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## **1. Brief**

### **1.1 Instructing Solicitors**

Swift & Co  
Central Park  
Central Town  
The City  
TC10 1CT

### **1.2 Instructions**

Investigate the circumstances of a road incident. Prepare a plan, report & Photographs.

### **1.3 Location Of the Incident**

A222 Heading towards Roundup, at the Junction with Little Oaks

### **1.4 Vehicles and Persons Involved**

#### **Vehicle**

Ford car registration number A121 PPU  
Driven by: Paula Meadows  
Passengers: None

#### **Pedestrian**

Mr Jay Jones

### **1.5 Witnesses**

There are four independent witnesses:

Rodger Brittain  
John Julius Coatte  
Donald Rook  
Emily Jane smith

## **2. Qualifications**

I hold a University Certificate in Forensic Collision Investigation.

TDC Certificate in Accident Investigation for Civil & Criminal Investigations.

I am an Associate Member of the IMI and I'm Studying towards a

Qualification with the IRITE

### **3. Summary of the Incident**

#### **3.1 Précis of Circumstances**

This is an report concerning a road traffic accident which occurred on the A222 at Broad St, Anytown. The collision occurred at approximately 11.30 on Monday 30<sup>th</sup> June 1997.

At the time of the collision the road surface was dry and the weather was clear and dry.

The collision occurred when a Ford car Registration number A121 PPU was travelling along the A222 towards Roundup. Close to the junction for Little Oaks the vehicle was in a collision with a pedestrian. The Pedestrian had been crossing the A222 from a housing estate on the opposite side of the Little Oaks Junction.

The Ford car struck the pedestrian in the outside lane of the A222 heading west towards Roundup.

Mr Jay Jones the pedestrian was thrown in the air and landed some 8.2 meters in front of the Ford cars post impact position. Mr Jones was taken to Hospital but died 3 weeks later from the injuries sustained in the incident.

Paula Meadows the driver if the Ford Car was not injured, her vehicle sustained damage to offside and leading edge of the bonnet. The windscreen was damaged at the base of the offside.

P.c Wardle attended the scene. His accident report shows the following

Comments from the driver.

Paula Meadows “Almost as soon as I had seen the man, I realised that he was not in fact going to wait for me to pass”

## **4. Evidence**

### **4.1 Evidence Supplied**

I have been supplied copies of statements from: -

**Paula Meadows** the driver of the Ford car.

**Rodger Brittain**e, independent witness.

**John Julius Coatte**, independent witness.

**Donald Rook**, independent witness.

**Emily Jane Smith**, independent witness.

### **4.2 Examinations and Comparison of Witness Evidence**

#### **4.2.1 Statement of Paula Meadows**

Paula Meadows was the driver of the Ford car. As per her statement "*I was travelling at a speed I would estimate at 30-35mph*" (13.4ms-1 → 15.7ms-1) She goes on to say "*When I was about 25ft away from the traffic light island I saw what I immediately recognised as a man crossing the road on foot in front of me*". When I first saw the man he was in the nearside lane approaching the central white lines separating the two carriageways.

*"As soon as I realised the man was not going to stop walking I stamped my right foot onto the brakes of my car. I really don't know how far away I was from the man at this time.*

*"At this point I realised the a collision between my vehicle and the man was inevitable because of the close proximity of the man, I was unable to take any avoiding action. I just kept my foot on the brake and hung on to the*

*steering wheel”.*

*“At no time did I see the man look toward my vehicle”*

*“About seconds after I started braking hard the front of my vehicle struck the man, causing him to fall onto my bonnet and hit my windscreen”.*

*“I kept my foot hard on the brake and my car came to a standstill. The man then fell off the front of my car and onto the carriageway”.*

*“The man was lying in the carriage way a few feet from my car”*

The final part of Paula Meadows statement says.

*“I feel that at the point that I realised the man was not going to stop walking, there was no way for me to avoid the collision”.*

#### **4.2.2 Statement of Mr. Roger Brittain**

Mr Brittain watched the incident from an office on the opposite side of the road. He states *“I noticed an elderly man walking across the road from the direction of the houses towards the town centre. I was not paying much attention to the man until I saw a Ford car collide with the man in the middle of the offside carriageway. I don’t know if the car skidded before the collision because the windows in the office are fairly soundproof. I did not actually hear skidding”*.

He states the movements of Mr Jones after impact *“When the Ford struck the gentleman, he was thrown into the air and forwards. He ended up a distance in front of the Ford, I would estimate at about 7-9 meters. The man lay motionless and face down”*.

From his statement it is not clear whether Mr Brittain saw the car before the impact and could not hear any noise caused by the impact. This means that he is unable state the velocity of the car or Mr Jones.

#### **4.2.3 Statement of Mr. John Julius Coatte**

Mr Coatte witnessed the incident from the opposite side of the road. He was walking in the direction of Roundup and was near to the junction with Little Oaks. He states *“I noticed a man, age 55-60 years, wearing a blue jacket, blue jeans and trainers, he had walked across a grassed area in the central direction of the road”*.

*“The man stepped over the barrier, I did not see him look for oncoming traffic, and walked across the Roundup bound track of the dual carriageway. I heard a screech of brakes, I looked to my side and saw a ford collide with the man, who landed on the bonnet, hit the windscreen and was thrown into the air”*.

*“I went to his assistance”*

*“The man said nothing to me. He appeared to be having breathing difficulties”*

Mr Coatte does not comment on the car until it collides with Mr Jones. He did have a good view of Mr Jones crossing from the grassed area and stepping over the barrier. He states that he did not see Mr Jones *“look for oncoming traffic”*

#### **4.2.4 Statement of Mr. Donald Rook**

Mr Rook was walking along the footpath towards the junction Where Broad St meets Little Oaks. He was approximately 50 yards from the traffic lights when the collision occurred.

He states, *“I was walking towards the traffic lights, although I wasn’t paying much attention to the road.*

*suddenly I heard a loud noise of a vehicle skidding from the direction of the junction I have just described. As I watched and just after hearing the skidding noise, I heard a loud thump noise.*

*I then saw something go through the air in front of the car”.*

*“I would say that the person went into the air about as high as the roof of the car and then landed in front of the car, which had now stopped.”*

Mr Rook also states that he did not have a good view of the car.

*“I did not see the vehicle approaching the junction, because before the accident I was not really paying attention”.*

Mr Rook also did not see Mr Jones cross the barrier and enter the dual carriageway. He does however state that many people including himself use this route to cross this road.

#### **4.2.5 Statement of Emily Jane Smith**

Ms Smith was Walking along Broad St and was close to the Junction with Little Oaks.

She describes the man in the same way as the other witnesses and did have a good view of Mr Jones crossing the road.

*She states "I noticed the man, who was aged about 60 years was wearing a jacket, blue jeans and trainers, who was walking at normal pace".*

*"The man crossed my path about 5 yards ahead of me. He stepped over the barrier and onto the road. This did surprise me as I had expected him to stop on the other side of the barrier and examine the state of the oncoming traffic, but he did not, He did not break his stride at all, he walked straight across the road with out looking for oncoming traffic".*

*"I noticed that there was an oncoming Ford and I knew there was going to be an accident. The man did not glance to his right at all.*

*He was then struck by the car, he landed on the bonnet, hit the windscreen and was thrown in the air landing ahead off the car.*

*He lay still. He was bleeding from his head".*

*"I went to speak to the driver"*

*She was very upset and screaming that she did see him, He walked out In front of me, I couldn't stop".*

#### **4.2.6 Police Report of P.c Simon Peter Wardel**

The report confirms that the Ford car struck a pedestrian in the outside lane of the A222 heading towards Roundup. The pedestrian had been taken to hospital before P.c Wardle attended the scene. He was informed of the final position of the pedestrian. P.c wardle States that the Ford car had not been moved prior to his attendance and the *“vehicle was still within the offside of the two roundup bound lanes”*.

The vehicle had impact damage to the *“front of the vehicle, just offside of centre”* and *“an external impact at the base of the windscreens offside”*.

P.c Wardel examined the scene and measured all relevant details and sketched a plan of the scene.

The Ford car was test driven by P.c Wardel and *“there was no detectible pre-collision mechanical defect or component failure present which would have contributed to the collision in which it was involved”*.

#### 4.2.7 Comparison of the evidence

From a comparison of evidence it would appear that: -

1. On the day of the incident the road was dry and the weather was fine and dry.
2. Mr Jones entered the carriageway from grass area close to the housing estate. (Northerly direction)
3. After stepping over the barrier Mr Jones did not stop and check for oncoming traffic.  
**(Highway Code Rule 7d.** If traffic is coming let it pass. Look all around and listen. Do not cross until there is a safe gap in the traffic and you are certain that there is plenty of time. Remember even if traffic is a long way off, it may be approaching very quickly  
**Rule 9.** Pedestrian safety barriers. Where there are barriers cross, the road only At the gaps provided for pedestrians. Do not climb over the barriers or walk Between them and the road.)
4. Paula Meadows was travelling along the A222 towards Roundup.  
(east to west)
5. Paula Meadows spotted Mr Jones when she was approx 25yards away from the traffic lights.
6. Paula Meadows expected Mr Jones to stop in the centre of the carriageway and wait for her to pass.
7. Mr Jones did not stop and Paula Meadows carried out an emergency brake procedure.
8. Mr Jones was struck by the Ford car while it was skidding.
9. Mr Jones was thrown of the car and landed 8.2 beyond the locked wheel marks left by the Ford car.
10. The collision occurred in the outside lane of the A222.

## **5. Scene Visit**

### **5.1 Introduction**

At 9.30 am on the 29<sup>th</sup> August 2004 I attended the scene of the collision.

The road had been changed due to new pedestrian lights having been installed close to the collision scene.

This however will not effect the scene inspection as the road lanes and traffic junction for Little Oaks have not been altered.

I took measurements of the scene and using both the measurements and scene data from statements, I produced two plans 1 to scale.

I also took a number of photographs of the approach to the junction and impact point.

Photos 1-4 are of the approach and photo 5 is looking east from the Incident point and junction. Photo 6 is of the grassed area that Mr Jones Crossed. Please note that this area (photo 6) will have changed since the Incident date, due to the installation of the pedestrian crossing.

## 5.2 Description of the A222 (ford cars direction of travel)

The A222 is dual carriageway heading in an East →West direction.

A single broken white line separates the lanes.

**(Highway code Rule 106.** A broken white line. This marks the centre of the Road. When the line lengthens and the gaps shorten, it means that there is Hazard ahead. Do not cross it unless you can see the road is clear well ahead And wish to overtake or turn off.)

The road is constructed of hot –rolled asphalt with rolled granite chippings

Travelling from Aerial roundabout a cobbled area begins on the left after

800yds.This continues until the starts of Severn Road. On the opposite side

a grass verge starts and runs until the start of the filter lane for Little Oaks

*See Photo 1*

After the Severn Road Junction on the left, a hedge starts and continues

along left hand side the road. A low crash barrier runs parallel with the

road and the hedge. There is a single white line along the left kerb side

and continues up to the pedestrian crossing. On the right hand side the slip

road for Little Oaks starts. The grass verge stops and continuous railing

starts and continues until the traffic lights fro the Little Oaks Junction.

There is a Red hazard section separating the outside dual carriageway lane

and the filter lane. This stops at the starts of the island for the new

Pedestrian crossing. The street lighting at this point is spaced approx

200yards apart and a (70mph—32.2ms-1) national speed limit sign can be

seen fixed to one of these lampposts.

There are clear road markings indicating what lanes are to be taken

to continue along the A222 towards Roundup.

*See Photo 2*

Continuing along the road a clearing starts to come into view on the left hand side just before the traffic light. *See Photo 3*

This is the point where the hedge stops and then barrier continues for a short distance afterwards. This is the approx point that Mr Jones entered the carriageway. On the right hand side the stop line at The filter lane can be seen along with the junction lights. A railing separating the outside lane and filter lane is now coming into view. A traffic bollard marks the starting point. A new higher grip road surface can be seen, this was not there on the day of the incident.

*Photo four* shows a clear view of the barrier that Mr Jones stepped over before crossing the carriageway. A section of the barrier has been removed when the pedestrian crossing was installed. The railings beside the barrier were not there on the day of the incident. The railings on the island on the right hand side were present on the incident day. The cobbled area can be seen although it is now slightly overgrown. This would not have been the case on the incident day and witness statements say that many people used that route to cross and that would have caused a level of erosion.

This is the approx point that the Ford car locked its brakes and the pedestrian was in the centre of the road.

**Photo five** is a view from the crossing point of Mr Jones. This view is from just in front of the barrier. It can be seen that there is a clear view along the road and a car can be seen entering the filter lane.

**Photo six** has been taken from the grass area that Mr Jones crossed. Again the railings in the picture were not present on the incident day. This shows the new crossing and the junction for Little Oaks can be seen with its 30mph (13.4ms<sup>-1</sup>) road signs.

**Plan A** has details of the Ford car position and Mr Jones's entry point. It also shows the final resting position after the collision of Mr Jones and the car. This plan has all the details listed by P.c Wardle.

### **5.3 General Points**

The road is subject to a national speed limit of 70mph (32.2ms<sup>-1</sup>)

The road surface leading to the crossing had been resurfaced when the crossing was installed. The surface directly before this was original and was in good condition. P.c Wardle confirms this in his report “the surface was in a good condition”.

## 6. Investigation & Reconstruction

### 6.1 Calculations to establish $\mu$ the coefficient of friction of the tyre/road interface.

As the value for mu was not calculated on the incident day or any skid

Testing carried out, I have used the reference chart from: -

*Lynn B. Frickie and J. Stannard Baker in traffic Accident Reconstruction  
Volume 2, North western Traffic Institute.*

This reference data has coefficients of friction ( $\mu$ ) of various road surfaces.

The driver of the ford states “ I was travelling at a speed I would estimate at 30-35mph” (13.4ms<sup>-1</sup>→15.6ms<sup>-1</sup>)

From the reference table I have used the following:

**Asphalt travelled less than 30mph 0.60 → 0.80**

**Asphalt travelled more than 30mph 0.55 → 0.70**

The average of each value is

Less than 30mph = **0.70**

More than 30mph = **0.625**

The average of the results gave a value of **0.66**

**The coefficient of friction of the tyre road interface is 0.66**

## 6.2 Calculations to show velocity of vehicle at impact

The vehicle skidded for 11.8 meters from the point of impact to point of rest.

Equation:  $v^2 = u^2 + 2 a S$

Where the vehicle is slowing, a may be replaced by  $-\mu g$  to give

$$v^2 = u^2 - 2 \mu g S$$

Where v the final velocity is zero this gives

$$0 = u^2 - 2 \mu g S$$

Transposing for u gives

$$u = \sqrt{2 \mu g S}$$

Enter the known values gives

$$u = \sqrt{2 \times 0.66 \times 9.81 \times 11.8}$$

$$u = \sqrt{152.8}$$

$$u = 12.36 \text{ ms}^{-1}$$

**The velocity of the vehicle at point of impact was 12.3 ms<sup>-1</sup> (27.6mph)**

$$\begin{aligned} \mu &= 0.66 \\ u &= ? \\ v &= 0 \\ g &= 9.81 \\ S &= 11.8 \end{aligned}$$

### 6.3 Calculate the velocity at point of application

The length of the longest skid was 12.5 meters

Equation:  $v^2 = u^2 + 2 a S$

Where the vehicle is slowing, a may be replaced by  $-\mu g$  to give

$$v^2 = u^2 - 2 \mu g S$$

The final velocity is zero this gives

$$0 = u^2 - 2 \mu g S$$

Transposing for u gives

$$u = \sqrt{2 \mu g S}$$

Enter the known values

$$u = \sqrt{2 \times 0.66 \times 9.81 \times 12.5}$$

$$u = \sqrt{161.865}$$

$$u = 12.72 \text{ ms}^{-1}$$

$$\begin{aligned}\mu &= 0.66 \\ u &= ? \\ v &= 0 \\ g &= 9.81 \\ S &= 12.5\end{aligned}$$

**The speed of the vehicle at the point of impact was 12.72ms<sup>-1</sup> (28.5mph)**

**6.4 Calculate the minimum velocity of vehicle at impact using Searle method.**

$$\begin{aligned}\mu &= 0.66 \\ g &= 9.81 \\ S &= 20 \\ V &= ?\end{aligned}$$

Equation: 
$$V_{\min} = \sqrt{\frac{2 \mu g S}{1 + \mu^2}}$$

Enter the known values

$$V_{\min} = \sqrt{\frac{2 \times 0.66 \times 9.81 \times 20}{1 + 0.66^2}}$$

$$V_{\min} = \sqrt{\frac{258.98}{1.436}}$$

$$V_{\min} = \sqrt{180.35}$$

$$V_{\min} = 13.43 \text{ ms}^{-1}$$

**The minimum velocity of the vehicle was 13.43 ms<sup>-1</sup> (30mph)**

*This method is based on the launch speed of the pedestrian*

**6.5 Calculate the maximum velocity of the vehicle at impact using Searles method**

Equation

$$V_{\max} = \sqrt{2 \mu g S}$$

$$V_{\max} = \sqrt{2 \times 0.66 \times 9.81 \times 20}$$

$$V_{\max} = \sqrt{258.98}$$

$$V_{\max} = 16.09\text{ms}^{-1}$$

**The maximum Velocity of the vehicle at impact was 16.09ms<sup>-1</sup> (36mph)**

*This method is based on the launch speed of the pedestrian*

## 6.6 To calculate the point of actual perception

Using a likely range of reaction times for the driver, between 0.5 and 1 seconds.

Equation  $S = V t$

Enter known values for 0.5second reaction time

$$S = 12.72 \times 0.5$$

$$S = 6.36\text{m}$$

Enter known values for 1.5 seconds reaction time

$$S = 12.72 \times 1.5$$

$$S = 19.08\text{m}$$

$$\begin{aligned} S &= ? \\ V &= 12.72\text{ms}^{-1} \\ t &= 0.5\text{s} \\ t &= 1.5\text{s} \end{aligned}$$

Assuming that the speed prior to lock up, was constant, the point of application

was between 6.39 and 19.08 metres prior to the point of application.

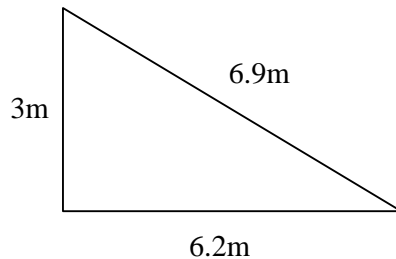
The length of pre-impact skidding was found to be 0.7meters this can be added to the distance calculated above to find the point of actual perception. This was therefore between **7** and **19.8** meters prior to the point of impact.

## 6.7 Calculate the point of possible perception

Hermes carried out tests on pedestrians of all ages Crossing road junctions and Eubank covertly timed adults walking across a 15.2 metre road and jogging between two cones placed 15.2 meters apart. From their results I have used the speed of an adult between 55 & 60 Years old. This was found to be between 1.3ms-1 and 1.78ms-1, taking an average the speed Of 1.5ms-1 has been used in my calculations.

### Step 1

Calculations for distance walked by pedestrian:  $3^2 + 6.2^2 = 6.88^2$



*See plan*

6.2 m = Distance from kerb to scuff.  
3.0 m = Point pedestrian crossed barrier.  
6.9 m = Distance travelled by pedestrian.

**The distance from the entry point to point of impact was 6.9 metres**

### Step 2

Calculate the time it took the pedestrian to reach the point of impact.

Equation :  $S = V t$

Transpose for t  $t = \frac{S}{V}$

Enter known values  $t = \frac{6.9}{1.5}$

$$t = 4.6 \text{ s}$$

**The pedestrian therefore took 4.6 seconds to reach the point of impact**

### 6.7.1 Step 3

Calculate the time it took the vehicle to skid to point of impact.

Equation:	$v = u + a t$	 u = 12.72ms <sup>-1</sup> v = 12.72ms <sup>-1</sup> μ = 0.66 g = 9.81 t = ?
Vehicle slowing	$v = u - \mu g t$	
Transpose for t	$t = \frac{u - v}{\mu g}$	
Enter values	$t = \frac{12.72 - 12.36}{0.66 \times 9.81}$	
	$t = \frac{0.36}{6.48}$	
	$t = 0.06 \text{ s}$	

**The vehicle took 0.1 seconds to skid to point of impact**

Time for pedestrian to reach point of impact	4.6 s
Time for vehicle to skid to pint of impact	0.1 s
<b>Time remaining</b>	<b>4.5 seconds</b>

#### 6.7.2 Step 4

To calculate the position of the vehicle when the pedestrian left the kerb (point of possible perception)

Equation:  $S = Vt$

$$S = 12.72 \times 4.5$$

$$S = 57.24 \text{ m}$$

$$S = 57 \text{ metres}$$

**The point of possible perception was therefore 57 metres prior to the point of application. Since the impact occurred 0.7 meters after the point of application, the point is 57.7 metres prior to the point of impact.**

## 6.8 Calculate the point of no escape

From scene data we know that the vehicle took 12.5 meters to skid to stop.

The point of no escape can be expressed as 12.5 metres from the point of impact plus the distance travelled whilst reacting (see page 24)

With a reaction time of 0.5 seconds the total distance is

$$S = 12.5 + 6.36$$

$$S = 18.86 \text{ metres}$$

With a reaction time of 1.5 seconds the total distance is

$$S = 12.5 + 19.08$$

$$S = 31.58 \text{ metres}$$

**The point of no escape was somewhere between 18.9 and 31.6 metres prior to the point of impact.**

## 6.9 Calculate the position of the pedestrian when the driver reacted

### Step 1

Calculate time for the vehicle to reach the point of impact from the point of actual perception.

#### **Data:**

Time to skid to point of impact	0.1	seconds (see page 26)
Reaction Time	0.5	seconds (see page 24)
Or	1.5	seconds (see page 24)

The total time to reach the point of impact is;

$$0.1 + 0.5 = \mathbf{0.6} \text{ seconds}$$

$$0.1 + 1.5 = \mathbf{1.6} \text{ seconds}$$

### Step 2

Calculate the distance the pedestrian could cover in this time

#### **Data:**

Pedestrian speed 1.5ms<sup>-1</sup> (see page 25)

Equation:  $S = Vt$

Driver reaction time of 0.5seconds

$$S = 0.6 \times 1.5$$

$$S = 0.9 \text{ metres}$$

Driver reaction time of 1.5 seconds

$$S = 1.6 \times 1.5$$

$$S = 2.4 \text{ metres}$$

The pedestrian was between 0.9 and 2.4 metres from the point of impact when the driver reacted. The point of impact was found from the scene data to be 6.9 metres from the kerb.

**The pedestrian was therefore between 4.5 and 6 metres into the road when the driver reacted**

## 7. Conclusions

1. The collision occurred in the outside lane of the A222 heading towards roundup. A ford car A121 PPU was travelling in a westerly direction and was being driven by Mrs Paula Meadows.  
Mr Jones was crossing from a nearby housing estate heading north towards Little Oaks. As Mr Jones was crossing the road was struck by the ford car.
2. The A222 is a dual carriageway and the point of collision was close to the junction with Little oaks. The junction has filter lane for Little Oaks and traffic lights control the traffic flow at the junction. There are safety barriers along this stretch of the road and there is no pedestrian crossing at this junction.

### ***Highway Code Rule 9.***

*Pedestrian safety barriers. When there are barriers, cross the road only at the gaps provided for pedestrians. Do not climb over the barriers or Walk between them and the road.*

Scuffmarks found at the scene confirm that Mr Jones was struck in the outside lane.

3. The Ford car was travelling at a speed of  $12.72\text{ms}^{-1}$  (28mph) at point of application (see page 20). The ford car skidded for 0.7 metres before colliding with Mr Jones. Mr jones was struck by the vehicle and landed 8.2 metres from the resting point of the Ford Cars front wheels.

4. At the point of entry of Mr Jones, a clear view can be seen of the A222 looking East for some distance (see photo 5). This will also be the same for the Ford car. Mrs Meadows states “when I was about 25ft (7.6m) away from the traffic light island I saw what I immediately recognised as a man crossing the road on foot in front of me”
5. Mr Jones crossed over the Safety barrier and continued onto the road. two witnesses state that they did not see Mr Jones look for oncoming traffic.

**Highway code Rule 7c.**

*Look around for traffic and listen. Traffic could come from any direction. Listen as well, because you can sometimes hear traffic before you see it*

**Rule 7d**

*Look all around again and listen. Do not cross until there is a safe gap in the traffic and you are certain that there is plenty of time. remember, even if Traffic is a long way off, it may be approaching very quickly*

The driver of the Ford car states “ at no time did I see the man look to his right towards my vehicle”

6. Mr Jones was between 4.5 & 6 metres or 3 & 4 seconds onto the road when the driver reacted. The total time Mr Jones took to reach point of impact (6.9metres) was 4.6 seconds.

7. The distance that the Ford car driver started to react was between 7 & 19.8 metres prior to the point of impact. The distance that the Ford car driver could have first seen the need for action was 57 metres prior to the point of impact. The point of no escape was between 18 & 31 metres prior to the point of impact
8. The driver of the Ford Car Mrs Meadows assumed that the Mr Jones would stop and wait for her to pass *“I thought at first that the man was going to wait in the centre of the carriageway and wait for me to pass”*.  
Mr Jones did not stop and did not look for oncoming traffic when entering the carriageway.
9. If Mrs Meadows reacted when Mr Jones entered the carriage way she would have stopped within a safe distance of Mr Jones.  
Mr Jones did not stop and look for traffic before proceeding to cross the carriageway.