



Department for Transport

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Dear George

When we met on 16 January to discuss the concerns about speed cameras of your constituent Mr Idris Francis of Sandy Bank, Church Lane, West Meon, Petersfield, Hampshire GU32 1LD, I promised to write to you again about these concerns, and also about the related criticisms he has raised of the numbers we use to underpin our valuations of road accidents and casualties.

Mr Francis has raised a number of concerns about speed cameras with the Department over more than a decade, as official and Ministerial correspondence and also as Freedom of Information requests, to which we have replied to the best of our ability. Over the past year he has asked questions about how speed camera benefits are estimated.

Mr Francis' principal concern is that the National Safety Camera Programme's four-year evaluation report, written by PA Consulting and published in December 2005, fails properly to allow for regression to mean (and other effects) in making claims for the effectiveness of speed cameras. Regression to mean is a phenomenon that can arise where the number of accidents in the period before the installation of a camera is higher than the long-term average for that location.

Section 3.3 of the evaluation report stated that the before and after casualty frequencies could not be directly compared because of the factors other than cameras that also influence the frequency of collisions. A statistical analysis of the data was conducted to estimate the effect of the introduction of safety cameras on road safety, separating out those parts of the variations in the casualty data that were associated with safety cameras from others that were present in the data (for example the underlying national trend, seasonality, speed limits, etc.) The report's authors noted in 3.3 that while it would be desirable to include some explicit allowance for regression to mean, no reliable method had yet been established for doing so. Their headline figure,

that the numbers of those killed and seriously injured at camera sites fell by 42%, is qualified by the statement that some proportion of the reduction is due to regression to mean but that the reductions attributable to safety cameras would remain substantial after allowing for this. The matter is treated in more detail in Appendix H of the evaluation report.

Mr Francis further notes that this alleged flaw was replicated in the Handbook of Rules and Guidance for the National Safety Camera Programme for England and Wales, also written by PA Consulting, the most recent version of which (for 2006/7) was sent out to camera partnerships in 2005, and in an associated database designed and built by PA Consulting to enable the camera partnerships to supply data to the Department in a standard format. Mr Francis' Freedom of Information request of 16 April 2012, which we discussed when we met, asked for the information issued to the Camera Partnerships to enable them to estimate camera benefit, which is a reference to this handbook and database. I attach a copy of the correspondence and our reply of 1 May.

The database associated with the Handbook was developed by PA Consulting jointly with the Partnerships and included some features they requested, one of which was a 'site effect' calculation based on annualised casualty and collision numbers, which included a 'number avoided' calculation. This was not set out by DfT as the method to calculate effectiveness and in fact the site effect tool was never completed. The Handbook was cancelled in 2007 when the National Safety Camera Programme ceased and DfT no longer required the submission of the monitoring data.

Though DfT was free to distribute the database we do not hold the details of the calculations that sat behind it, which remain with PA Consulting. In answering Mr Francis' Freedom of Information request we contacted PA Consulting who provided the information for the reply.

Mr Francis is concerned that some local camera partnerships (he names Safer Roads Humber, to whom he has repeatedly written) continue to rely on these claims of speed camera benefits. He asks us to admit that the Handbook's method of analysis is wrong and that claims based on that advice must be withdrawn, and demands that DfT instruct all organisations to stop using these claims. DfT has responded that since the end of the National Safety Camera Programme on 31 March 2007, actions relating to enforcement cameras have been a local matter for the Partnerships, where they still exist, or the Police where they do not. With the end in March 2007 of the arrangements whereby Safety Camera Partnerships could recover their costs from revenue raised from fixed penalty notices, the Department has no power to direct the actions of those agencies undertaking enforcement.

Mr Francis also commented on DfT's valuation of road accidents and casualties. The HM Treasury Green Book sets out the principles that should be applied to cost-benefit analysis when appraising policies, programmes and projects. The Green Book specifies that, where possible, costs and benefits should be estimated using market prices but that cost-benefit analysis should also include "costs and benefits for which there is no market price". Therefore cost-benefits analysis should not be narrowly based on purely cash or financial impacts but on a wider measure of economic welfare.

A standard approach to valuing non-market impacts is through stated preference estimates of individuals' willingness to pay for (or willingness to accept) an outcome. The values of prevented fatalities in the Department's guidance are largely based on such stated preference evidence of people's willingness to pay for reductions in the risk of death. Therefore, while it is correct that these are not cash impacts, it is entirely correct for the values of prevented fatalities and injuries to be applied in cost-benefit analysis.

I hope that this provides a full answer to Mr Francis' concerns. I should like to reassure you that we have given him all the information that we can.

Yours ever

A handwritten signature in blue ink, appearing to be 'SH' followed by a stylized flourish.

STEPHEN HAMMOND