



THE COLLEGE OF OPTOMETRISTS

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Claire Hughes
Driver Licensing Policy
DVLA
Strategy, Policy and Communications Directorate
Longview Road
Morrison
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Dear Ms Hughes

The Motor Vehicles (Driving Licences) Regulations 2013 (SI No 258)

Thank you for allowing us to comment on your review of the above regulations in relation to eyesight and driving.

Group 1 (Cars and Motorcycles)

Visual acuity: We have no comment on the visual acuity standard of 6/12 (0.5 decimal). However, we do not believe that reading a number plate from 20 metres is a reasonable proxy. By definition, the number plate test cannot be undertaken in controlled conditions, for example because one person may take it in fading light on a cloudy day and another on a bright summer's day at 12 noon. In addition, the number plate test is only done at the time of the driving test. Otherwise it is left to the driver to estimate the distance and declare whether they can see the number plate.

An unintended consequence of relying on self-declaration is that it may prevent drivers from seeking a sight test if they realise that their vision is below the required limit for driving, even if this can be easily remediable with spectacles, or may be open to other treatments or interventions.

A good consequence of adding the requirement for a driver to read 6/12 is that optometrists are now able to reliably advise a patient if they do not meet the vision standards for driving. Previously, because of the poor relationship between reading a number plate and a Snellen chart, optometrists were unable to advise a patient that they did not meet the standard unless their vision on the Snellen chart was significantly worse than 6/12. This is because a person may still have been able to read the number plate at the required distance, even though they may not have met the 6/12 standard. The requirement that a driver now has to be able to read 6/12 is to be welcomed.

Visual field: Without a formal assessment of this, drivers may be unaware of loss of field of vision as this can happen slowly.

Research has shown that older drivers with glaucoma with even mild to moderate field loss exhibit impairments in driving ability, particularly during complex driving situations that involve tactical problems with lane-position, planning ahead and observation. These results,

together with the fact that these drivers self-report their driving to be relatively good, reinforce the need for evidence-based on-road assessments for evaluating driving fitness.¹

Impaired contrast sensitivity: We agree that impaired contrast sensitivity may impact upon safe driving, and that more research is needed on what levels are compatible with safe driving. Research shows that drivers' ability to recognise pedestrians at night is degraded by simulated cataract and refractive blur, even when the drivers' visual acuity meets the licensing requirements.² Cataracts are known to affect contrast sensitivity, and the researchers showed that simulated cataracts were significantly more disruptive than blur, even though daytime visual acuity levels were matched.

General: Research done for the College of Optometrists³, concluded that there was evidence of an association between injury-collisions and visual impairment and health. The study analysed the MAST Online data, and found evidence that supported the hypothesis that older drivers aged 60 and over were more likely to be involved in an injury-collision where visual impairment or illness and disability was cited as a contributory factor.

The authors recommend that all drivers should have a vision check every five years and every two years for drivers over 60, and that further research should be undertaken to determine whether those intervals are the best ones. It also recommends that drivers aged 70 and over should have a mandatory sight test (which would include checking their eye health, as well as their vision, and their visual fields if necessary) upon renewal of their driving licence.

Our recommendation is therefore that

- All drivers aged 17-59 have a vision check every five years
- All drivers aged 60 and over have a vision check every two years
- All drivers aged 70 and over should have a mandatory sight test upon renewal of their driving licence

Group 2 (buses and lorries)

We believe this objective meets its objective and know of no unintended consequences.

Yours sincerely



Dr Cindy Tromans
Chair of the Board of Trustees

¹ Wood JM, Black AA, Mallon K et al, Glaucoma and Driving: On-Road Driving Characteristics, <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0158318>

² Wood JM, Tyrrell RA, Chaparro A et al. Even Moderate Visual Impairments Degrade Drivers' Ability to See Pedestrians at Night, *Investigative Ophthalmology and Visual Science* May 2012, Vol 53(6), 2586-2592

³ <https://www.college-optometrists.org/the-college/research/research-projects/visual-impairment-and-road-safety2.html>