

01 May 2012

Complaint 50441 - Safer Road Humber This nonsense has to stop - NOW!

Angela.Dixon@eastriding.gov.uk

**Dear Ms Dixon,**

Your reply arrived as I was about to finalise my formal complaint to the authorities. I will now **delay that complaint until the weekend** in the hope that you and your colleagues will finally accept the irrefutable evidence I provided that your claims of camera benefit are wildly overstated and **confirm to me that they will be withdrawn.**

It is surely significant that **no reply from Ms. Gore or now from you challenges the detailed points I raise** and instead retreat into what used to be known as the Nuremburg Defence "*I was only following orders*". It did not wash then, and will not wash now, because as public servants you have a **statutory duty of care to the public you serve**, and that necessarily means withdrawing **false claims that can only prejudice road safety decisions.** You may or may not be aware that the **statutory duty of care** and a related offence **Misconduct in a Public Office** relate not only to what public officials do, but **also to what they fail to do.** If you believe (though I doubt) - that **blame for the error lies with the DfT** then it is surely your organisation's responsibility to refer the matter to them, not least because any such error is likely to have influenced other organisations to make similar false claims.

#### **Falls in accident and casualty numbers happen without Cameras**

To illustrate my complaint as clearly as possible I attach a reduced version of your Report's spreadsheet, showing only one line for the A165 /Coniston, and only KSI. The same **applies however to all other sites** and All Accidents as well as to KSI. I have also added in Red two columns which your Report failed to show.

**This is what the data tells us:**

**a/ Columns C and D** tell us that the baseline period was **3 years**

**b/ Column I** tells us that the **4 KSI** (Column H) in those **3 years** was an average of **1.33 per year.**

**c/ Columns E and F** tell us that the enforcement period was **6.92 years** (6 years, 11 months)

**d/ Column J** tells us that there were **4 KSI** in the enforcement period of **6.92 years**

**e/ Column K** tells us that the average of the above was **0.58 KSI per year** (4 / 6.92)

**f/ Column L** tells us that the original average **1.33** fell in the later period by **56.63% to 0.58**

**g/ Column M** tells us that the casualties "**avoided**" were **5.22 (see below)**

**h/ Column N** (added in Red) adds the **actual 4 KSI** (Column D) to the "**avoided**" **5.22 KSI** (Column M) to give the total of **9.22 KSI** which **you wrongly assumed would have happened without cameras.**

i/ **Column O** (added) shows the average of that **9.22** (Column N) over the enforcement period of **6.92 years** (Column J) as being **1.33** ( $9.22 / 6.92$ )

**What is significant about that 1.33 figure** - which you chose not to show - is that it is **precisely the same as that of the baseline period average of 1.33** - and that the **same principle applies to every other site in your spread-sheet.**

Please note that I do not challenge the "methodology" (a rather grand name for simple arithmetic) **you used to arrive at your figures** in Columns L and M. Instead **I object to your ludicrous assumption**, confirmed by the titles of those Columns, that **it was your cameras alone that brought about those reductions.** I would not be at all surprised when I see the DfT reply that you have used their recommended arithmetic, **but would be utterly astonished** if they turn out to have recommended that you **claim that all observed falls have been due to your cameras - that is the crux of the matter and one that you can no longer avoid.**

I have already copied to you much detail of other factors which contribute to those falls, so I will only summarise them here:

1/ **Long term trend.** Over the periods in question **national KSI fell by 25%**, and would logically have fallen to a broadly similar extent at your sites too. Indeed, the various national reports, whatever their other failings, do at least adjust for trend, as does Appendix H in the 4th Report.

2/ **Regression to the Mean** or Selection bias. Covered in detail in Appendix H and the later RAC report. Because cameras are installed where there has been a recent history of accidents it is only to be expected that they will subsequently fall back to more normal levels (or in this case to long term trend).

The above two contributing factors have been common ground for analysts for years, yet **Humberside chooses to ignore them altogether.** In case you are still unable to understand them, or lest you continue to deny their importance, I attach also a spread-sheet based on my analysis of 4.7m injury accidents from 1989 to 2007.

**Line 34 for Humberside** shows that the average falls in **2,259 examples of sites** which had suffered at least 4 KSI in 3 years were **46%** (K), **29%** (SI) and **31%** (All) despite (obviously) having **very few cameras installed.** These figures are living proof that casualties fall significantly even without cameras.

### 3/ **Falling traffic volume**

While average national **traffic volume changed little** over the period, your figures show **an overall fall of 5% at your sites** (likely because some drivers choose to avoid cameras). This alone would account for **5% of the observed falls - yet you ignored that effect too.** (Note that those accidents were not "saved" but moved elsewhere as those drivers took their share of accidents with them)

### **Causation Data Also Confirms that Your Claims Are Absurd**

It is in any case **utterly impossible, given the low significance of speeds above limits in causing accidents** (about 5% overall, and even that low figure includes "possible" as well as "likely" and also those where

speeding was not the primary causal factor) that speed cameras to bring about the 40/60/70/100% reductions shown in your spread-sheets. **It is palpable nonsense.**

Do you seriously imagine, for example on the **40mph** A165 /Coniston road, that **no change whatever in the average speed of 40mph**, a reduction in **85th percentile speed only from 48 to 44mph** and a **reduction from 50% to 32% of numbers speeding**, could possibly lead to a **56% reduction in KSI - when only 10% of KSI accidents involve speeding to start with? Do you really?**

### **DfT Valuations**

As if the above gross misrepresentation were not bad enough, your Report goes on to multiply the accident savings you wrongly claim to have brought about by **largely bogus DfT values** - not **costs**. I need not repeat here what I have published elsewhere, for example at <http://www.fightbackwithfacts.com/bogus-dft-values/> but in essence:

a/ **DfT "values"** for pain and suffering avoided are notional, subjective and theoretical - **but not cash that occurs in any ledger known to man**. It is wholly wrong (as the National Audit Office has confirmed) to treat them, as your report implies as if **they represent cash saved for the taxpayer or financial benefit achieved** by your organisation.

(I note in passing that anyone who multiplies suspect data by an estimate, divides the result by a guess times an assumption and then quotes the result to 8 significant figures as in 73,223,760 has little understanding of how **numbers work** and should not be allowed within a mile of public money.)

b. **The DfT's estimates of "lost output"** when someone is unable to work, permanently or temporarily, **are utter tripe because no output is in fact lost!** When one person is unable to work, someone else does it in his place to satisfy demand and one of the most fundamental laws of economics - that **output is determined by demand, not by labour availability!** Does anyone seriously imagine that when a member of staff is injured and unable, temporarily or permanently, to return to work, that others do not step in to do it? With 2.5m unemployed, far more than job vacancies? (In terms of fatalities, that person's loss of output arises only because his share of demand also disappears, on average leaving GDP per head - which is what matters - unchanged).

For both the above reasons and because your **claims for accident reductions achieved are grossly exaggerated, the figures you claim to save the State or the taxpayer are utter rubbish and must be withdrawn, failing which I report you to the Police, local Councillors and MP's, the DfT, Transport Select Committee and the anti-fraud authorities. You have until noon on Saturday.**

Yours faithfully,

**Idris Francis**

**and shortly afterwards after receiving the DfT response:**

**Dear Ms Dixon,**

Only minutes after I sent yesterday's email to you I received the DfT's reply about recommended methods of analysis which confirmed my assessment that this is not a matter of incorrect arithmetic but of your serious misrepresentation of what the numbers mean.

The NSCO Programme Monitoring Handbook of 51 pages (attached) is, I assume, what you follow. It contains a great deal of information but the relevant part being **F. SITE EFFECT** on page 29.

It is clear that you have followed for each site the recommended methods of calculating the actual and % falls in (average annual) casualties and accidents. **Where you have gone badly wrong** (not least because the handbook is badly written and to an extent potentially misleading) **is in claiming that all of the changes are due to camera effect and nothing else.**

I note in passing that what the Manual Table shows simply "**Effect**" (which although potentially misleading, arguably refers to overall effect of more than one factor) your **Report** shows as [Effect of Enforcement on KSI Casualties](#) - on the wholly invalid assumption that cameras alone have brought about these changes

I note in passing that amongst other discrepancies in the **Manual** that concern me are Lines 4 and 11 showing respectively increases from zero to 2 as a 50% increase and from zero to 1 as a 25% increase. Both are of course infinite % increases, and I have to wonder about the competence or motive of anyone who thinks otherwise.

### **Summary to date**

I have **already set out in detail** what any road casualty analysis surely should know - that casualties change in response not only to camera effect but also due to **long term national trend, local trends (road changes, local employment levels etc.) regression to the mean, traffic diversions, inevitably of course, random chance**. It is beyond rational dispute that by crediting cameras with the whole of the recorded falls while ignoring the many other contributory factors **Humberside has very seriously exaggerated whatever** (probably minimal) **benefits its cameras provide.**

Further proof lies of course in **% reductions claimed for cameras being many times greater than the % of accidents that involve (let alone are primarily caused by) speeding**, and despite your cameras far from eliminating all speeding.

For all these reasons your claims are palpable nonsense and **I must again insist that you withdraw them**. If you fail to do so by noon on Saturday I will **on Monday file formal complaints against your organisation and the individuals involved.**

You must also make it clear that, in regard to the **pain and suffering** figures in the DfT's valuations of accidents and casualties, these are hypothetical and notional figures and **in no way represent cash saved in any known ledger** - as the National Audit Office have confirmed.

I accept however that the blame for the "**lost output**" valuations lies with the DfT and its advisers, and that putting an end to that nonsense will have to be pursued with them, with the Transport Select Committee and other authorities.

**Yours faithfully,**

**Idris Francis**

and shortly afterwards

**Dear Ms. Dixon,**

Further to my complaints of false claims, I have now been advised that the responsibilities of organisations such as yours and their employees are also covered by the **2004 Traffic Management Act** (duty to implement measures to reduce incidence of collisions) and/or **Construction Design and Management act 2007** (duty to identify and reduce hazards in use).

Given that I have provided you with more than enough evidence to show that your claims of camera benefit are wildly exaggerated you and your colleagues might wish to read the Act carefully.

**Yours faithfully,**

**Idris Francis**