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Angela Gill
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Portsmouth City Council
By email to angela.gill@portsmouthcc.gov.uk
Copies to all Councillors, relevant MPs, the DfT and others.

Portsmouth 20mph zone.

Dear Ms. Gill,

On the 4th of January I wrote to your Council pointing out in detail that there is no meaningful statistical evidence to support your claims of “encouraging” results in the 1st year of your 20mph scheme. I also pointed out that to the limited extent that minimal data for only one year might be of any significance, it suggests failure, not success.

Rather than reply to me you circulated to Councillors a briefing note which, as I subsequently pointed out, contained factual inaccuracies and misleading statements and, despite clearly having been intended to deflect my criticisms, in reality accepted most of them. Despite all this your Council seems to have done nothing whatever to withdraw or qualify these bogus claims which at best are not supported by any meaningful evidence and at worst are in direct conflict with the limited evidence that does exist.

I turn now to the one remaining loose end, until the data for the second year becomes available - the statement in your briefing note that: “*The Atkins report offers a comparison to the national casualty data*”. Those parts of the report were not included in the extracts originally copied to me by your Freedom of Information section but I have now received the whole report and, as promised, comment further below:

Not only in relation to national comparisons but elsewhere the report is skewed both by arithmetic and weasel words (too consistently so to be accidental) to give a more favourable impression than could ever be justified by the limited data available. Despite stating in plain terms that:

*“The (statistical) tests showed that the observed changes in the PCC sectors were **not statistically significant and could have been due to random chance**”* (my emphasis)

the report also states that:

*“Based on the available data for one year after scheme implementation, casualty benefits greater than the national trend have not been demonstrated but nonetheless **may be demonstrated when more data is available.**”* (my emphasis)

There is in fact no more reason – and arguably less - to expect success to be demonstrated, given time, than for failure to emerge. In any case, the volume of data available is so small that not even several years’ data could be relied on as evidence of the effects of the scheme on casualties – especially for numerically smaller serious injuries and even more so low single digit fatalities.

In terms of national comparisons the report states that,

“..... the provisional casualty data obtained from the DfT.....shows an underlying trend of decrease in national casualties (11% reduction in the number of casualties on Great Britain roads based on previous three year results and one year after results of the same study period as the PCC sectors, with a 9% reduction in KSI casualties). The total casualty reduction (15%) for the roads within the 20mph Speed Limits in Portsmouth is consistent with the total GB casualty reduction”

and

“The total pedestrian casualty reduction is 9.1% for GB which is greater than the 6% for PCC. In Portsmouth, there was no change in the total KSI casualties whilst there was an increase in the pedestrian KSI casualties (35%) compared to a national reduction of 9% and 5.1% respectively.”

These false comparison completely ignore the **12% fall in traffic** in the Portsmouth roads compared to **only 1% in national data**. As the data table I copied previously shows, a **15% fall in total casualties where traffic (for whatever reason) fell by 12%** is simply NOT “consistent” with an **11% fall where traffic fell by only 1%**, - **it is substantially worse**, in terms of the risk per mile to which road users are exposed.

Ignoring the much greater fall in traffic in the 20mph area substantially understates the extent to which the Portsmouth results were worse than national trends. To pretend otherwise, as Atkins and you do, is both unprofessional and unacceptable.

The report also states, correctly, that::

*“changes overall were found **not to be statistically significant** when compared with the casualty reduction that has occurred nationally”* (my emphasis)

but this in no way excuses the misleading comparisons above **which lend themselves to selective quotation by those determined to claim success in defiance of the evidence – or lack of it.** (Please note however that I do not claim that the results prove failure – rather that there is simply no evidence to support claims of success.)

Of traffic migration the report surprisingly states that

“Due to the limited amount of data available at this stage, ...it has not been possible to determine if the scheme has had an effect on traffic migration or vehicle composition”

Leaving aside the question of why so much effort was put into analysing data which clearly never could be statistically meaningful, I have to ask why the report goes on to say, without any evidence that:::

“.....the possible impact of the initiative on traffic volumes on surrounding roads but traffic migration to cordon roads from 20 mph speed limit roads was expected to be limited”.

Expected by whom? And why? Drivers I know do tend to avoid 20mph areas, both because of a greater risk of being penalised for breaching it and/or slower journeys.

The report continues:.

“There has been a general reduction in traffic on all roads since 2007 in Great Britain, based on DfT provisional results, of 1% in 2008, with a 0.9% reduction on minor urban roads, and a 0.7% reduction on motorways. The average reduction in traffic (3%) on PCC cordon roads is therefore greater than the national reduction (1%) and as such it is likely that there was no traffic migration to these cordon roads from the 20mph roads”.

That is one interpretation, but even in its own terms it is suspect – if not self-serving. In the first place, it assumes that drivers who would previously have gone through the area would divert **only** to the cordon roads listed – but no one knows what alternative routes might have been taken. Second, the 3% fall on the cordon roads compared to the 1% national figure might well imply drivers avoiding Portsmouth altogether – including going to Southampton or Chichester instead. There is no basis for believing that traffic migration did not take place, and every reason to assume that it would have done. Thirdly, traffic comparisons between different roads are meaningless and potentially misleading if given only as % changes without reference to total traffic numbers -for example, 5% of vehicles diverted from a quiet route would increase traffic on a 5 times busier route by only 1%.

While it may well be that some who need to use the 20mph area regardless might walk or ride bicycles instead – despite cycling is 20 times more likely to lead to death, per mile, than driving – the enclosed graph shows how extraordinarily resilient vehicle mileage has been, at least since 1950, in defiance both of fuel price rises and recessions. In any case the option to walk or ride bicycles is available only to relatively fit people for quite short journeys and therefore could not possibly have accounted for much of the 12% fall

The Fuschia graph of total vehicle mileage rose strongly and steadily for almost 60 years and even in the worst recessions such as the Suez crisis in the early 1950s, the oil crisis of the early 1970s and the ERM debacle of the early 1990s, no more than paused for breath. Given this clear and consistent evidence of drivers' determination to use their vehicles come what may – also confirmed by just a 1% fall in national traffic volume in 2008 at the start of a serious recession – it is much more likely that the 12% fall in traffic in the 20mph area **was indeed largely due to traffic diverting elsewhere**. If that **was** what happened then the brutal reality is that the 20mph area **diverted not only traffic but also its associated accidents to other roads, whether the cordon roads or further afield. Spending public money to move accidents from one area to others is not, as far as I know, an official objective not does it provide any sensible return on investment.**

I note that Cllr Moon and Councillor Stagge are both speaking at a Conference on Saturday the 17th April on the subject of the 20mph zone, and that you and Mr. Lukoda of Atkins are booked to do the same at a Brake Conference in May. Unless you assure me otherwise I will assume that your Council intends to ignore my complaint and continue both to misrepresent the results of the scheme and to encourage other local authorities to install similar schemes.

Accordingly I draw your attention and that of your Council to your statutory duty of care towards those whom your actions might affect, the offences of misconduct in public office, misfeasance and others and in particular that spending inherently limited public funds on schemes which provide no quantifiable benefit, rather than on road safety methods of proven benefit is likely to lead to more road casualties than would otherwise occur.

I therefore call again on Portsmouth City Council to cease and desist making unfounded claims for its 20mph area and to stop encouraging other local authorities to make the same mistakes.

I was told recently that your Council, like other bodies, should have a formal procedure for dealing with complaints – yet all that has happened in respect of my complain is that it has been all but ignored. Please implement the appropriate procedure.

I await your substantive response

Yours faithfully,

Idris Francis