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To All Hampshire Councillors, and others.

Dear Councillors and others.

This email is intended to update information provided in earlier emails - the numbers in square brackets relate to copies web site page <http://www.fightbackwithfacts.com/portsmouths-20mph-area/>

Previous emails

8th of September [20] pointing out that serious injuries (SI) had risen, not fallen in Portsmouth's 20mph area in the first two years of the scheme,

20th September [21] Response from Cllr. Kendal

20th September [22] My detailed reply to Cllr. Kendal's response, pointing out that no attention seemed to have been paid to the possible effect on casualty rates, and other shortcomings of his reply.

16th October [23-27] My email to Cllrs. providing casualty data for 3rd and 4th years in Portsmouth and analysis of the 4 year period, confirming the strong adverse trends for serious injuries.

New from here on:

26th October [28] Reply from Alison Mills, Assistant Service Manager, Traffic Management South, including replies to my FoI questions.

13 December [29] This email, including my response to Ms. Mills, below and as attached:

Dear Ms. Mills

Thank you for your reply of 26th October, I apologise for the long delay in replying - too many problems to keep up with, many but not all related to flawed road safety policies.

My response to your long first paragraph that essentially says that your scheme is so different from Portsmouth's that you will therefore not the same adverse casualty trends, **seems to me to be not credible**, for these reasons:

1/ Cllr. Kendal's reply to me dated 20th September made it clear that **casualty reduction was not an objective as such**, and that has simply been **assumed** that lower speeds, and therefore lower casualty numbers, would result. Neither it necessarily true.

2/ I doubt that your Council was even aware, when planning the scheme, that **SI had risen in Portsmouth** in the first two years. Whether you were aware of it or not, I can be certain that you were **not aware of the bad 3rd and 4th year results** until I copied them to you in September, because it was only through my persistence that the data was made available, Portsmouth mysteriously having decided not to provide further reports.

3/ For the above reasons, I believe that your Council went ahead with this scheme on the assumption - possibly based on Portsmouth City Council's false claims - that the effects on casualty rates would be benign, but **without bothering to any quantitative analysis to confirm it**. I consider that to be totally unacceptable - the data was out there, why did they not obtain and evaluate it?

4/ It is far from clear to me why you think that the "*defined residential areas*" to which you refer and to which the limits will apply are **materially different in kind** from the clearly residential streets of Portsmouth which represent the majority of their 20 mph area.

5/ I very much doubt that **the mechanisms** - in the scientific sense - **which results in rises in Si when 30mph limits are reduced to 20mph are understood well, if at all**. (Though Continental experiments do suggest that a misplaced sense of lower risk when speeds are in reality little different, and also lower levels of driver concentration both play their part)..

6/ But whether 5 above is right or not, there is no question of anyone understanding how and why these effects differ from one type of urban road to another, as your reply seems to claim.

7/ Of course if I am mistaken, and your planners **did** review data and trends from elsewhere and not simply assume benign effects on casualties, and **did** compare likely adverse effects on your designated roads compared to Portsmouth's please **copy me under FoI all documents relating to any such analysis**.

8/ A young lady I happened to speak to this evening about these schemes told me that her mother lives on one of the estates in question, and that they were both utterly dismissive of them and that nothing would change. For my part, I fear adverse change and rising serious injuries.

9/ "*Residentsto take ownership of the project*". Mumbo-jumbo as far as I am concerned, I am afraid. I have already replied to Cllr Kendal that I am seriously concerned (as indeed is one of your Councillors) about private individuals taking on tasks that properly belong to the Police and I am not in the least reassured by your dismissal of those points. (Incidentally, at least one such volunteer was killed or injured a year or so ago, from memory in Sussex, and I would not like to have my head on the block when a child volunteer is hit).

10/ The first item of interest via the first link you provided is the statement at http://www3.hants.gov.uk/getdecisiondocumentfile?item_doc_ID=8636&file=Residential%2020%20Pilot%20Project.pdf&type=pdf

that, "*The DfT has made it clear that it remains the decision of local Councils to decide whether or not to use 20mph schemes following **robust cost-benefit [estimates] of any such proposals**" - **yet you tell me that "cost benefit figures are not available"**. I am much irritated by that weasel-worded phrase, as if cost / benefit figures just happen to available, or not, rather than being a clear choice. In plain terms it means:*

"Although the DfT told us to use robust cost-benefit analysis, we chose not to do none at all and we have decided to spend hundreds of thousands of pounds of taxpayers' money with no idea what tangible returns will result but hope that voters will be pleased that we are doing something."

I am not impressed. Indeed, anyone who behaved in that way in a private business would soon find himself analysing the relative cost-benefit of walking or driving to the Job Centre.

11/ The second is the DfT's statement that:

"It is recommended that five residential areas be selected for the pilot programme as this would achieve a suitable balance between having a sufficient number of sites to be able to establish their effectiveness"

Well, as Professor Joad might have said on "The Brains Trust" many years ago, "***It all depends what you mean by effectiveness***". What is beyond dispute is that accident rates in those five small areas can never be statistically meaningful (especially for five times smaller serious accident numbers compared to slight), because of the many other factors such as random chance, regression to the mean and national trends which inevitably affect the results.

12/ The third is:

"5.1 Before and After speed measurements should be taken in a sample of the roads in each area in order to assess the success of the 20mph speed limits."

My first comment is that it the **speed measurements**, necessarily only as occasional samples on some roads but not all, **will by no means be reliable** or meaningful, given how small the changes brought about by the new limits are. likely to be. Even if sufficient sample readings have been taken before implementation - have they?- future readings might also be affected by factors such as weather, season, local conditions etc.

My second comment here is that experience in Portsmouth shows (see my detailed analysis in my emails [1] and [2] to PCC) shows that while the **average speed is unlikely to change by more than 1mph or so, speeds will fall significantly on some roads but will also rise significantly on other roads**. The problem here is that no one **knows whether the increases cause more extra accidents than the lower speeds eliminate** (though in my view they logically would). Incidentally, another factor in speed changes is likely to the recession and rising cost of fuel, influencing some drivers to drive more slowly and arguably reducing themileages of young men who tend to drive faster.

There is also a well known correlation between road accident trends and the state of any economy (drivers being more careful in a recession)

Another problem is of course that as you are highly unlikely to measure speeds on all roads, **your choice of roads on which to measure speeds might well skew the results one way or the other**.

13/ You claim that ***"measures of success are outlined in the report"***. Not that I can see, or not in any meaningful sense.

Your documents state, in terms, that ***"Success of the scheme will be assessed on changes in speed"*** but nowhere do I see any indication **whatever of what degree of change will confirm success**. Would it not be best decided before rather than after the event? As an engineer for 50 years, well used to measuring parameters of all kinds, I find this curious and perhaps significant.

In any case, what measure will be used? Average? Median? 8th percentile? And how will you determine success or failure when you find that speeds have **risen on some roads** (as happened in Portsmouth and Cambridge) but **fallen on others?** (Incidentally, it was realised many years ago that lower speed limits can lead to higher speeds, because some drivers who willingly obey a limit they believe to be appropriate, ignore unrealistically low limits and then decide they might as well be hanged for a sheep as well as a lamb - and break the original limit too). What will your planners and Cllrs say to residents on those faster roads? ***"Sorry it's now worse, but bear in mind it's better somewhere else?"***

14/ The same document states that;

"5.2 Public perception will be the most important measure of success. Therefore additional surveys with local residents will be required following the introduction of the schemes."

I see. Public perception - largely based as it is on subjective assessments of noise, vibration and speeds with a touch of propaganda thrown in, will be more important than - say - **increases in serious injuries?** Will it really? How many broken limbs will be outweighed by less vibration?

15/ ***"Evidence suggests that in residential streets, and in town centres where there is likely to be a conflict between vehicles and pedestrians, carefully implemented 20 mph zones can contribute to an improvement in road safety.."***

As I have demonstrated in detail, there is clear evidence that it **leads to more** serious injuries than would otherwise occur.

16/ I note the **emphasis on public opinion**. It is an unfortunate fact of life in any democracy that politicians feel it necessary to take into account the opinions of often uninformed or ill-informed members of the public - something which would never be contemplated in serious safety engineering, for example. What often makes things worse is that those who claim to be reporting public opinion have often put considerable effort into propaganda addressed to that same public, so that the opinions they report are little more than their own, reflected back, to justify their doing what they wanted to do in the first place.

(My late uncle demonstrated to me how most people tend to answer "Yes". He would drive alongside a kerb and ask a passer-by "Is this the right way?" and they would almost always confirm that it was - without knowing where my uncle wanted to go. This is of course well known to pollsters and those who devise referendums, in that a question carefully phrased so that the answer the questioner wants is "Yes" has a significant built-in advantage.)

Summary

It seems to me that your Council has embarked on these schemes largely in response to supposed public demand (much of it influenced by the ill-informed and suspect ~"20'sPlenty" campaign) on the assumption that speeds will fall and that any effect on casualties would be benign.

Unfortunately although there is ample evidence that 20mph limits can lead to increased speeds at least on some roads, trivial changes in average speeds and serious increases in serious injuries, you appear to have made no effort to find and check that evidence.

Although you may not have been aware until I told you in September that Portsmouth Council's claims, aided and abetted by Atkins and the DfT, were very seriously misleading, all Councillors did know prior to the September decision to go ahead. In the circumstances I think that decision both unfortunate and inexplicable.

Your Council has made no attempt to estimate cost - benefit ratios despite being required by the DfT to do so and has instead stated that success or otherwise is to be based (a) on public opinion (despite most members of the public knowing little about the issues other than the propaganda to which they have been and no doubt will again be subjected) and (b) on small changes in average speeds likely to be within the range of random statistical error.

You have stated that speed reduction will be one measure of the success or otherwise of the scheme, but have not explained what measure(s) of speed you will use or what levels of change will indicate success, Or explained how you will deal with speeds falling on some roads but rising on others.

I believe that you have made a serious mistake and that on the balance of probability serious injury numbers will increase over the next few years - especially relative to those in other non-20mph areas.

I trust therefore that you will put in place with Hampshire Police, if you have not already done so, arrangements by which road casualties in these 20mph areas will be compared on an on-going basis to those of previous years so that changes can be made quickly if casualty trends deteriorate

Yours sincerely

Idris Francis