manoeuvres to be conducted on a special testing ground. If a special derogation (30 mph rather than 31.1 mph speed minimum) had been applied for in time, the special manoeuvres could have been conducted legally on British roads with a speed limit of 30 mph. This would have avoided the costs of specialist sites and would have permitted training schools and students to more easily organise legal and safe opportunities to practice the special manoeuvres.

1.3 The EU directive (para 6.2.4) requires one manoeuvre to be executed at at least 30 km/h (18.6 mph). The DSA has interpreted this requirement to show safe riding through a curve but fails to measure the 30 km/h speed.

1.4 Para 6.2.4. also requires one manoeuvre to avoid an obstacle at a minimum speed of 50 km/h (known as the “avoidance” manoeuvre). The DSA does measure the approach speed but the measuring devices are incorrectly placed. They are 10 metres before the avoidance cones so that when the swerve is applied, more often than not, it is occurring below the required speed. To comply with the directive wording, the speed measuring equipment should be placed either side of the two blue avoidance cones. (For a copy of the DSA’s diagram visit: http://www.dsa.gov.uk/Documents/MPTC/MC_manouvre_Diagram.pdf)

2. Are the off-road motorcycle tests safe and appropriate?

2.1 Certainly not. Ten out of eleven components do not extend the candidate’s skills beyond CBT (Compulsory Basic Training) standards. CBT is the basic initial training required by law. The avoidance manoeuvre is badly interpreted and executed as well as representing bad practice for avoiding a hazard. If a candidate has dangerously poor machine control then this will be apparent to a competent examiner or instructor within a few minutes of the commencement of on-road riding.

2.2 Good driving/riding practice requires good forward observation and planning so that hazards are identified and avoided as soon as possible. Even an untrained rider/driver will instinctively (and correctly) reduce speed (by easing off the accelerator followed by firm braking) on the approach to a hazard. With the DSA’s avoidance manoeuvre instructors have to coach students to override their good safety instincts and keep the accelerator open and maintain speed right up to the point where they are only ten metres (0.6 second) away from the hazard. The instinct to brake hard and early when approaching a hazard at speed is a very strong one even (or especially) with novices. I understand that many of the accidents occurring on the new test happen as a result of a loss of control when the candidate starts to apply the front brake too soon i.e. whilst leaning the machine slightly to pass through the avoidance cones. With the student being aware that a lack of speed might cause them to fail the test, they might be tempted to glance down at their speedometer on approaching the speed trap which is not a good idea as they need to be looking where they are going. One must also remember that sometimes a novice motorcyclist will do something unexpected as a consequence of test nerves, no matter how good their training.

2.3 Good collision avoidance technique requires that the hazard should be spotted early and speed reduced as soon as possible so that if an impact cannot be avoided then it at least occurs at a much reduced speed reducing the severity of any injury. Reduced speed will also make the machine more responsive to swerving inputs from the rider. A good collision avoidance manoeuvre would involve closing the throttle, applying the brakes as firmly as possible in a straight line on the approach to the hazard and if there was insufficient room to come to a complete stop, the rider then releases the brakes and conducts a swerve around the hazard at a much more controllable and lower speed.

2.4 A well respected survey of motorcycle accidents in the USA (The Hurt Study: http://isddc.dot.gov/OLPFiles/NHTSA/013695.pdf) concluded many things, one of which was: “. The typical motorcycle accident allows the motorcyclist just less than 2 seconds to complete all collision avoidance action…” The DSA allows only 0.6 of a second. This is the time taken at 50 km/h to travel the 10 metre distance from the speed measuring equipment to the avoidance cones.

2.5 The current avoidance manoeuvre requires the rider to accelerate towards a narrow gap (1.5 metres) which contradicts basic safety instincts for a motorcyclist.
If a student successfully practices and passes the module one test in its current form, they may have a dangerously incorrect reaction to a real emergency on the public roads. They may be thoroughly conditioned into believing that all they have to do to avoid a vehicle emerging unexpectedly into their path is to close the accelerator and swerve to the left (into a kerb) or to the right (into oncoming traffic). They will have omitted to carry out the most important aspect of collision avoidance—namely to apply the brakes as firmly as possible whilst upright in whatever space is available to them. Whilst the brakes are being applied, there will hopefully be a brief opportunity to look for, choose and aim for an “escape route”.

For some inexplicable reason, the DSA requires the candidate to come to a stop at a precise point (a “controlled” stop) immediately after taking the avoidance manoeuvre. A “controlled” stop is a vital skill to enable riders to come to a halt behind a give way or stop line but it has no relevance to collision avoidance and it should be completely detached from the avoidance manoeuvre. This means that the DSA’s version of collision avoidance is conducted in the wrong order: ie swerve then brake after the hazard has been avoided. Braking should be done before and not after the hazard.

There is no allowance made for weather conditions which means that by keeping the same speed and distance requirements for wet and dry conditions, the test is difficult (and sometimes dangerous) in the wet and consequently much easier in the dry. The failure to make allowance for reduced grip in the wet contradicts the Highway Code and good practice generally. (ie The stopping distance doubles in the wet due to reduced grip). The DSA claims that the surface used offers high grip in the wet but my understanding is that it is the same surface as commonly used on new main roads (mastic asphalt).

Older candidates might find the avoidance manoeuvre more difficult than young people (under 25s) because they will feel (correctly) that maintaining speed whilst approaching a hazard is inherently dangerous. An under 25 year old will usually have less fear and awareness of risk and will consequently find this manoeuvre easier than someone twice their age. This is most unfortunate as young drivers and riders are in the age group most likely to have a serious accident early in their motoring careers.

The DSA has claimed that some of the accidents can be attributed to poor preparation which may be true. The DSA decided early on that the module one manoeuvres could not be conducted safely on public roads and as a consequence started on an expensive programme of building special test centres. The DSA has experienced great difficulty and considerable delays in securing suitable sites but at least the DSA has the funds to provide such facilities. The vast majority of training schools have great difficulty in obtaining regular access to suitable practice areas. The DSA has been at fault in designing a test which is difficult, illegal and unsafe to practice on suitable public roads.

The DSA claims that adequate consultation took place but empirical evidence showing an alarming increase in test accidents suggests that such consultation was inadequate, untimely, inappropriate and/or ignored.

I am not aware of any evidence to suggest that the previous practical test was in any way dangerous, deficient or inappropriate. Motorcycle accidents occur for a variety of reasons and I am not aware of any evidence to suggest that the old-style practical test causes or contributes to motorcycle accidents. The new style test was introduced purely on grounds of European harmonisation.

I am not aware of any means (statistically) of checking the DSA’s claims that the new test will improve road safety. How will this be measured meaningfully? We have been here before when the DSA introduced the hazard perception test: The Select Committee on Transport’s seventh report (http://www.publications.parliament.uk/pa/cm200607/cmselect/cmtran/355/35507.htm) concluded in paragraph 69: “… We are concerned that four years after its introduction, the Department has yet to publish an evaluation of the impact of the hazard perception test on novice driver collision involvement rates…” Has the DSA evaluated the effectiveness of the old-style practical motorcycle test in reducing motorcycle accidents?

Via a Freedom of Information Act request, I have obtained copies of the DSA’s risk assessments for the module one manoeuvres and I believe the assessments to be seriously defective. They cover all aspects of the use of the off-road site with the exception of the most important aspect, namely the manoeuvres themselves. The fencing is mentioned in some detail on the risk assessments but the possibility of the fencing being a hazard to a candidate carrying out a manoeuvre is not mentioned. The alarming increase in injury accidents on test confirms my view that the risk assessments themselves were seriously deficient. This worrying deficiency will, I believe, render the DSA vulnerable to injury claims with resultant costs to the tax payer.

When I have discussed the module one test with students after they have completed it, there is a clear consensus that the majority of the manoeuvres are contrived and artificial with little obvious relevance to riding a motorcycle on real roads. The layout and use of cones combined with the continuous high fencing all contribute to an impression of artificiality. This is enforced by the examiners requiring candidates to make rear observations before moving off even though there are no other vehicles in the enclosure and the examiner is the only other person. The effective use of rear observations is of course tested properly (and more realistically) on module two (the road ride).
3. Is the number of motorcycle test centres adequate and are the locations satisfactory?

3.1 No. The enormous reduction in the number of test centres means that on average the candidates have to travel much greater distances with increased costs, inconvenience and carbon emissions. This will be a serious safety problem in the winter for novice motorcyclists travelling long distances to test centres (eg for an 8.10 am test) on dark and frosty roads before sunrise.

4. What is the impact of the recent changes in motorcyclist testing?

4.1 A big increase in injury accidents. In the first 1,905 new-style tests, there were 14 accidents, 10 of which involved injury. This compares very badly with only six injury accidents (over 27,460 tests) in the final four months of the old-style tests which ceased on 25 April 2009. Pre-test change (25 April 2009), there was on average one injury accident every 4,576 tests (0.02%). Since the new test came in on 27 April 2009, the injury rate has greatly increased to one injury incident every 190 tests (0.52%). (I have obtained the above figures from Hansard and the DSA respectively). If such a dramatic rise in injury accidents had occurred in a factory for example, then I presume that the Health and Safety Executive would have demanded very urgent remedial action. If a motorcycle training school reported such a dramatic increase in accidents then the DSA would consider closing the school down. We have yet to experience the effect of low winter temperatures upon the accident rate when cold hands and cold tyres will increase the risk to the novice motorcyclist. It is ironic that a government agency responsible for reducing road casualties has actually implemented a proficiency test which has increased motorcycle accidents on DSA premises.

4.2 Increased costs for training schools which will have to be passed on to the consumer which may discourage some learners from taking sufficient training and a few from taking any training at all and riding illegally. The increased costs will arise from additional fuel bills, wear and tear as well as repairs to motorcycles damaged on the avoidance manoeuvre.

August 2009

Memorandum from Trevor Wilbourn (EMT 04)

My name is Trevor Wilbourn. I am the owner of Ridesure Motorcycle Training, an approved training body by the DSA to carry out all aspects of road based motorcycle training. I would like to submit my concerns to the Transport committee enquiry into the DSA handling of the recent changes to the motorcycle test.

My primary concern is the safety of candidates during mod 1, in particular the avoidance and emergency stop during inclement weather.

Can I firstly state that I am broadly in favour of the module 1 test but I have very serious concerns about it in the winter months.

I have written to Rosemary Thew and her staff on numerous occasions regarding this issue and have found the replies to be ignoring the issue and on occasions patronising. The first concern is that the avoidance and the controlled stop have NO need to be an integral part of the same exercise according to the EU directive as shown in the extract below:

6.2.3 At least two manoeuvres to be executed at slow speed, including a slalom; this should allow competence to be assessed in handling of the clutch in combination with the brake, balance, vision direction and position on the motorcycle and the position of the feet on the foot rests;

6.2.4 At least two manoeuvres to be executed at higher speed, of which one manoeuvre in second or third gear, at least 30 km/h and one manoeuvre avoiding an obstacle at a minimum speed of 50 km/h; this should allow competence to be assessed in the position on the motorcycle, vision direction, balance, steering technique and technique of changing gears;

6.2.5 Braking: at least two braking exercises shall be executed, including an emergency brake at a minimum speed of 50 km/h; this should allow competence to be assessed in handling of the front and rear brake, vision direction and the position on the motorcycle. The special manoeuvres mentioned under points 6.2.3 to 6.2.5 have to be implemented at the latest five years after entry into force of this Directive.

Associated with this is that because the DSA have incorporated the avoidance exercise and braking exercise there is a dimension in which to perform the stop after swerving. This dimension is 31 metres from the avoidance cones which are being swerved around. The braking distance as given by the Highway code for a wet surface is 28 m at 30 mph. However the avoidance cones are mid swerve as obviously you have to begin the swerve before them and straighten after them in order to then brake in control and stop in the one metre box. So in the wet they have allowed three metres leeway to get straight and brake, and that would be at 30 mph. The exercise has a minimum speed of 50 kph (32 mph) but you can’t swerve and watch the speedo so the speed is likely to be nearer 35mph. This now means that in the wet, in order to stop in the box a rider has to start braking whilst swerving which brings an increased risk of skidding and subsequently
crashing. This is not the case in the dry because of higher grip levels. If you then factor in long journeys to the test centres in cold wet conditions, giving reduced rider input, cold tyres, cold wet surface, it doesn’t take much insight to see there is a potential for a serious accident sooner or later and with that the ensuing litigation. Also damage will occur to a candidate or training school machines, with spilt oil etc on the testing area surface. No instructor would promote braking and swerving at the same time as it is a high risk manoeuvre so there needs to be time to close the throttle, swerve and then stop. Most of the incidents so far have been in the wet in reasonably high temperatures. Very soon we will have much lower temperatures and a bigger problem. We all know that we should reduce speed and increase distances in poor weather, but no account for this is given in this test.

The speed is as laid down by the EC directive so apparently is not adjustable for the conditions. This means that either the stop box needs to be moved further from the swerve in inclement weather or taken out of the avoidance exercise altogether. DSA say they will not carry out tests in inclement weather which is totally unrealistic. How can they make that statement when the whole idea of this is to improve rider skills. This is Britain, we have bad weather, we are famous for it. We need to learn to ride and drive in most conditions but not at the risk of candidates with little experience being exposed for the sake of it with unrealistic expectations and exercises.

I need to add very little to the problem of test centre availability. We have to travel 28 miles and 30 miles to our nearest test centres, which in the scheme of things is not too bad but it is outside the 40 mins scope of DSA requirements. However it should be noted that for most centres now the first test of the day is 0810 and the last one 1430 to accommodate the wishes of examiners. This means that to travel an hour to the nearest centre requires leaving at 0700 at the latest so for me as a typical example I would arrive 30 mins before the customers at 0615, leaving home at 0545 and getting up at 0500, with much the same routine for the test centres in cold wet conditions, giving reduced rider input, cold tyres, cold wet surface, it doesn’t take much insight to see there is a potential for a serious accident sooner or later and with that the ensuing litigation. Also damage will occur to a candidate or training school machines, with spilt oil etc on the testing area surface. No instructor would promote braking and swerving at the same time as it is a high risk manoeuvre so there needs to be time to close the throttle, swerve and then stop. Most of the incidents so far have been in the wet in reasonably high temperatures. Very soon we will have much lower temperatures and a bigger problem. We all know that we should reduce speed and increase distances in poor weather, but no account for this is given in this test.

The reason the DSA gave for closing Kidderminster was that it was underused by local candidates and 70% of candidates came from areas closer to Lower Gornal. They said that only 20% came from Kidderminster. I argued with the DSA that the increase in cost would have a direct effect on the increase of unlicensed drivers but they would not accept it. In 2003 Ross Silcock conducted a road safety report for the DfT. It was titled Research into Unlicensed Driving (No. 48). One of the major reasons for unlicensed driving in the report was cost. With the current economic climate more people will take to the roads unlicensed if the cost of learning to drive increases by 20%. This will be the case all around the country where test centres have been closed and not only in Kidderminster.

The nearest viable option is Worcester which is 16 miles away. The DSA have agreed that three hours test area familiarisation is acceptable but to achieve this the average pupil will spend 20% extra on lessons and create 20% more emissions. This is based on three separate two hour lessons and the journey on the day of the test. It does not include any retests. Tiredness is a key factor for not doing longer than two hours at a time. Cost is another factor.

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The reason the DSA gave for closing Kidderminster was that it was underused by local candidates and that 70% of candidates came from areas closer to Lower Gornal. They said that only 20% came from Kidderminster. I asked for detailed candidate information by postcode area through the FOI Act in June 2009 and received a response that was full of discrepancies when compared to previous requests. I challenged this and an internal review clarified that the information sent was incorrect. They did not send the correct information with the report and after asking several times I am still waiting for them to send it. The latest
excuse is that they are having problems accessing the figures. The matter is with the Information Commissioner at the moment. The case has also been with the Parliamentary Ombudsman for the last four months.

The real reason they closed Kidderminster was that it is owned outright and they want to sell the building. Lower Gornal is leased. They have not sold the building yet though and are paying a security firm to look after it. The cost for this will go to the learner driver. As you probably know, any money raised by the sale will go straight back to the government and not towards the running of the DSA. The learner drivers of Kidderminster have paid for the upkeep of that building for the last 12 years but the DSA have let it get into a state of disrepair. They have apologised for this but have not explained where the money went.

I have been in direct contact with Rosemary Thew at the DSA since October 2008 and although she has answered several letters she consistently ignores any questions I put to her. She denies categorically that she has lied about the figures for usage but has stalled me at every opportunity in getting them. In all the correspondence that has passed between us road safety has never been mentioned by her. The only thing that concerns her is cost.

I have been in this job for 12 years. When I started there was talk of “super test centres” like the hospitals. The EU directive was the perfect excuse to implement these test centres and call them MPTCs. The main reason I have heard for opening these is that they had to follow the EU directive. It is more likely that the directive fitted their vision.

On a final note you may find it beneficial to speak to DSA examiners during your inquiry. You will find the opinions of the experts out there who have to implement these changes do not always agree with the management at the DSA. September 2009

Memorandum from Ken Taylor (EMT 06)

If ever you wanted a case of why a test centre should close to pay for the MPTC please take the time and look at Kidderminster—you will find tons of support to assist you in any investigation—local council, ADIS, public.

I am part of the Wrye Forest ADI group which have been directly affected by this disgraceful decision and have argued against this decision by going to DSA headquarters, Parliament, public meetings with Rosemary—with no luck.

Even though they had no grounds at all to close this centre, it went ahead. It has even been proven that the DSA, Rosemary, had amended the figures to suit her case.

PLEASE HELP US TO RE-OPEN A KIDDERMINSTER TEST CENTRE.

Students from Kidderminster have to travel to Worcester or Ludlow which is about 40 minutes on a clear day! September 2009

Memorandum from Road Safety GB (EMT 07)

1. Road Safety GB represents all Local Authorities in the United Kingdom with a responsibility for Highways Matters including Road Safety.

2. Road Safety GB is advised in Motorcycling matters by three Advisors who, in addition to being employed in a professional capacity as local authority Road Safety Officers, are committed and experienced motorcyclists.

3. We note, following the introduction of new testing arrangements in April 2009—as a consequence of the European Second Driving Licence Directive, that the Transport Select Committee is to hold an inquiry into current motorcycle testing arrangements.

4. Road Safety GB welcomes the opportunity, on behalf of its Members, to make the Committee aware of its views.

5. We therefore request that the views of Road Safety GB be placed before the Committee and we shall offer our comments in relation to each of the questions 2–4 posed by the Committee.
6. Question 2. *Are the off-road motorcycle tests safe and appropriate?*

It is the understanding of our Advisors that the only figures available to judge the safety of the tests are the Driving Standards Agency’s own figures which indicate a 1% crash rate. These figures would appear to indicate the possible need for additional independent research.

However, this raises wider issues relating to Health and Safety which could attract the attention of the Health and Safety Executive:-

(i) Were injuries sustained by the candidates involved in the crashes?

(ii) If so, were facilities available at the Centres involved to offer treatment for those injuries?

(iii) Had each centre conducted a risk assessment, bearing in mind the likely differences in surfaces, available space and treatment facilities available at the location?

(iv) If crashes occurred during testing is there any evidence of the highly likely event of crashes having taken place during training?

(v) Were the issue of crashes and their consequences, including treatment for injuries, given sufficient consideration during the drafting of the Directive?

The Advisors agree that rider training for novice riders should focus on teaching good forward observation, anticipation and road craft as opposed to riders taking evasive or avoidance actions which could present difficulties even to experienced riders.

7. Question 3. *Is the number of motorcycle test centres safe and appropriate?*

It is the considered view of our Advisors that there is an insufficient number of test centres and that their locations necessitate some novice riders being required to undertake journeys which are considerable and inappropriate in relation to their riding experience in order to attend a test centre thereby exposing those riders to greater hazards and increased risk of collision. Members of the Committee will recall that Early Day Motion 184 of 8 December 2008 covered this question.

8. Question 4. *What is the impact of the recent changes in motorcycle testing?*

As the Modular testing system was implemented as recently as April 2009 it is the view of our Advisors that, after only five months, it is not possible to assess the impact of its introduction on motorcycling and on motorcycle ridership. However, they also believe that, taking into account the current financial climate, as well as the points dealt with above, further consideration needs to be given to the potential medium and long term impact of the Regulations relating to motorcycle rider testing.

September 2009

Memorandum from Gordon Kemp (EMT 08)

I am an ex-police motorcycle instructor with over forty years of motorcycle experience. I was an authorised Police motorcycle instructor, raced at international level and competed in most forms of motorcycle sport. I have been actively involved in motorcycle training for twenty years. I have recently graduated BA degree in Education and Training (2000) during which I looked at motorcycle accident causation factors and motorcycle training. I am a practising motorcycle instructor/coach at all levels including advanced motorcycling and have researched motorcycle training in Europe and USA as part of my degree. I am on the register of post test trainers.

I am a grade 5 car ADI. As part of my CPD I am undertaking a course on coaching at the University of East London.

*Has the DSA interpreted the EU Second driving Licence directive correctly? And applied it correctly?*

There can be little doubt that the DSA has applied the directive, but as to it being applied correctly gives me serious concerns.

1. The swerve to avoid test was invoked by the EU to test an extremely important area of Motorcycling not understood by the DSA. It is evident from not only communications that I have had with them but also the following Paragraph in their own publication, Essential Skills for motorcycling, that they do not understand this area:

“Countersteering is a method of effectively controlling the direction of machine whilst negotiating hazards such as bends and corners.”
It is a technique and skill that should only be taught by professional motorcycle instructors. DSA recommend that the technique should only be introduced at a stage of your training and development that the instructor deems safe and appropriate.”

2. The inability to understand countersteering has serious ramifications on the implementation of the new test. The inability to countersteering has been identified as serious accident causation factor. It is actively taught in America, Europe, Australasia as well as many other regions. In a recent conversation I had with a senior instructor from the American equivalent of the DSA, I asked how important teaching countersteering to a new rider was, his reply was once they can move off it’s the most important thing to understand.

3. My degree dissertation which I have made available to the DSA is on this particular subject. The DSA have no understanding of conscious and unconscious requirements involved in controlling a two wheeled linear tracked vehicle, as discussed by Whipple. The Wright Brothers, Professor H Hurt and many others since.

4. I can evidence many incidents of the inability to understand Countersteering as a causation factor in many serious and fatal motorcycle incidents including one woman killed whilst undertaking her motorcycle test. Readers of this report should be made aware that this aspect of motorcycling has been misunderstood by the British motorcycle fraternity for some considerable time but reference can be made to the subject on numerous internet sites and knowledge of the unconscious workings of the brain is essential for complete understanding.

5. I am concerned by the need to adhere exactly to 31.6 mph. As the majority of UK speed limits are thirty miles per hour. I would have felt it prudent for the DSA to have asked the EU for derogation of this speed to 30 mph allowing students to be taught a manoeuvre consistent with road speeds and normal use of vehicles on the road. A 30 mph requirement would make more educational sense. I would have thought that a pragmatic approach to the EU parliament would have had favourable results as the spirit of the requirement would have been met.

6. The size of the testing area coupled with the required speed makes it impossible for a large framed rider to reach the minimum speed on a 125cc motorcycle. We have had three such cases where we have had to redirect that person to a larger machine. A large rider under the age of 21 would be severely disadvantaged if not totally excluded from the new test requirements, as their machines would be unable to obtain the speed in the given distance, clearly a breach of human rights.

7. It is self evident that the DSA implementation team have little or no understanding of educational concepts. If the required objective that is being tested is the candidate’s ability to swerve or stop at a speed in excess of 31.6 mph, why is there a necessity to only allow them two attempts at these manoeuvres? If the requirement was to be able to judge 31.6mph I could understand. Short of using technology, we are either asking the candidate to guess 31.6 mph or to look down at the speedometer. At that speed, in that confined area, clearly a dangerous request. Candidates should be allowed at least three attempts at the manoeuvre and informed immediately on completion of each attempt of the actual speed obtained. The requirement to complete the test in two attempts unfairly disadvantages the cautious rider.

8. There is no requirement within the directive for a need to carry out shoulder checks as if on a road. The off road tests are not on a road, they are in a secure and enclosed environment any request to carry out observations as if on a road is playing unnecessary and teaching the wrong requirements. The requirement to make appropriate observations is tested in the on road element of the test and should be excluded from the off aspect of the road test.

9. The requirement to stop the machine without locking a wheel is out dated. In New Zealand emergency braking is taught by locking the rear wheel and concentrating on using the front brake to maximum effect (single task operation). I have heard more that one instructor brief their rider for this manoeuvre by saying “put your foot over the rear brake but don’t use it. Concentrate on using the front brake and you will not fail for locking the rear brake”. The requirement should be “bring the bike to a stop under control” locking a rear wheel even to a standstill should not be a consideration.

Are the off road motorcycle test safe and appropriate?

10. The area appears just fit for purpose, but I have concerns about the run off after the emergency stop and swerve to avoid. A reduction of speed for the manoeuvre to 30 mph would not only make this run-off greater but would also increase the ability of the heavier rider achieving the minimum speed.

11. I am concerned that in our current test centre(Exeter), destined to be used for not only motorcycle tests but also several car tests at the same time, at a time when there is additional need for candidates to make themselves comfortable, there is only one toilet available for men and one for women. When this is viewed with the fact that there are 12 vehicle parking spaces for examiners I would suggest toilet facilities are clearly insufficient for a modern building.

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1 Page 130 The official DSA Guide to riding. The essential skills.
2 The HURT report Professor Hugh HURT 1981.
Is the number of motorcycle test centres adequate and are the locations satisfactory?

12. The numbers of completed test centres are woefully inadequate and also their implementation has been very badly managed. At Taunton we still have no clear date as to when the permanent MPTC will be open or in fact when the building work is to commence. This is twelve months after the original implementation date. This delay typifies the bad management and operation of the DSA, the key point of the directive was laid down nearly ten years ago and we are still unsure of when we will have a testing centre, this mismanagement has had a direct effect on my business and should be investigated as to why there has been a delay in getting these sites functional within the allocated time.

13. At present we have to take candidates on a 90 mile round trip which takes in excess of four hours (not including test times). I have had students who have had to travel three hours to get to the test centre from their home. Because of regulations this journey must be taken on minor roads as it is illegal to use the motorway. Students arrive at the test centre exhausted and ill prepared for the test as a result our pass rate has fallen dramatically. We could of course devote more time (more expense) or deliver the bikes by van to the centre (no practice area available).

14. The DSA booking service is overwhelmed at the present, we have candidates advised to attend at Taunton VOSA site despite it being closed, been given repeat times for the same test when clearly only one test can be undertaken at a time. Mistakes made by booking happen to often and are often very difficult to correct as the attitude of the management permeates down through to all staff.

15. The temporary VOSA site at Taunton has been closed for over 3 months and despite being informed by newsletter, 5 weeks after it was closed, that this is due to ongoing building work which is totally untrue, no work has been undertaken since it was closed and according to the DSA supervising examiner at Taunton none is planned. We are unable to obtain mid week tests at Exeter due to booking procedures.

16. The examining staff are also clearly overwhelmed, on our last visit the examiner was working on overtime having travelled to the centre from his local centre over 100 miles away and was booked into an hotel overnight to carry out more tests the next day. Ironically he was unable to obtain entry to the test centre and all tests were postponed until he was able to get the supervising examiner to attend from Taunton to open the doors. I have heard many cases of examiners travelling hundreds of miles and staying two or three nights in expensive hotel accommodation to undertake motorcycle tests.

17. The examiners are overzealous, with their interpretation of rules I have found it impossible to get permission to enter the site to take photographs of the layout to utilise in training, (this is before tests are undertaken with nobody using the area.) when asked the examiners comments are “we are not allowed to let anyone photograph the test area”. I am still awaiting permission from DSA headquarters.

18. My biggest concern is that there appears to be no accountability on behalf of the DSA, my last letter written in June this year to Rt Hon R Winterton complaining about the very subject of this enquiry was forwarded to the DSA for them to answer direct to me. This cannot be correct, who is overseeing the DSA? Who can I make a complaint to about the running of the DSA?

19. In his book “Driving is more about psychology than systems” John Brown makes the following statement regarding the DSA and Car driving:

   It is obvious why the system is failing and yet because of vested interests, no one is prepared to say enough is enough and so we have a system which has been allowed to continue, because through its failure, it makes money. The more it fails the more of the same poisonous medicine is given and the more ill our drivers become. The system then tries to cover its failure by blaming learners and their instructors and the stronger medicine then prescribed is to make the test even harder . . .

   If I appear to be critical of the DSA, it is because this is where the rethinking needs to take place.3

20. I would also bring to the inquiry attention the fact that the DSA has decreed that the Module one certificate will last until the theory test expires. I feel this is not only unfair, but also unnecessary and probably another breach of human rights. It cannot be fair that someone who takes their test having passed their theory test a week before gets nearly two years before taking their test whilst another candidate who undertook their theory test 20 months ago only has the remainder of their theory test to complete their training and obtain a module two pass before both certificate expire.

21. The problems that this inquiry are researching is a clear indication of the problems within this governmental quango. I am of the opinion the DSA have become unwieldy and unable to function in the manner originally intended, it seems to implement what amount to legislation, which is beyond their remit. These requirements often fly in the face of human rights consideration and best practice and alienate those that they are meant to be partners. The requirement for car examiners to sit in on all driving test is having a similar receptions by ADI’s.

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3 Page 12 Driving is more about psychology than systems. 2008 Driving is.
I thank you for the time in expressing these views I would be prepared to expand on them at any time and would be grateful of feedback as to the views of the enquiry.

September 2009

Memorandum from Black Country Motorcycle Training (EMT 09)

Black Country Motorcycle Training (BCMT) are a West Midlands based operation, training an average of 1,450 people per year to Compulsory Basic Training standard and around 500 people per year to DSA test standard, we have been trading for over 10 years and employ over 30 staff. BCMT are an approved DSA training body and have been running the new DSA test since its implementation in April 2009 despite not having a local MPTC.

1. The EU Directive made straightforward requirements for the skills and behaviour to be tested and we feel that the DSA interpretation of the directive is critically flawed.

2. We fully support the Motorcycle Rider Training Association (MRTA) memorandum, listed as appendix 24/Select Committee on Transport/Minutes of Evidence/submitted 13 January 2006 and subsequent evidence. We fully support these documents both in their comparison of the DSA test against the EU Directive, the flaws in the new test and the recommendations for a fairer, safer and more practical test still possible within the framework of the EU Directive.

3. The EU Directive does not make a requirement for the specific manoeuvres to be taken in a separate or off road test. It is only the DSA’s interpretation of the EU Directive that has created the need for an off road area in which to execute the manoeuvres. Our business turnover and bottom line profits have been directly affected by the DSA being unable to provide us with a local off road testing area. Candidates do not want to take a test in an area that they are unfamiliar with and there have been significant cost implications of taking tests out of our area.

4. The new test is not equally fair to all as it does not make any adaptations for the size, specifications or capabilities of differing motorcycles.

5. The manoeuvre described by the EU as “a manoeuvre avoiding an obstacle” makes no recommendation for this to be performed on a circuit nor for the performance of a controlled stop during this manoeuvre. The DSA require this manoeuvre to be performed firstly by accelerating to the prescribed 50kph around a 180—degree circuit area of 57.5metres, then performing a swerve followed by a controlled stop. No consideration has been given to the training of candidates for this manoeuvre, we are unable to safely replicate this manoeuvre on any road for our candidates to practice and we are unable to replicate the whole manoeuvre on our off road (DSA approved) training area, due to the layout and size of the area required. Whilst we have, to date, had no major incidents involving candidates performing this manoeuvre we have witnessed many accidents at test centres where the training bodies and candidates involved have criticised the manoeuvre as being difficult to replicate during a programme of training.

6. Whilst we fully appreciate the improving motorcycle safety objective of the DSA test, we have personally experienced a decrease in the quantity of structured training that each candidate, on average, has taken prior to the new test. What we have actually seen is the reverse with an increase in candidates asking for training for the off road manoeuvres, particularly elements of the swerve and brake exercise. Candidates have then compensated by reducing the amount of on road training. In our opinion no amount of practicing a swerve and brake manoeuvre can replace the experience gained by attending a structured on road training programme.

7. Again we fully appreciate the objective of improving motorcycle safety, and appreciate that the new test was designed to encourage candidates to take a full, structured programme of training. We therefore find it incredible that the general public are still allowed to book their own tests. Not only are the public allowed to book a test on a machine that they are not legally allowed to ride without being accompanied by a DSA approved instructor (DAS) but we have witnessed an increase in, and have found that this has encouraged, illegal motorcycling both to the test centres and on the road in the form of practicing.

8. Due to failings in the booking system the general public are often able to book themselves a test slot earlier than those available to Approved Trainer Bookers again making it easier for candidates to present themselves for test and avoiding the need for any training, or to be accompanied by an approved DSA instructor.
9. Most alarmingly we have seen a huge decrease in the number of people attempting to take the DSA test at all. Prospective candidates have been discouraged by the new test and have therefore found riding a 125cc machine having completed only the CBT training to be a cheaper and easier option. We have also seen an increase in the amount illegal riders with candidates taking the CBT training then riding a machine over 125cc without having taken any further training.

September 2009

Memorandum from Charles T Owens (EMT 10)

(1) The DSA is an agency that should be working in the interest of the customer. Unfortunately they have an unhealthy monopoly of the driving industry which leads to a very strong, dictatorial attitude towards their customer. Having a captive client base does not give any incentive for them to improve their manner and standards.

(2) Motor bikes account for only 4% of the combined testing of bikes and cars in the UK. No-one would object to improving standards however there needs to be a positive route.

(3) The EU directive relating to changes in the motorbike test asked for a swerve test at a speed of 50km an hour, in our language 31 mph. If the DSA had challenged the EU directive the speed could have been adjusted to 30 mph. Instead, for the sake of 1 mph, the DSA decided to embark on the multi-purpose test centre MPTC programme, spending millions of pounds of its customers money and making the driving industry suffer right across the country.

(4) If it was necessary to revamp the motorbike testing, small sites reasonably spaced across the country would have been more sensible. Instead the MPTC were installed at random available sites across the country just to suit the DSA, with no thought to the customer. To try to generate business at these new centres the DSA decided, irrespective of location, to close profitable test centres in other areas. The fact that this would cause long travelling distances for both bike and car learners which would give the additional cost, were ignored by the DSA.

(5) Strong protests were generated right across the country as instructors supported learner drivers. Unfortunately all the correspondence, challenges from concerned MPs and representation s from associations were brushed to one side. Even the Prime Minister was not interested. Any meeting, if you were lucky enough to get one, with the DSA was a sham.

(6) There were to have been 66 MPTC, to date there are 46 a tremendous short-fall. I have been told that the programme is on hold due to difficulties. Will there ever be 66? I doubt it!

(7) The shortage of MPTC meant that the new bike test was deferred for 6 months, then still with the problem of lack of sites it was decide to split the bike test into two modules. Module 1 had to be off-road at a MPTC and module two could be at any test centres (supposedly on request.) This split defeated the original concept of the MPTC.

The DSA got it wrong but they will not admit it. To see motor bike riders coming for test to do their module 1 with their bikes in the back of vans because of the travelling distance highlights the injustice.

(8) Due to the direction the DSA took, the test fees were increased way above inflation to help to pay for the MPTCs. The DSA’s attitude and manner fuelled a lot of resentment which means many instructors for cars are boycotting the MPTCs. These centres are working way below their original target level for cars but have a long waiting list for bikes.

(9) The question to ask is, What has this fiasco cost? The DSA chose the wrong road, they would not listen. I would expect a large loss this year in the DSA trading figures. If correct, who will bail them out?

(10) I hope this enquiry will act positively. ADIs have been waiting for one for long enough. Even though this seems to lean towards the EU directive there may be a need for a much larger overall look at the DSA regarding the way that they treat their customers and run the DSA in general.

(11) The volume of the industry now seems to be too great for the DSA to be able to cope with.

(a) Long waiting time for tests, both car and motorbike.

(b) Unable to get through to the call centre to book a test. They closed down for a long weekend for a computer up-grade and since that work it has been pathetic.

(c) Lack of examiners at test centres, some days just one. This cannot be cost effective.

(d) Moving examiners from one test centre to another due to waiting times to make it seem as though they are dealing with the issue.

(e) Candidates waiting weeks for test only to be turned away on the test day—no examiners—yet the centre manager is in the office!

(f) No programme to bring new examiners in to ease the problem, just making do with what they have.
(g) What are the DSA doing with the test fee? Obviously not spending it at test centre level.

12) M.P. quote “The DSA, as you know, operates independently of the government even though it reports to the transport ministry. Ministers can not override the decisions made by the Chief Executive and the management team.”

A very strong statement. How can any administrative body be given such powers?

If the DSA were a private concern they would most probably have ceased trading by now and the instigators of all this turmoil would be out of a job. There is definitely an urgency for something constructive to be done to protect the customer and save the driving industry in this country.

*September 2009*

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**Memorandum from Mark Williams MP (EMT 11)**

1. **INTRODUCTION**

1.1 As Member of Parliament for Ceredigion I have received significant representations from motorcycle users and learners about the lack of testing facilities in the area. I have held meetings with the DSA and the former Minister Jim Fitzpatrick MP to discuss this matter, and I am continuing to work with the DSA and interested local parties to find a suitable site for Module 1 testing in Ceredigion.

1.2 My interest in this matter is framed by a local perspective, and I will largely confine my comments to the availability of testing sites, rather than commenting on the specifics of the new test.

2. **BACKGROUND**

2.1 When the original sites for MPTCs were announced, Ceredigion residents were to be served by one of four MPTCs. The closet MPTCs were to have been Haverfordwest (64.6 miles from Aberystwyth, travelling by road), Shrewsbury (75.2 miles from Aberystwyth, travelling by road), Swansea (77.8 miles from Aberystwyth, travelling by road) and Bangor (86.5 miles from Aberystwyth, travelling by road).\(^4\) I felt this was wholly inadequate, particularly given the commitment by the Department of Transport and the DSA that most customers would be within 20 miles or 45 minutes of a test centre.

2.2 Ceredigion covers a large area, and some parts of my constituency were to have better coverage than others. For example, Cardigan, the second largest town in Ceredigion, is only around 25 miles from Haverfordwest. However, I don’t believe that anywhere in Ceredigion has been within the recommended at any point during this process.

2.3 The DSA applied for planning permission at a site in Haverfordwest, but despite an appeal, permission was eventually refused by Pembrokeshire County Council, thus reducing the number of MPTCs available in Ceredigion.

2.4 Having met with both the DSA and the previous Minister, my understanding is that there are no plans to search for an alternative MPTC site in West Wales, despite the fact that a need had been identified through the suggestion of Haverfordwest as a location.

2.5 Discussions have been ongoing to find a casual site that can accommodate the Module 1 test, but these have been particularly difficult, as the conditions required are relatively demanding, and while several sites have been rejected in Ceredigion, no appropriate site has yet been found.

3. **SAFETY CONCERNS**

3.1 Several concerns relating to the safety of learner riders in the future have been raised with me. The journeys proposed will be extremely long, particularly for an inexperienced rider, and many of the roads in the area are particularly dangerous, even more so in poor weather conditions.

3.2 It has also been suggested to me by riders in my constituency that some will opt not to take the test at all, and stay on a provisional licence. It would obviously be perverse if a test that was introduced to improve safety had the opposite effect, and I would urge the Committee to look into whether there is any evidence that this has been the case.

3.3 The safety of the test itself has been criticised, particularly the “swerve” element, and there is a need for the Government to work with motorcycle users to ensure that the test is as safe as possible.

\(^4\) All distances calculated travelling by road from Aberystwyth, the largest town in Ceredigion using AA Route Planner.
4. **Extent of the MPTC Network**

4.1 It is my belief that there are not currently enough MPTCs or casual sites to ensure that most people can conveniently and safely take both Modules of the new test. This is particularly the case in Ceredigion, but I am aware of other areas that suffer similar difficulties.

4.2 The DSA identified a network of sites that they felt was sufficient to administer the new test. However, some of these sites have been delayed, and others cancelled entirely, so even by the DSA’s own reckoning there are fewer MPTCs than required.

4.3 The lack of accessibility of the testing sites that exist is also a problem. For many riders, the time they come to take the test will be the first time they have seen the site. An indication was given to me that the DSA would look into setting aside time for familiarisation in Bangor. This is something that should be considered for all sites, but particularly those serving a large area.

5. **Summary**

5.1 Severe mistakes have been made in introducing the test, and there are a number of issues that need to be addressed.

5.2 It is essential that the test is re-examined to ensure that safety issues are recognised. While clearly the test must be an examination of the competence of the rider, there should not be a significant risk of injury.

5.2 While I fully appreciate that demand must be taken into consideration when assessing appropriate locations for motorcycle testing, at the most basic level there must be reasonably convenient and safe provision for all those that wish to gain a motorcycle licence. Currently no such provision is in place, or is it likely to be in the near future.

5.3 Urgent attention needs to be given by the DSA to finding casual sites in areas that are not adequately served by the current network. They should proactively search for sites as well as responding to suggestions.

5.4 In the long-term, the Department for Transport should commit to extending the network of MPTCs. This may not be possible within current budgets, but the principle should be acknowledged that there are not currently enough MPTCs.

September 2009

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**Memorandum from the Motor Schools Association of Great Britain (EMT 12)**

The MSA is the national trade association for driving instructors and schools founded in 1935. Members of the association are in the main Driving Standards Agency Approved Driving Instructors (ADIs) we also represent the interests of a number of large goods vehicle driving instructors, some driving school proprietors, together with a small number of bus/coach instructors and motorcycle instructors.

**The Committee’s Questions**

**Has the DSA interpreted the EU Second Driving Licence Directive correctly and applied it appropriately?**

Whilst the DSA may have interpreted the second directive correctly we do not believe they have applied it appropriately. We believe that it was inappropriate to undertake the building of so called multipurpose driving test centres (MPTCs), the term being something of a misnomer since many driving test centres have for years been multipurpose providing tests for motorcycles, cars, driving instructors etc. at one site.

It would have been more appropriate if the testing system now in place—a two part motorcycle test which makes use in some places of existing hard standing areas, car parks and the like, to conduct the off road section of the test—there are plenty of areas like this available around the country, had this system been the preferred option there would have been no need whatsoever for MPTCs.

**Are the off-road motorcycle tests safe and appropriate?**

We have heard the concerns of a small number of members who feel that the slalom or swerve test can be dangerous in the wet. All the members we have spoken to consider the building of MPTCs an unnecessary waste of money.

**Is the number of motorcycle test centres adequate and are the locations satisfactory?**

No. Clearly there is a lack of easy access to test centres both for car and motorcycle tests as many local centres have been closed in favour of building unnecessary MPTCs. The DSA have adopted a policy of slash and burn on the driving test centre estate, destroying a huge number of efficient well run local centres that have provided an excellent local service for generations of learner drivers and their instructors.
What is the impact of the recent changes in motorcyclist testing?

Fees—All driving test candidates are facing huge fee increases, well in excess of inflation, with a clear drop in the availability of test centres. Over the last six years the fee, for a weekday driving test, has increased by over 63% from £38 to £62.00. It appears that a large part of these fee increases are to pay for the new multi-purpose driving test centres? DSA plan to build sixty six new premises, with the planned costs reported to be way above the original estimates. This has resulted in a massive waste of resources to produce centres especially for the 4.3% of test candidates who are on motorcycles.

Locations—Despite the protests of local instructors, residents and in some cases MPs the DSA have refused to act on any protests against the closure of local test centres. For example local instructors, residents and councillors protested about the closure of the centres at Brighton and at Hove to no avail.

This has caused major problems for the residents of Burgess Hill where the replacement centre is located some fifteen miles from Brighton and Hove along the busy A23. Complaints by residents to the DSA, Burgess Hill Town Council and Mid Sussex District Council continue to rise and there is no sign of them slowing down. Residents are complaining about the huge rise in the number of learner vehicles in Burgess Hill, which has resulted from the closure of the test centres at Brighton and Hove. This also has the effect of new drivers being tested in a small country town instead of a large vibrant, busy city environment.

Residents complaints have been taken up by the local councils and a meeting has been held with the local MP along with representatives from Burgess Hill Town Council and Mid Sussex District Council together with representatives from the MSA. The DSA were invited but did not attend.

Lavatories—Whilst huge sums of money have been spent on these new centres many existing driving test centres to not have basic toilet facilities available for candidates and their instructors. Instead of spending millions of pounds on opening new centres the DSA should have spend money on updating the facilities at existing centres to twenty first century standards.

Recommendations we would like the Committee to consider

That DSA stop the MPTC building programme now and use the less expensive, more local solution of conducting the module one motorcycle tests at local sites.

That DSA take urgent steps to provide proper lavatory facilities at all driving test centres in Great Britain by 2012.

That DSA consider re-opening the dozens of local test centres they have closed.

September 2009

Memorandum from Wayne “Rob” Smyth (EMT 13)

Executive Summary

This submission is the considered opinion of the author and relates specifically to the issues surrounding motorcycle rider training and testing in the UK. In particular it relates to the suitability of the Module 1 test which is part of the current motorcycle licence test process.

The following questions are addressed within the submission:

1. Has the DSA interpreted the EU Second Driving Licence Directive correctly and applied it appropriately?

   The problems with motorcycle safety in the UK go beyond just the Euro test and reflect what appears to be mismanagement of the entire process from infrastructure, accreditation, training and testing.

   This submission will show that there are clear issues with content, testing and delivery. The maintenance of standards of which appears to be patchy or non-existent. It is no wonder that the standard of riding on the roads of the UK is so poor and the toll among riders so high.

2. Are the off-road motorcycle tests safe and appropriate?

   A detailed evaluation of the tests is contained within the body of the submission, however the main concerns regarding the Module 1 off-road test are:

   The manoeuvres do not adequately evaluate address safe riding skills and practices as well as statistically acknowledged crash causes.

   The test takes up an inordinate and expensive amount of space in order to accommodate the higher speeds required to perform the curve riding exercises as well as the swerving and emergency braking exercises.

   The higher speeds create an unnecessary risk of serious injury for students.

   While there is rudimentary electronic speed measurement, there is no actual scientific measurement of the performances leading to increased subjectivity and a lack of test integrity.
3. *Is the number of motorcycle test centres adequate and are the locations satisfactory?*

Motorcycle riding is a high risk mode of transport totally dependent on the environment. For motorcycle training and testing the facilities need to be fit for the purpose of teaching and practicing in safety. An example of which might be that the range surface condition must be clean, consistent and level. All static hazards must be kept to a minimum or the risk mitigated. In these days of litigation and health and safety, providing anything less is totally unacceptable. The author’s experiences have highlighted significant issues with the adequacy as well as safety relating directly to facilities and equipment used for the delivery of training and testing.

4. *What is the impact of the recent changes in motorcyclist testing?*

At this point in time there appears to be little consistency between the schools in what is taught, how it taught and how it is controlled. In addition there are issues with the consistency and integrity of the actual test administration.

Riders are poorly prepared for the hazards of riding on-road either with cognitive skills or basic skill fluency in globally identified key performances. As a result the new test is held in low regard by trainers, testers and public alike and regarded as being dangerous and inconsistent.

**Conclusion**

There are clear and far reaching issues with training content, the test itself, method of testing and delivery of both training and testing. The maintenance of standards appears to be patchy or non-existent.

It is no wonder that the standard of riding on the roads of the UK is so poor and the toll among riders so high.

**Authors’ Credentials**

The author, Wayne “Rob” Smith, is a motorcycle safety professional based in Victoria, Australia.

He has been involved in motorcycle safety as a full time professional for the last 19 years and has held a number of safety related positions including the Chief Motorcycle Instructor for the State of Victoria. More recently (2006–09) he has trained both motorcycle instructors and examiners for the United Arab Emirates Road Traffic Authority (based in Dubai) as well as implementing a training and testing system that forms the basis of the motorcycle licence. Other work includes Motorcycle Safety Researcher at Monash University Accident Research Centre (MUARC) and over the last 10 years a Motorcycle Crash Investigator and Road Auditor.

He has remained a regular rider trainer and has attended rider training conferences the world over presenting papers, participating in forums and demonstrating rider training innovations. For many years Rob Smith as also held a seat on the Victorian Motorcycle Advisory Council (VMAC) reporting to and advising government on motorcycle matters.

Rob first became interested in motorcycle safety whilst living in the United Kingdom prior immigrating to Australia in 1990. He regularly travels to the UK and has maintained an active interest in motorcycle safety issues in this country.

A full Curriculum Vitae is included in Appendix 11.4

**Evidential Basis for Comments Made in this Submission**

The following comments are the opinions of the author entirely and are based on observations made during two separate visits to the UK this year, in March and August 2009.

The first visit in March was to undertake the RoSPA Diploma in Advanced Motorcycle Instruction. During the second visit, he presented an Australian style training course and test to a group of recently licenced volunteers on behalf of the UK magazine *Motorcycle News*. (Details of the test can be found at the end of this submission in Appendix 10.5)

On each occasion the author visited a DSA approved motorcycle training location where the Module 1 test was being conducted. The first location was in Somerset and the second in Leicestershire not far from Coventry.

**Introduction**

**Background Information**

In 1981 the American researcher Mr Harry Hurt conducted what is still regarded as the most seminal research into the causes of motorcycle crashes. Since that time his findings have been the underpinnings of motorcycle safety and training worldwide. The most important findings were that there were three core competency skills essential to safe riding. These are:

— Braking in an emergency
— Swerving to avoid an obstacle (Countersteering)  
— Riding curves

Basic Skill Fluency (BSF) in the three core competency skills listed should be a pre-requisite for any new rider before they move into an In-Tra environment. While the exercises contained within the European test have components that seek to address the above, it is immediately apparent that they do so at a very simplistic level. There are also components, such as the figure of 8 that have no practical purpose and are actually counter productive to safe riding. This issue will be addressed in greater detail further in this document.

Perhaps a more important issue is that none of the exercise performances have any degree of objective measurement, which largely negates the purpose of trying to establish and maintain a standard, when any result is based on nothing more reliable than one individuals opinion. An example of this is that the emergency braking exercise appears to have no scientifically measured and determined distance for the student to stop in. The decision whether or not the stop was acceptable is at the examiners discretion.

The test itself would seem to be an intermediate test designed to sit between the Compulsory Basic Training (CBT) and other testing that accompanies a graduated licensing system. It is not a stand alone riding test and acts as preparatory test prior to conducting an in traffic “pursuit” style test.

The test exercises are a mixture of components that appear to have their roots in the Motorcycle Safety Foundation’s “Rider Course” in the USA.

Motorcycle training is divided into three broad categories, licence level, advanced safety and advanced performance level. All three focus to differing degrees on two separate components, loosely described as:

1. Machine handling skills
2. Hazard perception and reaction skills

At licence level, machine handling skills always underpins the formative basis of rider training and to a greater or lesser degree the test aims to measure the outcome. This being Basic Skill Fluency.

The objective of BSF is to allow riders to dedicate as much time and attention to hazard perception and reaction as possible.

Has the DSA interpreted the EU second Driving Licence Directive correctly and applied it appropriately?

The problems with motorcycle safety in the UK go beyond just the Euro test and reflect what appears to be mismanagement of the entire licensing process from infrastructure and accreditation, through to training and testing.

This submission will show that there are clear issues with content, testing and delivery. The maintenance of standards of which appears to be patchy or non-existent. It is no wonder that the standard of riding on the roads of the UK is so poor and the toll among riders so high.

The first question posed is “has the DSA interpreted the EU Second Driving Licence Directly correctly and applied it appropriately?” It is the opinion of the author that the answer must surely be an emphatic No. The resulting chaos that is so widely reported via the media bears all the hallmarks of a rushed job with insufficient resources and planning as well as a desire to satisfy too many masters.

If the DSA continues to allow the current system to continue coupled with an unsuitable test in the form of Module 1 that actually increases the amount of motorcycle injuries, then it is only a matter of time before the DSA and subsequently the Government is held accountable through legal action.

There can be only one objective, and that is to deliver a quality system that produces safer riders. Having a system that adds to the toll of injury clearly indicates a need for a major rethink and restructure. All of which can be achieved.

Are the off-road motorcycle tests safe and appropriate?

The main concerns regarding the off-road test are:

1. The test takes up an inordinate and expensive amount of space in order to accommodate the higher speeds required to perform the curve riding exercises as well as the swerving and emergency braking exercises.
2. The manoeuvres do not adequately address safe riding practices and statistically acknowledged crash causes.
3. The higher speeds create an unnecessary risk of serious injury for students.
4. While there is rudimentary electronic speed measurement, there is no actual scientific measurement of the performances leading to increased subjectivity and a lack of test integrity.

5 See definition for countersteering in Appendix section 11.2
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Test Components

Exercises 1 and 2: Putting the motorcycle onto the centre stand and pushing the motorcycle backwards.

The first part that is taught at the beginning of the Australian (Vic) Motorcycle Learner Permit Course (MLPC) is something that may be considered a “nice to know” rather than a “need to know”. By this it is meant that putting the motorcycle onto the centre stand has not been the cause of any recorded injuries. The same might be said of the second part, which is the walking backwards of the motorcycle. An exercise that is supposed to replicate the rider putting his motorcycle in a garage facing outwards so that he can ride straight out without having to walk the motorcycle backwards.

The ability to carry out these exercises has no relationship with safe riding and actually disadvantages persons of a small stature. In this context it could even be considered discriminatory. At least it may be considered a waste of time.

Exercise 3: called “The slalom”.

This exercise is usually used as part of a training course as preparation for learning “countersteering”, which is the method used to initiate motorcycle lean angle. While useful in training, when it is included in a test protocol it raises the questions “what is it for, what does it prove and how do you determine what is good or bad?” Observations of students at the second training facility confirmed that the countersteering training they had received was inadequate as despite having been trained at high speed (80mph) they were unable to perform a swerve at 15mph.

Exercise 4: The figure of 8.

This is similar in some respects to exercises 1 and 2 in that it has little value in achieving or improving safety. This is because unless it is taught as a complex throttle control, clutch, brake, balance and eye direction training exercise, using either countersteering or counterbalancing, it does not teach any significant safety related behaviours. Indeed as has been previously mentioned, this exercise has the potential to be counter productive to safe riding, in that it encourages the rider to look down at the ground to maintain a designated path instead of up and ahead to observe.

From observing the instruction and testing of this practice recently during delivery of instructor training in Dubai, this is certainly the case and its use in any test is of questionable value and would seem to be a backward step.

Exercise 5: 30Kmh circuit ride.

Completed by riding a constant radius curve at 30Kmh. The reason being that the constant radius curve is the simplest and allows students to apply basic positioning strategies. At licence level in Australia an increasing and decreasing radius curve is used during the training in order to get the students to use their pre-planning to adjust position and speed for curves. This is then tested during the *Motorcycle Licence Skill Test in an objective and scientific manner by the use of the electronic equipment that measures the riders speed and determines whether the rider chose the optimum safe position and safe speed to negotiate the curve.

Exercise 5 simply requires the rider to ride a curve with no form of measurement to determine whether or not the student has reached the required speed other than the examiners opinion. Far more importantly, there is no way of determining whether or not the student has given any thought to the critical skills of road positioning or the right technique, both of which are far more important as real world skills related to safe riding.

Exercise 6 and 7: Swerving to avoid an obstacle and brake.

This exercise requires the student to accelerate from the 30Kmh curve up to 50Kmh, where I understand the speed is actually measured electronically before passing through a “gate” 1.5 metres wide. They are then required to swerve to the left or right through another “gate” before emergency braking and finally stopping between more cones for a controlled stop. As already mentioned, there is no objective determination or measurement of the braking distance in this exercise, the outcome being dependent on the examiners subjective opinion.

The most obvious problem here is that if the rider makes the most common of mistakes, and tries to ride faster, swerve and brake at the same time, then there will be a 50Kmh crash, with potentially disastrous consequences. Anecdotally this is the case. At 50Kmh the rider is travelling at approximately 14 metres per second compared with around seven metres per second for the MLST used in Australia that determines the required stopping distance to provide a benchmark, measures the actual performance and does so at a lower speed and with less risk.

Swerving requires the rider to counter-steer suddenly, an exercise that uses all the available grip from the tyres, when the swerve occurs the motorcycle leans over and cannot brake. It is an exercise that requires careful and protracted instruction by highly skilled trainers as well as a basic understanding of countersteering to fully appreciate the risks involved. Poor training inevitably leads to crashes as any application of the brakes during the swerve will result in a crash.
The recognized basic exercises a rider needs to perform can all be achieved at a speed of 20–25Kmh. This is why all the training exercises in the Australian Learner and Licence Courses are primarily taught at those speeds. During the licence training, the highest speed a student may achieve will be 30Kmh. There is simply no need for a higher speed if the skill can be achieved satisfactorily at a lower speed in safety where confidence can be built and BSF achieved.

Exercise 8: The U turn.

This is a useful training exercise for licence level students as it teaches good techniques, such as countersteering and counterbalancing, eye direction and throttle control. However, its importance as a road safety skill is questionable simply because there is no known or documented crash risk associated with the manoeuvre. Therefore it may join Exercises 1 and 2 as well as 3 and 4 as “Nice to know” rather than “Need to know”. The greatest risk to riders where a U turn is involved is where another vehicle performs a U turn in front of the rider without warning. In this case emergency braking is a more valid test skill because it has a known crash avoidance value.

Exercise 9: The slow ride.

This particular skill is very useful in developing low speed control, particularly the combining of rear brake, clutch and throttle with eye direction. For this reason the slow ride is included in Australia at the learner permit test level. Although essentially the same, the learner permit test however requires the rider to ride an 18 metre path in over 10 seconds, whereas the British test requires the rider to ride a shorter 10 metre path in over 10 seconds, or in simple terms progress at 1 metre per second, making the standard appear to be harder to achieve. The reality is that with the training provided in the learner licence course, students regularly achieve the same rate of travel by exceeding 18 seconds over the 18 metre path. In fact, during recent training of the motorcycle instructors in Dubai, the instructors were regularly exceeding 30 seconds and even in one case over 60 seconds over the 18 metre distance.

Exercise 10: 30Kmh circuit ride.

This exercise appears to be repeated twice as both exercise 5 and 10 and has been discussed earlier in this report.

Exercise 11: Emergency brake from 50Kmh.

Regardless of speed the techniques for emergency braking are exactly the same, whether the speed is 25Kmh, 125Kmh or 225Kmh. By increasing the speed to 50Kmh, there is no significant benefit to conducting the exercise at the higher speed, it simply takes more space for the motorcycle to stop and therefore requires an increased range size. Those that advocate and justify the higher speed in the name of “realism” are attempting to push students into running before they can walk. Given that braking is the most important crash avoidance skill that a rider needs to master, a lower speed allows increased confidence, increased practice time and the opportunity to limit injury severity should the rider make a mistake and fall from the motorcycle during the exercise.

Summary

In answer to the original question “are the off-road motorcycle tests safe and appropriate?” The purpose of the test being to accurately and objectively measure a riders ability to show competence in recognized safe riding techniques.

With regard to the first issue “are the off-road tests safe” the answer is NO. The reasons being twofold:

1. The speed that the test is being conducted at is too high. By carrying the most complicated test exercise at 30mph the potential for harm is too great and invalidates the test by being at odds with the purpose of the test which is to teach SAFE riding.

2. The training that precedes the test is clearly inconsistent, inadequate and does not properly prepare the student for the test itself. This is evidenced by the fact that a large number of students are crashing during the combined swerve and brake exercise.

With regard to the second issue of appropriateness, it is the opinion of the author that the answer is NO for the following reasons:

1. The Hurt report identified the real issues associated with motorcycle risk and in so doing established the core competencies needed for safe riding. These being the ability to brake in an emergency, to swerve to avoid a hazard and ride through curves correctly. The European test attempts to achieve measurement of these basic skills it fails to do so because there is no objective or scientific measurement of the rider’s performance.

2. Some of the exercises contained within the test are superfluous to the objective of measuring the identified core competencies.

3. The test does not establish a consistent standard of basic skill fluency conducive to safe riding.

4. The skills required for the exercises are not being taught consistently amongst trainers.
Is the number of motorcycle test centres adequate and are the locations satisfactory?

Although I am unable to answer the first part of the question with any sort of concrete evidence, it stands to reason that given the amount of space needed to carry out the first off-road part of the test and the cost of real estate in the UK, it is unlikely that there are enough testing facilities available for the riding population. An examination of the waiting period for a test booking should be a reliable indicator of adequacy. Also the fact that a person seeking a licence has to travel to two locations to complete a motorcycle licence would seem to support the suggestion that perhaps the amount of test locations is inadequate.

On the subject of “are the locations satisfactory?” I can offer the following;

Motorcycle riding is a high risk mode of transport totally dependent on the environment. For motorcycle training and testing the surface condition must be fit for purpose by being clean, consistent and level. All static hazards must be kept to a minimum or the risk mitigated. In these days of litigation and health and safety, providing anything less is totally unacceptable. Any organisation charged with the responsibility of accrediting and overseeing facility standards must be held accountable, just as the any organization providing training is responsible for the day to day safety of all.

Range condition

At the first location, (1) the training area in Somerset was a derelict livestock sale yard which featured a large area of concrete and derelict stock holding sheds. The concrete area had been laid in rectangular slabs and as a result there were numerous seams and gaps between the slabs. There were no training facilities such as a classroom or indeed toilets at the range. The area had a significant amount of damage and loose material including rubble and debris, dust and gravel spread over the majority of the surface. While the most commonly used sections of the actual training area were free of loose material there was still a significant amount on the surface that posed a threat to safe riding.

Due to the condition of the surface, the area used for the test was extremely limited and as a result students had to start the run up to gain the necessary speed inside one of the stock buildings amid dust and debris including broken glass, make a left turn across the concrete and then approach the actual test area marked by the required cones. From the start of the test run, the actual manoeuvre point was not in sight.

Location (2) near Coventry was on a slope and again consisted of a broken, pot-holed surface. Again there was an unacceptable amount of debris on the surface as well as grass, leaking water and slime that appeared to come from the toilet block located uphill of the training/test area. It was noted that the water and slime ran across the actual brake and swerve area.

Neither location were considered fit for purpose and raised questions regarding the accreditation process.

Equipment Condition

Motorcycles

At both locations motorcycles were provided for the students to use for their training and testing. Although relatively modern, of the 5 visually inspected only one could have been considered roadworthy. The worst machine, a Suzuki 600cc Bandit observed by the author being used for a Direct Access test, had brakes that were barely operational. All the machines showed signs of damage as might be expected but were considered unlikely to pass a MOT inspection.

Helmets etc

Of the helmets provided for use by students, none were stored as one might expect such important safety items to be stored. No sanitation was provided in the form of hair nets and other equipment at both locations was stored in a heap on the ground. Again at both locations, the equipment including helmets showed signs of severe damage, wear and mould.

Health and Safety

At both locations, there were no signs of health and safety requirements being complied with. Neither location had first aid kits readily available. At the second location the chief instructor was observed riding on the range without motorcycle safety clothing and without a helmet.
SUMMARY

On the subject of are the locations satisfactory, based only on the two locations observed, the answer is NO. Neither location was suitable for motorcycle training and testing as they were not fit for purpose.

What is the impact of recent changes in motorcyclist testing?

Inconsistency

At this point in time there appears to be little consistency between the schools in what is taught, how it taught and how it is controlled. Each trainer teaches what they think is appropriate. Further to this it was apparent from discussions with instructors both in the UK and Belgium as well a students who had undergone the test that there is widespread inconsistency in the delivery of the test. An example of this is that some trainers leave certain parts out and others allow multiple attempts at the test or provide coaching advice during the test administration.

Lack of validity

The Module 1 test presents the rider with no decision making at all. The rider knows exactly what is expected in terms of brake or swerve for example. Real world riding does not afford the luxury of foresight or forewarning. The test attempts to remain valid but fails to accept common and globally held understanding about motorcycle safety and safe riding. An example of which is “countersteering” which is used in the test but apparently is not understood or recognized by the DSA.

Professional distrust

Again based on discussions with instructors the new test is held in low regard. Most believe the test to be overly complicated, difficult to accommodate with suitable range size and therefore costly. None believe that the DSA provides adequate support and all those spoken to believe that the DSA motorcycle representatives are out of touch with real world riding.

Public distrust

Based on discussions with 12 students and widespread discussion on various websites, the riding public regard the test as dangerous, and inconsistent.

Increased injury

By combining a brake and swerve test at 30mph on poor surfaces and with poor training, the outcome will always be injury. Some trainers believe the test is too dangerous on wet surfaces. This may indeed be true. However the same skills have been tested in Victoria (Australia) since 1993 with no serious injuries in both wet and dry conditions. The critical differences being the training, training facilities, test method and speed.

OTHER ISSUES

What is taught

In addition to the above, there are major issues with what is being taught. In both the locations visited, the instructors taught techniques completely at odds to safe riding and guaranteed to lead to crashes. An example being: riding through a slalom while standing on one leg. This kind of practice has little to do with safe riding and everything about showing off. Worse, is that it cements in the minds of the student that the motorcycle is a toy.

Another example is excessive high speed, with 80–90mph being stated as being acceptable for novice riders to learn at. Others include pulling the clutch in while cornering which leads to a loss of control through free-wheeling.

How it is taught

At both schools the level of professionalism was very low. This included the facilities, as well as attitude, actions and appearance of the trainers not withstanding style of teaching. Poor examples of which were inappropriate role modelling, sexist comments and verbal bullying, both of which were heard and observed during the visits.

Teaching safe riding has largely fallen to people who are riders first and educators second. Because motorcycle riding carries so much risk, the emphasis must be not just on the content of the curriculum and the methods of performance measurement, but also on the standards of delivery. For this reason greater consideration should be given to the selection and profile of those undertaking such an important role.

6 See definition for Countersteering in Appendix section 11.2
Conclusion

The problems with motorcycle safety in the UK go beyond just the Module 1 test elements, and in the opinion of the author the problems being experienced reflect a mismanagement of the entire process from training through to testing.

The test itself is inappropriate and entrenched in the past in that it relies on subjective opinion based on observed performance. Technology exists such as the MLST to make the test process more objective and the standard of rider more consistent.

There are clear and far reaching issues with training content, the test itself, testing and delivery. The maintenance of standards of which appears to be patchy or non-existent. It is no wonder that the standard of riding on the roads of the UK is so poor and the toll among riders so high.

The first question posed was “has the DSA interpreted the EU Second Driving Licence Directly correctly and applied it appropriately?” The answer must surely be an emphatic No!

The resulting chaos bears all the hallmarks of a rushed job with insufficient resources and planning as well as a desire to satisfy too many masters. If the DSA continues to allow the current system to continue coupled with an unsuitable test in the form of Module 1 that actually increases the amount of motorcycle injuries, then it is only a matter of time before the DSA and subsequently the Government is held accountable.

There can be only one objective, and that is to deliver a quality system that produces safer riders. Having a system that adds to the toll of injury clearly indicates a need for a major rethink and restructure. However, the positive perspective of this submission is that now the issues and challenges with the current safety system have been identified, they can certainly be rectified.

How can these issues be rectified?

Obviously this falls outside the scope of this submission and is extensive. Having helped set up such a system in Victoria that has now been in place for the last 15 years, I have some experience in this regard.

Some areas for consideration relate to:

— The process of accreditation for providers
— Infrastructure
— Standardised curriculum
— Training of providers
— Objective testing
— Audit and surveillance relating to standards of delivery
— Data collection
— Provider support
— Customer support
— Government reporting

It is the opinion of the author that the European test, offers nothing new in objective licence testing. It simply perpetuates a dogmatic adherence to creating increasingly more complex exercises that should prove rider fluency but don’t, simply because there’s no real measurement of the outcomes. Critical questions that should have been asked before accepting the Module 1 test should have been, what does it prove and does it create safe riders?

If the UK Government is to address the issue of motorcycle safety in a logical way, then it must look to new technology rather than rehashing what went before, even if the rehash does comes from Brussels. There are many within the rider training industry as well as the licensing system that are afraid of change and the adoption of hi-tech methods because they are afraid of what might be exposed. As the numbers of motorcycle riders grows and more people see motorcycle travel as part of the solution rather than an anti-social problem, motorcycle safety must break new ground and move forward with the times.

Lastly, any test of a rider or driver’s BSF should integrate with the skills associated with planning, decision making and safe riding strategies, which go hand in hand with the physical skill fluency of handling the vehicle.

The real world environment and the dangers that riders face demand rapid hazard identification and response to unexpected events. Every single exercise and requirement in the European test is known by the rider in advance, who simply has to follow a formula to pass the test. There is almost no decision making involved at all.

In this regard, the test over focuses on a surfeit of machine handling skills and fails to adequately prepare the rider for the mental skills associated with safe riding.
APPENDIX

VICTORIAN LICENSING AND TRAINING

Here in my home state of Victoria, motorcycle training for licence only consists of two machine handling tests required for two types of licence. The first being a Learner Permit that carries the following restrictions.

— 660cc (Power limited to 150Kw/tonne)
— No pillion
— 0.00% Blood Alcohol Content

The skills required are very basic and comprise Slow riding, Basic turns, and Quick stops within a required distance. After a minimum three month period of on-road aclimatisation they can then attempt the licence test. This includes emergency braking, emergency swerving (countersteering) and riding curves.

The difference between our system and others both in Australia and elsewhere in the world is that we use an electronic system called the Motorcycle Licence Skill Test (MLST) The MLST requires riders to perform brake or swerve techniques in random order, just like in the real world and measures speed with a curve of a known radius to assess a riders ability to match speed and lean angle to the requirements of the curve.

Once the student passes they are then fully licenced with the above restrictions for a period of 12 months, after which they can move to an unrestricted capacity, carry a pillion and have 0.05 BAC.

COUNTERSTEERING—AN EXPLANATION

All motorcycles lean in order to turn and go around bends and corners. In order to get the motorcycle to lean the rider must “counter-steer”. The purpose of the counter-steer is to initiate the leaning over of the motorcycles chassis in the chosen direction. Because the front wheel of the motorcycle sits in front of the motorcycle attached by forks and steering assembly it has to be tuned via a pivot mounted on the chassis. This is effectively a hinge for want of a better word. By pushing forward on the left handlebar for example towards the right, the chassis falls away from the hinge. In so doing it leans to the left of the centre line.

In very simple terms, gravity then acts on the front wheel causing it to turn back and realign with the chassis, the motorcycle then tracks to the left. The advantage of countersteering is that not only does it lean the motorcycle but the response is almost immediate. The immediacy of the response is what makes countersteering so useful in an emergency situation where the rider may have to swerve suddenly to avoid a hazard.

The ability to swerve suddenly on demand makes a very useful crash avoidance skill and one that is considered vital for riders to learn. Countersteering has been taught both in Australia and the US since the early eighties.

ELECTRONIC SKILL MEASUREMENT

As explained the state of Victoria uses an electronic measurement tool called the Motorcycle Licence Skill Test (MLST). This device measures speed using a stop watch facility and apportions a benchmark or score to three exercises—Curve riding, Braking and Swerving. A rider starts out with 0 points and collects negative points up to a standard pass mark of < 40. Over 40 being a test failure.

The test design itself requires no more than 60 metres x 40 metres to run and is therefore very cheap and easy to accommodate. The test marking comprise a curve of known radius and a grid calibrated in feet for measuring distance.

To assess a riders ability to ride a curve, the rider rides both left and right through a curve of a known radius and width. The time taken to negotiate the curve is measured and compared to the optimum time for a perfect path and speed. A perfect path and speed results in a score 0. The further in time away from the optimum the more points the device apportions up to a maximum of 8.

The rider then attempts to perform two emergency stops and two swerves—one in each direction. The order of the manoeuvres is random and requires the rider respond appropriately just as in the real world.

To brake, the device again measures the riders speed between two points and immediately works out an acceptable shortest possible stopping distance. The amount of units taken to stop over the chosen distance converts to points. For example if the device allocates 20 units as the stopping distance and the rider stops in 25, then he score is five.

A similar protocol measures the swerve by measuring the speed and working an acceptable swerve distance. The observed distance is then compared to the allocated distance and the points noted.

The test is very simple to operate, takes no more than 10 minutes and requires very little in the way of line markings. As has been mentioned, the amount of space required for the entire test as well the training that goes with the test is 60m x 40m. A new version of the test that removes the last remaining subjectivity of the stopwatch is currently under development by myself.

Advantages of the new system include:
— Objectivity and integrity
— Data capture
— Download capability to a testing organization for audit purposes
— Progress measurement of training
— Tester tracking

Results of tests conducted in UK Rider training facilities—2009

In collaboration with the weekly UK motorcycle publication Motorcycle News (MCN) the author conducted an “Australian Style” training course at the DSA accredited facility near Coventry. The subject group (6) was comprised of volunteers (students) recruited by MCN. There ages differed from <20 through to 50 > years but all had become recently licensed and had therefore undergone the Euro test. This range of age and limited experience was chosen so that comparisons could be made with recent training and testing.

In addition to the above, a further two riders were involved who had passed their Direct Access test that same day.

The course being taught was an abbreviated version of the standard curriculum used in Victoria since 1983 in preparation for the licence test. It focuses on building a rider’s skill fluency in countersteering, braking and riding curves. Due to time constraints, the course was reduced down from eight hours to four.

Preliminary discussions with the students revealed that even though all the students had carried out the swerve and brake manoeuvre required in Module 1, only two of the students had heard the actual term “countersteering” in the explanations for the swerve component. All had undergone some training for emergency braking and all had received training in riding curves.

Observations

A. Swerving (Countersteering)

None of the students had ever had an explanation of what countersteering is and how it applies to riding a motorcycle. None had ever had it demonstrated to them in simple terms. At the beginning of the training exercises all conducted at speeds under 20mph, none of the students were able to counter-steer effectively and would not have been able to perform an evasive swerve if the need had arisen.

At the end of the course, all the students had an understanding of what countersteering is and could use it to a greater or lesser degree. It is worth noting that the two students who had passed their Direct Access test that morning were unable to perform a satisfactory swerve at speeds of around 15mph but claimed to have been taught to swerve at 80mph.

B. Emergency Braking

In the emergency braking exercise, of the eight students only one appeared to have been shown how to brake effectively. Again none had received instruction on the importance of using four fingers to brake in an emergency and none had had the concept of weight transfer explained in a way that made sense to them and influenced their ability to improve their braking performance.

In the exercise, all the students showed noticeable improvements in both technique and confidence.

C. Riding Curves

As part of the training program, students are shown the technique of riding curves through a simple “walk through” demonstration and discussion. None of the students had been shown how to ride curves in this manner. Most had received practice in riding the curves required for the test, but considered they had been trained for the test rather than receiving explanation of cornering issues and techniques. In the exercises there was significant improvement and increased confidence once adequate instruction had been provided.

D. Testing

All the students attempted the MLST at the conclusion of their practice. Of the students only one person passed the test by demonstrating adequate competency. The remaining students were unable to meet the standard required for the issue of a motorcycle licence in the state of Victoria. However all the students showed increased skill and confidence compared to when they started. It is the opinion of the author that had they received a full eight hour course then the success rate would have been higher. Unfortunately due to constraints on time the students only received somewhere in the order of three hours of actual training.

It is also worth drawing attention to the fact that the two students who had passed their Direct Access test that day were not able pass the MLST but were able to ride fully licenced on high powered motorcycles.
CONCLUSION

The training and test met with very positive feedback from the students all of whom felt that they had benefited and learnt things they should have learnt prior to riding on the road. The MCN article covering the course and test is available in 24 September edition.

September 2009

Memorandum from Roy Osmond (EMT 14)

Has the DSA interpreted the EU Second Driving Licence Directive correctly and applied it appropriately?

1) The EU Second Directive has not been applied appropriately. The 50KPH speed requirement is neither relevant nor practical in a country which retains imperial speed measurements. Further, motorcycles by law must be fitted with MPH speedometers—KPH only speedometers are NOT LEGAL.

Are the off-road motorcycle tests safe and appropriate?

2) No. The nature of the swerve and stop manoeuvre is fundamentally flawed. The test requires that a candidate ACCELERATES towards an observed hazard—the exact opposite of that which is required in a real life situation.

3) No allowances are made for differing weather conditions. Cold tyres, wet tarmac and violent high speed manoeuvres do not mix. If the new test is an appropriate measure of competence in the dry then it clearly is an excessively difficult test in wet conditions.

4) The test itself PRESSURISES riders to ride at a pre determined arbitrary minimum speed taking no account of the prevailing conditions. Effectively DO IT OR FAIL. Clearly this is potentially dangerous and a practice that would never be condoned on the road where riding to suit the conditions is fundamental.

5) From my base in Lampeter it requires new riders to undertake a 120 MILE ROUND TRIP for the test or even training for the test. This may well involve riding in poor conditions or darkness on unfamiliar roads and terrain. A bike test is a stressful undertaking with some riders being unable to talk coherently subsequent to a test let alone ride a bike safely.

6) Nerves play a huge part in a candidate’s ability to perform. All trials of the new manoeuvres were undertaken in a non test situation and consequently do not provide for a suitable assessment of the suitability of the test.

7) A lack of suitable off road areas to prepare candidates for the test has seen some trainers taking inappropriate risks and breaking the law by practicing on public roads.

Is the number of motorcycle test centres adequate and are the locations satisfactory?

8) There are obviously too few test centres—LOOK AT THE FIGURES. Importantly rural areas are worst hit.

9) Location, location, location ! LOOK AT A MAP OF WALES. The West and South West of Wales is now a desert in terms of testing facilities. Haverfordwest was to have a MPTC. This did not happen. The cost of a MPTC is on average in excess of £1 million. However the DSA now state that they are only willing to provide £80k for a test site in West Wales! A clear example of rural West Wales residents being treated like second class citizens.

What is the impact of the recent changes in motorcyclist testing?

10) The impact of the test on my business. For the period between May and August 2008 compared to the same period 2009 since the introduction of the new test I have experienced an 80% REDUCTION IN INCOME. 35 tests in that period in 2008 compared to just two this year! Clearly this is unsustainable for a small business. Not only have I experienced a dramatic reduction in test candidates but also a reduction in the number of CBTs being undertaken. Anecdotal evidence suggests that many riders will ride without the proper licence and insurance because of the increased costs involved with the new test. This at a time when legal, safe and environmentally friendly motorcycling should be promoted.

11) I am aware of one experienced dedicated trainer being laid off in Haverfordwest. He will not be the only one. MY BUSINESS IS UNLIKELY TO SURVIVE—IT WILL NOT BE THE ONLY ONE TO SUFFER. If my business does go through it also means no basic training facilities in the south of Ceredigion for locals.

12) Several of my CBT trainees have stated that they will not undertake the costly extra training required for preparation for the new test. They will ride for two years on L plates and possibly renew after that. Effectively after their basic training they will receive no further advanced training to help them ride safely.
13) Motorcycling in rural areas is not just for leisure purposes. Many youngsters need mopeds and motorcycles as an affordable form of transport to get to work in an area that has a virtually non-existent public transport system.

September 2009

Memorandum from the North West Federation Of Approved Driving Instructor Associations (EMT 15)

We have conducted a survey of local motorcycle trainers in our respective areas.

These are some of the responses we have obtained.

Item 1.) Has the DSA interpreted the EU Second Driving Licence Directive correctly, and applied it appropriately?

Response: The trainer is not really able to comment too much on this as he has not read the EU document in detail.— It has been said that we could have had an option to run the test at 30mph and not the 32mph (50kph.) This would have allowed on road testing, and would have made more sense.

If the DSA had not taken the option to run at 30mph and it could have done so.— It has in my view been negligent, resulting in high costs to the tax payer and test fee candidates.

Item 2.) Are the off-road motorcycle tests safe and appropriate?

Response: The slow speed items are fine. The 50kph emergency stop and swerve are unsafe. Reasons why: Both exercises require a minimum speed to pass, and especially

On a 500cc machine. It is very easy to run these exercises well in excess of 50kph. (I have seen 70kph plus.) Putting the rider under unnecessary risk if they make an error.

It is not easy for the rider to regulate speed, as there are no reference points. And the rider needs to look where they are going. So it is difficult to look at the speedo, the bike is also accelerating quite firmly, which again makes speed traps hard to judge. A solution? A simple green light speed achieved system on the test site, needs to be introduced. In the line of travel of the bike, so excessive speeds are not obtained.

2.) The swerve test takes no account of the reduced level of grip in wet conditions, (same speed.) It take no account of the type of bike or tyres fitted. E.g. Trial bike fitted with off road bias but road legal tyres. Cheaper less grippy tyres etc. The trials done prior to implementation, do not represent real world bikes taking the test. The testing station sites grip levels vary considerably. For example, in wet conditions Blackburns’ MMA site leaches clay residue onto the surface.

We have not got through a winter yet with this test. Low temperatures and wet surfaces will considerably reduce grip. The swerve test takes no account, with a “one size fits all.” People will be hurt, —and are being hurt, on this test as it is.

Item 3.) Is the number of motorcycle test centres adequate, and are the locations satisfactory?

If the test centres are locally based it is alright. I regularly use Blackburn. But I regularly meet instructors travelling over 70 miles every test day.

Item 4.) What is the impact of the recent changes in motorcycle testing?

A significant reduction in people taking the motorcycle test, because of more expense. Once module 1 is passed, trainees do not want to train for module 2, as a result, trainees are not as well prepared for module 2. As they were for the old part one test. As an instructor you can advise strongly what is required, but you cannot force people to take training. Especially when it costs more than to take the old test. Higher costs discourage training, and encourage a “scrape through” mentality. Illegal riding is also on the up, with riders bypassing CBT, theory and two tests. Only when they get caught, do they get legal. I have noticed many more than normal of this rider type.

If you make things too difficult or expensive, then it may have the opposite effect to that intended. That is, a responsible attitude to regulations and road safety.

Further response:

This trainer has been training motorcyclists for a considerable number of years.
Item 1.) Has the DSA interpreted the EU Second Driving Licence Directive correctly and applied it appropriately?

Well, they have added their bit to the test. Which is partly a bone of contention.

3.) So that point is mostly a matter of opinion. My viewpoint would have to be in the interest of safety, and a duty of care for the candidate. Mainly the avoidance and emergency stop elements of the test. Giving a nervous candidate a minimum speed, without setting a maximum speed to reach, or some way of controlling this within reason. (ie over 36mph.) Will result in a fail. Or strobe lights running along the side of the path to be travelled, with the lights travelling at 33mph. So all the candidate has to do is match that speed, rather than looking down at the speedo, when they should be looking ahead as taught on the road.

Item 2.) Are the off-road motorcycle tests safe and appropriate?

Dispensation for weather conditions. Wait until we have winter tests, with cold tyres and a cold surface, or heavy rain. They are taught to ride to these conditions on the road. But on the Module 1 Test it’s 32 mph through the trap and 19mph around the circuit, whatever the weather conditions. Because that is what the book says.

On the top of the DL25, the candidate is asked to sign a declaration to state the bike is insured to use on the public highway. A fair point. However the test is then carried out off the public highway, and for a form of speed testing—so no insurance?

Item 3.) Is the number of motorcycle test centres adequate and are the locations satisfactory?

I am very lucky. The ATB where I work is only a ten minute ride from the test centre. Looking at the bigger picture. It must be a nightmare for some remote schools and candidates having to travel for over an hour to reach the test centre.

There would have to be in place cost effective arrangements to enable them to compete with ATB’s on the doorstep of a test centre, very hard to do indeed.

I see candidates coming up for test who have never seen the MMA, let alone been taken around it by their instructor.

The difference it makes to the candidate having been taken through the test beforehand by his/her instructor, is massive. I start them at a lower speed through E/S and A/M elements, and then bring them up to speed at their own pace

Over a period of runs. Using the revs of the bike rather than the speedo, and thus keeping their eyes up.

4.) Item 4.) What is the impact of the recent changes in motorcycle testing?

Whilst I have noticed a downturn in work, we are in a prime location to conduct testing at a competitive rate, so it is not so bad for us. However I do feel that there is a real serious risk of some riders going unlicensed, which would be a total disaster for road safety.

NWFDIA Comments:
These views are expressed by real motorcycle instructors in the real world.

As the NWFDIA mostly represents qualified ADI’s, we can only sympathise with their concerns.

It does affect us as car driving instructors. We have seen a serious downturn in work amongst our members. Even though motorcycle testing is only up to 4% of all driver testing. It does affect the other 96%.

The imposition of MPTC’s against the wishes of the whole of the ADI industry has had a serious effect on business. Which can only encourage a lowering of standards. We have received information that in the first three months of 2008, of all learner drivers. Only 43% paid for lessons. In the same period of 2009 only 32% paid of all learner drivers.

MPTC’s, have forced candidates not living in the relevant areas to have to pay double the costs to travel to and from these unknown areas. To familiarise themselves with the road layouts. It has been said that they do not need to do this.

But even qualified drivers get lost in strange areas. If you get lost you make mistakes. DSA marks mistakes as either minor, serious or dangerous on the examiners marking sheet. Resulting in more failed tests, and even more expense for the candidates for test. The recent economic downturn has some part to play in this. But the large rise in test fees to pay for MPTC’s, and the consequent rise in costs to candidates must have a large part also. This can only lead to more illegal driving and
illegal instruction. It must also have a large part to play in DSA finances which are now showing we believe a large deficit. Which can only be rectified at the taxpayer/parent and driving test candidates expense. An unnecessary and very costly mistake.

September 2009

Memorandum from the Motor Cycle Industry Association (MCI), Motor Cycle Industry Trainers Association (MCITA), Motorcycle Rider Trainers Association (MRTA) and Motorcycle Retailers Association (MRA) (EMT 16)

Summary

The Industry welcomes the opportunity to submit a response into the Transport Select Committee Inquiry. This response represents the views of a wide range of stakeholders within the motorcycle community who are the members of four trade association groups (above).

Many issues have arisen from the interpretation and implementation of the Second driving licence directive. Our submission provides evidence for the Committee’s consideration.

In summary two fundamental issues emerge, cause great concern and are responsible for much disruption;

1. The lack of Multi Purpose Test Centre’s (MPTC)
2. The inadequate Trainer Booking System

Industry representatives will be available to give oral evidence to the Transport Select Committee should the Committee desire this.

1. Introduction

1.1 The MCI is the UK trade association for the supply side of the motorcycle industry. MCI represents manufacturers and importers of motorcycles, accessories, parts and other motorcycle products. Membership includes major suppliers of components and also the finance sector.

1.2 The MCITA and MRTA represent the welfare and interests of companies involved in the provision of motorcycle rider training. This includes all types of training, including pre-test through Approved Training Bodies (ATB’s), post-test, off-road and track.

1.3 The MRA is the only organisation that represents exclusively the welfare and interests of retailers of motorcycles, related accessories and services.

1.4 The UK motorcycle industry represents approximately £3 billion (2005) to the UK economy and employs approximately 15,000 people. Approximately 135,000 new motorcycles of all kinds were sold in the UK in 2008, with new and second hand transactions representing approximately half a million units.

1.5 The motorcycle industry takes a keen interest in the evolution of motorcycle licence requirements at EU and national level, because we believe that a well-trained, safe riding community is one of the best ways to challenge the misconception that motorcycling is too hazardous an activity to be promoted as a mainstream transport mode. The new motorcycle test, informally known as 2DLD, is the second change to the motorcycle licencing regime, the first Driving Licence Directive having been implemented in 1997.

1.6 MCI first made its views known officially in response to the DSA’s 2003 consultation on the new test. The industry warned that the DSA proposals for Multi Purpose Test Centres (MPTC) were “fundamentally flawed” due to:

— The manoeuvre element suggested in the DSA paper gold plated the Directive with several additional manoeuvres that result in a very large test site being needed
— The size of the site proposed would greatly reduce the availability of test centres
— The DSA proposal was likely to result in a separate off road element to the practical test, thus
— The cost of the full test would rise substantially

1.7 The MCI also warned that these flaws created a significant risk of unintended consequences:

— That many riders who would have taken the full motorcycle test will choose to renew their provisional licence through CBT and not achieve the higher skills level and hazard awareness required by the full test.
— A complex and costly motorcycle test which has much more limited availability will inevitably result in more people deciding to risk riding unlicensed.
— Some of those on low incomes for whom a Powered Two Wheelers (PTW) offers affordable transport will also be put off the use of PTWs.
— The same will apply to many potential riders living in rural areas where a PTW offers the only form of low cost transport.
1.8 MCI concluded that “It would be ironic indeed if the effects of the Directive and its implementation were to reduce rather than improve motorcycle safety” (MCI Response to “Delivering the New Motorcycle Test” April 2003).

1.9 The DSA chose to ignore these warnings and moved ahead with a complex MPTC proposal. Industry takes no pleasure whatsoever in noting that its warnings in 2003 appear to be well founded.

1.10 In answering the TSC’s questions, the industry’s evidence below outlines how the current new motorcycle test is flawed both in how EU requirements were interpreted and how the DSA chose to implement these requirements.

2. Question 1—Has the DSA interpreted the EU Second Driving Licence Directive correctly and applied it appropriately?

2.1 The EU required the following items to be added to the existing UK motorcycle test:


6.2.3 At least two manoeuvres to be executed at slow speed, including a slalom; this should allow competence to be assessed in handling of the clutch in combination with the brake, balance, vision direction and position on the motorcycle and the position of the feet on the foot rests;

6.2.4 At least two manoeuvres to be executed at higher speed, of which one manoeuvre in second or third gear, at least 30 km/h and one manoeuvre avoiding an obstacle at a minimum speed of 50 km/h; this should allow competence to be assessed in the position on the motorcycle, vision direction, balance, steering technique and technique of changing gears;

6.2.5 Braking: at least two braking exercises shall be executed, including an emergency brake at a minimum speed of 50 km/h; this should allow competence to be assessed in handling of the front and rear brake, vision direction, and the position on the motorcycle.

The special manoeuvres mentioned under points 6.2.3 to 6.2.5 have to be implemented at the latest five years after entry into force of this Directive

Amendment under 2008/65/EC

(d) in the second paragraph of point 6.2.5, “five years after entry into force of this Directive” is replaced by “by 30 September 2008”;

2.2 The Directive does not refer to the need for MPTC’s, neither does it refer to the need to interpret the manoeuvres in the form of a complex set of circuits to be conducted off road. It should be noted that many EU Member States have chosen to include the new manoeuvres as part of the on road motorcycle test, with some aspects delivered on car parks or on quiet roads.

2.3 A particular complication arose because Ministers failed to argue for, or attempt to gain a “derogation” to allow 50 km/h to be interpreted at 30mph under UK law. The fact that 50 km/h equals just 31.06 mph, offered justification for the DSA to propose that aspects of the test be delivered on special off road sites (MPTC). It should be noted that if there had been a will at the DSA to do so, the existing motorcycle test could have been largely adapted to accommodate many of the proposed manoeuvres on-road, with the 50km/h aspects covered either off road, or on quiet roads with a speed limit of at least 40mph.

2.4 To counter this, the DSA argued that “public roads carrying other traffic would be unsafe places to carry out the exercises…” However, on-road testing of specific manoeuvres such as the emergency stop and “U-turn” were already being carried out with a laudable safety record by the simple expedient of examiners using their common sense regarding where to conduct these aspects of the test.

2.5 Only two of the proposed manoeuvres were truly new additions to the current UK test, most of the “new” test is, in some way or another, pre-existing.

2.6 Industry argues that there has been a large element of “gold plating” in the Agency’s approach:

— That the DSA off road test exceeds EU requirements by introducing additional and duplicated manoeuvres.

— That it was solely the DSA’s choice in the way these special manoeuvres were to be executed that created the need for an off road test at all.

— That it was the DSA’s design, addition to and repetition of, the special manoeuvres that then required the MPTCs to be such large areas of land that obtaining sites and planning permission became obstacles to their provision.

2.7 It is inconceivable that the EU ever intended the interpretation of the prescribed manoeuvres to result in exercises that are considered unsafe to be tested on road. Indeed, this is not the case in other Member States.
3. Question 2—Are the off-road motorcycle tests safe and appropriate?

3.1 There has been a great deal of concern at the number of accidents and injuries that occurred on the test immediately after its introduction.

3.2 Parliamentary questions in June/July 2009 revealed that since the new test was introduced at the end of April 2009, there had been 4.71 accidents per week on the test. This compares to 1.55 accidents per week in the previous year. This suggests that attention needs to be given to safety on the test.

3.3 Most disturbing has been the negative publicity that has accompanied such incidents, which has very likely acted to discourage some people from taking the test. Clearly, for any vehicle licence test to enjoy the confidence of the general public, safety needs to be assured at all times. It seems that safety concerns lie with the design of the test itself, which in no way replicates the “real world” that novice and newly qualified riders will face.

3.4 Manoeuvres at prescribed speeds

3.4.1 Reaching 50kph in the space provided in the module one test is difficult for a 125cc motorcycle. An experienced motorcycle trainer and member of MCITA commented “The idea that a novice rider should have to accelerate really hard coming out of a corner and head as fast as possible towards an obstacle that they then need to swerve round then come to a controlled stop is ludicrous” (Newcastle Rider Training). Instead, candidates should have the opportunity to accelerate in a gradual and controlled fashion (as you would on public roads) getting up to speed then swerving.

3.4.2 It is easier to reach 50kph in the space provided on a larger-capacity machine. The unintended consequence of introducing this manoeuvre to the test is that many more novices may choose the direct access route in order to take the test on a larger motorcycle, despite it being recognised by the later introduced 3DLD that riders should be encouraged to start the testing process on a 125cc motorcycle.

3.5 Inflexibility on stopping distance

3.5.1 MCITA and MRTA members report almost universal concern regarding the fixed speed for the swerve and controlled stop manoeuvre and the emergency stop. The Highway Code dictates that stopping distances should be doubled in the wet and many trainers feel that the space allocated for these two manoeuvres is insufficient in the wet.

3.6 Surface Conditions

3.6.1 The part time Vehicle and Operator Services Agency (VOSA) and casual sites do not usually have the same quality of tarmac available at MPTC’s thus disadvantaging candidates in adverse weather conditions. Croydon VOSA site is regarded as unsafe by some Instructors as it is a mix of tarmac and concrete. (ART Motorcycle Training).

3.6.2 Europe clearly did not intend for the new test to give rise to safety concerns. This is a further example of the unintended effects of DSA “gold plating” of what were a fairly simple set of exercises in the Directive itself.

4. Question 3—Is the number of motorcycle test centres adequate and are the locations satisfactory?

4.1 No. It is important for the TSC to clearly understand what the DSA mean when they talk about 65 sites being available.

— Only 45 are full time MPTC’s. There are significant gaps in national coverage due to this low number of sites, resulting in the need for many candidates to travel large distances to take a test.

— Most of the remaining 20 “casual” or VOSA sites are available at weekends only (often only Sundays).

4.2 VOSA/Casual Sites

4.2.1 Industry rejects the notion that the casual or VOSA sites should be included in the overall numbers of test sites. Indeed, industry believes that the DSA is being disingenuous and is misleading the public and Parliament by doing so. This is because:

— VOSA Sites are only available on one, or sometimes two days a week, not five days a week.

— The casual sites are plagued with problems. There are instances of litter including broken glass, cars parked, lorries obstructing and pedestrians walking across the test area mid test all reported to have caused cancellations/disruptions (Lightning Motorcycle Training).

— Cars are commonly left parked on the casual sites and there are generally no signs advising the public that parking is limited at certain times.

— SAM’s (Site Access Managers) who open up and lay out the cones etc are reported as being unreliable and not turning up.
— Three instructors from one training provider made a 70 mile trip for a pre booked practise slot. There was no SAM there to let them in and no answer on the out of hours phone line.

— In one instance at a part time VOSA site when an instructor turned up for test with his candidates, the DSA Examiner was not there. His candidates had to wait five weeks to get another test through no fault of their own.

— Relying on VOSA centres for weekend testing as the only option for some trainers has huge impact on trainers’ business. Trainers carry out the majority of their CBT work on weekends; they can’t be in two places at once. Also there is usually no opportunity for practice slots to be made available at these sites, again putting novices in these areas at a disadvantage.

— We have already mentioned non standard tarmac problems and test layouts also tend to be different at VOSA sites.

4.2.2 The DSA originally proposed in excess of 80 new MPTCs. This commitment later changed to 66. Currently, there are 45 full time test sites available to deliver the new “module one” test. Before the new test was introduced, there were in excess of 200 motorcycle tests centres. Industry finds it bewildering that such a large percentage reduction in the number of test sites can in any way be argued as improving motorcycle safety. It is accepted that there are many more sites available to deliver module two of the test, but module one represents a “log jam” which must be passed in order to move through to module two and pass the motorcycle test, therefore the number of module one test sites should be judged as the critical factor for test availability/delivery.

4.2.3 Industry has never been convinced that only 66 full time MPTC’s were sufficient to cover the UK’s need for motorcycle testing and said so in its response to the 2003 DSA consultation. There is still a long way to go (only 45 are currently available) before this target is reached and even when it is, industry believe that 66 will be insufficient. The industry is of the opinion that the current interpretation and implementation of 2DLD would require a number of sites in excess of 66 to provide acceptable coverage and meet ongoing demand.

4.2.4 The DSA quote figures regarding test availability, distances candidates have to travel to the test and overall geographic coverage. Industry feels that these figures and accompanying assertions bear no resemblance to the reality reported by trainers. The figures quoted by the DSA for travel time are also flawed. Over 80% of motorcycle tests are booked by ATB’s so the candidates travel from the ATB site and not home (adding mileage), also novice riders may have to travel further to avoid high speed or unsuitable roads making journeys appear to be within target when the reality is very different.

4.2.5 Faced with the lack of MPTC’s available in time for the original deadline of Sept 08, Industry agreed with the DSA’s proposal to split the test into two modules and welcomed this flexibility and in particular the positive interventions of the then DfT Minister Jim Fitzpatrick MP. Splitting the test seemed like a commonsense approach as module 2 testing could be carried out at a much larger number of old sites, thus making more tests available. However, implementation of the split test has been inadequate. The Trainer Booking system cannot cope with the split test, while Instructors are often unable to get tests close together or at reasonable times.

4.2.6 The operators at the Contact Centre are unable to view tests for module one and two on the same screen. This means that when booking tests they have to go in and out of the systems. Whilst one operator is attempting to tally up a usable sequence of tests for one trainer, another operator can be booking the same tests for another trainer. The result of which is that trainers rarely get tests that are close together or in pairs which is not ideal as training ratios are prescribed by the DSA as 2:1. In some cases a trainer may have travelled over an hour for a test at 9am and then has to repeat the journey with another single candidate at 2pm as they could not get tests together.

4.3 Other Test Availability Issues

— The vast majority of trainers who have spoken to industry about test availability cite the lack of available tests (Kent MPTC being the exception), with module one in most cases being most problematic, although some trainers are having problems getting module two tests (Bryans Motorcycle Training).

— Trainers with long journeys to test centres, some with over two hours travel time (Riders Edge) are often unable to get late morning/afternoon test slots with 8.30 starts being obviously impractical. It appears that many MPTC’s start testing in the morning (8.30am) and are finished by around 2.30pm.

— Of particular problem is the inability to block-book tests. Trainer booking limits are often one test or three tests. This does not reflect the DSA requirement of an instructor/pupil ratio of no more than 2:1. Offering one or three tests places a large financial burden on either the customer or the ATB or both.

— Most trainers have to travel further than they did before, and to make the journey more often, as the test is now in two parts. One ATB now travels 30 miles to a test centre 13 times in a week (Ridesure). Much instructor time is taken escorting riders backwards and forwards or waiting two to three hours at the test centre between tests inconveniencing customers as well as instructors.
— DSA cancellations due to the weather for module 1 are now much more common than with the previous old style test. Rain is a frequent cause of cancellations. Concern has been voiced about cancellations during winter months when we see more inclement weather. Also the MPTC’s in Hull and Newcastle in particular are often subject to cancellations due to wind (Hull MPTC is right next to a 408 ft wind turbine).

4.4 Compensation
— When tests are cancelled due to the DSA or SAM’s it is possible for trainers and their customers to claim compensation, but DSA has not made clear what the exact procedure is and what exactly can be claimed for. Some trainers are able to claim more than others and guidance does not seem to be available. Trainers who have long distances to travel with their customers are not being adequately compensated when tests are cancelled due to DSA or SAM staff being unavailable.
— A fair compensation system which takes into account the real value of the time lost by individual ATB’s and their customers, with clearly laid out procedures is required. At present it appears that trainers who are willing to complain get more compensation than those who accept whatever is offered.

4.5 Trainer Booking System
4.5.1 The inadequate Trainer Booking System gains the majority of complaints from members. Quite simply, it is not fit for purpose.
4.5.2 The main concerns about the Trainer Booking System can be summarised as:
— ATB’s cannot book tests in usable blocks (as explained in point 4.2.6).
— Currently an ATB employing 10 instructors is able to buy the same allocation of tests as an ATB employing only two instructors.
— ATB’s need to travel to numerous test centres to get the tests that they require.
— The upgraded system (beginning of August 2009) caused much disruption instead of improvement and meant that at least two members (Lightning Motorcycle Training/Abbey Motorcycle Instructors) could not book any tests at the local site for almost four weeks.
— On a number of occasions, trainers have tried to pay for tests only to find that someone else’s credit card details have overridden the correct details due to a computer error.
— Trainer Booking Limits are not flexible and are often reached with odd numbers of tests which goes against training ratios.
— There have been instances of the DSA mistakenly re-selling a test that has already been purchased and candidate details have been supplied to the DSA.
— The current system allows members of the public to re-book a test following a failure within three days which is against legislation. One riders licence has already been revoked.
4.5.3 Due to the complex nature of the Trainer Booking System and the nature of the issues involved, more detailed evidence is provided in Appendix A.

5. Question 4—What is the impact of the recent changes in motorcycle testing?
5.1 The DSA's Impact Assessment in its original 2003 consultation judged that there would be minimal impact on the training industry and even claimed that some business advantages would emerge.
5.2 However, all trainers are reporting a severe downturn in business, with the lowest reported at 40% down and the highest 65%.
5.3 We have the names of nine training schools that have closed down and many more who are cutting down on the number of instructors that they employ.
5.4 In recent weeks, the DSA have been disingenuously claiming that the industry’s “Now’s The Time” campaign, prior to the introduction of the new motorcycle test is somehow responsible for the severe downturn in the number of tests being taken. The industry’s campaign was designed to encourage people to take up motorcycling and take the test, but the campaign also had a broader based message, designed to promote motorcycling generally. This means that campaign key messages carried over the date that the test changed, with candidates running into immediate problems in booking and taking tests which are in no way related to the industry’s campaign. The problems of test availability, location, difficulty in booking and taking tests are in no way related to the industry’s campaign, nor is the loss of confidence in the safety of the test caused by the over-implementation of the EU Directive.
5.5 Future Impacts

5.5.1 Industry is concerned that the lessons of 2DLD interpretation and implementation are not utilised to the benefit of further licence changes.

5.5.2 The DSA is to consult on further changes to the motorcycle test required by the European Third Directive on Driving Licences (3DLD). The UK did not support 3DLD and after the Directive was adopted by the EU, Ministers gave specific assurances in 2005 that 3DLD would be implemented with “the lightest touch possible”. Industry would welcome “a light touch approach” providing it did not compromise future progressive rider training and development, and opportunities to improve rider safety.

5.5.3 MCI believes that the consultation on motorcycle specific aspects should be dealt with separately from other aspects of 3DLD. This is because:

- Proposals include options for training or testing to move between licensing stages. The DSA seem to have already pre determined that repeating the motorcycle test between stages is their favoured approach due to cost concerns. All reasonable safety evidence suggest that training is a better approach. MCI does not agree that the training option need be as expensive or as complex as the DSA is trying to suggest.

- There is a threat that provisional licences may be removed from the UK licence regime. This is due to pre existing EU regulations and the European Commission have apparently threatened infraction action unless the UK “falls into line”. However, the EU have indicated that compromise on provisional licences may be possible. MCI expects the Government to seek this compromise and preserve the UK provisional licensing scheme.

5.5.4 Taken together, the new motorcycle test under 2DLD and the forthcoming possible provisions of 3DLD give industry and the riders groups a great deal of reason to be alarmed. To give an example: If the new motorcycle test is structured so that people are discouraged from taking it (so remaining on provisional licences) and then the provisional licence is removed under 3DLD, then the pattern that is indicated to the public from these separate actions is that the Government is committed to reducing the number of people riding PTWs.

5.5.5 Such a policy would do nothing to improve safety for the 1.5 million people or so motorcycle licence holders who currently ride and would be little more than a repeat of failed Government policies of the 1980s and early 1990s.

6. Industry Observations

6.1 It should be noted that ministerial interventions and comments on 2DLD have been in the main very helpful and useful in moving the issues forward. Parliamentarians of all Parties have also expressed deep concerns about the current situation. In excess of 25 Parliamentary Questions have been asked about MPTC’s and licences.

6.2 It seems that greater Ministerial oversight could be provided when it comes to the DSA’s handling of motorcycle testing and training, providing greater accountability to Ministers, senior officials, and the motorcycle community.

6.3 Industry is of the opinion that motorcycle testing and training policy could come under the remit of a body such as the National Motorcycle Council (NMC). This is a body working in partnership with the DIT on the overall Government’s Motorcycle Strategy and its implementation. Linkage with the NMC will also bring an element of “joined up thinking” to overall motorcycling policy and help to address deficiencies in Government thinking on motorcycle safety as it will bring the DSA closer to discussions about the overall direction of motorcycle safety and transport policy.

6.4 Industry acknowledges that the DSA have held consultations with industry stakeholders, but the lessons of this consultation have not been implemented and recommendations or comments of user groups have been disregarded. In the recent consultation regarding modular testing, 62% disagreed with the 10 day wait for a modular two re-test and only 38% agreed yet it was still introduced. This decision impacts on the problems of test availability, as short notice cancellation slots cannot be effectively utilised.

6.5 Industry representatives will be available to give oral evidence to the Transport Select Committee should the Committee desire this.

MCI, MCITA, MRTA and MRA

*September 2009*
APPENDIX A

THE TRAINER BOOKING SYSTEM

The Trainer Booking system is not fit for purpose. Most of the complaints that industry has received are from members expressing concern or anger over the booking of tests.

Industry was assured from the very beginning that the booking system could cope and that ATB’s would be able to book tests in blocks, close together, and also that it was likely that ATB’s wishing to put riders forward for both module 1 and module 2 tests on the same day would in many cases be accommodated. In reality this has turned into a hugely expensive and administrative nightmare for ATB’s with tests often only available singularly and with long waits between tests. To get the number of tests that they need many trainers are having to resort to using several test centres adding even more travel and time wasted. This all comes at a time with trainers all reporting decreases in business from 40–65%. How will the system cope when demand rises?

The biggest single problem is the DSA’s booking system which was recently upgraded causing even more dissatisfaction but doing nothing to improve the situation overall.

The system opens at 8.15am and by 8.30am almost all available tests have gone. There must be a fair system that does not penalise against both large and small businesses. Currently an ATB employing 10 instructors is able to buy the same allocation of tests as an ATB employing only two instructors and those who get through on the phone first benefit immensely. The allocation of the trainer booking limit is very unfair and also causes problems as odd numbers of tests are often offered as a result of the calculations.

This system of allocation needs an urgent review. The DSA gave the following example of trainer booking limits as part of their questionnaire on the Trainer Booking Review.

“We manage the proportion of test slots available to trainer bookers at each test centre to try and give trainers a fair chance of getting the slots they want. We do this by setting daily percentage limits which are built in to our booking system. The limits are based on demand at individual test centres and as such vary from one test centre to another and are subject to change. Please see below an example of the daily percentage limits where forecasting has shown that there is no demand from private candidates:

<table>
<thead>
<tr>
<th>Total trainer booking limit</th>
<th>100%</th>
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<tbody>
<tr>
<td>Single trainer booking limit</td>
<td>75%</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>One driving examiner</th>
<th>one programme of seven module 2 tests</th>
</tr>
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<tbody>
<tr>
<td>This shows that on each day there are seven module 2 slots available to all trainer bookers and out of these an individual trainer booker may book up to five slots per day. Leaving just two tests for all the other trainers wanting to use that MPTC</td>
<td></td>
</tr>
<tr>
<td>Where the level of demand justifies two driving examiners there will be 14 slots available to all trainer bookers and out of these an individual trainer booker may book up to ten slots per day.”</td>
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</table>

This would leave only four for the next caller who could book three, leaving only one test for the next caller etc. This highlights the problem of trainers receiving odd numbers of tests too.

MCI/MCITA have visited the Newcastle office where bookings are taken and the system is not helping the staff there who are obviously trying hard to provide an efficient service. For example the operator cannot see module 1 and module 2 availability at the same time, meaning that they have to swap and change between screens trying to find module 1’s and 2’s to suit the trainer. Whilst this process is underway, other ATB’s with different operators can and often do book the tests that the first ATB wanted but was trying to match with a module 2. This is frustrating for the ATB’s and the DSA staff alike. As a result some trainers book all the module 1’s they can, then once they are safely booked the ATB’s try to match them with appropriate module 2’s. Sometimes once the availability of module 2’s is confirmed they don’t tie in with the module 1’s already booked which have to be cancelled and the process just gets more and more complicated and as minutes go by the ATB can end up with almost nothing. This is part of the reason that some ATB’s are over booking, it pays to grab whatever tests you are allowed then wait and see if any cancellations come up to see if you can make useful pairs out of them, the alternative is seen as ending up with nothing at all. If they cannot be made use of the tests can be handed back at three days notice for a full refund. Whilst we do not condone over booking it is easy to understand why this practice has been adopted by some.

When ATB’s cannot get sufficient tests they will then be given the opportunity to make a request using the call back facility, to do this the operator has to switch programs and then run through all the details of the ATB again and key them into the second program again wasting time. The IT systems do not help the operators.

As most ATB’s will take any tests they can get, they travel further to alternative MPTC’s with spare test slots. The deployment team at the DSA do not take this into account when allocating resources (examiners).
The fact that there were not enough tests available at a particular MPTC in the first instance is not recorded so DSA records show that a trainer actually purchased the number of tests required and therefore, it is difficult to see how the situation can improve.

The recently introduced Testing and Registration System (TARS) came in at the beginning of August. This system has done nothing at all to help ATB’s it has just made the process take longer. The system was not working properly when implemented and we have members using the Kassam Stadium who were unable to book any tests for almost four weeks and had to travel to a more distant MPTC just because the system could not book tests, the Kassam Stadium site stood idle, the DSA could not implement any alternative manual or IT system to cope with this. All our members are complaining about the slowness of the system and some are having problems getting calls answered.

The TARS system has also implemented the use of the three digit security code on the back of credit cards, as none of our members have yet fallen victim to fraud through using the DSA’s booking service, the extra disruption has not been worthwhile for them. Those that have in the past booked by e-mail or fax now have to send off their request then sit by their desks until the DSA phone them back to get the three digit security code, and then sometime during this extended booking process these test are allocated to another trainer causing confusion and annoyance. This is hardly a streamlined process and many ATB’s believe that the DSA should invoice them on a regular basis to eliminate this and also to speed up the telephone booking system and ensure that fraud is eliminated.

TARS was implemented very much later than predicted, but given the problems already experienced with the booking system it seems ridiculous to introduce yet another change to the ATB’s without being sure that this system would actually work.

The current booking system has recently allowed a rider to retake a module one test within three days of failure. This is prohibited by legislation but not well publicised to the public. When a DSA Examiner realised the error, he allowed the re test to go ahead despite this knowledge, and the candidate went on to pass both module 1 and module 2 thus gaining a full licence. This gentleman then bought a bike which he rode unaccompanied on the road effectively illegally. The DSA then revoked his licence, and he has since had to re take both tests. This demonstrates the incompetence of both the booking system, the DSA Examiner involved and the officials with whom he consulted.

It has also come to light that some novice riders have been able to book two tests on the same licence number/theory test number. This cannot happen with cars and should not happen with motorcycles.

*September 2009*

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**Supplementary memorandum from the Motor Cycle Industry Association (MCI), Motor Cycle Industry Trainers Association (MCITA), Motorcycle Rider Trainers Association (MRTA) and Motorcycle Retailers Association (MRA) (EMT 16A)**

The above organisations are pleased to submit supplementary evidence to the Transport Select Committee, subsequent to the hearing on Wednesday October 14th 2009, where it was indicated that further evidence would be provided regarding how other European countries have implemented the 2nd Directive on Driving Licenses. We have included more information on “gold plating” i.e. the extra manoeuvres that have been included in the UK module 1 test. We have also evidenced that whilst the industry may have supported the principle of off road testing, we have always expressed great concern about the size of the sites proposed. By testing some of the Module One manoeuvres on road we could have utilised much smaller areas of tarmac.

Questions were asked by the Transport Select Committee regarding whether or not there should be a “tougher” motorcycle test in the UK. Indeed, PACTS submitted the view that to their knowledge, the UK had “got it about right” in terms of “toughness” compared to, say, France, for example.

However, this is not the real issue and we do feel it necessary to reinforce that the issue is not about whether or not the test is “tougher”. The industry and training organisations support licence testing that is appropriately taxing and challenging for candidates. Instead, the real concern is about test availability, and distances travelled due to the lack of Module One test sites. There is also concern about how appropriate certain manoeuvres are, for example, the coupling of the “brake and swerve” manoeuvre.

The attached table shows “European Implementation” and gives information from a range of countries regarding 2DLD. This data was gathered by an email and telephone survey of European motorcycle industry trade associations in the countries indicated. In all cases, the associations had hands on experience of implementing the 2DLD, working with their respective governments and training organisations.
2DLD IMPLEMENTATION IN EUROPE: INFORMATION GATHERED BY TELEPHONE SURVEY OF MOTORCYCLE TRADE ASSN MEMBERS OF ACEM

<table>
<thead>
<tr>
<th>Super Test Centres?</th>
<th>Status September 2008</th>
<th>Update October 2009</th>
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<tbody>
<tr>
<td>UK</td>
<td>Yes (125x40)</td>
<td>Yes 125x40 metre “super” site imposed</td>
</tr>
<tr>
<td>France</td>
<td>Unclear. Video seems to show car park being used for off road element</td>
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<tr>
<td></td>
<td>No new specialist motorcycle centres, but only certain percentage of existing sites will survive. Swerving and emergency braking manoeuvres implemented at 30 km/h but not at the required speed (50km/h). France envisages to implement 2000/56 in 2008. About 2 test centres per department, still usable after implementation, which means more than 180 centres. Objective to reduce the number of centres down to about 100</td>
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<tr>
<td></td>
<td>Test for full licence can’t be taken until age 18. Test consists of 15 mins off-road followed immediately by 30 mins in traffic, not 2 separate tests. Off road you are tested manoeuvring round cones with and without a passenger and off and on the bike. Braking tests are either 1) in a straight line, 2) an emergency stop OR 3) a “precision stop”. You are allowed a few seconds extra if it’s raining. No speeds set to do it at. No combi “brake &amp; serve”</td>
<td></td>
</tr>
<tr>
<td>Holland</td>
<td>No</td>
<td>No change</td>
</tr>
<tr>
<td></td>
<td>No motorcycle centres. Use large car parks and shopping centres where necessary. 2000/56 implemented since April 2004. Swerving at 50 km/h without braking (safety of the test), quick slalom at minimum speed of 30 km/h, deceleration exercise (NL specific), followed by emergency braking, stopping and precision stop exercises. Parking places, shopping centres, offering 150X8 meters are currently used.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>No, but some existing facilities adapted, use of “quiet areas”. Low speed manoeuvres are performed on a normal road. Higher speed manoeuvres performed in “stable” area. Slalom performed at 50 km/h. Evasive manoeuvre followed by braking at 50 km/h. Braking exercises from 50 km/h. Germany fulfilled the requirement of 2000/56 since 1999</td>
<td></td>
</tr>
<tr>
<td>Germany</td>
<td>No</td>
<td>Entire test done on road. Brake test done between 30-50 kph, on “quiet areas” like car parks, or on quiet roads, and speed of it not monitored exactly—is the examiner’s judgment that counts. No high speed slalom. No off-road element to the test, so no MPTC equivalent. The examiner on the day will decide whether the braking / manoeuvring is safe. No “brake &amp; swerve” equivalent in their test.</td>
</tr>
<tr>
<td>Sweden</td>
<td>No</td>
<td>No change</td>
</tr>
<tr>
<td></td>
<td>No motorcycle centres. Instead; private grounds, airports, race tracks used. Existing avoidance and braking manoeuvres before implementation of 2000/56: avoiding manoeuvre performed at high speed, slalom performed at 50 km/h, emergency braking from 70 km/h and 90 km/h, speed limit at braking point 50 km/h. 2000/56 implemented since 2004. Needed area 300X5-7 meters. Private ground airports, racing tracks, . . . 30 test centres available out of 45 (67 according to another Swedish source)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>No, already have requirements in law, but need to raise some speeds from 40-50 kph in August 2008 in order to meet the requirements of the 2000/56. Speed measurement by radar. Appropriate motorcyclist protective clothing required.</td>
<td></td>
</tr>
<tr>
<td>Italy</td>
<td>No</td>
<td>No specific off-road Test Centres. No emergency stop test, one “precision stop” test not done at speed. No “swerve”, just slalom through cones (5), no speed indicated. Figure of 8 also. No “obstacle avoidance manoeuvre”. The above tests are done off-road but not in special centres—not specified where.</td>
</tr>
<tr>
<td>Finland</td>
<td>No</td>
<td>No motorcycle specific centres. Raised the speed of existing avoidance and braking manoeuvres from 40 to 50 km/h in August 2008 in order to meet the requirements of the 2000/56. Speed measurement by radar. Appropriate motorcyclist protective clothing required.</td>
</tr>
<tr>
<td>Belgium</td>
<td>Yes—smaller (100x30)</td>
<td>Yes, new specific sites are used. 100x30 metre area required. Uses speed measurement device to perform the new manoeuvres</td>
</tr>
<tr>
<td></td>
<td>No super centre. Introduced 1-2-2008, on road test with intercom</td>
<td></td>
</tr>
<tr>
<td>Cyprus</td>
<td>No</td>
<td>No change</td>
</tr>
<tr>
<td></td>
<td>No motorcycle specific test centres. Test elements carried out in Off Road Test Centres—the test is done in traffic currently, but is under discussion with</td>
<td></td>
</tr>
<tr>
<td>Austria</td>
<td>Yes—BUT not bike specific (2000m2) for all types of vehicle</td>
<td></td>
</tr>
</tbody>
</table>
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Super Test Centres?  Status September 2008  Update October 2009

Ministry of Traffic (ie looks like 2DLD not yet implemented). Likely to continue as now. No emergency braking test, no swerve at speed. There are 30 Testing Centres for driving companies, have to be 2,000m² but are for all types of vehicle.

Spain  Yes—smaller (90x11)
Size of manoeuvring areas for exercises is indicated (90x11 metre Max), but no given size for Test Centres—there is no information as to how many Test Centres there are but at least one for each region.
Swerve manoeuvre conducted at 50k/h, no info as to how that is measured. Emergency brake is also from 50k/h, immediately after “swerve”, again no info given as to how that is measured.

GOLD PLATING—EU REQUIREMENTS AND UK MODULE 1 TEST COMPARISON

When asked about Gold Plating the Minister replied “I do not think we have gold-plated it. There is one manoeuvre, I accept, which we have added, which is the manoeuvre at slow speed, with the examiner walking at the side, which we think is right, about learning about control of the machine that you have. I do not think we have gold-plated it at all”.

The table below shows the extra manoeuvres that have been implemented in the UK, we have 4 slow speed manoeuvres when 2 are specified, we also have one extra higher speed manoeuvre. In the UK the mandatory 50 kph avoidance has been linked to the controlled stop manoeuvre there is no requirement for this. This caused particular problems in the early weeks of the new test. Since then riders are learning to tackle a “set piece” manoeuvre. We do not feel that this prepares riders or really replicates real world riding. On the road a rider would need to maintain control of their machine and stop, but where they stopped is irrelevant providing they did so safely, and would depend upon circumstances. On test it is off putting for nervous test candidates to have to stop within a defined box and is of very limited safety benefit.

<table>
<thead>
<tr>
<th>EU Requirements</th>
<th>DSA Module 1 Test</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slow Speed Manoeuvre 1—Slalom</td>
<td>Slalom</td>
</tr>
<tr>
<td>Slow Speed manoeuvre 2</td>
<td>Slow Ride Figure of Eight U Turn</td>
</tr>
<tr>
<td>Higher Speed Manoeuvre 1—50 kph avoiding obstacle</td>
<td>50 kph Avoidance (linked to Controlled Stop)</td>
</tr>
<tr>
<td>Higher Speed Manoeuvre 2—30 kph</td>
<td>30 kph Circuit (1) 30 kph Circuit (2)</td>
</tr>
<tr>
<td>Braking Exercise 1—Emergency Brake 50 kph</td>
<td>50 kph Emergency Brake</td>
</tr>
<tr>
<td>Braking Exercise 2</td>
<td>Controlled Stop</td>
</tr>
</tbody>
</table>


6.2.3 At least two manoeuvres to be executed at slow speed, including a slalom; this should allow competence to be assessed in handling of the clutch in combination with the brake, balance, vision direction and position on the motorcycle and the position of the feet on the foot rests;

6.2.4 At least two manoeuvres to be executed at higher speed, of which one manoeuvre in second or third gear, at least 30 km/h and one manoeuvre avoiding an obstacle at a minimum speed of 50 km/h; this should allow competence to be assessed in the position on the motorcycle, vision direction, balance, steering technique and technique of changing gears;

6.2.5 Braking: at least two braking exercises shall be executed, including an emergency brake at a minimum speed of 50 km/h; this should allow competence to be assessed in handling of the front and rear brake, vision direction and the position on the motorcycle.

The special manoeuvres mentioned under points 6.2.3 to 6.2.5 have to be implemented at the latest five years after entry into force of this Directive Amendment under 2008/65/EC:

(d) in the second paragraph of point 6.2.5, “five years after entry into force of this Directive” is replaced by “by 30 September 2008”;
The Development of an Off Road Test and MPTC's

The Minister stated that the industry had been consulted and supported the off road test, whilst this may be true, we all had reservations. An extract from MCI's reply in April 2003 warns about the size of test sites (below).

1.6 MCI first made its views known officially in response to the DSA's 2003 consultation on the new test. The industry warned that the DSA proposals for Multi Purpose Test Centres (MPTC) were "fundamentally flawed" due to:

- The manoeuvre element suggested in the DSA paper gold plated the Directive with several additional manoeuvres that result in a very large test site being needed.
- The size of the site proposed would greatly reduce the availability of test centres.
- The DSA proposal was likely to result in a separate off road element to the practical test, thus.
- The cost of the full test would rise substantially.

1.7 The MCI also warned that these flaws created a significant risk of unintended consequences:

- That many riders who would have taken the full motorcycle test will choose to renew their provisional licence through CBT and not achieve the higher skills level and hazard awareness required by the full test.
- A complex and costly motorcycle test which has much more limited availability will inevitably result in more people deciding to risk riding unlicensed.
- Some of those on low incomes for whom a Powered Two Wheelers (PTW) offers affordable transport will also be put off the use of PTWs.
- The same will apply to many potential riders living in rural areas where a PTW offers the only form of low cost transport.

1.8 MCI concluded that "It would be ironic indeed if the effects of the Directive and its implementation were to reduce rather than improve motorcycle safety" (MCI Response to "Delivering the New Motorcycle Test" April 2003).

The DSA chose to ignore these warnings and moved ahead with a complex MPTC proposal. Industry takes no pleasure whatsoever in noting that its warnings in 2003 appear to be well founded.

MRTA also reminded the DSA of their concerns in a detailed document issues in December 2005. An extract from a document collated from the responses of over 200 training schools follows:

5. The DSA's proposed special manoeuvres test received widespread criticism.

6. It was felt that there was a large element of "gold plating" in the Agency's approach. They had purposely designed an off road test that exceeds EC requirements, introducing additional and repetitive manoeuvres.

That it was solely their choice in the way these special manoeuvres are to be executed that impinges on safety and creates the need for an off road test at all.

That is was their design, addition to and repetition of, the special manoeuvres that then required such a large and expensive area.

The DSA have consulted extensively over several years on 2DLD implementation, but stakeholders feel that almost no account has been taken of the suggestions received. We are pleased to give our time freely to attend meeting with the DSA, but we do need to feel that our suggestions may be considered and sometimes adopted.

The industry and training associations remain at the Transport Select Committee's service.

October 2009

Memorandum from the Wessex Association of Motorcycle Schools (WAMS) (EMT17)

First Submission: Lack of urgency in preparation for the new test.

October 2000: the European Commission brought into force the Commission Directive 2000/56/EC ("the Directive") which required certain steps to be implemented by October 2005 ("the first implementation date").

January 2001: A discussion paper “European changes to the driving test—a Discussion Paper” was issued by the DSA.

August 2002: the DSA issued “Implementing European changes to the driving test—a report on responses and decisions reached”.

18 March 2004: response published. Amongst the decisions were intentions for the DSA to administer the new test and for the “special manoeuvres” to be carried out off road. In consequence, the DSA decided on the construction of Multiple Purpose Test Centres (“MPTCs”) with the intention of combining all testing from one site.

2005?: Postponement of first implementation date to 30 September 2008 (“the second implementation date”).

16 January 2006: first MPTC site, Newport in Monmouthshire, acquired.

8 September 2006: Newport MPTC completed.

11 September 2008: Postponement of second implementation date to 30 March 2009. Thirty-eight MPTCs (including the DSA Training Site at Cardington, Bedfordshire) were ready for use but that was only 57.58% of the total which should have been ready. It was anticipated by the DSA that a further seven sites would be ready by the postponed implementation date of 30 March 2009 and, possibly a further four by the end of September 2009. This meant that a further seventeen (over 25%) had no definite in service date.


29 January 2009: Response to consultation published coupled with low-key announcement that the implementation of the new test would be postponed by a further month to 27 April 2009.

27 April 2009: new test inaugurated.

Second Submission: The DSA lost sight of what it was supposed to be doing—complying with the Directive—in its keenness to develop MPTCs.

The DSA was charged by the Government to introduce the new motorcycle test. By deciding to consolidate its estate of test centres down to sixty-six with the apparent intention of conducting all testing from those few centres, larger sites had to be located to suit not just the motorcyclists but also all other types of vehicle involved in driver testing and the resulting sites had to be more sophisticated in consequence. It narrowed the search down to those sites in or on the edge of towns and cities with access to dual-carriageways. Had the DSA concentrated on complying with the Directive rather than its own advantages in rationalisation, smaller, cheaper, more basic sites could have been developed and in less demanding areas due to the greater manoeuvrability of motorbikes compared to larger vehicles. Undoubtedly, this would have been quicker to get on stream.

Third Submission: New test centres were too few and unevenly distributed.

Had the DSA concentrated upon its remit to implement the Directive, as per the second submission above, the cost per test site would have been less and the budget would have gone further. Therefore, more test centres would have been built and the distribution more even. Concentrating on the MPTCs, there are supposed to be 49 in England; 4 in Wales; and 13 in Scotland. This compares with 153, 14 and 52 respectively of test centres which were in operation as at the end of September 2009. That there was (and is) a serious problem on numbers and distribution, was acknowledged by the DSA earlier in 2009: four meetings were arranged by the DSA with representatives of the training bodies in the four “real problem areas” (DSA’s description). Those areas turned out to be the whole of the south of England with meetings at Exeter and Cobham; most of northern England with a meeting at Harrogate; whilst a meeting at Bathgate covered the whole of Scotland. Wales was excluded but was clearly a problem area with only two MPTCs on line by the end of March 2009 and only four to serve the Principality when all were ready. Test centres have been arranged for the convenience of the DSA and not for the public. The meeting resolved nothing, with at times, inconsistent answers being given. Promises to look into some matter appear to have received no attention.

For many doing a Module 1 test, a major problem arises in regard to travelling to and from an MPTC due to the considerable distance which is involved. The purpose of the test is for the DSA examiner to resolve whether a candidate is deemed safe enough to do the road ride on Module 2. Accordingly, until that happens, the candidate must be assumed to be unsafe and yet there may be no way of getting to the test centre without riding there and riding back even if having failed the Module 1 test. DSA’s flippant response is that training bodies could invest in vans and/or trailers to ferry the candidate to and from the test centre without giving any thought as to how that would be financed.

Fourth Submission: Lack of consistency by the use of VOSA and other “temporary” sites.

To fill the gap caused by the ineptitude of the DSA, a number of temporary sites was brought into use, mainly from the sister-agency VOSA from 30 March 2009. These don’t provide the special surface with which the MPTCs have been coated and vary in size, shape and standard. Naturally, this means that the administration of tests is not uniform across the UK as, not only is there variety between the individual temporary sites but also a lack of uniformity between those sites and the MPTCs.
All VOSA sites are only available at weekends. Training bodies have problems as many do CBTs at weekends and the smaller units do not have the flexibility to do both and suffer financially in consequence. There is difficulty in getting tests at the weekend sufficient in number to satisfy even the limited number of people who want to do tests, especially as the VOSA sites cover the same area as a full-time MPTC would do. The DSA seems to have difficulty in providing sufficient examiners to carry out tests at weekends—the maximum is two examiners for each of the two days but the reality is more normally one for both days or even one for one day only. When VOSA go back to testing vehicles on Saturday mornings, the situation will become even worse. Unlike at MPTCs, there are no facilities at VOSA sites to carry out training.

Fifth Submission: DSA’s determination to conduct the higher speed exercises from 50km/h.

Paragraph 6.2 of Annex 2 of the Directive deals with the special manoeuvres element of the new test and requires a minimum of two manoeuvres to be executed at slow speed, two at higher speed, including an avoidance manoeuvre at a minimum speed of 50km/h; and two braking exercises, including an emergency stop from a minimum speed of 50km/h. The DSA insist that the special manoeuvres should be conducted as if on the road (which is reasonable) but ignore the fact that kilometres per hour is an illegal measurement on the roads of Britain. Further, although the Directive refers to speeds of 30km/h and 50km/h and the DSA have never raised the matter of any lower speed being possible, it is believed that most, if not all, other EU countries have opted for lower speeds. Speedometers on British vehicles have to be marked in miles per hour to comply with the law and although many are also marked in kilometres per hour, this is not a legal requirement and, where that does occur, almost invariably, the continental figuring is very insignificant. To expect a novice rider to carry out a hazardous manoeuvre at a speed which exceeds the normal “about-town” speed limit and, whilst carrying this out, to try and ascertain the speed against almost illegible markings on the speedometer, is unbelievable. Surely, the appropriate authorities could have obtained an indulgence from the Commission for the speed of 30mph to be substituted for 50km/h?

Sixth Submission: The emergency avoidance manoeuvre.

The emergency avoidance manoeuvre has proved to be the most contentious of all the special manoeuvres introduced by the new test regimen. Paragraph 6.2.4 of Annex B of the Directive, requires: “At least two manoeuvres to be executed at higher speed, of which one manoeuvre ... avoiding an obstacle at a minimum speed of 50km/h.” This seems to state, fairly clearly, that the manoeuvre must be carried out at a minimum speed of 50km/h. However, the manoeuvre is set up so that speed is measured some 10 metres beforehand and, therefore, there is no means of knowing that the speed at the critical point meets the Directive requirements. This is especially so as the DSA contends that speed should be reduced after passing the speed measuring device and before executing the manoeuvre of avoiding the obstacle.

The second problem is that, as conducted by the DSA, this is not one manoeuvre but a combination of two: the emergency avoidance manoeuvre and the controlled stop exercise. Paragraph 6.2.5 of Annex B deals with braking namely: “at least two braking exercises shall be executed, including an emergency brake at a minimum speed of 50km/h.” As the emergency avoidance manoeuvre is dealt with under one paragraph and the braking exercises under another, the implication is that the two manoeuvres or exercises should be treated separately from each other. In practice, as two runs are allowed at either of the two higher speed manoeuvres if the required speed is not achieved on the first run in regard to either; a candidate may be required to do the controlled stop twice and, if the second controlled stop is fluffed (ie by the candidate stopping perfectly well and safely but not in the precise spot required), the test is failed. That is not fair. Bearing in mind that every time a vehicle stops, otherwise than as an emergency, technically it is a controlled stop. The Directive does not require the controlled stop to be exercised at any particular speed and, therefore, in the Module 1 test, no fewer than some seven controlled stops are carried out—but this does not satisfy the DSA.

The third problem with this manoeuvre is that it is unnatural. The candidate is required to accelerate into a diminishing gap. Not only does this go against the grain for any experienced road-user but it is against good practice as expounded by any safety expert or any advanced riding or driving manual. Furthermore, when confronted with a situation that requires emergency action, one is confronted with three basic choices: to use the performance of the bike and accelerate out of danger; to brake in a straight line to a stop (if possible); or to swerve around the object either at a constant speed or one which is mildly increasing. There is a fourth possibility and that is to lay the bike down and try to slide clear. Whatever the choice, one does not swerve and then stop. Why stop? To turn around and swear and gesticulate at the miscreant who caused the problem; to go and exchange words and/or blows with that person? Hardly. One swerves and gets on with life. To this unnaturalness is added the thought that, having swerved, one has to stop in accordance with the DSA’s requirements. It can tend to overload some candidates; even those with many years of driving behind them.

The final aspect of this submission again relates to speed. The minimum speed of 50km/h is absolute whatever the situation. There is no allowance for the speed to be reduced if weather conditions are bad whereas, in normal riding and the teaching thereof, speed would be reduced and extra care taken in encountering the normal hazards of the road. An examiner would take the road conditions into account on a Module 2 test and a candidate would fail who did not follow that precept. Not on the Module 1 test, however, where the reverse is the case. Furthermore, the insistence on this particular speed means that the manoeuvre is different for the different bikes used. Special allowances are made for mopeds so they can be put to one side. So called “big bikes” (which are used for the Direct Access Scheme to achieve a class “A”
unrestricted licence tend to be 500, 550 or 600cc bikes which can accelerate quite quickly and generally do not have problems. To achieve the required speed in second gear calls for engine revs to be somewhere between 5,500 and 7,000. For the standard test (where a bike must be between 121 and 125cc and capable of at least 62mph to obtain a class “A” restricted licence), the bike will tend to be up at around 10,000 revs in second gear, or more and therefore up at or even beyond the red line at the recommended maximum rev. limit. The use of third gear is not feasible as speed is lost in the gear change and cannot be recovered in the distance provided. For the category of bike between 75 and 125cc but not capable of at least 62mph (for a class “A1” licence), the speed is impossible and, therefore, that category has been eliminated by the DSA, apparently without any authority.

Seventh Submission: The intransigence of the DSA and Rosemary Thew in particular.

In dealing with the senior staff at the DSA, they exude an aura of knowing best whilst motorcycle rider instructors are dumb hobbleddehoys who know nothing at all. Any correspondence which has been sent to the DSA in regard to the new motorcycle test, appears to be treated as a complaint no matter that it is a comment, a suggestion or even a constructive criticism. Inevitably, it will end up with Ms. Thew and this means the reply one receives is likely to contain phrases such as: “the test has been developed with input from our key stakeholders”; “there have been extensive trials during the development of the test to ensure the safety and practicality of test delivery”; and “there are no plans to change the motorcycle test”. Trainers are experts in training people to ride motorcycles and have current, up-to-date experience of that. From that, they have a valuable point of view which, it is felt, should be listened to with some degree of respect. The DSA are supposed to be the experts in delivering the test and the two fields of expertise should dovetail. The DSA and instructors should be viewed as partners working together to deliver a common goal. Instead, those instructors are treated with disdain; as children who cannot possibly have a view to express and should, perhaps, be tolerated but better ignored, if at all possible. At times, it is not possible to ignore instructors completely but then their involvement is superficial with mere lip service being paid to the concept.

One specific example of being ignored occurs in regard to the consultation issued in November 2008 (see Submission One above) and in which, inter alia, the question arose as to the period which should elapse between failing a modular test and being able to retake that test. The DSA were suggesting a three day gap in regard to Module 1 tests and a 10 day gap in regard to Module 2 tests. The response from the consultees was that a 10 day wait was excessive with 62% disagreeing including 42% overall who indicated that they would “totally disagree” with the proposal. The DSA’s response to this was: “Ministers have noted concerns about the 10 day wait before a candidate can retake a Module 2 test but feel that reducing this requirement would send the wrong message to candidates. They have decided that candidates should wait for three days before being able to retake a Module 1 test and 10 days before being able to retake a Module 2 test. Minimum waits allow candidates to complete further training and discourages further early, but futile, attempts to pass the test without addressing the reasons for failure.” In a response to a representation made to the DSA about this, it was said: “the reduction to a three day waiting period has been tried before and we saw a significant rise in test failures and terminations as a direct result. The message the trainer needs to stress to the candidate is that the waiting time is an opportunity to address the reasons for earlier failure and take further training as necessary. The 10 day wait for the Module 2 test has direct parallels with the current practical motorcycling and car tests, and encourages candidates to ensure they are test-ready. The three day waiting time before retaking the Module 1 test has parallel (sic) with the theory test as any additional revision should only be fine tuning and not necessarily further detailed training. Drivers of large goods vehicles and passenger carrying vehicles are regarded as professional drivers therefore requiring less in depth training.” Such a response wholly ignores and, in seeking to tell how instruction should be given, belittles the experience of motorcycle instructors. The original three day gap between tests was a considerable time ago and times have changed. Test terminations (where the test is abandoned because the driver or rider is deemed to be too dangerous) are extremely rare. Until a driver of a large goods vehicle or of a passenger carrying vehicle has passed his or her test, they cannot possibly be viewed as a professional driver of that vehicle. What a learner driver of such a vehicle does possess is maturity and a full car driving licence. Accordingly, he or she is building on existing skills but then so too are the great majority of motorbike riders. All motorbike test candidate will have done a Compulsory Basic Training course within the previous two years; the vast majority will hold a full car licence and be over twenty-one years of age. Training for a test is generally of the order of three or four days and the national average for passing the test was about two-thirds—much higher than for car test candidates. Reasons for failure of a motorcycle test are generally minor and require very little in the way of corrective treatment, rarely lasting as much as a day and more likely only lasting an hour or so. For the DSA to tell us that 10 days are needed to retrain a pupil for a Module 2 retest and any lesser period would be “futile” shows a complete lack of understanding of training; is insulting in the extreme to instructors; but, very clearly, demonstrates the DSA’s attitude towards instructors and, indeed, towards motorcyclists at large.

In a letter signed by Ms. Thew, dated 19 February 2008, and sent to all Authorised Training Bodies (“ATBs”), is the sentence: “We remain confident that in excess of 40 MPTCs will be operational by 29 September, with up to 66 being brought on line during the course of the following six months.” However, this is contradicted by a schedule of “Status of the proposed 66 MPTCs” which was attached to the letter and revealed “45 areas where we predict an MPTC will be operational by 29 September”; “17 areas where we expect an MPTC will be available shortly after 29 Sept.”; and four “Areas where we have no identified
option”. It is very difficult to accept that there could be any genuine belief that there would be anything approaching “up to 66” MPTCs being ready by the end of March 2009. What was available was 38 sites by the end of September 2008 and a further seven six months later.

In the in-house magazine, “Dispatch”, in October 2008, the DSA announced that an appeal had been lodged against refusal of planning permission for an MPTC to be constructed at Poole in Dorset but contracts had been exchanged for the purchase of the land, subject to the appeal. Following a successful outcome in March 2009, it was announced work would start in early July for completion in six months. On 23 July, it was announced that work would start in August but, on 18 August, this was changed so that work would not start until “the autumn” due to “delay in clearing the necessary legal documentation”. The implication is that this documentation relating to the purchase but, bearing in mind that the site is on a developed industrial estate, title to which must be well known, it is very difficult indeed to see the reason given as being the true reason for the delay.

Eighth Submission: Choice and use of “stakeholders” by the DSA.

In almost any dealing with DSA hierarchy, there is a reference before long to their “stakeholders” who have been consulted over this and that. These “stakeholders” are worthy bodies but if training is involved, then should not the trainers themselves be involved as stakeholders? A stakeholder is one who has an interest in a concern. Instructors very livelihood is in training so that they, almost above anybody else, are the prime stakeholders in this business. It is appreciated that it would be very unwieldy to consult instructors or even training bodies on an individual basis but, where such training bodies have organised themselves into a local association, then it must make sense to consult that association and incorporate it into the list of DSA’s stakeholders.

Ninth Submission: Difficulty in booking tests.

For tests to work, they need to be booked. The DSA operates a “trainer booking” facility whereby training bodies may book tests up to 10 weeks in advance and subsequently either “name” the test by providing the name, driver number and theory test pass certificate number of the intended candidate or else cancel the test by notifying the DSA and recovering the test paid, in either case not less than three clear working days before the test date. Unfortunately, it does not work very smoothly. It is possible to “name” up to eight candidates on one form but not impossible to turn up for a test and find that one candidate on the list is down for the test but another is not. It is also possible to turn up at a test centre and, without any warning, find no examiner present. When trying to get tests, one may be told that a test centre (particularly if it is a VOSA site) does not exist according to the computer or that no tests are available on the day required but a subsequent call on the same day to another operator, will get a different result. It used to be possible to obtain all the tests one wanted (or were available) at a number of test centres and then pay for all in one go but now each centre has to be paid individually before another test centre can be checked out. This lengthens the call; reduces the efficiency of both the training body and DSA; increases costs; and proves quite frustrating.

Tenth Submission: Perceived bias against motorcyclists—paying for the MPTCs, etc.

Motorcycle test fees have been used to provide MPTCs and, in consequence, have increased sharply over the last couple of years. Including the theory test, the cost for motorcyclists in test fees as from the beginning of October will be over £120 and which is nearly 40% more than for a car test candidate. Bearing in mind that “Multiple Purpose Test Centres” will be used for car as well as motorbike tests, it does not seem reasonable that the burden should fall on the narrower shoulders of the motorcyclists rather than be shared by the wider ones of the car driver.

When the theory test was first introduced, it was possible to use the same certificate for both a practical car test and a practical motorcycle test. After a short while and although the test is the same, DSA ordered that separate theory tests had to be done for each type of practical test. Although only a relatively small number do both practical tests within a short period of each other, this ruling does increase the cost for such a candidate, somewhat unfairly. Also, it would seem to contradict the requirement that a Module 2 test must be done within two years of passing the motorcycle theory test in order “to demonstrate practical driving competence within a reasonable period of having successfully demonstrated theoretical knowledge.” There is no obvious reason for this requirement—other than to increase income for the DSA.

September 2009

Memorandum from the Department for Transport (EMT18)

BACKGROUND

1. In September 2000, the European Commission, with the agreement of Member States meeting in the Driving Licence Committee, published higher minimum standards for the theory and practical tests to be passed in order to obtain a driving licence. Among other changes, the higher standards required new and more challenging manoeuvres to be assessed during practical motorcycling tests.

2. UK abstained from voting on the minimum standards proposed because UK Ministers were not convinced that all the provisions would be cost effective. Nonetheless the Directive was approved under the relevant qualifying majority voting procedures that apply. The new motorcycling manoeuvres were initially to be implemented by October 2005, though following further Commission action, the target for implementation was subsequently extended to 30 September 2008.

3. DSA developed proposals to implement the requirements of the new EU law. In 2001, the Agency publicly consulted about the general principles of the Directive, including implementation of the requirements for the motorcycling test. Following consultation it was decided, in line with views of consultees (list of consultees at Annex 1), that the special manoeuvres should be undertaken off-road to protect the safety of candidates, examiners and other road users.

4. In 2002, DSA undertook a further consultation focused on how to deliver the new practical motorcycling test. Whilst motorcycling interest groups expressed concerns that special testing areas would inevitably increase the costs of delivering the practical motorcycling test, most the consultees preferred the option of a single event test on the grounds of minimising cost and administration. In the light of this preference it was decided that the test would be delivered as a single event with two parts; the first part a special manoeuvres element, to be undertaken off-road, followed by a second part, an on-road assessment riding in traffic.

5. DSA did not have suitable sites within its existing estate from which to deliver the off-road element of the new practical test. Therefore DSA needed to acquire a national network of testing sites. To provide improved customer service and to maximise utilisation of the new facilities the Agency chose, where possible, to develop these sites as multi-purpose test centres (MPTCs) delivering other types of practical test.

6. The Agency faced many issues acquiring these sites adjacent to centres of population, operating in a costly market place with commercial and residential developers as competitors. Many planning authorities were not supportive of our developments. Our wish to promote sustainable development objectives meant we were often involved in expensive and time-consuming brownfield regeneration. More recently, as a result of the economic downturn, private developers—who are delivering many of DSA’s new centres—are finding it increasingly difficult to obtain bank funding.

7. On the run-up to the intended implementation date of 29 September 2008, DSA received representations from motorcycling interests about the number and location of service delivery points that would be active when the new test was introduced. DSA listened to the concerns expressed and it was decided to defer introduction of the new test until spring 2009. We used that time to work with the motorcycling and other relevant interests such as road safety officers and police to develop alternative solutions.

8. DSA developed a solution based on a two-part modular test where the modules could be provided at different times and from different locations. This approach allowed the Agency to deliver the test from significantly more delivery points. Although this approach had been rejected by the industry in previous consultations, during the autumn/winter of 2008, motorcycling and other interest groups that were engaging in a stakeholder forum supported this proposal. DSA then undertook a further public consultation and the modular solution was broadly supported. Based on this it was decided to introduce the new practical motorcycle test in this manner. The new test was successfully introduced on 27 April 2009.

Has the DSA interpreted the EU Second Driving Licence Directive correctly and applied it appropriately?

9. DSA has worked with user groups, trainers, other regulators and the European Commission to implement the Directive’s requirements in a way that maximises the safety benefits whilst minimising the costs and inconvenience falling on users.

10. The new standards specified in the Directive require the practical motorcycling test to include specified manoeuvring exercises on slow speed control (slalom, figure of eight, riding a curve in 2nd or 3rd gear) and three manoeuvres (obstacle avoidance, controlled stop and emergency stop) which must be carried out at least 50kph (31.5 mph). The Directive does not specify the administrative details about how the standards are implemented. Member States have flexibility which allows the tests to be organised and delivered in a way that best suits prevailing local conditions.

11. It was decided, consistent with the views of most of those who commented on the matter, that to minimise the risk of incidents the special manoeuvres must be conducted in safe off-road environments. Discussions with other Member States about their delivery methods showed that countries with similar heavy traffic levels to UK had also decided to deliver the manoeuvres off-road. CIECA (the international commission for driving testing authorities) research also confirmed that most western EU nations had expressed a preference for conducting the special manoeuvres off-road (Annex 2).

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8 Commission Directive 2008/65
9 January 2001—European Changes to the Driving Test
10 December 2002—Delivering the New Motorcycling Test
11 November 2008—Introducing the New Practical Motorcycling Test and Associated Fees
12. Research and development was carried out to design the new motorcycling test in a way that riding competencies could be assessed effectively and efficiently. Extensive trials with motorcycling interest groups investigated different sizes and layouts of areas needed to conduct assessments of the manoeuvres.

13. In 2002, a two-day event offered road safety experts, motorcycling industry and training bodies and government officials from Member States the opportunity to take part in discussions about the changes and see demonstrations from several Member States of their proposals to test the manoeuvres. DSA’s design for the assessment of off-road manoeuvres were acknowledged by the majority of delegates as being a practical and efficient way of examining competence for these exercises. Representatives from UK motorcycle stakeholders who attended the event commented that DSA’s proposals for testing the required manoeuvres were preferable to others they had seen. In the same year DSA met the Commission to discuss our proposals for delivering the practical test along with the other requirements of the Directive, and no issues that would indicate failure to apply the directive were identified.

14. During the development stages between 2004 and 2008, DSA commissioned research carried out by the Transport Research Laboratory (TRL) in addition to welcoming continuous input from the motorcycling training industry. A large number (over 300) of volunteer riders, including trainers and representatives from motorcycling industry bodies, with varying skill levels from complete beginner to expert rider took mock tests in a variety of weather conditions and on different sized motorcycles. The feedback and research from the trials confirmed that the manoeuvring area was “fit for purpose” and that the cone configurations (including distances apart) did not need to be modified or changed.

15. During the deferment period from September 2008 to April 2009, DSA took the opportunity to examine the delivery of the new test and consider options to increase the flexibility of test delivery methods and sites. The solution that was finally adopted retained the same components as previously designed and met the same standards. However, splitting the test into two modules had the advantage of providing DSA with greater flexibility regarding suitable test sites. Sites for the specified manoeuvres would not need to be adjacent to suitable test routes and the on-road ride could be offered from a number of existing driving test centres. The deferment also allowed some MPTCs under development to become operational. Motorcycling interests supported this proposal.

Are the off-road motorcycle tests safe and appropriate?

16. The Directive introduced the changes to the test with the intention of improving standards of riding and the training which underpins it. The objective is to help reduce the disproportionate numbers of riders killed and seriously injured. The new test sets higher standards for the skills and abilities that must be demonstrated. The new testing arrangements introduced in GB include all the competences required by the Directive and the layout of the manoeuvres area has been carefully designed to effectively and efficiently deliver safe riding tests. Those candidates who are poorly prepared will struggle to demonstrate the necessary competence.

17. One of DSA’s paramount concerns during the development of the new test was the safety of candidates and examiners. Health and safety issues identified—surface, size of manoeuvres and “run off” areas, etc were considered and addressed.

18. On numerous occasions in the run up to the introduction of the new test DSA has issued advice and guidance to trainers and offered them opportunities to experience the test for themselves. The Agency issued all Approved Training Bodies with a free DVD explaining and demonstrating the test. Opportunities for practice sessions on the off-road manoeuvring areas have been made available (free of charge) to motorcycling trainers since December 2008. We have encouraged trainers to take advantage of these opportunities in order to bring their skills to an appropriate level in order to help them properly prepare their pupils for the test. In the event very few trainers have chosen to take advantage of these opportunities—during December to April only 4.7% of available slots were taken up. It is notable that at the locations where the incidents on Module 1 test occurred there had been very little or no use made of this opportunity in advance of the test being introduced.

19. If candidates who are not properly prepared do insist on taking a test, the off-road environment removes the risk of any incident involving another vehicle or a pedestrian.

20. Although some trainers have expressed concerns about the higher speed manoeuvres these have not been universal. Comments from numbers of motorcycle riders and trainers who have taken the opportunity to ride the course support our view that properly prepared candidates should have no problems in satisfactorily completing Module 1.

21. A number of articles appeared in the press about the incidents that occurred during the first week of the new test. Some of the articles portrayed the new test as dangerous. Since then numbers of incidents and attendant negative publicity have decreased. A further positive indicator has been the reporting of statements made by trainers on the value of the test in raising the standard of motorcycling training and improving novice riders’ skills.

13 Assen October 2002—Bike Safety 2002
22. The reports of incidents which have occurred during Module 1 tests have highlighted that the riders appear often to have made the same mistake by braking heavily while steering to carry out the avoidance exercise. This exercise reflects the situation that could occur when a motorcyclist is faced with an obstruction, for example a car door being opened. Such situations often account for crashes involving motorcycles. Braking and steering at the same time is contrary to good riding practice and should be properly covered during pre-test training. Unless the motorcycle has been returned to an upright and stable position before the rider applies firm but progressive and balanced braking, the outcome of heavy braking while steering risks loss of control of the machine and this is one of the main causes of serious casualties on our roads. But the avoidance exercise is not the only cause of incidents at Module 1 tests. Others have lost control at the emergency stop or in the figure of eight, indicating that these test candidates had simply not yet reached test standard.

23. Compared to the number of incidents that occurred during Module 1 when the new test was first introduced, we have seen a reduction in the number of incidents now occurring. More recently many incidents that have occurred have been during the emergency stop exercise, which has always been an element of the motorcycle test. (Table showing number of Module 1 tests conducted and incidents occurring at Annex 3)

24. Incidents occur during all categories of practical driving test, not just motorcycling tests. We advise all test candidates that they should wait until they are competent drivers and riders before taking the test. Advice and guidance issued to trainers in our regular newsletters has continued to stress that the new test requires higher levels of skill than previously and they should ensure candidates have mastered the appropriate machine control skills to safely and correctly complete the manoeuvres. We have stressed the importance of a modular, structured approach to training over a period of time.

Is the number of motorcycle test centres adequate and are the locations satisfactory?

25. As DSA made clear in the consultation exercises, the number of service delivery points represents a compromise between the costs of providing more test centres and the potential inconvenience of longer travel-to-test journeys. The set-up costs would initially need to be met from public funds but would then be recovered from fees charged to test candidates. DSA sought sites which would provide the environment for a valid test, give good geographical coverage for most candidates and where there is a proven demand for tests. These were key factors when search areas were identified.

26. In 2001–02, DSA had considered the possibility of using some VOSA sites for delivery of the special manoeuvres part of the originally proposed single event test. However, this was rejected at the time as the use of the sites for their normal purposes would mean only limited access would be possible. Also, the dimensions of these sites did not allow for a full sized manoeuvring area. In addition, there were concerns expressed about the safety of the surface area if contaminated by diesel or oil spills.

27. DSA initially estimated that, in order to deliver the new test a new national network of 50–75 MPTCs would be required, plus additional part-time, or “casual-hire”, sites, designed to meet localised demand for motorcycling tests. The intention was that most candidates should be able to reach a test centre within 30–45 minutes, travelling no more than 20 miles. DSA subsequently undertook extensive scenario modelling and found that 66 MPTC test locations would deliver approximately 83% service coverage within a 45 minute/20 mile “travel to test” distance. These 66 sites would also mean that 96% of the population would fall within 60 minutes travel time and 99.5% within 90 minutes. This standard was felt to achieve a reasonable balance between cost and travel-to-test distances.

28. In the run up to the intended implementation date of 29 September 2008, 38 MPTCs; nine part-time VOSA sites; and three casual hire sites were either operational or forecast to be operational by the implementation date. This meant that DSA had met the target set that most of the population (estimated at around 70%) were within the customer service criteria of 30–45 minutes/20 miles of a testing site.

29. The Agency could have gone live at that point and met the accessibility target, but as described at paragraph 7 it took account of motorcycling industry representations and decided to defer go-live to spring 2009.

30. DSA has experienced considerable difficulties obtaining planning permission for some of our proposed new centres. This was primarily because local authorities felt these centres were not direct generators of employment. In some cases there was also opposition from local residents. Planning consents have been refused or applications withdrawn at many sites, including Havercroft West, York, Rickmansworth, Upminster, King’s Lynn, Poole, Dundee and Wolverhampton. In addition, planning constraints have proved particularly difficult to overcome at Uxbridge, South London, Newbury and Swansea. DSA has worked hard to try to overcome objections by revising and resubmitting plans and holding informal discussions with planning authorities prior to and during submission of the applications.

31. DSA continued to work with VOSA throughout 2008. In particular, the decision to introduce a modular test has enabled DSA to include these additional service delivery points as a temporary measure until permanent sites are in place. The separation of Module 1 into a separate event means that we can obtain better utilisation of these sites when they can be made available at week-ends. A “hockey stick”
configuration has been developed that enables candidates to demonstrate all the manœuvreuvres adequately and safely within the confines of some VOSA sites. Remedial work has been undertaken as necessary to ensure surfaces are oil free and safe.

32. Currently, DSA offers Module 1 tests from 66 service delivery points, including 44 MPTCs, six casual-hire sites and 16 VOSA stations, while Module 2 tests are offered at 106 locations plus 30 remote Scottish sites. Consequently, 88% of Module 1 candidates and 97% of Module 2 candidates can reach a driving test centre within the service standard accessibility criteria. A further five sites have been acquired — with Ayr and Poole under contract and construction well under way at Wolverhampton, Gillingham and Leeds. (Annex 4 shows numbers of test centres delivering Module 1 and Module 2 tests)

33. Of the Module 1 test sites, two casual-hire sites and 13 VOSA test centres will be replaced in due course with permanent MPTCs. Although VOSA’s own operational requirements limit the times DSA can offer motorcycling tests, it is possible for two examiners to deliver up to 24 Module 1 tests in a standard day. Meanwhile, DSA can match demand levels and offer adequate provision in most areas while seeking to acquire and develop a permanent site in those areas.

34. A modular approach has clearly benefited the delivery of Module 2 tests as it allowed greater utilisation of the existing test centre estate. 30 occasional-use test centres in Scotland deliver Module 2 tests when demand is sufficient. This approach allows us to provide value for money by ensuring there is no wasteful over provision while delivering an acceptable level of service. Module 2 tests can be conducted from MPTCs as well as other test centres. Since the response to consultation in January 2009, following representations from local trainers, DSA has added three existing centres to the originally published list.

35. Maps showing Module 1 and 2 test centre coverage and locations of MPTCs, casual-use and VOSA sites are at Annex 5. Details of locations and progress to develop MPTCs are at Annex 6.

36. In the four search areas where no permanent solution has yet been identified — Haverfordwest, Oban, Lerwick and Redruth — DSA continues to search for suitable sites. The Agency is also looking for permanent casual hire sites to better serve Cumbria and the Isle of Wight.

What is the impact of the recent changes in motorcyclist testing?

Safety

37. We are confident that the new test will, supported by suitable training, mean riders obtaining a full licence are more competent in key vehicle handling skills, and this will help rider safety. The European Commission based the new test standards on advice from driver testing professionals.

38. The test supports our domestic strategy for reducing road casualties. Motorcyclists are a particularly vulnerable group of road users; they make up 1% of all road users but suffer about 19% of deaths and serious injuries. The Government’s Motorcycling Strategy, introduced in 2005, with a revised and updated action plan published in 2008, has helped introduce actions to facilitate motorcycling as a travel choice within a safe and sustainable transport framework.

39. DSA recognises concerns held by some that raising the test standard might cause increases in unlicensed riding. This is based on the assumption that if the test becomes harder or more expensive some riders will choose to opt out of the driver training and testing system. However, the argument that the higher fee is a major disincentive to compliance appears weak. The fee increase associated with the new test (a fee of £15.50 for a Module 1 test and £75 for Module 2 test from £10 and £70 respectively in October 2009) is only a small part of the total training and testing costs of obtaining a full licence to ride a motorcycle, which is typically around £750.

Demand for tests

40. DSA does not expect the adoption of the new testing arrangements will have a long-term effect on test demand. However, a combination of the modular test, with the surge in demand for practical tests experienced before the introduction of the change, means we would expect the number of candidates to be lower during the rest of 2009.

41. Normally there is a seasonal pattern of demand for practical motorcycling tests. During the months preceding the original planned implementation date in September 2008 and then, following the deferment, in the run up to April 2009, DSA saw an increase in demand for tests as learners sought to pass the “old style” practical test. These sorts of fluctuations are usual when changes are made to driving tests.

42. Normal levels of demand for practical motorcycling test (82,000 per year) have increased by 19% in 2007–08 and 27% in 2008–09. There was a surge in demand of around 40,000 tests. This may have been aggravated by campaigning by some motorcycling interests to encourage candidates to take their practical

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14 Exact coverage statistics are entirely dependent upon the precise location of each facility within a defined search area. This explains why the 66 facilities currently offering Module 1 of the test provide population coverage in excess of the original forecast of 83%.

15 Analysis of the theory and practical test for the motorcycle categories CIECA 1999

16 “Now’s the Time” MCIA campaign launched in 2007
test before the new, more demanding test was introduced. We are now (September 2009) seeing a reduction in demand for tests. DSA expects to see test numbers of around 20,000–30,000 below normal levels for each module in 2009–10. We predict that demand for tests will level out in 2011–12.

Pass rates

43. Before the new test was introduced the average pass rate for motorcycle tests was 66%. When the test was introduced the pass rate for Module 1 test was just over 50%, indicating that candidates had not properly prepared for the test and perhaps, as the fee for Module 1 was set at only £10, were using test attempts as part of their preparation. We have seen an improvement in the pass rate for module 1 tests over the first three months to 60%. This appears to indicate that candidates are increasingly better prepared when they present themselves for tests. Although the pass rate for module 2 appears to have fallen over the same period, it is actually higher than the pass rate for the single event test has been in the last 11 years. (Pass rates are shown at Annex 7)

44. There is increasing evidence that the training environment is adjusting to the new standards. There has been an increase (from 19% of available slots booked in May to 25% of available slots booked in July) in uptake of the thirty minute practise slots available at MPTCs. The areas are still available, free of charge, for training at weekends and where possible during the week. Since July, the service has been extended to three of the six casual hire sites.

Annex 1

Consultees who received a copy of Introducing the New Practical Motorcycling Test and Associated Fees (November 2008). Most of these principle stakeholders, or similar organisations in existence at the time, also received copies of the earlier consultations.

AA (Motoring Services) National Association of Citizen’s Advice Bureaux
AA—The Driving School National Taxi Association
ADI Federation Parliamentary Advisory Council on Transport
Ambulance Service Association Safety
Approved Driving Instructors National Joint Pizza and Pasta Advisory Council on Transport
Council Association of British Insurers Public and Commercial Services Union
Association of Magisterial Officers RAC Foundation
ACPO Road Haulage Association
ACPO (Scotland) RoSPA
Assoc. of Industrial Road Safety Officers Royal Scottish Automobile Club (Motor sport
Association of Magisterial Officers Ltd)
Big Wheelers St John Ambulance
Brake Sainsbury PLC
British Telecom Skills for Logistics
BSM Ltd Sustrans
British Red Cross Transport for London
Chief Fire Officers Association Transport 2000
Civil Service Motoring Association University for Industry
Commission for Racial Equality (England, This list is indicative only, and includes principal
Scotland and Wales) stakeholders. In all, some 6,369 persons and
Confederation of British Industry organisations have been notified in writing about
Confederation of Passenger Transport this consultation exercise. These include:
Convention of Scottish Local Authorities 880 individuals and organisations on the
Constitutional Committee Scottish Local Authorities Consultation List including:
CTC 150 Local Authority Road Safety Officers
Disabled Drivers’ Association 85 Government Departments and Agencies
Driving Instructors Association 1,087 Trainers on the DSA Voluntary Register of
Driving Instructors Democratic Union LGV Trainers
Driving Instructors Scottish Council 1,677 Trainers on the DSA Voluntary Register of
Eddie Stobart Ltd Fleet Driver Training
Freight Transport Association 670 Approved Training Bodies
GoSkills 1,785 Trainer Bookers (LGV, PCV and motorcycle)
Guild of Experienced Motorists 126 Delegated Examiner Organisations
IAM Foundation 150 Local Authority Road Safety Officers
Institute of Road Safety Officers 85 Government Departments and Agencies
Justices’ Clerks Society 1,087 Trainers on the DSA Voluntary Register of
Learn and Live LGV Trainers
Learning and Skills Council 1,677 Trainers on the DSA Voluntary Register of
Local Authority Road Safety Officers Association Fleet Driver Training
Local Government Association 670 Approved Training Bodies
London Borough Councils (14) 1,785 Trainer Bookers (LGV, PCV and motorcycle)
Magistrates’ Association 126 Delegated Examiner Organisations
to provide taxi and private hire tests

5. Area for carrying out special manoeuvres: on-road or private ground

<table>
<thead>
<tr>
<th>Country</th>
<th>On-road or private ground?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>Both are possible, depending on the facilities available in the area in question</td>
</tr>
<tr>
<td>Belgium</td>
<td>Private ground</td>
</tr>
<tr>
<td>Estonia</td>
<td>Private ground</td>
</tr>
<tr>
<td>Finland</td>
<td>Private ground</td>
</tr>
<tr>
<td>Germany</td>
<td>Both are possible, but only on public roads with very little traffic</td>
</tr>
<tr>
<td>Great Britain</td>
<td>Private ground</td>
</tr>
<tr>
<td>Hungary</td>
<td>Private ground</td>
</tr>
<tr>
<td>Iceland</td>
<td>Private ground</td>
</tr>
<tr>
<td>Ireland</td>
<td>Public roads apart from the slalom (to be carried out on a CPC compound</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>Private ground</td>
</tr>
<tr>
<td>Netherlands</td>
<td>Public roads</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>Private ground</td>
</tr>
<tr>
<td>Norway</td>
<td>Private ground</td>
</tr>
<tr>
<td>Slovenia</td>
<td>Private ground</td>
</tr>
<tr>
<td>Spain</td>
<td>Private ground</td>
</tr>
<tr>
<td>Sweden</td>
<td>Private ground</td>
</tr>
</tbody>
</table>

Annex 3

INCIDENTS OCCURRING DURING MODULE 1 TESTS

<table>
<thead>
<tr>
<th>Month</th>
<th>Module 1 tests conducted</th>
<th>Tests not completed</th>
<th>Incidents</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>27–30 April 2009</td>
<td>818</td>
<td>72</td>
<td>8</td>
<td>0.9%</td>
</tr>
<tr>
<td>May 2009</td>
<td>5,146</td>
<td>332</td>
<td>21</td>
<td>0.4%</td>
</tr>
<tr>
<td>June 2009</td>
<td>5,782</td>
<td>324</td>
<td>16</td>
<td>0.2%</td>
</tr>
<tr>
<td>July 2009</td>
<td>6,297</td>
<td>411</td>
<td>25</td>
<td>0.4%</td>
</tr>
<tr>
<td>Total</td>
<td>18,043</td>
<td>1,139</td>
<td>70</td>
<td>0.3%</td>
</tr>
</tbody>
</table>

Annex 4

NUMBERS OF TEST CENTRES DELIVERING MODULE 1 AND MODULE 2 TESTS

<table>
<thead>
<tr>
<th></th>
<th>NUMBER AT 31 August 2009 MODULE 1 (off road)</th>
<th>NUMBER AT 31 August 2009 MODULE 2 (on road)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Multi-Purpose Test Centres</td>
<td>44*</td>
<td>43</td>
</tr>
<tr>
<td>Driving Test Centres #</td>
<td>62</td>
<td></td>
</tr>
<tr>
<td>VOSA sites (weekend testing only)</td>
<td>16</td>
<td></td>
</tr>
<tr>
<td>Casual hire sites</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Module 2 low use sites in Scotland</td>
<td>30</td>
<td></td>
</tr>
<tr>
<td>TOTAL</td>
<td>66</td>
<td>136</td>
</tr>
<tr>
<td>%age of population within 45 minutes travel time</td>
<td>88</td>
<td>97</td>
</tr>
</tbody>
</table>

* Includes Module 1 tests being delivered from DSA’s Training and Development Centre at Cardington, Bedfordshire.
# Driving Test Centres were not suitable for delivery of the originally planned single event test.
Of the remaining search areas:

- two do not need a permanent centre and can be covered by casual hire sites, (Aylesbury and Bathgate);
- three are currently under construction, (Wolverhampton, Gillingham and Leeds);
- two are under contract, (Ayr and Poole);
- four have planning permission granted and discussions with developers are ongoing, (Newbury, Stoke, Dundee and Uxbridge);
- four have identified sites and planning applications have been or will be submitted shortly, (Croydon, Stockport, Taunton and York);
- the use of VOSA sites in two search areas is under consideration, (Keighley and Dumfries); and
- four have no permanent site located, (Haverfordwest, Oban, Lerwick and Redruth.

Annex 6

Tests conducted and pass rates

<table>
<thead>
<tr>
<th>Month</th>
<th>Conducted</th>
<th>Pass Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Module 1</td>
<td>Module 2</td>
</tr>
<tr>
<td>April 2009</td>
<td>818</td>
<td>105</td>
</tr>
<tr>
<td>May 2009</td>
<td>5146</td>
<td>2483</td>
</tr>
<tr>
<td>June 2009</td>
<td>5781</td>
<td>3737</td>
</tr>
<tr>
<td>July 2009</td>
<td>6297</td>
<td>4791</td>
</tr>
</tbody>
</table>

September 2009

Supplementary memorandum from the Department for Transport (EMT 18A)

During the course of the evidence session Ms Thew and I undertook to write to you with additional information about some of the points you raised. I apologise for the fact that we were not able to answer these points at the session itself.

The attached report provides you with information about:

- Publication of the “In depth study of motorcycle training research”.
- Actual distances travelled by practical motorcycling test candidates to test.
- Estimate of money saved by closing test centres.
- Cost and time of re-training motorcycle examiners.
- HSE involvement in development of the test.
- Numbers of candidates taking Modules 1 and 2.
- Progression from CBT to test and statistics showing how long it takes people to progress to holding a full licence.

I have undertaken to contact Home Office about numbers of unlicensed riders and to ask for the situation to be monitored so we can establish if there is any correlation between the introduction of the new test and numbers of unlicensed riders.

Q82 When is the In depth study of Motorcycling Training report going to be produced?

The Parliamentary Question answer to which this referred related to the research study *An In Depth Review of Motorcycle Training*. This was commissioned to investigate the content and delivery of a sample of pre-test and post-test training courses, to identify examples of good practice and to provide guidelines for a core element of training. The purpose was to inform the development of training to improve the skills and safety of motorcyclists. The study undertaken by the Transport Research Laboratory (TRL).

The report a *A Review of Motorcycle Training*, covers the first phase of the research, focusing on identifying good practice and developing guidelines for standardising core elements of training The findings in this report suggest that both basic skills and higher-level behavioural and motivational aspects of motorcycling need to be improved.
At the end of this phase, a number of suggestions were put forward by TRL for further investigation in the second phase of the project. It was decided to focus this second phase on the requirements for the introduction of the 2009 motorcycle test. The resulting report, *Updating the Motorcycle Test for 2009: exploring the training requirements for the off-road manoeuvres*, details trials of the new test manoeuvres and makes recommendations for the content of training programmes to prepare learners to take the new module 1 test.

DSA worked with TRL in the development of the study and in the preparation of the two reports. The study was largely complete by early 2008 and provisional results were taken into account by the DSA in the design of the new motorcycle test that was introduced in April 2009.

I can confirm that it is the Department’s intention that both of the above reports will be published on 29 October. Publication was delayed to ensure that the reports present the findings in the context of how they have been addressed in the implementation of the Module 1 test and the advice DSA have given to trainers to help them prepare their pupils. A copy of the published report(s) will be sent to the Transport Select Committee when available.

You may also be interested to learn of other forthcoming research that is relevant to the motorcycling agenda. The Department will be releasing:

- a Compendium of Motorcycle statistics, (also to be published on 29 October);
- a research report Understanding motorcyclists’ attitudes to safety (for publication on 29 October);
- a study into car driver involvement in accidents with motorcyclists, which is being conducted by Nottingham University and will report in 2010.

Elsewhere in the evidence presented to you last week, there were suggestions that rider training and assessment should address attitudes as well as the acquisition of vehicle handling skills. Work is already ongoing to consider this, DSA recognises the need to ensure that learners gain the knowledge, skills and understanding of what is required to be a safe and responsible rider. We have developed a competency framework that sets out what a rider must know and be able to do. This framework is underpinned by a comprehensive evidence base.

From this Framework we will develop a modern training syllabus for learning to ride and systematic assessment criteria to establish that a candidate has covered the syllabus properly and can demonstrate the required level of competence and understanding.

An equivalent Framework setting out the requirements for those who provide training to learner riders will also be developed.

We recognise concerns expressed about the importance of attitude and motivation alongside sound riding skills and also the role of other road users in motorcycle safety. In September we introduced case studies into our theory tests taken by learner car drivers, moped and motorcycle riders in order to assess candidates’ understanding of driving theory. We have invited motorcycle interests to participate as case study authors to help address these points.

**Q123 Distances motorcyclists travel to access a Multi Purpose Test Centre**

The Agency’s published customer service standard is that most candidates should be able to reach a test centre within 30 – 45 minutes, travelling no more than 20 miles.

The coverage offered by the original 66 MPTC locations gave 83% of GB population access to motorcycling testing facilities within 45 minutes, 96% within 60 minutes and 99.5% within 90 minutes.

Currently fewer than 12% of the population cannot reach a Module 1 service delivery point and fewer than 3% cannot access a Module 2 service delivery point within the customer service criteria of 30-45 minutes, travelling no more than 20 miles.

Data is not currently available to show the distance each candidate has travelled to take their test, candidates can choose to take their test at any test centre. In the next DSA Customer Insight Survey (Spring 2010) we will be asking customers how far they have had to travel to reach the test centre.

It is not financially viable to have cover for 100% of the population, we acknowledge that some motorcycling test candidates will have further to travel to take their test. DSA is committed to providing a reasonable service to candidates living in rural and semi-rural areas. However, test demand in these areas does not justify the commitment of the necessary capital funds for DSA to develop a MPTC. We have made representations to some local authorities to consider closing some minor public roads in rural areas for us to conduct Module 1 test manoeuvres, this was rejected.
TEST CENTRE COVERAGE

<table>
<thead>
<tr>
<th>Date</th>
<th>Module 1 (off-road)</th>
<th>Currently</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td></td>
<td></td>
</tr>
<tr>
<td>27 April 2009</td>
<td>44 MPTCs</td>
<td>44 MPTCs</td>
</tr>
<tr>
<td>No of Service points</td>
<td>6 Casual-hire</td>
<td>Further 5 MPTCs are under contract—with 3 in construction.</td>
</tr>
<tr>
<td></td>
<td>16 VOSA stations</td>
<td>6 Casual-hire</td>
</tr>
<tr>
<td>% Coverage</td>
<td>88%</td>
<td>88%</td>
</tr>
</tbody>
</table>

**Module 2 (on-road)**

<table>
<thead>
<tr>
<th>No of Service points</th>
<th>135 service points (including MPTCs, DTCs &amp; Casual-hire)</th>
</tr>
</thead>
<tbody>
<tr>
<td>% Coverage</td>
<td>96%</td>
</tr>
</tbody>
</table>

Test is temporarily suspended at Taunton VOSA site while minor tarmac repairs are undertaken. DSA expects to resume Module 1 testing in mid-November.

It was suggested during the evidence session that the percentage customer coverage was distorted by the part-time VOSA sites, which are only available at weekends. If the VOSA sites are excluded from the coverage statistics, in excess of 70% of the GB population still falls within the established service target.

Q140 How much money has been realised from the disposals of driving test centres that have been closed?

DSA has received capital receipt payments from disposal of the following properties:

<table>
<thead>
<tr>
<th>Site</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Edinburgh Joppa</td>
<td>£41,000.00</td>
</tr>
<tr>
<td>Gloucester</td>
<td>£300,000.00</td>
</tr>
<tr>
<td>Kings Lynn</td>
<td>£145,000.00</td>
</tr>
<tr>
<td>Lincoln</td>
<td>£107,007.00</td>
</tr>
<tr>
<td>Portsmouth</td>
<td>£339,000.00</td>
</tr>
<tr>
<td>Swansea</td>
<td>£155,000.00</td>
</tr>
<tr>
<td>Total:</td>
<td>£1,087,007.00</td>
</tr>
</tbody>
</table>

Although DSA has closed other test centres, some of which have been relocated to MPTCs, these have involved lease terminations, breaks of lease or surrenders so there has been no financial gain.

Q128/Q144 Has the Health and Safety Executive (HSE) been involved in developing the new test?

Ms Thew responded “yes”.

I think it would be helpful to clarify this. Mrs Young said in her response to Q144 that HSE had been involved in management of incident investigation.

DSA has conducted a risk assessment of the new test in line with HSE guidance. The risk assessment documentation was developed in compliance with safety legislation and followed best practice.

Extensive research and development were carried out during the design and development of the new motorcycle test. DSA conducted trials to ensure the safety and practicality of the test. The trials involved more than 300 volunteers with varying levels of skill ranging from complete novice to expert riders experiencing the test in different weather conditions. The trials also involved using a variety of machines including 125cc motorcycles. These were all able to meet, and most exceed, the minimum required speed of 50kph during the higher speed elements of the exercise.

During the development of the test we worked closely with, and sought the advice from DSA’s Health and Safety experts and we continued our policy of consulting with and inviting input from key stakeholders such as: the Motorcycle Rider Training Industry, Motorcycle Industry Association, RoSPA, IAM, BSM, the Metropolitan Police Motorcycle Training School, BikeSafe (National), BikeSafe (London), MAG (Motorcycle Action Group), BMF (British Motorcycle Federation) and the National Association of Disabled Bikers.

DSA has also been in contact with HSE about specific matters related to test design and conduct. HSE is normally cautious about expressing advance approval regarding the operation of a procedure or activity. However in June 2007, HSE wrote to DSA regarding concerns raised by a trainer about Gloucester MPTC. The concerns raised by the trainer were:
— that the motorcycle test compound did not have a run off area to allow speeding vehicles to come to rest;
— that, in the trainer’s view, the manoeuvring area was surrounded by non-impact friendly metal fencing; and
— that the test had to be carried out at a minimum speed and that, if this minimum speed is not met, motorcyclists are given one more chance after which they are failed. In the trainer’s view, this means that motorcyclists are encouraged to go as fast as possible as there is no upper speed limit, thus increasing the chance of an accident and a collision with the fence.

DSA replied on 29 June 2007 setting out details. DSA wrote again to HSE on 9 July 2007 asking whether any further information was required and what process would be followed to reach a determination. HSE replied the same day to state that they had referred the matter to an Inspector who would contact DSA should any further clarification be required.

No further contact was received from HSE or its inspector. DSA is therefore confident that HSE is satisfied with the design and layout of the new test and the standard manoeuvring area and is pleased to have had this external validation.

Separately we have responded to HSE Inspectors’ enquiries following two incidents that occurred during Module 1 tests, they were satisfied with our response and have not required any further explanation or activity.

Q153 What is the cost of retraining and time taken to retrain examiners?

DSA has arranged 2.5 day training sessions to train 176 existing motorcycle examiners to conduct the new practical motorcycling test.

A. 0.75 day refresher course was attended by 140 examiners following the deferment period to address skills degradation for those in the early cohorts of the original training.

The overall cost of this activity is 127,165 and took a total of 545 working days.

DSA also committed to “up-skilling” trainers’ quality assurance and provided practical support at the training events. Three staff seminars were held to keep examiners up to date with developments. This cost of this support has not been quantified.

Since August 2009 40 new entrant motorcycling examiners have been trained to conduct the new test.

You also sought assurance that the new test would be evaluated. I can confirm that we shall:
— Track candidate and instructor experiences of preparing for and taking the new test through our customer surveys.
— Monitor candidate performance on test through our management information systems (fault analysis and incident reports).
— We are seeking to analyse post-test accident involvement of new riders.

Q124 Numbers of candidates taking Module 1 and Module 2 tests

<table>
<thead>
<tr>
<th>Month</th>
<th>Module 1 Conducted</th>
<th>Module 1 Pass Rate</th>
<th>Module 2 Conducted</th>
<th>Module 2 Pass Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>27–30 April 2009</td>
<td>818</td>
<td>52.7%</td>
<td>105</td>
<td>77.1%</td>
</tr>
<tr>
<td>May 2009</td>
<td>5,146</td>
<td>59.4%</td>
<td>2,483</td>
<td>70.8%</td>
</tr>
<tr>
<td>June 2009</td>
<td>5,781</td>
<td>60.4%</td>
<td>3,737</td>
<td>68.2%</td>
</tr>
<tr>
<td>July 2009</td>
<td>6,297</td>
<td>60.2%</td>
<td>4,791</td>
<td>68.5%</td>
</tr>
<tr>
<td>August 2009</td>
<td>5,719</td>
<td>61.4%</td>
<td>4,279</td>
<td>69.5%</td>
</tr>
<tr>
<td>September 2009</td>
<td>6,226</td>
<td>60.6%</td>
<td>4,914</td>
<td>69.1%</td>
</tr>
</tbody>
</table>

Table attached separately to show historical data on tests conducted. This shows the inflated number of tests conducted in the run up to the original test implementation date in September 2008 and the deferred implementation date in April 2009.

Q94 How long it is taking motorcyclists who have CBT certificates to move through to the motorcycle test?

DSA currently records the number of DL 196 certificates (which are valid for 2 years and commonly known as CBT certificate) that are sold to Approved Training Bodies, this does not necessarily reflect the number of CBT courses actually conducted as trainees who fail to meet the requirements will not be issued with a certificate or whether trainees have continued to exercise their entitlement to ride a motorcycle.
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DSA undertakes to contact DVLA to establish numbers of DL196 certificate holders to obtain their driver numbers. We can then reference against who has applied, passed or failed a practical test and provide you with the information.

October 2009

Memorandum from the British Motorcyclists Federation (EMT 19)

WHO ARE THE BMF?
The British Motorcyclists Federation was formed in 1960 as a federation of motorcycling clubs and currently represents over 80,000 motorcyclists across the United Kingdom through elected officers and other democratic structures.

OVERVIEW
The recent changes to training and testing appear to have been a disaster for the whole motorcycle community. Fewer people are now taking their motorcycle tests than at any other time in the last five years and many businesses will probably not survive the seasonal drop in business on top of the drop caused by the new test. The provision of facilities for testing has not been universal and some areas literally face a 220 mile round trip for a Module One motorcycle test despite being next to a Module Two or car test centre. On top of this lack of provision, the new test has drawn much criticism for being dangerous and against current trends which numerous reported accidents seem to bear out.

RESPONSES TO QUESTIONS

Has the DSA interpreted the EU Second Driving Licence Directive correctly and applied it appropriately?

The amendments to the directive relating specifically to motorcycle testing are fairly explicit and therefore it would be impossible for the DSA to misunderstand them. Whether the DSA has applied them appropriately or not is a more difficult question. The manoeuvre that has caused the most controversy is the coupling of the swerve and brake manoeuvre and therefore it would be wise to start there.

The swerve and brake manoeuvre has caused a great deal of controversy since the amendments were suggested. The BMF’s original concern was that braking and then swerving would be expected as this has been a requirement in some other countries with dubious benefit. The DSA did not implement this but did implement a swerve and then a controlled stop manoeuvre. However, the directive does not specify that these manoeuvres need to be tested at the same time. In fact, what the directive actually states is that “one manoeuvre avoiding an obstacle at a minimum speed of 50km/h” is required in paragraph 6.2.4 whilst paragraph 6.2.5 goes on to specify that at least two braking manoeuvres are required “including an emergency brake at a minimum speed of 50km/h”. The fact that the DSA chose to do this in effectively one manoeuvre was up to them. This has unnecessarily made a difficult and hazardous manoeuvre more so.

In their implementation of this part of the directive, the DSA also decided to introduce specifications of distance and dimensions available to the candidate. The directive does not specify any minimum elements except the speed and therefore creating a restricted area to complete the manoeuvre is unnecessary. As an important side issue, the BMF is maintaining that not enough was done by the UK government to allow a derogation on the issue of speed. The UK does not have 50km/h or 30km/h roads and therefore it is impossible for some of the things that could easily have been tested on a quiet side road (as they were previously) to be done so now.

In fairness to the DSA, there was some mixed feelings from individual trainers on whether this swerve and brake manoeuvre was a good idea or not. However, the BMF has been against such difficult a manoeuvre being part of a learner test since it discovered the suggestion in early 2001.

In terms of the other elements specified in the directive, they all appear to be included in the two tests at some point. However, a lot of other manoeuvres which are not included in the directive are also present. Suffice to say that there was an extreme element of “gold plating”.

Are the Off-Road Motorcycle Tests Safe and Appropriate?

In short, the off-road motorcycle tests go above and beyond what is actually required by the directive. The DSA claim that this is not “gold plating”; however, they cannot escape the fact that the motorcycle test now includes at least four low speed manoeuvres (not including any occurring on-road) as opposed to the two mandated and various other manoeuvres, such as the swerve and controlled stop, coupled together in such a way as to make them more difficult. Many of the manoeuvres included as part of the off-road test could quite easily have been part of the on-road test such as the two manoeuvres executed at higher speed (over 30km/h). In the off-road test this could be going around a corner, something that is not difficult to find on road. The “controlled stop” could also have been easily assessed on road as almost all motorcycle rides will
The manoeuvres conducted at speed are clearly not safe. Any conventional definition of safe would imply that there were no or at least infrequent accidents. The DSA only furnishes us with statistics on the number of accidents occurring during a test. However, this is already a self-selected sample and a greater number of incidents will occur when people are practising for the test. The two manoeuvres that appear to be causing the most trouble are the high speed manoeuvres (over 50km/h) of swerve and controlled stop and the emergency brake. The main problems seem to be achieving the speed in the distance given and grip in wet weather. The DSA examiners make no allowances for underpowered machines or heavier candidates (which has a bearing on acceleration on small machines) or for adverse weather conditions. The dimensions of the manoeuvring areas are rigidly adhered to even though all advice on riding and driving in adverse weather conditions strongly recommends allowing a greater stopping distance. During previous tests where emergency braking manoeuvres were conducted on road, no specific stopping distance was expected. I should also note that once the motorcycle hits the ground, it is usually damaged and cannot be used by other candidates or the trip home (and in a few cases, for the next week or so as it is repaired).

Many of the manoeuvres are perhaps not inappropriate, but certainly fail to demonstrate a useful purpose. For example, the requirement to execute a figure of eight, whilst not challenging to an experienced rider on a small machine, is of dubious merit and is difficult for a learner and doesn’t really demonstrate any particular skills necessary for safe conduct in traffic other than good machine control. It is somewhat ironic that as the DSA seems to be of the opinion that the current car test spends too much time on testing machine control, the motorcycle test goes further down this path.

The concern the BMF has with the requirement to learn how to execute various off-road manoeuvres is the amount of time it takes when training a candidate for test. The trainer has a fixed amount of contact time with the candidate, usually limited by how much they can afford or think they need. Extra requirements which take time away from learning how to interact with traffic safely do not benefit road safety as the ability to recognise and correctly react to an upcoming hazard is far, far more valuable than the ability to swerve around a cone or execute a slalom. It may seem counterintuitive, but these seemingly harmless requirements may be doing more harm to motorcycle training than good.

Is the Number of Motorcycle Test Centres Adequate and Are Locations Satisfactory?

No. The BMF has argued repeatedly in every forum open to it that the programme for Multi-Purpose Test Centres was and still is inadequate. The number and speed with which they were built was clearly inadequate, hence the necessity of splitting the test in two to allow the on-road test to be delivered from existing test centres and the necessity of delivering some tests from borrowed and temporary sites.

However, it has been obvious from day one that the 66 proposed test centres would leave large parts of the country without a nearby test centre. Areas such as the South West, Scotland and Wales are particularly poorly served meaning candidates in some areas having to travel long distances before and after tests. In areas where there is naturally high demand, such as London and the Home Counties, there is also a shortage of test centres. Originally, there was discussion about organising part-time sites where there would be an examiner occasionally as there already are in places in extremely remote areas. However, this plan quickly fell by the wayside and little thought was given to service provision as unexpected costs started to mount up. What this means in practice is that taking a motorcycle test, especially if you live a poor rural area where personal transport is essential to partake in community life and access essential services, is an expensive and time consuming affair.

For example, the residents of Portree on the Isle of Skye used to be able to take a motorcycle test at Portree or Kyle, just off the Island (both locations you can currently take a car test as well as in Broadford in between the two). However, currently the nearest test centre to Portree for a Module One test is 110 miles away in Inverness or 150 miles away in Oban (should a test centre ever be built there). Clearly this is an extreme example, but 2,500 people live in Portree and there are literally hundreds of other small towns in the same situation, such as the 16,000 people in Aberystwyth contemplating the 70 mile trip to Swansea or the 27,000 people in Kendal planning a 55 mile trip to Blackburn all of whom can take a car test in their home town, but all of whom have to travel over an hour for a motorcycle test. Obviously serving all these people was always going to be difficult, but the fact that there is provision for a car test in nearly all these places is evidence that it is not impossible. This is the subtle, but important difference between running a business and offering a service.

What is also not mentioned is that candidates require the same facilities to practice as they do to test. Many training schools have already had to acquire large areas at great cost.

What is the Impact of the Recent Changes in Motorcyclist Testing?

The direct impact is very difficult to state as there is a world economic crisis which began at roughly the same time as the new test was due to be introduced. According to MCI registration statistics, in November 2008 the market was down 16% on the previous November. In February 2009, this was 25% on the previous February and by August, this was 30.5%. Ironically, given the potential fuel savings, the smaller categories
were hit hardest. However, the number of motorcycles applying for MOTs went up and this complicates a picture which might suggest that the drop in new registrations does not produce a similar drop in the number of licensed motorcycles.

As there has been no government support towards the motorcycle industry at this time, it is very difficult to tell which has been an effect of the world crisis and which is the effect of the changes in training and testing. However, as you would assume that the industry would be beginning to pick up as the rest of the economy does, it is disappointing to note that recent statistics do not seem to echo this.

In terms of direct sales of training to candidates, these seem to have also dropped off by a large amount. Training schools I have contacted report an actual recorded drop in income of around a third despite offering other services. What this doesn’t record is the fact that motorcycle testing is a seasonal business and a drop of a third now means that any profit from that cannot go towards maintaining employment over the winter months when the number of candidates naturally drops due to bad weather (ie this may translate in a much bigger drop in income over the whole year). Therefore it is not unreasonable to estimate that many trained professionals will find themselves unemployed this winter and many small businesses will go to the wall. This may seem like an overstatement, but any business facing a 33% drop in income whilst fixed costs like the cost of taking candidates to tests goes up would similarly face ruin. This is despite the fact that prices have gone up to cover costs and candidates now have literally twice as many tests to train for.

It also seems that actual number of tests being taken has gone down significantly. Naturally, some of this will be due to economic factors; however a drop on the previous four years of around 66% as reported in Motor Cycle News on 2 September 2009 is frankly catastrophic and cannot logically be entirely down to the economy. I have also received reports from trainers that some candidates are finding the new test too difficult and giving up.

Not to put too fine a point on it, the ability to access training and testing facilities is paramount to ensuring good road safety in the future. A motorcycle licence lasts for the life of the rider and any detriment now will have repercussions 30 or 40 years from now. Therefore it is very difficult to tell what the long term impacts of this new regime will be. However, it is safe to say that trainers will go out of business and that many qualified local road safety experts will no longer be able to supply safety information to motorcyclists. It is also fairly obvious that illegal riding or perpetual learning will start to become the norm.

September 2009

Memorandum from the Motorcycle Action Group (MAG UK) (EMT 20)

1. The Motorcycle Action Group represents 50,000 paying members, including motorcycle training instructors and proprietors of schools as well as new riders and their families.

2. MAG has been engaged in discussions regarding the European Second Driving Licence Directive since its inception. MAG has been a regular consultee of the Driving Standards Agency and Department for Transport on this matter and has been at the heart of discussions within the motorcycle community.

3. MAG welcomes the announcement of this inquiry by the Transport Committee. MAG and other members of the motorcycle community had been calling for an official review since it became clear that the arrangements devised by DSA for the implementing the EU Second Driving Licence Directive were not likely to deliver the goal of improved road safety and would inevitably result in severe disadvantage to new riders and a weakened training industry.

4. MAG notes the introduction given to the Transport Committee inquiry call for evidence. In reality, the fundamental issues surrounding the contentious arrangements for delivering the new motorcycle test were known well before the January 2009 announcement by DSA that the motorcycle test would be split into two parts. By that time, implementation of the new test was already several months beyond the deadline (October 2008) set by the European Commission.

5. DSA had already determined to split the test into those elements that were to be tested off the public highway, but to conduct these as part of a “single event” test involving the same examiner following the test candidature of the Module 1 test site on to the public highway for the remainder of the test. The DSA strategy depended on there being sufficient purpose-built off-road testing areas immediately adjacent to local roads suitable for testing the on-road elements of the test. The inability of the agency to deliver on this strategy, failing to provide sufficient test sites and greatly increasing the test fee, is at the heart of the problems that currently beset the agency and its customers.

6. Against the backdrop of public consultations held in 2001 and 2002-03, DSA was discussing the new test as an opportunity to realise financial and organisational advantages to the agency. These would accrue from disposing of part of the portfolio of high-street test centres to centralise staff and facilities at fewer, larger sites we now know as “Multi-Purpose Test Centres”. Other EU member states appear to have been able to implement the Directive without recourse to such a strategy.
7. The decision to split the test in two events came after it was clear that the preferred single-event test would be impossible to deliver on time, due to the failure of DSA’s property development strategy, rather than as a direct result of the European Union Second Driving Licence Directive.

8. Prior to the first formal consultation, DSA’s position was that the demand for the practical motorcycle test, then being delivered via c.235 test centres, could be met by just 90 MPTCs and that it was not envisaged that any “significant” rise in test fees would be required to pay for the new arrangements (until recently, the “FAQ” section on the DSA website carried such a statement). At the point of consultation in late 2002 DSA were considering the impact of providing as few as 30 MPTCs for mainland Britain and the costs of delivery almost doubling.

9. Following that consultation, DSA revised its ambitions to settle on 66 MPTCs to be operational in time for the Directive’s implementation deadline. By the October 2008 deadline, just 45 MPTCs were available and the Secretary of State agreed with the motorcycle community that the new test could not be delivered under the circumstances. A six-month moratorium was declared to allow further construction and the amendment of regulations to allow the new test to be split in to two modules taken at different times (and often at different locations).

10. The Minister asked DSA to meet with MAG and the other key stakeholders in the motorcycle community on a monthly basis, to attempt to resolve the situation. The basis for these meetings was to see if the various organisations could offer advice or local contacts which would allow the DSA to finally deliver on its preferred strategy.

11. At the end of the six-month hiatus, MAG and other stakeholders again met with the minister and DSA to review progress. The new estate of MPTC sites was still well under-strength. DSA sought to convince the Minister and motorcycle community that by using a number of “casual” sites (not owned by DSA or meeting the same standards as their MPTCs), as well as a handful of VOSA sites (used for testing large vehicles and typically only available to DSA on Saturday afternoons and Sundays) they were ready to launch the new test.

12. MAG and other motorcycle representatives present made it clear this was not adequate and requested a further delay. MAG members in Wales and Scotland report that new riders and their trainers often have to travel in the order of 100 miles/2 hours in each direction to take a Module 1 test. A number of areas in England were also well-beyond the DSA’s own criteria for adequate coverage.

13. These concerns were acknowledged but the initial six-month delay was said to have put the government on a collision course with the European Commission and an extension could not be contemplated. MAG and others present responded that since the DSA strategy was clearly not working there should now be a rethink and ideas which the motorcycle groups themselves favoured should be given further consideration. Consequently DSA were asked to meet the motorcycle groups again.

14. By the time of that subsequent meeting the new test had just been launched. Media coverage of the first day was dominated by a series of crashes resulting in damage and injury. The first test of the first day at Rotherham MPTC resulted in a rider suffering several broken bones while attempting the avoidance (or “swerve”) manoeuvre. One MAG member, an instructor waiting with their students, witnessed the event and corroborated other eye-witness accounts that spoke of standing water on the test pad, even thought the tarmac used is specified to be quick draining. When MAG raised this at the meeting, DSA stated that no standing water was present and suggested that photographs taken at the scene and circulated by a third party may have appeared “deceptive”.

15. MAG believes it is a severe failing of the DSA test that it does not allow for the significant difference in tyre grip available depending on whether the road surface is wet or dry. DSA advice to test candidates is that this difference in grip means that they should allow twice the braking distance when stopping in wet conditions, yet neither the braking nor swerving tests are altered in the event of wet weather. MAG has found that little experimental work has been published on the effect of tyre grip on this kind of manoeuvre but that between 20–50% more space may be needed in wet conditions when braking or swerving from 50kph.

16. Other organisations, representing trainers, also asked DSA to consider other changes in respect of the emergency braking and the stopping manoeuvre that complete the swerve test. DSA assured those present at the meeting that “extensive” experimental work had been conducted to devise a safe test.

17. The DSA position at that time was that all elements of the test had been adequately checked and no changes would be contemplated until at least six-months in the new arrangements. MAG pressed the DSA to consider the message that could send out to the public and prospective new riders fearful of the risks involved in the DSA’s new test. After a time DSA appeared to agree that it was not acceptable for them to be seen to be “sitting on their hands” and agreed to come forward “within a week” with their own suggestions for further work to demonstrate the safety of the manoeuvres. Subsequent communications from DSA to various members of the motorcycle community show that this undertaking was quickly reversed after the meeting concluded.

18. Having dealt with some of the issues stemming from the introductory description, we now turn to the specific questions asked by The Transport Committee:
Has the DSA interpreted the EU Second Driving Licence Directive correctly and applied it appropriately?

19. As previously noted, the Directive prescribes only “what” is to be tested, not “how”.

20. The Directive specifies that both the manoeuvre avoiding an obstacle and also the emergency stop should be tested at a minimum speed of 50km/h (31.25mph). This speed relates to typical urban speed limits and seeks to ensure that newly qualified riders are capable of avoiding hazards at such speeds. This is sensible given that somewhere around 2/3rds of collisions involving motorcycles in urban areas occur when a rider is riding within the speed limit and with right of way but is then placed in danger by the actions of another road user.

21. Some critics of the government position when negotiating the Directive, have asked why no derogation was sought to allow the UK to test to a minimum speed of 30mph. MAG understands from intermediaries that the Commission would have been open to discussion on this point had it been raised. It has been suggested this may have left more room for options other than building multi-million pound test sites that other EU countries do not appear to have found necessary. It would certainly have avoided that situation where riders in Britain are failing the test only because they achieved 49kph during the swerve or brake test—even though this equates to a speed above the standard urban speed limit in the UK and would thus have satisfied the intent of the Directive.

22. It is worth noting that neither the Second Directive, nor the Third Directive due to be implemented at the start of 2013, require an emergency stop at this speed when testing car drivers. Presumably, had it done so the DSA would provide many more MPTCs so that these manoeuvres could be safely conducted away from the highway. As it is, new drivers are passing the car test having completed an emergency stop at much lower speeds, if they have been asked to attempt an emergency stop at all. MAG believes that this is a shortcoming in DSA’s ability to demonstrate they are approving new drivers capable of safely avoiding a collision with more vulnerable road users.

Are the off-road motorcycle tests safe and appropriate?

23. As noted above, MAG and other bodies representative of motorcycle users and their trainers do not share the same degree of faith in the current tests as DSA.

24. The DSA claim the design of the new test was arrived at through an evidence-based approach, but are yet to publish that evidence.

25. Although several motorcycle community groups took part in demonstrations of the new test prior to its introduction, this was generally in good conditions.

26. MAG and others have made suggestions as to alternative arrangements and, most crucially, the need to demonstrate sound methodology in devising safe and appropriate tests that are meaningful in both wet and dry conditions. These have been dismissed.

Is the number of motorcycle test centres adequate and are the locations satisfactory?

27. The answer is clearly “no”. The DSA’s aspirations for the number of sites have shrunk dramatically since they first floated the concept to organisations such as MAG who represent the interests of DSA’s customers. DSA say they are determined to provide the minimum 66 MPTCs they believe are adequate for Great Britain and that this may increase in future. MAG is sceptical of this undertaking given the inevitable pressure on budgets, past failure to allow sufficient contingency for difficulties with planning approval, unforeseen costs, availability of suitable land, etc.—not to mention the recent history of the property market which saw DSA acquiring land at the over-inflated top of the market.

28. When no site can be found in the search optimum area, any alternative sites elsewhere no longer work as efficiently in terms of population served or distance/drive-time to access the alternative site. DSA’s interpretation of the requirement for “most” people to be able to reach an MPTC within the distance and drive-time criteria has greatly disadvantaged many living in rural areas of England, to say nothing of the wholly inadequate provision in most of Wales and Scotland.

29. The net result has been that around three out four test sites where a new rider could prior to May 2009 begin in attempts to gain a licence are no longer open to riders to take both modules of the practical test.

What is the impact of the recent changes in motorcyclist testing?

30. The bulk of provisions under the EU Second Driving licence Directive were implemented as long ago as 1996. These included major changes to rider training and testing which saw a significant increase in demand for motorcycle tests during the year or so prior to the changes, followed by a relatively small trough in demand during the following year.

31. DSA figures for test demand either side of the implementation of the new test in 2009 show that a similar surge in demand was witnessed prior to the event, but early indications are that the trough is much deeper than before. While there may be more general social and economic reasons for this, the lack of opportunity to get to an MPTC, the greatly increased cost of the test and the widely reported inadequacy of the DSA test booking systems represent structural failings that threaten to continue to suppress the demand for training and testing in future.
32. The impact on training schools and instructors has been considerable. While some have decided to invest in buses and trailers to transport their students and their bikes to the test centre, or even re-locating their business to be within reach of an MPTC. Others have ceased trading due to not being able to secure test slots after the new test was introduced, problems scaling their capacity to meet the surge and trough effect, or because the costs of adapting to the new test arrangements did not make economic sense.

33. Without a consistent supply of experienced and high quality trainers new riders may find it difficult to find sound advice on how to ride safely. Faced with sheer cost and impracticality of preparing for and attempting the test, there could be a rise in unlicensed riding such as has been noted among drivers of larger vehicles in recent years.

Annexe to submission

As part of its evidence gathering, MAG(UK) asked riders to submit instances of good and bad experience of the new test arrangements.

Overwhelmingly the responses are negative and reflect the concerns about; insufficient test sites, travel time and distance, site safety, unnecessary conflation of the braking and swerving exercises, insufficient space to reach the minimum speed, failure to allow for reduced tyre-grip when testing in wet conditions.

Here is a selection of real-world experiences reported by riders.

This first example illustrates the issues that were apparent from the first day of testing:

I was one of the unfortunate few who took the Module 1 test on its first day (27 April) of operation. I took the test at Rotherham Test Centre, it was an appalling day and raining heavily, one rider had already come off his bike doing the new “swerve manoeuvre” and broke his arm. The guy taking the test before me also came off his bike doing the “swerve manoeuvre” fortunately he wasn’t seriously hurt but I did see it. All too soon it was my turn and I was terrified I might also fall off and/or skid in the rain and to top it all an ITN News crew were there filming me doing the test!

I was able to stay on my bike but was failed due to only reaching 49km/h instead of the required 50km/h.

I was gutted, it cost me £105 (bike hire and test fee) and a day off work to fail over a measly 1km/h—under circumstances that were very trying. It is drilled into you during lessons to take care (go slower) on wet surfaces and yet on Module 1 you have to get your speed up quickly then swerve and brake very quickly AND then stop in a designated place (rain or no rain)—this is not something you would have to do in the real world, swerve yes but not necessary have to stop so quickly. I have no doubt that witnessing a rider coming off and hearing about the earlier rider had an impact on me and my confidence/nerves, but failing me for 1km/h in a downpour like that seemed extremely harsh to me especially as I otherwise had a clean sheet!

Ongoing problems with DSA’s arrangements often involve the lack of practical opportunity for practicing the obstacle course, insufficient allowance for wet weather safety and the unsuitability of spaces normally used for lorry testing:

Hi I don’t know if I count but I’ve just broken my shoulder, a fracture of the humerus two weeks before my test. I was doing an emergency stop in the rain for the first time, with my instructor and I came off. He had wanted me to do the hazard avoidance but a lorry was parked in the way.

“And then I booked a 2nd test and went by myself to Newbury this time the first booking on a Sunday arrived 20mins early and not a person in sight by the time someone showed up my test was 15mins behind the allotted time, but never mind. Newbury I found out later is a lorry training station and when going around U bend for swerve test had to also go around a lorry and this time on swerve test only got 29mph so failed again”

The size of the test area dictated by DSA makes it literally impossible for some bikes to reach the minimum speed. Many riders complain that, even with zero or only minor faults marked against them, the difference of 1kph (0.6 mph) is enough to fail the test and incur the cost of retaking.

“We had to travel all the way to Farmborough test centre on a very miserable day and I took the test and passed it all but the swerve test I was only doing 31mph not 32mph which annoyed me a bit. When I finished getting my fail papers I was chatting to instructors from different schools and even a examiner, all were agreeing that the new test was stupid and one pointed out that as I am quite a heavy set fellow that doing it on certain 125’s for the A2 test that I would not be able to reach the speed required.

“I took Module 1 last Friday and failed because I reached only 49km/hr on the hazard avoidance test—in other words, for the sake of 1km/hr. I don’t really think this reflects my ability, since I passed everything else without any problems.”

The following illustrates the impact on trainers and riders based in the many rural areas that have been abandoned under the new arrangements.
DSA will not refund or assist with tests if we are late and the journey is around three hours each way. Because of the distance and the potential for problems an early start is needed and this results in a late finish around a 12 to 14 hour day.

7 July—First tests three students up for test. One a female was so intimidated by being shut in such a vast expanse of area she froze and was unable to carry out the test. In view of the distance we have to travel it is impossible to show students the MPTC prior to the test.

Second student was unable to make the speed for the emergency stop on the first run so went over the top on the second resulting in the fence coming up quicker than he was ready and failed on the emergency stop.

Third student passed.

7 July—Second test day two passes and a retest for the female who failed yet again due to knocking a cone over on the slalom.

4 August—Third test day. One pass and another fail for the female who was 1Kph under on the speed for the emergency stop. She has now travelled 536 miles and still not passed her part one test

20 August—Fourth test day. Two fails both female one was 30cm outside the box on the swerve test coming to a stop. This was on the second attempt as the first run was under the speed. The other student was under speed on both runs at the swerve test.

To date I have travelled over 715 miles for three students to pass the module one test.

September 2009

Memorandum from Angus Robertson MP (EMT 21)

1. INTRODUCTION AND KEY POINTS

1.1 In this submission I have focussed on the location of test centres and the wider impact of the recent changes in motorcycle testing. I have restricted my comments to the experiences of people in the Moray Constituency area, however it is my belief that these issues will be replicated in other geographical areas.

1.2. The Key Issues I have covered in this submission are as follows:

Test Centre Accessibility—Learner riders are now expected to make journeys along fast busy roads to attend a test centre—a journey that many would not contemplate on a slower bike or moped even when experienced.

DSA Site Selection Process—The process used by the Driving Standards Agency to justify Test Centre locations and, by extension, the closure of existing centres was flawed.

Economic Impact—The removal of test centres from communities has been detrimental to local economies.

Loss of Instructor Time—The removal of test centre facilities has resulted in quality instructor time being lost to allow for additional travel time in relation to tests.

2. BACKGROUND

2.1 In my constituency of Moray we have, until relatively recently, had the benefits of car and motorcycle driving test facilities, an LGV testcentres and a theory test centre.

2.2 Unfortunately the theory test centre has already been withdrawn and been replaced with a visiting bus and the motorcycle test facilities have also been closed as a result of recent changes implemented by the DSA and which are the subject of this Inquiry.

2.3 Motorcycle instructors, learner riders, local driving instructors and business owners expressed their concerns during the course of the recent changes that the plans to move test facilities to Inverness would be detrimental to learners, businesses, bike and bike equipment retailers and to the overall economy of Moray.

2.4 Around a thousand bikers, instructors and others joined a demonstration against the planned closure in Moray, one of the largest demonstrations of its kind.
3. The Issues

3.1 Test Centre Accessibility

3.1.1 In my own constituency’s example holding tests in Inverness now means that learner bikers in Moray have to travel for over an hour on the very busy A96 Trunk Road which already has a reputation for bad accidents.

3.1.2 At a surgery a learner rider from Lossiemouth in my constituency said that the move would “force young drivers on to killer roads”. While the agency says on its website: “We hope that communities, local authorities and driving instructors will recognise the important role of these new centres in supporting road safety.”

3.1.3 While bikers going for their tests should generally have a good number of lessons under their belt and have had appropriate instruction it would not necessarily be their wish to travel for well over an hour on a low-powered bike on a busy road just prior to the stressful experience of a driving test and then have to make the same journey home.

3.1.4 I am concerned that far from improving road safety this puts inexperienced riders at unnecessary risk.

3.2 DSA Site Selection Process

3.2.1 In correspondence with the DSA during the course of the changes the Agency said that an average of only 20 tests a month take place in Elgin making it economically unviable for the siting of a multi-purpose test centre, however what they fail to say is that there is only a small capacity for tests in Elgin and when checked at that time Elgin’s appointment availability was nearly three months away compared to half that time for Inverness.

3.2.2 This gave rise to concerns that the DSA were using the statistics to justify their position rather than to give unbiased information.

3.2.3 By failing to give an indication of capacity at the Elgin test centre the Agency suggested that only 20 tests are being requested. Local trainers gave strong assurances that this was not the case.

3.2.4 The consequence of this is that figures for Elgin could be artificially low while test figures for Inverness could have been artificially inflated by learners unable to obtain tests in Elgin using an alternative venue.

3.2.6 Since these figures form part of the basis of assessment for potential new test centre locations we start to see some serious questions arising about the processes and procedures that were use in the test centre investment programme.

3.2.7 Wider issues such as loss of employment to an area and the wider economic impact appear not to have received due consideration in the process. ie the assessment criteria was too narrow.

3.3 Economic Impact

3.3.1 The Driving Standards Agency’s Chief Executive Rosemary Thew was quoted on the Agency’s website saying “The driver training industry bodies consider the presence and accessibility of test centres as being crucial to their business. The location of test centres therefore provides direct employment and encourages associated employment at local rider training and driving instructing schools.”

3.3.2 The key phrase in this quote is “the location of test centres”. Clearly for instructors in Moray the removal of test facilities in the region, and it is exactly that, an entire local authority region, is crucial for their businesses but clearly not in a good way.

3.3.3 In Moray the test centre supports two full time and two part time instructors and the wider bike related business in Moray includes four shops supplying bikes and accessories, which in turn supports additional employment including mechanics and sales staff.

3.4 Loss of Instructor Time

3.4.1 The various bike instructors in Moray are well thought of and their excellent teaching speaks for itself with Moray having amongst the highest pass rates of any test centre at 83% compared to pass rates in Aberdeen and Inverness that in the mid 60s percentage range.

3.4.2 When instructors require to travel with students to test centres valuable instruction time is lost.

4. Conclusion

4.1 The loss of test centre facilities in Elgin has caused a significant impact on learner riders, instructors and local businesses.

4.2 There seems to have been a lack of joined up thinking in the approach taken by the DSA on the selection of new test centre sites and a lack of consultation with other agencies and public bodies to ascertain whether suitable sites were available, either by leasing or purchasing land or by sharing a site with another body.
4.3 The loss of skilled jobs through centralisation of government activity is always a blow, particularly for lower wage economies and the loss of the test centre encourages riders to purchase bikes and bike gear from suppliers in the town or city where the new test centre is located rather than supporting the local businesses that have grown up around existing test facilities.

4.4 There is a poor safety perception of the trunk road in the region that riders may have to negotiate to reach the test centre and it is unfair to expect riders to make such a stressful journey ahead of a test.

4.5 I am strongly of the view that the DSA should have put considerably more effort into considering the benefits of co-locating with other agencies in the Moray area, including VOSA, the Local Authority, DWP offices and the Ministry of Defence, amongst many others.

September 2009

Memorandum from Keith Lewis (EMT 22)

I am a Motorcycle instructor in the South Wales area, and these are the personal views of myself and the other instructors that work in the same company,

Since the new test started we have had approximately three riders per week taking mod 1

As far as point 1 that would be outside our knowledge.

Point 2 “Are the off-road motorcycle tests safe and appropriate?”

Since the new module 1 test started we have NO incidents of people crashing during the Avoidance exercise, either during training or on the test itself I refuse to call it a swerve as it is not a very large alteration in direction and would be no more than one may have to conduct to avoid some potholes that can be found on the roads,

All the exercises have a practical use on the roads of today; and, are safer to carry out on the Manoeuvring Area than would be on a public highway, for instance the “emergency stop and U turn” as these are now carried out on a well maintained surface as opposed to a residential street of dubious quality (on the old test we have had people coming off the motorcycle on a Public road during the U turn and the E stop)

3. Is the number of motorcycle test centres adequate and are the locations satisfactory?

there is a lack of module 1 test centres and some schools have to travel a long way to get to one

4. What is the impact of the recent changes in motorcyclist testing?

that would be difficult to assess as the recent “credit crunch” would possibly have had more impact as spare cash to get lessons is in short supply for some people.

I also think that the NEGATIVE press (eg. Motorcycle News (mcn)) given has put some people off, not one of our students have thought that the new test is anywhere near as bad as some elements would have had them believe, a typical comment is “IS THAT ALL IT is?”

September 2009

Memorandum from the Warrington Independent Professional Driving Instructors Association (EMT 23)

1. On behalf of all our members we would like to make a representation to the Department of Transport Select Committee with reference to the Driving Standards Agency and the E.U. Directive and the devastating impact it has had on our industry.

2. We are aware of E.U. Directive and the implications and impact on the motorbike tests, but there is an even bigger picture, the impact it also had on the car tests. This directive had nothing to do with car tests and yet the DSA has used test fees from the car tests to subsidize the roll out of the M.P.T.C. Programme, which is, about to, throw the DSA into millions of pounds worth of deficit.

3. It never had to be integrated in the way the DSA has implemented it, no other country has found it necessary to use the test fees from non—bike test candidates to provide the additional swerve test with specialised facilities. Only the U.K. has spent possibly billions constructing unnecessary test centres.

4. M.P.T.C.s are a waste of money and could have been avoided. Warrington test centres running costs, were about £1.50 per test conducted. We even offered Rosemary Thew the promise that each candidate out of Warrington would pay the £1.50 as an extra fee, to keep the centre open, thus making it a free centre, at
no cost to the DSA. It was a viable centre with 6,000 tests per year and bringing in £400,000 p.a. in revenue. We got a point blank refusal from Miss Thew. Who said, “We don’t need a test centre in Warrington!”……… but we do, and still do.

5. They have now stopped employing any further examiners and the waiting lists are rising. Northwich recently reached 11 weeks. The pupils, instructors and examiners alike can’t understand what the DSA are doing. There are no phone staff; when you require to speak to a human being, so we don’t know why they need all that office space, Nottingham must be empty.

6. Some of the ideas that are coming from the DSA at the moment are going to totally destroy the industry, but only someone who has worked in that industry like the instructors and examiners could make an informed choice. Miss Thew has no prior knowledge to allow her to make an informed choice, she isn’t listening to the industry, who are all, singing from the same hymn sheet. Miss Thew talks about developing bonds between examiners and instructors, Warrington had one of the best centres in the country, the examiners did support the industry, and bonds were made with instructors. All the hard work that this association has done over decades was destroyed the day our centre closed. Which had been a facility available to the people of Warrington for the past 50 years.

7. Miss Thew at recent meetings has told the industry that they intend to bring in free driving; this serves no purpose, it is a reading exercise and not a driving exercise. It will cause embarrassment to those who have dyslexia, autism, or just can’t read at all. It is victimising those who have disabilities. We all have pupils who are perfectly good drivers; but will have their human rights removed by this change to the test due to their disability.

8. The instructors sitting in on all tests, is a breach of human rights, the data protection act and common sense. The instructors don’t want it, the examiners don’t want it and the pupils who pay all our wages don’t want it. It is the pupils test; they are paying for a service, an individual of good standing to judge their ability to drive. We have the DL25 to judge how they managed on test and because of sever nerves on the day and driving in strange areas, they no longer bare any resemblance to the pupil. A pupil has the right to refuse permission for people sitting on the back of their test, including senior examiners watching the examiner at work. The DSA are using the test candidate as an unpaid training tool, this candidate should get a free test, if they are quality controlling examiners.

9. Numerous instructors have been asked to contact their insurance companies about all these extra people being in the car with an inexperienced driver on test. They are more than concerned, they pointed out that rarely are instructors involved in accidents that are deemed their fault, they are usually side impacts or rear end shunts, who is going to pay when an accident occurs, five whip lash claims or worse. A recent accident in Northwich left the boot of the vehicle touching the front seats, any rear passengers would have been killed; there was no rear end of the vehicle left. Will the DSA take that sort of responsibility, will it pay or as usual someone else will foot the bill. Certainly the general public will suffer again, as insurance companies increase the cost of insurance policies to cover extra payouts and fatalities. It is always talking about road safety but always makes things worse. Example:—tire pressures as with all manuals for cars they recommend different pressures for fully laden vehicles and partially laden vehicles. This cannot be adjusted for ultimate safety but always makes things worse. Example:—tire pressures as with all manuals for cars they recommend different pressures for fully laden vehicles and partially laden vehicles. This cannot be adjusted for ultimate safety but always makes things worse. Example:—tire pressures as with all manuals for cars they recommend different pressures for fully laden vehicles and partially laden vehicles. This cannot be adjusted for ultimate safety but always makes things worse. Example:—tire pressures as with all manuals for cars they recommend different pressures for fully laden vehicles and partially laden vehicles. This cannot be adjusted for ultimate safety but always makes things worse.

10. To accommodate all these people the DSA are thinking of bringing in a standard for cars being used on test, are the DSA paying for all of us to buy new vehicles, most of us drive three door, small engine vehicles to help save the environment, in line with the governments greener policies; but for safety reasons, for example to accelerate from a stand still to join a 70mph road safely with five persons on board, we will need a much larger car, bigger engine, and more fuel, will the general public attending test in their personal car be refused a test if it can’t fit five. Who’s paying again, will the DSA cover the additional costs. Trevor Wedge said we should have seven seated cars available to train pupils with large numbers in a vehicle, they need all types of experience, is he also going to allow pupils to drive on their own before passing; because this is also something they must do after they pass their test, and far more likely than driving a seven seated vehicle.

11. The driving test was introduced to help road safety, as a standard of driving for us to meet, it isn’t a spelling test, or to put us on show, or be used as a training aid for examiners, it is a service which is provided to a fee paying customer, who has human rights to privacy and discretion.

12. As for the general public sitting in on tests; it will put the examiners at further risk of verbal and physical assaults coming from the rear of the vehicle after a failed test.

13. The examiners have been badly hit in this also, some that only lived a few hundred yards from the old test centres who could be in work in a few minutes, now having to travel excessive distances and adding unacceptable travel time to their day.

14. The DSA needs investigating, where has all the money from test fees gone, they seem to be broke. No extra examiners for the increasing waiting times. No phone staff so that you can speak to someone to book a test when you’re out for the day working and have no internet. No one to answer your letters when you write and complain, they just remain unanswered; as do our questions why…….
15. Where is the evidence that all these changes will benefit road safety? Where are the risk assessments for the people being forced to sit on tests? Where are the data protection laws and equal opportunities for all? Where is the protection against discrimination and victimisation? Where is the protection against verbal and physical assaults for examiners? Where is the money that is going to fund all these unnecessary changes?

16. Where has the Department of Transport Gone?

17. We have all lost faith in the system and the DSA! Most of us have had enough of the industry, its more hassle than it's worth. We are not well paid most struggles to make a living, we won’t be able to afford the changes that the DSA are requiring and we will see more schools close. Huge amounts of driving instructors joined the industry via redundancy packages in the first place, it frightening to think we could be unemployed again.

The remaining section is comments from

Rob Harper—Driving Instructors Branch of Unite the Union

18. The DSA and Rosemary Thew in general have constantly promised to work with the ADI profession. Indeed the watch word was I am listening. It is sad to think that the meetings, surveys, research, feedback, driving tests done as an experiment on independent driving have come to no conclusion.

19. DSA now seeks to ignore the evidence that clearly presents itself.

20. Too many people who are under paid, on low wages or face redundancy or are already on benefits will suffer the most.

21. Students who get paid an attendance allowance and then have to work will be worst hit by the proposed changes. It is sickening in the current climate of how DSA is fiddling whilst Rome burns. With a plush new headquarters in Nottingham. This money is coming from the hard work of the ADI’s and driver trainers throughout the UK and their pupils. It should not be wasted, but invested in a safer future for all road users. Having been in at the consultation period and attended and submitted suggestions to DSA, the driving instructor branch of Unite the Union cannot support these knee jerk proposals. The effects will be devastating and in some cases will see the demise of the independent driving instructor. In our mind a vote for these changes will have little or no direct affect on the KSI’s.

22. Closer work with the professionals of this industry is now urgently needed with a group that oversees the work of the DSA. Indeed it is now high time a watchdog was set up!

September 2009

Memorandum from the Parliamentary Advisory Council for Transport Safety (PACTS) (EMT 24)

RESPONSE TO THE DEPARTMENT FOR TRANSPORT (DFT) REVIEW
“REVIEW OF UK DOMESTIC DRIVERS HOURS RULES”

The Parliamentary Advisory Council for Transport Safety (PACTS) is a registered charity and an associate Parliamentary Group. Its charitable objective is “To protect human life through the promotion of transport safety for the public benefit”. Its aim is to advise and inform members of the House of Commons and of the House of Lords on air, rail and road safety issues.

Casualty rate per billion passenger kilometers
Source: Road Casualties Great Britain (2007)

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<td></td>
</tr>
<tr>
<td>Killed</td>
<td>31</td>
<td>33</td>
<td>29</td>
<td>26</td>
<td>32</td>
<td>34</td>
<td>31</td>
</tr>
<tr>
<td>KSI</td>
<td>666</td>
<td>632</td>
<td>555</td>
<td>543</td>
<td>550</td>
<td>536</td>
<td>527</td>
</tr>
</tbody>
</table>
The motorcycle rider is overrepresented in road accident and road casualty data. A close analysis of the casualty rate per billion passenger kilometres shows that motorcycling continues to be the most high risk mode of travel. In 2006, motorcyclists were 52 times more likely to be killed or seriously injured than car occupants and 356 times more likely to be killed than bus or coach occupants. The above statistics highlight the very obvious need for greater protection of powered two wheeler riders through the training of other road users, vehicle design, informative campaigns and rider training and testing. It is vital that the likelihood and severity of collisions involving motorcyclists is reduced. PACTS therefore welcomed the EU directive which called for a change in motorcyclist testing methods.

The following will respond to questions one, two and four from the Transport Select Committee enquiry.

1. Has the DSA interpreted the EU Second Driving Licence Directive correctly and applied it appropriately?

Based on analysis of the directive, analysis of the new DSA test, consultation with our members and a look into the interpretations from other member states, it is fair to say that the DSA has interpreted the directive correctly and applied it appropriately. We were able to compare interpretation of the directive in France, where it has been applied more stringently than in GB, and Germany, where the interpretation is similar to that of the DSA.

There are important questions to be asked however around the quality and availability of training for instructors on the new test. The lack of syllabus makes it difficult to say whether or not sufficient support and guidance is available to learners and instructors. PACTS would like to see a framework in place which ensures that instructors are able to train learner riders, enabling them to complete the test safely.

2. Are the off-road motorcycle tests safe and appropriate?

It is vital that skills are adequately tested before riders become fully qualified. It therefore seems appropriate that the new test place higher demands on the learner rider, preparing him/her for what we already know to be high risk conditions on the road. The greater the level of exposure to risk within the controlled conditions of learning, the better prepared a rider will be once s/he has gained a full licence.

This is of particular importance in the UK where the average age of new riders is rising. As such, new, inexperienced, older riders have been able to ride more powerful machines sooner. The testing procedure should encourage longer, more technical training. We feel that the new off-road tests provide this.

Despite a number of parliamentary questions on the matter, it is not possible to find a reliable incident rate for motorcycle testing before and after the application of the directive. If the incident rate is higher following implementation of the Directive, it is important to ensure that adequate training is given to learners and to instructors for whom the testing is new.

Importantly, the more difficult aspects of the test are kept off-road in a supervised and controlled environment. As a result, the learner is much safer than s/he would be completing the manoeuvres on the road.

4. What is the impact of recent changes in motorcycle testing?

It is too soon to tell. Close monitoring and evaluation of the new testing requirements, procedures and training is necessary over at least the next year.

It is important to bear in mind the likelihood of an influx of test applications directly before the application of the directive which could distort the pass-rate comparisons.

September 2009

17 Per billion vehicle kilometres travelled
Supplementary memorandum from the Parliamentary Advisory Council for Transport Safety (PACTS) (EMT 24)

Further to the request for more information made during the Transport Select Committee Oral Evidence Session of Wednesday 14 October 2009, on the New European Motorcycle Test, I attach two documents outlining the interpretation of the European Commission Directive 2000/56/EC in other Member States.

In response to questions around whether or not the DSA’s interpretation of the Directive is “gold plated”, we believe that, to the best of our knowledge, this is not the case. Having looked at a number of other interpretations of the Directive, it seems apparent that the UK test is more difficult in some manoeuvres than in other EU Member States, and easier in some others.

Additionally, I would like to draw attention to the way in which manoeuvres are tested—some Member States have separated-out the manoeuvres as in the UK, others have chosen to test them in a more cumulative fashion, as in France. In this sense, it is possible to state that the DSA interpretation is not the most taxing and that there does not appear to be any gold-plating of the Directive in terms of difficulty.

As I stated during the evidence session, it is too soon to see what the implications of the new testing regime are on the safety of motorcyclists and PACTS would strongly support a move to monitor the effects over the coming years with a view that results be used to inform future interpretation of Directives and/or future reviews of the testing procedure.

French Motorcycle Licence Testing:

INTRODUCTION:
Like for all driving licences, the examen du code (equivalent of theory test) must be taken before any practical test is carried out. There is no motorbike specific theory test therefore the usual theory test must be taken if

- It has never been passed by the person before.
- If the person has not passed the test in the last five years.

Once the theory test has been passed, the practical riding licence is split into two parts.

1. One section off-road, testing the riders technical abilities.
2. An on-road section, evaluating the rider’s ability to ride safely and securely.

To pass the test, a budget of 600€ to 1,000€ will be required.

THE SLOW MANŒUVRES:
For this section, one of the four possible options will be chosen. Riders have two attempts at the manœuvre, unless they come off the bike during the first attempt.

Circuit 1:
Taking a passenger, follow the marked course with the rear wheel tracing the dotted line, complete the marked slalom, followed by another bend before stopping.

Circuit 2:
Leaving without a passenger, line up the front wheel with the first cone; follow the course around the cones. Stop at point A to pick up a passenger and continue around the bend until the final post.
Circuit 3:
Taking a passenger, follow the marked course, keeping the rear wheel along the dotted line. Stop at point A to let the passenger off. Complete the slalom, stopping once through the final “gate”.

Circuit 4:
Leaving without a passenger, line-up the front wheel with the first cone, pass through the slalom stopping at point A to pick up a passenger. Continue around the bend with the passenger before stopping after the final gate.

The Normal/Rapid Maneuvers (considered under either title)
For this section, one of the four possible options will be chosen. Riders have two attempts at the manoeuvre, unless they come off the bike during the first attempt. Riders have between 19 and 22 seconds to complete the exercise in dry weather and between 20 and 23 seconds in the wet.

Circuit 1:
Leaving from the edge of the piste, the area marked B must be ridden through in first gear. Third gear should be engaged before passing the first cone of the slalom. Enter the slalom from the right (third gear minimum) turn 180 degrees and complete the slalom from the opposite direction, again in at least third gear. Exit through the final “gate” without slowing, then, without changing gear, stop in zone B.
Circuit 2:

(Timing Begins and ends at “1”)

Leaving from the edge of the piste in first gear, engage third gear before reaching the first cone of the slalom. Entering from the left, complete the slalom before turning 180 degrees and completing the slalom from the opposite direction (still in at least third gear). Go through the final “gate” without slowing, break without changing gear at “1”, then stop in zone A.

Circuit 3:

(Timing Begins and ends at “1”)

Leaving from the edge of the piste in first gear, engage third gear before reaching the first cone of the slalom. Entering from the right, complete the slalom before turning 180 degrees and completing the slalom from the opposite direction (still in at least third gear). Go through the final “gate” without slowing, break and change gear at point 1 before stopping in first gear before line 2.

Circuit 4:

(Timing Begins and ends at “1”)

Leaving from the edge of the piste in first gear, engage third gear before reaching the first cone of the slalom. Entering from the left, complete the slalom before turning 180 degrees and completing the slalom from the opposite direction (still in at least third gear). Go through the final “gate” without slowing. Stop in zone B without changing gear.

October 2009

Memorandum from Neil Hopkins (EMT 25)

I drive a 125cc Piaggio MP3 and have commuted to work daily for the last year. I am 40 years old, drive carefully, and have had no near misses.

I have in the last two months twice failed the Module 1 test, both occasions relating to the swerve test.

On the 1st occasion I completed all manoeuvres perfectly but was 2km and then 1 km per hour short of speed.

On the second test I concentrated almost entirely on going fast enough and hit the cone.
My bike weighs 225kg and I weigh 100kg. A total of 325 kg on a 125cc machine. This struggles to accelerate quickly enough. I do to think the test should penalise safer riders (ie those that are risk averse and prefer not to swerve at 50kmh) or safer bikes—larger more stable machines, in my case with three wheels. I expect that a 17 year old lightweight on a light bike would throw it around and pass easily.

If the test was on a long straight run it would at least be a level playing field regardless of the bikes power and riders weight but still a difficult and unnecessary test.

I now find myself swerving on public roads to practice and am considering riding a bigger bike to pass the test. This test is encouraging unsafe behaviours.

*September 2009*

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**Memorandum from Christopher Owens (EMT 27)**

The manoeuvres (particularly the swerve and stop) are almost impossible to practice for, and completely unrealistic. Swerving on a motorcycle (especially to the right, into on-coming traffic) is I believe not something to be generally encouraged. At no stage in my training (or that of anybody else I know) have "swerves" been recommended as safe practice—the emphasis is always to ride at a safe speed and to be aware of potential hazards, avoiding the need for any drastic manoeuvres.

I would ask the Inquiry to consider why it is necessary to be tested on skills (such as the emergency stop and U-turn) which are already tested on the CBT course, which all new riders undertake.

Additionally, I live in Stoke on Trent and had to make (approximately) a 50 mile round trip to take my test in Burton on Trent. How can this be in the interests of safety, or the environment?

I would urge the relevant parties to rethink this overly-onerous test, which is probably deterring people from learning to ride motorbikes and forcing more cars onto the road as a result. One wonders if the intention was actually to deter learner riders—failing it certainly has had that effect on me and I have reverted to driving a car. I do not believe that the general approach or methodology of the test (two parts?) is fair or proportionate, and cannot agree to taking a test for which it is, in effect, impossible to practice.

*December 2009*

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**Memorandum from Trudi O’Connell (EMT 28)**

I understand that evidence concerning the new tests introduced for motorcycles is under review at the moment.

I took the module 1 test on 5th November at Silverstone. This resulted in a serious accident and my admittance to hospital. The conditions were cold and wet.

I had completed several swerves with my instructor in the dry at his premises and experienced no problems. Indeed, if I were on the road, I would certainly not accelerate towards an obstacle and to encourage a learner to do this and in cold wet conditions, is completely unacceptable.

I am appalled that there have been many accidents concerning this new test and yet it is still allowed to take place. Furthermore, the conditions in which the test are allowed to take place are highly dangerous. No extra stopping distance is allowed, or reduced speed, when the conditions require this, as per the Highway Code!

I have discovered since my own accident that there have been problems reported for months and I am extremely concerned that there will soon be a fatality.

I am undergoing further scans and tests for my injuries, the full extent still not being known, which include the severe swelling on my left knee and extensive bruising on the whole of my right leg.

My instructor spoke to the examiner following the accident. The examiner reported that he had had an ambulance out three times in a week due to this test!! My instructor indicated that the examiner has now called off further tests during the cold and the wet.

I have reported the accident to the Driving Standards Agency and I understand that a report has been submitted. I await the outcome of this.

*November 2009*
Further supplementary memorandum from the Department for Transport (EMT 18b)

1. Your email of 23 February asked DfT to update the information provided in the written evidence we submitted to the inquiry:
   — Annex 3—Incidents occurring during Module 1 tests.
   — Annex 7—Tests conducted and pass rates.

2. The department would also like to provide a breakdown of the manoeuvres on which the incidents occurred. Our findings here, taken with the increase in the pass rate for both modules of the practical motorcycling test, support our view that candidates who have properly prepared for the test should be able to satisfactorily and safely complete Module 1.

3. Although DSA widely publicised the need to undergo sufficient training before attempting the test, unfortunately there have been a relatively small number of incidents (currently 0.49% of tests conducted) where candidates have lost control of their machines whilst undergoing the higher speed manoeuvres. Most of the candidates sustained slight or no injury but a small number have resulted in hospital treatment being required.

4. From 27 April 2009 to 31 January 2010, there have been 212 incidents on the Module 1 motorcycle test. Investigation of these incidents has evidenced an obvious lack of training and required level of competence on the part of the candidate.

5. We are continually monitoring and analysing these incidents and have seen that the majority (49% of the total number) have occurred when candidates attempt the emergency stop.

6. Nevertheless these incidents do give us cause for concern and confirm the need to focus greater attention on the standards of pre-test training being provided. A programme of targeted supervision of the trainers in those locations with a high incident rate has been initiated. An in-depth analysis of all module one test results conducted so far is underway to identify any possible trends that need further consideration.

7. But in general, we feel that our experience is in line with the evidence presented in support of the new test before it was introduced.

8. The report published by the EU Initial Rider Training Supervisory Board in 2007, indicated that they believed that: “the braking and swerving requirements of the national A category licence tests, introduced within the review of the second European driving licence directive, are increasing the attention given to hazard awareness and avoidance in initial training programmes.”

Annex 3—updated 22 February 2010
Module 1 motorcycling test incident percentage by month

<table>
<thead>
<tr>
<th>Conducted</th>
<th>Incidents</th>
<th>Incident %</th>
<th>Tests not completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>April 2009 (27 to 30)</td>
<td>818</td>
<td>8</td>
<td>0.97</td>
</tr>
<tr>
<td>May 2009</td>
<td>5,146</td>
<td>22</td>
<td>0.42</td>
</tr>
<tr>
<td>June 2009</td>
<td>5,781</td>
<td>16</td>
<td>0.27</td>
</tr>
<tr>
<td>July 2009</td>
<td>6,297</td>
<td>25</td>
<td>0.39</td>
</tr>
<tr>
<td>August 2009</td>
<td>5,725</td>
<td>20</td>
<td>0.34</td>
</tr>
<tr>
<td>September 2009</td>
<td>6,266</td>
<td>30</td>
<td>0.47</td>
</tr>
<tr>
<td>October 2009</td>
<td>5,728</td>
<td>33</td>
<td>0.57</td>
</tr>
<tr>
<td>November 2009</td>
<td>4,439</td>
<td>48</td>
<td>1.08</td>
</tr>
<tr>
<td>December 2009</td>
<td>2,149</td>
<td>7</td>
<td>0.32</td>
</tr>
<tr>
<td>Total</td>
<td>42,349</td>
<td>209</td>
<td>0.49</td>
</tr>
</tbody>
</table>

Driving Examiner reports attribute reasons for tests not being completed. The data given in the “Tests not completed” column above comprises:
Mechanical failure, Documents not produced, Vehicle not suitable or no vehicle for test, No “L” plates, DSA motorcycle breakdown, No interpreter, Accident—unable to complete text, Candidate under the influence of drugs/alcohol, Candidate taken ill on test, DSA Module 1 equipment failure during test, Candidate failed to attend at test centre, Late cancellation by candidate/school, Candidate late arriving for test, Test cancelled due to examiner being ill, Test cancelled due to examiner being absent, Test cancelled as unable to start test on time, Bad weather at Driving Test Centre, Bad weather at candidate’s home, Candidate refused to sign residency declaration, Candidate chose to stop test, not already failed, Test terminated due to alleged illegal activity by candidate.
Manoeuvre on which the incident occurred

<table>
<thead>
<tr>
<th>Avoidance manoeuvre</th>
<th>Emergency stop</th>
<th>Other/unknown</th>
<th>Total</th>
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<tr>
<td>April 2009 (27 to 30)</td>
<td>6</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>May 2009</td>
<td>13</td>
<td>8</td>
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<td>June 2009</td>
<td>7</td>
<td>9</td>
<td>0</td>
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<tr>
<td>July 2009</td>
<td>10</td>
<td>13</td>
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<tr>
<td>August 2009</td>
<td>7</td>
<td>13</td>
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<td>September 2009</td>
<td>13</td>
<td>13</td>
<td>4</td>
</tr>
<tr>
<td>October 2009</td>
<td>18</td>
<td>12</td>
<td>3</td>
</tr>
<tr>
<td>November 2009</td>
<td>14</td>
<td>32</td>
<td>2</td>
</tr>
<tr>
<td>December 2009</td>
<td>1</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>January 2010</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>90</strong></td>
<td><strong>104</strong></td>
<td><strong>18</strong></td>
</tr>
</tbody>
</table>

Annex 7—updated 22 February 2010
Tests Conducted and Pass Rates

<table>
<thead>
<tr>
<th>Month</th>
<th>Conducted Module 1</th>
<th>Conducted Module 2</th>
<th>Pass Rate Module 1</th>
<th>Pass Rate Module 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>April 2009 (27 to 30)</td>
<td>818</td>
<td>105</td>
<td>52.7%</td>
<td>77.1%</td>
</tr>
<tr>
<td>May 2009</td>
<td>5,146</td>
<td>2,483</td>
<td>59.4%</td>
<td>70.8%</td>
</tr>
<tr>
<td>June 2009</td>
<td>5,781</td>
<td>3,737</td>
<td>60.4%</td>
<td>68.2%</td>
</tr>
<tr>
<td>July 2009</td>
<td>6,297</td>
<td>4,791</td>
<td>60.2%</td>
<td>68.5%</td>
</tr>
<tr>
<td>August 2009</td>
<td>5,725</td>
<td>4,272</td>
<td>61.4%</td>
<td>69.6%</td>
</tr>
<tr>
<td>September 2009</td>
<td>6,266</td>
<td>4,944</td>
<td>60.6%</td>
<td>69.2%</td>
</tr>
<tr>
<td>October 2009</td>
<td>5,728</td>
<td>4,864</td>
<td>61.2%</td>
<td>69.1%</td>
</tr>
<tr>
<td>November 2009</td>
<td>4,439</td>
<td>4,074</td>
<td>59.8%</td>
<td>70.6%</td>
</tr>
<tr>
<td>December 2009</td>
<td>2,149</td>
<td>2,156</td>
<td>61.4%</td>
<td>71.7%</td>
</tr>
<tr>
<td>January 2010</td>
<td>1,223</td>
<td>1,064</td>
<td>62.0%</td>
<td>70.1%</td>
</tr>
</tbody>
</table>

February 2010

Supplementary memorandum from the British Motorcyclists Federation (EMT 19a)

SHORT COMMENTARY OF RAW STATISTICS

Seasonal variations

<table>
<thead>
<tr>
<th>Season</th>
<th>Accidents</th>
<th>Licence Issuing Tests Taken (Module One)</th>
<th>Total Tests</th>
<th>Accidents per 1,000&lt;sup&gt;19&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>England</td>
<td>Scotland</td>
<td>Wales</td>
</tr>
<tr>
<td>2007</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>September/October/November</td>
<td>13</td>
<td>22,385</td>
<td>1,425</td>
<td>2,153</td>
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<td>2008</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>December/January/February</td>
<td>5</td>
<td>12,147</td>
<td>685</td>
<td>942</td>
</tr>
<tr>
<td>March/April/May</td>
<td>16</td>
<td>19,723</td>
<td>1,177</td>
<td>2,042</td>
</tr>
<tr>
<td>June/July/August</td>
<td>13</td>
<td>29,854</td>
<td>1,776</td>
<td>2,905</td>
</tr>
<tr>
<td>September/October/November</td>
<td>27</td>
<td>26,715</td>
<td>1,647</td>
<td>2,662</td>
</tr>
</tbody>
</table>

<sup>19</sup> Accidents recorded by Driving Standards Agency.
— We can see from this table that accident rates increased considerably since the introduction of the Module One test.
— Document IA/02704/09 also shows that there were more recorded accidents (96) following the introduction of the new test than during the whole of the 2008 (69).
— The number of licence issuing tests taken dropped considerably following the introduction of the new test by around two thirds (63%) comparing Summer 2009 with Summer 2008 (12,798 versus 34,535).
— Scotland has been hit hardest by this drop with 422 tests in Summer 2009 against 1776 in Summer 2008, a fall of around three quarters (76%).

Pass Rates

<table>
<thead>
<tr>
<th></th>
<th>Old Test</th>
<th>Module One</th>
<th>Module Two</th>
</tr>
</thead>
<tbody>
<tr>
<td>England</td>
<td>66.8%</td>
<td>60.2%</td>
<td>68.9%</td>
</tr>
<tr>
<td>Scotland</td>
<td>66.5%</td>
<td>61.8%</td>
<td>70.7%</td>
</tr>
<tr>
<td>Wales</td>
<td>64.1%</td>
<td>58.7%</td>
<td>64.4%</td>
</tr>
</tbody>
</table>

— We can see from this table that pass rates for Module Two are slightly better than they were under the old test and that pass rates for Module One are slightly worse. There is little regional variation.
— However, these numbers hide the fact that Module One sees a huge gender split where less than 40% of women were passing the test compared to an almost identical pass rate for Module Two.
— There is wide range of results for Module One when looked at by test centre with Kings Lynn and Kirkwall scoring 76.1% and 77.8% respectively compared to Livingston LGV and Wick scoring 39.2% and 43.8% respectively.
— The type of test centre (ie MPTC, LGV or VOSA site) does not appear to correlate with the pass rate.
— There is also a similar spread of results by test centre for Module Two with Newport (Isle of Wight) getting 100% and Glasgow Shieldhall MPTC scoring 45.3%.

RELEVANT DATA:
(Available at www.dsa.gov.uk)
Annex B—Accidents.pdf
Annex C—Pass and fail.pdf
RSISreportbyDTC-MPTC27.04.09-31.07.9mod1.xls
RSISreportbyDTC-MPTC27.04.09-31.07.9mod2.xls
October 2009

\[20\] Accidents recorded by Driving Standards Agency.
\[21\] New test introduced 27 April 2009.
Supplementary memorandum from Charles T Owens (EMT 10A)

I have been able to watch the above inquiry on the internet. As it asked for comments I would like to make the following points which may assist your overall view.

1. I thought that the representation from the motorbike industry was very positive. The point raised about when the driving industry was directly responsible to the department of transport was very valid. The DSA has developed a culture of its own since it became the responsible agency, one of self preservation and reward at a very high cost to the customer.

I feel that the level of immunity that they seem to have not only obstructive but in what is supposed to be a democratic country, very dangerous.

2. The DSA is very good at masking the facts. When the MPTCs programme was first presented at meeting it seemed quite a good idea! However we were only told what they wanted us to hear. As the programme unfolded and the wider implications of the programme became known resistance started to grow within the training industry right across the country.

3. The Minister for Road Safety stated at your inquiry (forget the speed element—the manoeuvres had to be done o

road).

What started all this was the speed issue. The DSA and the Department of Transport have always clearly stated (the reason for the MPTCs was to comply to the EU directive of speed, so manoeuvres had to be done off road.

I have a letter from my Euro MP who looked into the matter for me. It clearly states that if the matter had been referred back to the EU this speed difficulty would have been altered. Other countries have integrated the test into their existing scheme. It has always been thought that the DSA had their own agenda for what has been done not fully realising what negative effect it would have on the industry.

4. Any change introduced in the industry needs to be of benefit to the driving industry. What the DSA have done is made things more difficult and much more expensive for their customers both learners and trainers. Their lack of concern shown over this is an absolute disgrace.

The DSA have known about MPTCs programme for a number of years. They should have had a team capable to oversee the project. They left it very late to start the programme which they needed for the 66 designated locations across the country. As time was slipping away and desperation began to set in, sites were located more for site availability, rather than suitability of location to suit the requirements of the customer.

Rosemary Thew said that there are 66 sites. That was the original target I think that there are only 44 MPTC sites where a bike rider has to go to take part 1 module of the test. This is a terrible shortfall only managing two to three of the original target, meaning a lot of travelling for learners. The other locations are made up by the stakeholders making locations available for training only.

5. A very important point in the inquiry was the DSA criteria used to determine where a test centre is to be sited or if a test centre is to stay open. Rosemary Thew in her interview stated what the criteria laid down by the DSA is, in time or distance. However she was not asked and did not state whether or not the criteria were being achieved across the country. We know what the criteria are so the important points are:

(a) when were these criteria first conceived;
(b) when was it decided to implement it to the industry, and
(c) who authorised it, did it need to go to the minister?

At the meeting with Rosemary Thew were the local MP took the chair there were major concerns expressed about these criteria as to how and when they were decided.

When Rosemary Thew could not answer she was asked by the MP to write to her with the appropriate information. I followed up that point after the meeting unfortunately that correspondence never arrived.

I have tried to get an answer but have been unsuccessful. If you are able to get a response to this very important issue I would appreciate it if you could forward the information to me.

The criteria is not at all practical:

(i) The travelling time does not take in the geography of the journey (traffic volume, major junction difficulties) it is more an as the crow flies assessment.

(ii) The ratio which is determined by population and area size per square km which is the district boundary is impractical. Who ever thought this up needs to be challenged to its logic.

To have an average size population in a small area who due to its ration are able to command a test centre compared with a larger population in an area which has a bigger boundary which would dilute that ratio meaning that that area would not be able to have a test centre. This criteria is unfair and unreasonable to the customer. It needs to be rectified. The only purpose it serves is for the DSA to accomplish it quest.

Where it has also been shown that the DSA are working from out of date population statistics they still will not take notice.
6. When the MPTCs programme was running into difficulties, there were major concerns for the industry. The arranged a meeting with the DSA and Jim Fitzgerald from the Dept of Transport (now moved) in London. Because of that meeting and after a slight delay due to the fact that Jim Fitzgerald need time to confer it was announced that motorbike test would be deferred for six months. So it was the industry that instigated the commonsense that was required.

After six months postponement the DSA was still unable to meet the requirements necessary to cover the test. The big U turn was when they split the test into two modules. This made the prestige MPTCs programme a very expensive exercise with little purpose.

7. **The DSA**

The DSA should not try to avoid their responsibility. They should listen to their industry. They have spent millions on the MPTCs project which have resulted in some drivers being heavily discriminated against. It has also presented the trainers with unnecessary hardship (several have gone out of business). These millions could have gone to much better use.

To close profitable test centres to save on expenditure is wrong forcing the customers of those centres to travel additional long distances to MPTCs take a test which means a substantial increase in cost that learner is totally unacceptable. One area offered to pay more for their test to keep their centre. This was firmly rejected by the DSA (Why?)

One driving association work very hard with the council when told the test centre was to close due to the expiry on the lease. The council looked for a suitable alternative site to keep the test centre. Not only was this totally rejected by the DSA but the council were told through the Driving Association that they could not attend the arranged meeting with the DSA. So what is the DSA true agenda? Are they really working for the customer or are they just self orientated?

They have lost a lot of credibility within the industry generating harsh resentment towards them. Even when you use their own statistics in your favour they will either ignore you or just brush the matter to one side. It is being polite to say that at times they can be very conservative with the truth.

The point about the accidents at the MPTCs (regardless as to how many). The DSA position is—not a DSA matter! It is a training issue—it is up to the trainer to make sure it does not happen. If they were a commercial outlet they would be hounded and heads would roll. They are now using the recession as a get out. You have to look pass this smoke screen of distraction for the reason for their difficulties.

8. The inefficiency is demonstrated at every level of business. I am not referring to the hands on staff but higher up the ladder. As an instructor/customer I have no alternative to turn to when it comes to testing and the DSA know it.

That is the real injustice when there is no freedom of choice. I have to rely on an agency, which on a professional and performance front, provide a tremendous shortfall.

In today’s world how can one agency be allowed to operate like this and be given so much power?

I know this letter is long but I do feel this matter with the DSA has to be seriously addressed.

*November 2009*