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11 Feb 10

Angela Gill  
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Portsmouth City Council  
By email to [angela.gill@portsmouthcc.gov.uk](mailto:angela.gill@portsmouthcc.gov.uk)  
Copies to all Councillors and others, as before.

Portsmouth 20mph zone.

Dear Ms. Gill,

I fail to understand why I have yet to receive at least a formal acknowledgement, let alone a substantive reply, from the Council to my detailed complaint of 4<sup>th</sup> January despite two recent reminders. However I now know that you circulated a **seriously flawed briefing document to Councillors** for them to use if they chose to reply to me individually – replies I neither asked for nor expected.

Having seen the briefing document by a Councillor I can however tell you that – whether you realise it or not – the effect of your document **is not to deflect my criticism, but to justify and indeed extend it**. I attach my detailed responses, interleaved between each point you make, but I summarise below show the **main points that your briefing explicitly accepts or fails to deny**.

As your Council's preferred method of dealing with my complaint seems to have been to ignore it I have no confidence that I will receive a reply. **Accordingly I will take it that Portsmouth City Council accepts the following points, unless it challenges any of them by noon on Monday 22 February.**

1/ **No research was done** to estimate likely benefits prior to implementing the **£575,000** scheme.

2/ The scheme was *“never intended to be judged solely on casualty or accident statistics”* but was based on a *“vision”* of *“residential streets more welcoming and useable* (a somewhat intangible return for a large amount of money, many taxpayers might think.)

3/ The scheme was intended to *“to change the way some drivers travel through our narrow residential streets.....so it becomes a natural response to slow down to 20mph or less”*. Yet the Atkins report states of the average 0.9mph fall that *“there was no statistically significant reduction in average speed within the individual sectors.....due to the fact that the 20 mph signs were applied largely on roads where traffic speeds were already close to 20”*. **Hardly “encouraging”**.

4/ The scheme was **not** limited as your briefing note claims *“to roads where the speed before implementation was 24mph or less on average”* but **included 19 sites** on roads where prior speeds had been **above 24mph**, as set out in the report and in my more detailed response.

5/ PCC admits *“that one year's figures, or figures from a small area, are not significant”* but has claimed - and continues to claim – *“encouraging signs”* by **cherry picking changes in data that it admits to be too small to be meaningful**.

5/ The one small set of data in the entire report considered to be statistically significant and on which claims of *“encouraging”* results might arguably be based is for **falling speeds at 17 out of 151 sites across the zone** where prior speeds had been 24mph or higher. However the much greater volume of data for the whole zone **shows average reductions of only 0.9mph**, described as **not** statistically significant. Further, as Table 1 of my detailed response shows there were **57 sites at which speeds rose** and another **25 sites at which speeds did not change**. The significance of **changes of speed in terms of accidents** does not depend however on the **number of sites** involved but on the **number of sites weighted by the volume of traffic** at each site – data which is not available. Only an optimist with his own agenda would feel encouraged by such largely meaningless data – especially **given the adverse trends in casualties** (6/ below) which is after all **what really matters**.

6/ While admitting that the data is insufficient to be meaningful, **PCC nevertheless claims 13% falls in accidents and 15% falls in casualties – but as you admit in your briefing note, without adjusting for the 12% reduction in traffic and also without comparison to far better national trends.** Furthermore you all but ignore the much worse Serious Injuries figures. Such fundamental errors are indefensible – that you chose to ignore them does nothing for your credibility or that of the Council.

I set out in my original complaint and again, (with one important correction) in the attached response to your briefing note, **the real figures** showing that, if the casualty data tells us anything it tells us that casualties in your zone followed **worse or much worse trends than the national trends** over the same period. Here for your convenience are the comparisons for casualties adjusted for traffic volume:

<b>Severity</b>	<b>PCC Claim</b>	<b>GB</b>	<b>GB Adjusted</b>	<b>PCC Adjusted</b>
Killed	see note C	14%	13%	too small to mean anything
SI	-1%	6%	5%	-9% <b>MUCH WORSE</b>
KSI	0%	7%	6%	-7 % <b>MUCH WORSE</b>
SL	17%	7%	7%	6 % <b>MUCH THE SAME</b>
ALL	15%	7%	7%	4% <b>WORSE</b>

Positive figures represent falls

Please note that in my complaint I missed out the – sign from the 7% KSI figure, so the description changes from “Much the same” to “Much worse”

Note also that the GB % falls are from 2007 to 2008 – I will recalculate the figures to for 2008 compared to the average for 2005/6/7 - which can only make the comparison even worse for PCC.

7/ PCC’s “*position has been that we would need to wait at least for three years for meaningful stats*” – but in reality accident and casualty statistics **even over three years, from part of one City** can never be statistically meaningful, especially for numerically much smaller fatal and serious injuries. PCC’s “*position*” amounts therefore to blatant failure to understand how these statistics work – random variations overwhelming whatever trends might lurk in such small numbers over such short periods.

8/ PCC believes that “*it is common sense to encourage slower speeds on residential streets*”. This simplistic and naïve statement implies sublime ignorance of the law of unintended consequences, by which the **measures used to obtain lower speeds** – not achieved, as it happens – **can themselves lead to danger**. One example is that a driver looking at **his speedometer is more likely to run into someone**, another that **pedestrians will be less careful** if they assume that traffic will be slower.

9/ PCC does not understand **that impact speeds are almost always much lower than free running speeds** because drivers brake, and so repeats **the mindless mantra linking speeds with casualties** without apparently realising that it is bogus.

10/ PCC clearly does not understand that the views of **uninformed or ill-informed members of the public** should not be allowed to influence policy, still less when it largely represents Council and DfT propaganda being reflected back. **How many would approve if they knew the real casualty trends?**

11/ PCC does not understand that spending £575,000 of road safety funds to give people the impression they are safer, while actually achieving nothing of the sort – and arguably at least much worse casualty trends - **is not a sensible policy**, especially when the same money spent on proven road safety methods could have provided real benefits.

**As above, if the Council fails to challenge these points or those in my response attached I will assume that they are agreed.**

Yours sincerely

**Idris Francis**