

Ph (44) 01730829416  
Mobile (44) 07717222459  
e-mail [irfrancis@onetel.com](mailto:irfrancis@onetel.com)  
GU321LD

Sunny Bank,  
Church Lane  
West Meon,  
Petersfield,  
Hampshire

10 Feb 10

My comments interleaved, in Blue to Portsmouth' County Council's response to my complaint, copied to Councillors but strangely not yet (as of 8.45pm Monday 8<sup>th</sup> February) to me.

Indeed, the heading "Dear Councillors" and the third paragraph imply that the email is not the PCC formal reply to me that I asked for, but rather a briefing note to Councillors for their individual replies to me, that I had neither asked for nor expected.

Idris Francis

Dear Councillor

### Comments on the 20mph speed limit scheme from Mr I Francis

I am writing in response to the letter you may have received from Mr Idris Francis regarding the 20mph scheme, as we understand he has written to all councillors.

I hope the points below will counter incorrect views of the scheme, and perhaps help you in any correspondence.

**Comment** None of the points I made are incorrect, instead you ignore many of them and instead rebut points I did not make – the all-too-common "straw man" tactic of those unable to answer the real questions. Also there are many factual errors in the reply.

Some general comments are below, followed by more detailed comments on individual points.

### General comments

The questions posed by Mr Francis show a lack of understanding of the vision underpinning this scheme.

**Comment.** I did not comment on the "vision underpinning the scheme", rather on (a) the outrageous ways in which PCC embarked on spending £575,000 of taxpayers money with no prior estimate of benefit to be expected, no research that would quickly have shown that 20mph zones relying only on speed limit signs have minimal benefit and (b) misrepresented the results as promising and/or encouraging when, as I pointed out in detail, they were **worse** than happened nationally that year. You might call it **vision** – I call such conduct (at best) **wishful thinking** and at worse a direct breach of PCC's statutory duty of care to the public.

That is to change the way some drivers travel through our narrow residential streets (which often have cars parked on both sides), so it becomes a natural response to slow down to 20mph or less.

**Comment** The Atkins report stated that:

*"The results also show that there was no statistically significant reduction in average speed within the individual sectors. This is likely to have been due to the fact that the 20 mph signs were applied largely on roads where traffic speeds were already close to 20 mph and hence the relatively small changes in average speeds that have been observed".*

In other words hundreds of thousands of pounds were spent to slow down traffic where drivers “*natural response*” to “*our narrow residential streets (which often have cars parked on both sides)*” already slowed them down.

The aim is to gradually change the driving culture in the city, to make residential streets more welcoming and useable, especially for older people and children, and for cyclists and pedestrians generally.

**Comment** This part of your response suggests that actual results, in terms of accidents and casualties, are only of secondary importance, secondary to whether the streets seem more “**welcoming and useable**”. Just how **many additional casualties** are you prepared to see in the interests of that warm glow of well being?

As I pointed out in detail in my complaint, to the limited extent that the results indicate anything, they indicate **worse trends than occurred nationally** in the same year. The reply rather reminds me of Sir Ian Blair’s speech, when he was Deputy Commissioner, at a Party Conference, all about reducing the public’s impression of crime, rather than reducing crime itself. And you know what happened to him.

I say again that even the most basic research – as recently confirmed by Thames Valley Police – would have shown that the scheme was unlikely to provide any significant benefit in terms of accidents or casualties. The other side of the coin is of course what **benefits might have been achieved if the same money had been better spent on proven road safety measures.**

Responsible drivers now have formal backing for their appropriate speed, and reckless drivers know they are breaking the law.

**Comment** I hope that this gives a warm inner glow to taxpayers and those injured in the additional accidents that the results suggest. The vast majority of drivers drive at safe speeds the vast majority of the time, the few reckless drivers do not care that they are breaking the law unless they are likely to be caught – in other words, without the enforcement most studies show to be essential but without which you blundered ahead, beguiled by “vision” instead of being guided by science and experience.

The scheme was limited to roads where the speed before implementation was 24mph or less on average.

**Comment. It most certainly was not!** Read the Atkins report, for goodness sake!

Table 3.3 in the report gives the changes in speeds for 3 different groups of roads, the ones with average “before” speeds of (a) <= 20mph (b) 21-24mph (c) > 24mph. Extracting figures from that table shows that for each of the speed ranges, the number of sites at which speeds fell, did not change or rose were:

**Table 1**

| <b>Before speed</b> | <b>Falls</b> | <b>No Change</b> | <b>Increase</b> | <b>Total</b> | <b>% no change/ increase</b>       |
|---------------------|--------------|------------------|-----------------|--------------|------------------------------------|
| (a) <= 20mph        | 46           | 21               | 45              | 102          | (59%)                              |
| (b) 21-24mph        | 17           | 3                | 11              | 31           | (55%)                              |
| (c) > 24mph         | 17           | 1                | 1               | 19           | (10%)                              |
| Totals              | 80           | 25               | 57              | 151          | <b>(54%) no change or increase</b> |

**The basis for your most prominent claim relating to the first year was the 7mph fall in case (c) – a total of 17 sites, but you somehow failed to mention that speeds ROSE at 57 sites and did not change at another 25 sites.**

**DOES THAT GIVE YOU AND PORTSMOUTH RESIDENTS A NICE WARM INNER GLOW AS YOU WALK AROUND YOUR “WELCOMING AND USEABLE” STREETS? IS THAT GOOD VALUE FOR MONEY?**

I pointed out in my original complaint that **a fall of 7mph on previously faster roads but an overall average fall of only 1mph necessarily means that average speeds rose on previously slower roads, as the above figures now confirm.** Without relative traffic volume figures (not available) for

each street, and without weighting each site for precise degree of speed change (as opposed to ranges of speed change), no one can be sure whether speed **increase at 38% of sites** lead to more danger than **speed reductions at 46% of sites** removed – but the overall results, if they suggest anything, suggest that they did.)

We know very well that one year's figures, or figures from a small area, are not significant.

**Comment.** Your public position, as reported, was that the results were “**encouraging**”, as in this quotation in the Portsmouth News from Cllr Moon:

*“But there are some **encouraging signs in it**, especially the result on roads where speeds were significantly higher than 20mph”.*

Why do you continue to claim “encouraging” signs and encourage other Councils to do the same **despite your admission, above that the results are not meaningful?**

Why did Cllr. Moon or anyone else not **give equal prominence to increases in speeds** on slower roads? Or was that too inconvenient a truth, to coin a phrase? Or “cherry picking” to coin another.

More important than speeds however are casualties – **so why did you publicise a 13% reduction in accidents and a 15% reduction in casualties without mentioning the 12% reduction in traffic volume that largely accounted for them?** (It is of course always likely that those drivers who do not need access within the 20mph zone will choose to drive around it instead – and have their accidents elsewhere – so the probability is that your zone merely moved accidents around, not eliminated them.)

Why did you **compare 1998/99 casualty changes only with the previous 3 years on the same roads but not with equivalent changes in national figures?** (One of the reasons that a single year's casualty figures are not meaningful is that many factors such as weather, the economy, traffic volume etc also change and affect them – which is why it makes more sense to compare changes in a given area with the national trend) As I set out in detail in my complaint, your “**encouraging**” **results were anything but**, when compared properly to national trends in the same year.

Our position has been that we would need to wait at least for three years for meaningful stats.

A word or two on basic statistical principles if I may. I am an engineer not a statistician but I am working closely with people more qualified than I am in these matters.

Accidents being largely the result of almost random coincidence of (usually several) causal factors can be analysed by standard statistical methods, for example what range of random variation may be expected for figures of given magnitude. (In this context it is important to understand that there are typically 10 serious injuries and 50 slight injuries for every fatality. For that reason the figures for slight injuries are less volatile than for SI and even more so than for K.)

Because of factors such as weather, the economy etc analysts know that even for national figures (3,000 fatalities a year, 28,000 SI and 250,000 slight injuries) one year is far too short to show up any meaningful trend or the result of policy changes, three years being the minimum. Divide that down by the 43 separate police force areas and it is unlikely the same 3-year minimum rule would suffice – but to divide it down again, as in “**wait at least for three years for meaningful stats**” - **in relation to casualty figures for a handful of streets, is simply incompetent nonsense, particularly for K and SI.** (For the avoidance of doubt, speed measurements involve far more numbers and can be statistically significant over shorter periods than can accidents)

As I said I am working with others with more detailed knowledge of statistical theory than I have, and will come back to you with more a more detailed response on this question, but my understanding at present is that the reported changes **all fall well within the limits attributable to purely random variation – and will remain so even after three years** because the numbers will remain too small to be meaningful – especially for the more serious K and SI numbers.

Even then, to take best account of external factors, the results must first be adjusted in the way I did in my complaint, for **comparison with national trends and in relation to traffic flow.** To take

another example, more relevant over a three year period, **the rapid improvement in car design and safety might well lead to falls in accidents** and to what would otherwise have been fatalities to serious or slight injuries or serious injuries to be slight. This will automatically show up in the national figures, another reason that they must be the reference point.

But the scheme was never intended to be judged solely on casualty or accident statistics.

**Comment** Perhaps not "solely" but surely "primarily"?

We believe it is common sense to encourage slower speeds on residential streets.

**Comment.** I have studied road casualty data and trends for thousands of hours over the last ten years but never cease to be astonished by naïve and simplistic comments of this kind especially from supposed traffic professionals. Do you not understand **the Law of Unintended Consequences?** From birth to death life is a constant struggle to decide between the benign and malign consequences of any action or inaction – drink too much, enjoy it bit then fall down. Eat too much, enjoy it but grow fat. Spend too much, enjoy it but go broke

In this context the Law of Unintended Consequences tells us that **forcing drivers to slow down might result in:**

a/ Drivers spend more time looking at their speedometers instead of the road ahead. At 20mph that's about **30 feet or 2 car lengths driven blind**, longer at night when eyes have to adjust more. **Is a 20mph car whose driver is looking at the speedometer more, or less dangerous, than a 25mph car whose driver is looking ahead as the pedestrian steps into the road?**

b/ **Sudden braking** when a driver sees or thinks he sees a mobile speed camera.

c/ Drivers driving **up** to the 20mph limit, which effectively says that 20mph is safe – as has in fact happened according to the Atkins data.

d/ Pedestrians **assuming that the oncoming car will not be travelling at more than 20mph when in fact it is.** In general, the "*welcoming*" aspect in your "*vision*" might make pedestrians careless. It is well known that human beings adjust their behaviour to account for perceived risk – e.g. drivers drive faster in safer cars, pedestrians cross the road more slowly if they think the car is approaching slowly.

A pedestrian hit by a car travelling at 20mph is likely to suffer slight injuries, but at 30mph they are likely to be severely hurt.

**Comment.** I long ago grew weary of this **one-sided simplistic propaganda**, which assume that impact speed is the same as the free travelling speed before the accident. In fact **only a small single % figure of people hit by motor vehicles die** – showing that the vast majority of drivers brake to much lower speeds or steer around problems rather than ploughing into pedestrians.

(In 1986 I suffered only a sprained wrist when I crossed the road looking the wrong way, into the path of a 30mph American station wagon in urban Philadelphia. I survived because the driver was looking where he was going, not at his speedometer, and he steered around me, hitting me flat across the back and legs with the slabsided rear side of his car. None of the simplistic propaganda ever seems to mention the often preferable and more effective emergency action of steering rather than panic braking. For fifty years I have almost subconsciously borne in mind escape routes to left and right whenever I drive. This is yet another reason that concentration on speed can be counter-productive).

The success of the scheme, for us, is shown by its wide appeal among residents, and their requests for streets to be included ahead of schedule and for enforcement.

There has also been interest and encouragement from other councils and interested organisations, which have approached us.

**Comment** As a contact of mine, **a professional safety engineer in aerospace** says, the uniformed – or often these days seriously ill-informed opinions of the general public should never be a factor in

safety decisions. What matters is evidence, not what is all too often official propaganda – including yours – **reflected back from those who know nothing of the real issues** or the real figures. How many Portsmouth residents would want the zone in their street if they knew that speeds might well rise? Or that accident trends in your first year were much worse than the national trend, not “encouraging” as PCC proclaims?

The Atkins report into the scheme was commissioned by the Department for Transport, not the council. Atkins collected the data in the report, and evaluated it.

**Comment.** I have, as you know copied my complaint to the DtT, who have acknowledged receipt. I will now contact Atkins with my criticisms.

I have noticed with concern over the last 20 years an increasing tendency for analysis to charge fat fees for collecting and analysing data and presenting it every-which-way in innumerable tables of figures – **even when as in this case it was perfectly obvious – or should have been – that there was too little data to support any conclusions.** But hey ho, it’s money in the bank, and who cares if no one ever reads it beyond the eye-catching and misleading headline claims? We do after all live in the age of “spin” as we know to our cost.

Our view is that it is only an interim report (as Atkins state), that it is limited, and that it has some encouraging signs in it, like the conclusion that the scheme has succeeded in cutting average speeds on faster roads by 7mph.

**Comment** I sometimes wonder whether you have read my criticism or the Atkins report! It is “**limited**” (at least in terms of accidents and casualties) to the extent that it is, as you admit, it is “**not meaningful**”. In other words **it is meaningless** and as such is simply incapable of providing “**encouraging signs**” for the reasons I have set out in detail

We have not used the report to prove the scheme’s success.

**Comment.** Weasel words and the straw man tactic! No one, least of all I, has used claimed that you used the report to “**prove the scheme’s success**”

**What I did accuse PCC council of doing**, and now continuing to do, is:

a/ **failing to estimate benefits before spending £575,000** of taxpayers' money

b/ **failing to research the likely effects**

d/ **claiming “encouraging signs” on the basis of cherry-picked yet meaningless accident and casualty data.**

e/ **highlighting reductions in speeds but not the increases**

f/ **failing to adjust results for the 12% reduction in traffic**

c/ **comparing the results only with previous years** at the same sites and not against **the national trend** – which automatically includes factors such as weather, long term downward trend due to improving vehicles.

The conference at the Guildhall on 20mph was requested by the Department for Transport and organised and run by PTRC Education and Research Services. Delegates paid for their attendance. There was no financial contribution made by the council.

**Comment** Thanks for clarification – though PCC and therefore Council taxpayers must have contributed towards the time and expenses of the Councillors and employees involved.

I very much doubt that the other delegates paid for their attendance out of their own pockets, far more likely that their employers and in particular their Council employers and therefore taxpayers elsewhere paid for them.

## Detailed points

### Reduction in average speed

The Atkins report commissioned by the DfT regarding the *'Interim Evaluation of the Implementation of 20mph Speed Limits in Portsmouth'* indicates that there was an increase in sites where speeds had reduced to 20mph or less after the implementation of the scheme. This is attributed to sites within the city where previous speeds had been recorded of 24mph or less. The DfT recognised that although there had been a reduction in average speed, overall this was not statistically significant. However, the report notes a significant increase in sites where average speeds had reduced by 7mph after the implementation of the citywide scheme where previous speeds had been recorded above 24mph. Although the report finds the average speeds after the implementation of the scheme were above 20mph it is still important to recognise that it finds a reduction compared to the previously recorded speeds. From a safety point of view any decrease in speed is a positive.

Comment This is **object nonsense**, and it is barely credible that anyone could have written it. Talking it item by item:

"...there was an increase in sites where speeds had reduced to 20mph or less after the implementation of the scheme"

I read this clumsily worded statement to mean that there were more sites with average speeds below 20mph after the scheme was implemented than before – but without numbers the statement is all-but meaningless. In other words, **how big an increase?** As an engineer, whose business depended on numbers not generalities and wishful thinking,, I long ago learned to ignore claims that are not quantified. The report does not give all the figures but does state that:

*"Table 3,2 above shows that speeds decreased at 24 sites, in all the three sectors, from above 20 mph to 20 mph or below. However, speeds increased at 15 sites from below 20 mph to above 20mph."*

As the "after" figure given for sites with average speeds of 20mph or less is 87,the "before" figure must have been 78. but these figures too are statistically **meaningless without the corresponding traffic volume figures**, which are not available. For all we know we might be **swapping a speed reduction at a site with little traffic for a similar increase at a site with a great deal of traffic**. Similarly **we might be swapping a site where speed fell by 1mph from 21mph to 20mph for another where it had risen from 20 mph to 25mph – and there is no way of knowing without far more precise and numerous records**. The statement is therefore **utterly worthless and misleading, and indeed wishful thinking based on selective use of data**.

*"However, the report notes a significant increase in sites where average speeds had reduced by 7mph after the implementation of the city-wide scheme where previous speeds had been recorded above 24mph."*

**Comment** Yes indeed it does, but that DfT statement, like your public claims, **fails to mention** that if a significant number of sites saw a **7mph reduction** yet the **average was only a 1mph reduction** there **must have been a significant number of sites where speeds rose**, as Table 1 above sets out. This was one of the central points I raised in my complaint, but your response is not to acknowledge it but to **repeat the same selective and misleading statement**.

"It is still important to recognise that it finds a reduction compared to the previously recorded speeds."

**Comment.** **This is becoming quite absurd!** First you accept that the 1mph fall in average speed at 151 sites was **"was not statistically significant"** and then somehow claim that it is **"important to recognise"** a 7mph average fall at only 19 sites. Yet again cherry-picking of convenient numbers and ignoring inconvenient numbers.

“From a safety point of view any decrease in speed is a positive”

**Comment.** From a safety point of view, **if** speed were an important causal factor in accidents (in reality is a minor one, in low single digit percentages) what **would** be important would **not** be the changes in average speeds across areas – trivial and unreliable as they are in any case in this context – but the **net benefit of the falls in some areas less the increases elsewhere**. Any engineer knows the dangers lurking in averages, that mask the most hideous distortions – a *reductio ad absurdum* example to prove the point is that the average age of people in this country may be 45, but many are on their death beds and many were born yesterday - including those who take road safety propaganda at face value.

Furthermore, as above, the **number of sites** at which speeds rise or fall beyond an arbitrary threshold is **virtually meaningless, unless adjusted in each case both for traffic volume**, the actual **change in speed**, not a range of speeds and indeed for the **relative danger of each site**. In the latter case, **speed increase of 2mph at dangerous sites might cause more accidents than speed reductions of 5mph might avoid at safe sites**). Thus the data in the report, devoid as it is of such details is **virtually meaningless – and could and should have been recognised as such before public money was wasted on analysing it.**

In addition and as above, a **decrease in speed can be** dangerous – ever tried 45 mph on the M1? I did, for long enough to get off the motorway after the engine of my pre-war car lost much of its power. That anyone in any position of road safety responsibility should write “*From a safety point of view any decrease in speed is a positive*” suggests a **wholly superficial and simplistic understanding of accident causation**. There are many other examples of how lower speed can be dangerous, as when overtaking, or forcing others to overtake, or too much attention to speedometers rather than the road ahead.

In any case, as pointed out elsewhere, if drivers nearly always drive at safe speeds, **how can making them drive faster than previously**, as has demonstrably happened in your 20mph zone, **improve safety?**

**Claim: The council failed to understand that minimal data can never provide reliable indications of success or failure**

The council does not dispute the fact that minimal data cannot provide reliable indications of success or failure. However, the DfT commissioned the interim evaluation carried out by Atkins one year after the implementation of the scheme. Based on the available data for only 12 months, casualty benefits greater than the national trend have not been demonstrated. However, this may be demonstrated when more data is available

**Comment Weasel words**, again. It is, as you admit elsewhere, not that the data is not “**reliable**” but that it is **effectively meaningless**. What astonishes me that you appear to believe – perhaps even Atkins do – that 3 years data will be significant. As above, it will remain too limited to prove anything. Equally, the longer the period the greater the chance of other factors coming in to play, so the simple answer is that data for a few city streets can never be meaningful, and it **idle and incompetent to believe otherwise**.

In any case you again ignore my detailed analysis pointing out that the available data, to the extent that it might mean something, suggests **not casualty trends no better than national trends but very much worse**.

Therefore Portsmouth City Council agrees with the recommendation contained within the report that a study that takes account of three years of data after implementation of the scheme is carried out. The plan has always been to assess the scheme after a longer period.

**Comment** The plan is therefore mistaken – anyone who believes that even 3 years’ data for a few city streets can have statistical significance should not be employed in any job involving public safety – or for that matter public expenditure.

### **Claim: The council cherry-picked data**

The Atkins report commissioned by the DfT summarises the outcomes of the 20mph scheme. It concluded that on low-speed streets, speeds were 0.9mph lower than the average speeds before implementation of the scheme.

**Comment** As before – have you read the report? It says no such thing – instead it shows that average speeds **across all roads in the 20mph zone** – including those previously showing speeds above 24mph – fell by **0.9mph, a figure which the report rightly described as statistically insignificant.**

What it also shows, but you prefer to ignore, is that **that speeds fell significantly on some roads and rose significantly on others.** As above, no one can know what the net effect on safety would be without also knowing traffic volume and the nature of each site.. **To highlight the falls but ignore the increases is seriously – and perhaps deliberately – misleading.**

One of the most important parts of my complaint is that you did indeed cherry pick data, viz:

a/ You **highlighted falls in speed but ignored increases**

b/ You **highlighted the All accidents/all casualty figures but virtually ignored much worse Serious Injury data.**

c/ You **ignored the inconvenient 12% fall in traffic.**

D/ You ignored the much greater casualty reductions in national data for the same period.

At sites where the average speed was previously recorded to be higher than 24mph,

**Comment** Which in an earlier paragraph you stated were not included

It concludes that the average speed did reduce by 7mph and that this change is statistically significant. However, as stated before, a study taking account of three years of data after scheme implementation will be carried out to evaluate and monitor the longer-term impacts. This may demonstrate stronger evidence of any outcomes when more data is available.

**Comment** Yet again you chose to ignore the downside, the **unknown adverse effects of the increases in speed elsewhere.** As there were only 19 sites out of 151 with above 24mph “before” speeds it is **difficult to see how the increases at 57 sites could be less statistically significant or would not have resulted in more problems than the lower speeds solved.**

**Claim: The council claimed reductions in casualties without adjusting for the national falls in same figures**

The Atkins report offers a comparison to the national casualty data.

**Comment.** Your Freedom of Information Department did not copy the whole report, only some 14 pages. I was not aware of any comparison in the report with national data, and a word search for “national”, “GB” and “UK” fail to find a match. Accordingly I will contact your FoI section for a copy of the missing information and write to you again on this issue, including my own comparison with national data.

Whilst it is not directly comparable due to differences in time period, the provisional casualty data obtained from the DfT website (2004 – 2008) shows an underlying trend of decrease in national casualties (11% reduction on Great Britain roads based on previous three year results and one year after results of the same study period as Portsmouth, with a 9% reduction in KSI casualties).

**Comment.** This increasingly seems to be **deliberately obtuse, or perverse.** You have again failed to allow for the significance of changes in traffic volume. I have all the relevant data but without looking it up I recall that that national traffic volume had been rising by no more than 1% or so for several years and fell by 1% or so in 2008. In other words, hardly any **change from the average of**

**the previous 3 years.** In your 20mph zone traffic in the areas where it was measured – and by reasonable assumption therefore in the whole zone – **fell by 12%.** As indeed one might expect as some drivers choose to drive around it.

The correct comparison is therefore, as I set out in my complaint, is to **adjust for traffic volume figures,** not compare casualty numbers directly as you (perhaps understandably) prefer to do. These are my figures, as set out in my complaint:

**Table 2**

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

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 my GB comparison was of 2008 relative to 2007. I will produce a better comparison of 2008 against the average for 2005/6/7 that will inevitably show Portsmouth’s figures in an even worse light, given that the national falls compared to the 3 year period will be greater.

The total casualty reduction (15%) for the roads within the 20mph speed limits in Portsmouth is consistent with total GB casualty reduction.

**Comment** Only before – **misleadingly – failing to allow for 12% traffic reduction** in the zone but only 1% nationally. If you understand this point you are trying to mislead Councillors, if you do not you should not be in your present position.

Again you are **cherry-picking data,** because you highlight your less bad figures for All casualties but ignore the more important Serious Injuries, which on the correct basis for comparison **rose 14%** compared to national trends, and **KSI which rose 13%.**

**Even matching national figures would in principle fail to justify the £575,000 expense, but much worse figures suggest that it has been an expensive mistake.**

The total pedestrian casualty reduction is 9.1% for Great Britain, which is greater than the 6% for Portsmouth City Council.

**Comment.** **Only if you ignore traffic volume** – adjusting for that, GB would fall 10% but PCC would rise 6% - 16% worse.

It should also be noted that Portsmouth’s KSI results also contribute to the national figures.

**Comment** What an extraordinary statement – and yet again unquantified. PCC KSI was 19 pa, nationally close to 30,000 pa – 1,500 times greater! Do you really believe that it is worth mentioning that “contribution”?

**Claim: The council has claimed % reductions in casualties without adjusting for a 12% fall in traffic**

After referring to the DfT document ‘*Tomorrows Roads Safer for Everyone*’ our casualty reduction targets were set independently of traffic growth data, therefore are not related and do not depend upon fluctuations in traffic flows within the area.

**Comment Perhaps the most ludicrous statement in the entire document!** Again *reductio ad absurdum* comes to the rescue - why not put up "Road Closed" signs, **set a target of zero road casualties – and achieve it?**

Weasel words again – I am discussing **results**, you slide sideways to **targets**. You are free to define your targets any way you like – including assuming zero change in traffic volume – but **assessment of results necessarily involves traffic volume. To fail to do so, in the context of a 12% fall in traffic – and to persist in failing to do so after the error has been pointed out is seriously dishonest or incompetent or both.**

No one can sensibly deny that in normal circumstances more traffic leads to more accidents, other things being equal, or that less traffic automatically leads to fewer accidents. **Claiming 15% casualty reduction without adjusting the figure for a 12% fall in traffic is seriously misleading, that you persist even now in repeating and seeking to justify it suggests that it is deliberately misleading. Do you not understand that the cover-up always turns out to be worse than the original problem?**

What the total figures suggest – to the extent that they mean anything - is that these accidents have not been eliminated but simply shunted off to roads outside the zone – but **the SI and KSI figures imply a worsening record too**, i.e. the same casualty rate despite a 12% fall in traffic. Can anyone seriously believe that this does not represent failure?

**Idris Francis 01730 829 416 irfrancis@onetel.com**