

# **“ PPP ”**

## **People for Proper Policing in North Wales**

### **Cooking the figures big style ... . Is it corruption or numerical illiteracy?**

The PPP comments... this lengthy report (please persevere for democracy's sake!) opens one's eyes to the reality of government in the UK. So called experts, scientists, accountants and even Engineers are producing the results that the politicians demand to support their politically correct or daft preconceptions whether it be in the hospitals, on the roads, about the environment etc. **The result is, dangerous and deadly, costly chaos.** Road safety is serious but a minor issue compared with our foreign & immigration policies and criminal justice systems. **AND it is still going on...see the correspondence on pp5/6 from Dr Ladyman's successor!**

### **Introduction**

**Department for Transport figures, provided to the House of Commons Transport Select Committee, led to massively erroneous conclusions about the relative cost effectiveness of speed cameras and vehicle activated signs.**

While the Transport Committee claimed that speed cameras were marginally more cost-effective than vehicle activated signs, the truth is **that vehicle activated signs are around 50 times more cost effective than speed cameras.**

Mr Idris Francis noticed the discrepancy and set about:

- Finding out where the errors had come from
- Ensuring that the Transport Committee was aware of the problem
- Discovering that the errors were all originated by Department for Transport
- Discovering that the Transport Committee were, at best, unconcerned.
- Finally issuing formal complaints because the errors will inevitably cause scarce life saving resources to be misdirected with consequent loss of life.

This page provides the story and the document archive for examining the unfolding story in detail.

### **Summary**

15 March 06 Dr. Stephen Ladyman says in oral evidence to the Transport Select Committee

*"One of the things we wanted to deal with was indeed public perception. Our rationale for changing the rules was that it was clear to us that, in certain areas, partnerships had formed which might be minded to look first for a road camera based solution rather than a better and perhaps more cost effective solution."* (pg EV112 Q345. Committee Report)

18th October 06. The report (Pg EV156 Para 18, Q345) quoted the above and the question the Committee had put to Dr. Ladyman in response:

*"Please provide details of the evaluation of different techniques for cutting speed-related road deaths and injuries. Please identify those techniques which have been proven to be more effective in reducing speed-related deaths and injuries than speed cameras. Please include details of cost-benefit analysis to identify which techniques provide the greatest value for money in reducing road deaths and injuries; and a comparison of results from speed cameras and other techniques."*

The report then set out Dr. Ladyman's detailed reply to these questions. In summary, and in the context only of the comparison between cameras and vehicle activated signs, the reply prepared by the DfT and authorised by Dr. Ladyman:

(a) failed even to mention the existence of TRL548, "a large scale trial into vehicle activated signs" which the DfT had itself commissioned and published on 1st Jan 2003.

(b) claimed that,

"For the reasons set out above it is difficult to undertake a direct comparison of the effectiveness of speed reduction measures. Furthermore whilst a number of techniques have been individually evaluated over recent years, these assessments have not generally looked at as value for money or cost benefit matters.

In order to do make any attempt at a meaningful comparison it is necessary to compare like with like. It is not therefore possible to compare the effectiveness of a national programme, such as the national safety camera programme, with a 20 mph zone or vehicle activated sign."

This is of course utter twaddle, because. (i) It is never possible to establish precise comparisons between what would have happened had cameras or signs not been introduced at particular sites. Or (ii) there was however ample evidence available to establish approximate comparisons of benefits of cameras and signs (iii) that direct comparisons of cost effectiveness had not previously been done in no way meant that they could not be done now that they the Committee had asked for them and (iv) when the approximate comparisons show, as they do, that signs are massively more cost effective than cameras, there is no need whatever for precise figures.

Note at this point how very embarrassed the Dr. Ladyman and the DfT would have been. Their reply to the Committee's direct question had revealed, as it could and should have done, that they had been aware at least since January 2003 that signs are indeed massively more cost effective than cameras, but had continued the expansion of the camera scheme while largely ignoring signs.

(c) Having claimed that no comparison was possible, then provided one (pg. EV157 onwards) that

(1) Was based on statistically meaningless low single figure accident reductions of 2.2 and 3.1 pa., despite having data from 1000s of camera sites and at least 61 sign sites.

(2) Used the absolute reduction figures of 2.2 and 3.1 instead of the % reductions – 38% and 100%, thus failing to compensate for the higher accident levels at the camera site.

(3) Quoted the cost of a camera as £7,500 pa, when the real average figure is £50,000 pa (see FOI confirmation below)

(4) Quoted the cost of a sign as £14,000 pa when the real average figure is £1,000 pa (see FOI confirmation below.

(5) Claimed a 12 to 10.6 cost effectiveness advantage for cameras over signs when the real comparison is at least 50 to 1 the other way (see below)

Quoting this bogus comparison, the Committee then stated in its Report (Pg 40 para 117)

"In terms of the value for money, however, the speed camera was shown to be the most cost-effective (the first year rate of return was 12 times the cost, compared to 0.8 and 10.6 respectively" ....and

"A more cost effective measure for reducing speeds and casualties has yet to be introduced. An increase in safety camera coverage would be supported by evidence, as well as public opinion. There are many more sites which meet the existing camera guidelines and more funding should be made available to enable better coverage."

8th November 06 Having been aware of TRL548 and the enormous cost effectiveness of signs over cameras, Idris Francis wrote to every member of the Committee, Dr, Ladyman and Robert Gifford of PACTS, the special adviser to the Committee pointing out that the reports' findings were,

"Grotesquely at odds with the findings of TRL548 which shows the cost effectiveness of signs to be massively greater than speed cameras" and having set out in detail the extraordinary errors in Dr. Ladyman's figures, concluded by saying that, "I bring these facts to your attention in the hope that you will reconsider the report"

On the same day Mr. Francis sent a Freedom of Information request to the DfT seeking to find out where the data in Dr. Ladyman's reply had come from and who had prepared the nonsensical figures.

4th December 06 The chairman of the Committee, **the Hon Gwynneth Dunwoody** (The PPP comments this 'lady' is preconceptions personified!) replied claiming that,

"The Committee does not believe that it has been misled by the Government over the relative cost effectiveness of speed cameras and flashing signs." and **effectively told Mr. Francis not to bother to write again.**

5th December 06 A reply was received from the DfT to the Freedom of Information request confirming that,

"The supplementary memorandum was drafted by officials and cleared by Stephen Ladyman, Minister of State for Transport. This element of the memorandum was drafted by **Department for Transport officials responsible for speed management**" and

"Whilst a number of techniques have been individually evaluated over recent years, including **TRL report 548, Vehicle Activated Signs** – a large scale evaluation, those evaluations do not make comparisons with other speed management measures. Neither do they generally consider value for money or cost benefits. In order for an attempt to be made at comparing the techniques, officials used Appendix A of the Department's A Road Safety Good Practice Guide as the source document."

We see again hear the ludicrous proposition that because no prior attempt had been made to compare cost effectiveness on the basis of large amounts of data that had long been available, it could not be done and that the comparison should instead be made of the statistically meaningless data for only one site!

5th December 07 Not satisfied with the level of detail provided in the above DfT reply Mr. Francis wrote again pointing out the scale of discrepancies and seeking more information.

17th January 07 After a 6 week delay and checking by their lawyers, the DfT then replied again, making Appendix A available for the first time on their web site, but stating that, "The Department does not accept that misleading information was contained in the memorandum" (to the Committee) "and does not therefore intend to take any action of the sort you suggest"

24 January 07 Having finally been able to access Appendix A and find the data quoted by Dr. Ladyman's submission to the Committee Mr. Francis then sent Freedom of Information requests (27th January 07) to Oxfordshire County Council in respect of the speed camera site and Norfolk County Council in respect of the flashing sign site.

26 January 07 Norfolk County Council replied stating that:

"The Felthorpe signs were more straightforward with no weather/temp detection and the cost of £14,000 was for the pair of signs. Again this figure excludes provision of an electricity supply. Running costs of the signs are low; this is particularly true for modern VAS as LEDs have very long life (100,000hrs) and very low power consumption."

This reply confirms that the £14,000 quoted by Dr. Ladyman was for two signs, not one.

29 January 07 In response to a further query Norfolk County Council confirmed that,

"The average budget figure that I currently use for a complete VAS installation at a selected site is £6,000. This comprises £4000 for the sign, £1500 for pole & elec supply and £500 for staff time (we now have staff with a lot of expertise in the siting.....If a commuted sum to cover 10 yrs maintenance and electricity were to be added I would suggest a figure of £2000. Some of the newer smaller VAS mounted on an existing lighting column can cost as little as £3000 total".

This reply confirms that the amortised cost of running a sign over 10 years is rather less than £1,000 pa, not the wholly ludicrous £14,000 implied by Dr. Ladyman.

21 February 07 Mr. Francis emailed the Parliamentary Ombudsman to ask whether he has jurisdiction on this improper conduct by MPs and others (reply received 2nd April, see below)

24 February Oxfordshire County Council replied regarding the speed camera site, stating that, "The cost of £ 7,500 indicated in the Department of Transport's Good Practise Guide for Road Safety was for the camera housing plus setting up a power supply. During the 1990s the housings for the cameras cost approximately £ 6,000..... In 1998 the cameras themselves cost approximately £ 32,000"

This reply alone confirms that Dr. Ladyman's figure of £7,500, and therefore the overall cost effectiveness comparison was wrong by a factor of at least 6 and probably by a factor of 10 allowing for other costs such as police time, fine administration etc. The council has since confirmed that the error occurred at the DfT, not in the figures Oxfordshire provided to the DfT.

The real cost of a flashing sign, sensibly amortised over 10 years being less than £1,000 pa and the real cost of speed cameras being more than £50,000 pa . Fourth annual report into speed camera partnerships, it is clear that Dr. **Ladyman's comparison, £7,500 for a camera but £14,000 for signs is wrong by a factor APPROACHING 100 TIMES.**

19th March 07 Having accumulated this conclusive proof that Dr. Ladyman's comparison, repeated by the Committee in their report, was wildly wrong Mr. Francis wrote again to the Committee, copying that evidence.

20th March 07 The Committee Chairman send a single paragraph reply, making no comment whatever, saying only that a copy had been sent to Clerk to the Committee for their records.

25th March 07 Mr. Francis sent a formal complaint to New Scotland Yard of misfeasance and/or malfeasance in public office against the DfT, Dr, Ladyman, every member of the Committee and Robert Gifford, their special adviser.

02 April 07 Parliamentary Ombudsman replies stating that Mr. Francis' complaint is "undergoing initial investigation" on whether it is within his jurisdiction.

03 April 07 Mr. Francis sent a letter to the Committee advising them that in view of their collective failure to act, formal complaints had been laid against them.

At no time has Dr. Ladyman responded at all to my letters copied to him.

Idris Francis

## Summary

The DfT, having been asked by the Select Committee to provide comparisons in cost effectiveness of alternatives to speed cameras:

- (a) failed to disclose the existence of TRL548.
- (b) claimed that such comparisons were not possible despite having all the necessary information to hand.
- (c) then provided a statistically meaningless comparison based on only two, dissimilar sites.
- (d) failed to realise that **the £14,000 cost was for two VAS and not representative of current costs**
- (e) **quoted a bizarre first year cost of £7,500 for a speed camera, when the real figure was £40,000 plus.**
- (f) failed to compensate for widely different accident levels at the two sites.
- (g) used wholly inappropriate first year costs as the basis for comparison and
- (h) in all these ways transformed what they should have known since 2003 to be a massive cost effectiveness advantage for VAS into a marginal cost effectiveness for speed cameras.**

That Dr. Stephen Ladyman (as the DfT have confirmed) authorised submission of these figures to the Committee, and that the Committee then accepted them, much too important in terms of road safety policy to be ignored – hence this note, following the refusal of both bodies to acknowledge their errors.

It is also, incidentally, rather surprising that neither the Committee in their 264 page report nor Dr. Ladyman in the various DfT submissions ever mentioned the possibility that within months a verdict in favour of the applicants to the European Court of Human Rights over the right to silence in O'Halloran and Francis v UK (Application Nos: 15809/02 and 25624/02) may render S172 1988 RTA and the entire speed camera system inoperable, given that was provide a complete solution to the problems the authorities would then face.

#### Caveat

While it is necessary in this context to compare on a like-for-like basis the reductions in speed, accidents and casualties at camera and sign sites, as reported by the DfT, TRL and Camera Partnerships, nothing in this note should be read as necessarily agreeing that all of those reductions are in reality due to the presence of those cameras or signs, rather than to regression to the mean, pre-existing downward trend or other factors covered in Appendix H of the 4th annual report on Camera Partnerships. However it is clear that the greater the extent to which the notional benefits of cameras or signs should be reduced – sensibly by similar proportions - to allow for such factors, the more important it becomes that the costs involved be minimised.

Jim [Fitzpatrick@dft.gsi.gov.uk](mailto:Fitzpatrick@dft.gsi.gov.uk) 03 MAR 2008

Dear Mr. Francis

#### **Parliamentary Question on the estimated increase in fuel consumption from dedicated daytime running lamps.**

Thank you for your e-mail on the 26 February 2008 commenting on my answer to a parliamentary question on the estimated increase in fuel consumption due to the installation of daytime running lights.

You were correct to question the estimated increase in fuel consumption. The figure given in the answer was mistyped and should have read "about 0.5 per cent and not "about 5 per cent". I can only apologise for this mistake which was due to an **administrative error**.

The figure of 0.5 per cent assumes two dedicated daytime running lamps rated at 21 watts each are fitted and is intended to give a broad indication of the likely increase.

It also assumes that dedicated daytime running lamps are fitted with filament bulbs. Some vehicle manufacturers use LEDs for certain lighting functions which consume much less power. Overtime LED powered daytime running lights will become more common helping to reduce the predicted increase in fuel consumption.

JIM FITZPATRICK

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**03 March**

**Dear Mr. Fitzpatrick,**

**Many thanks for your confirmation that the 5% figure was indeed wrong, and should have been 0.5%. You will understand my concern that a figure which was so self-evidently wrong - at least to an engineer - should have passed in to the public domain not only via Hansard but also via many motoring journalists who surely should have known better! I trust therefore that the DfT will issue a Press Release of equal prominence to the first so that the 5% figure does not become received wisdom by default.**

**Before you do so however I must point out that the 0.5% figure is still too high - my best estimate, as per my previous**

email is about 0.1%. Dare I ask - without formally invoking the Freedom of Information Act - for the calculations on which the 0.5% has been based? Frankly, I do not believe that figure.

However I do agree that, as manufacturers given a few years' notice of the requirement for daytime running lights are likely - I would say certain - to use LEDs, the reality will inevitably be that the effect on fuel consumption and indeed emissions will be so utterly trivial as not be worth considering at all - perhaps equivalent to running with one tyre 2 psi lower than optimum, or an engine very marginally off tune.

What also concerns me however, and what you do not clarify, is at what stage, and where, this error was made. Given that the supposed increase in fuel consumption seems to have been a factor in policy-making not just here but across the EU, to what extent has policy for the whole of the EU been determined even in part by this spurious figure? Where did the error occur - here or in Brussels?

Could earlier proposals that existing cars be required to use sidelights or dipped headlamps in daytime have been abandoned in part due to this inflated estimates of the effects on fuel consumption? I should perhaps add that I recognise arguments both ways on such lights, my concern being only that the decision should be based in facts not fiction.

**FICTION and False assumptions won't save lives**