

4 BROOK END  
WESTON TURVILLE  
AYLESBURY  
BUCKS  
HP22 5RF

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ADRIAN NEIGHBOUR. B.Sc(HONS) MBA

E-mail: [adrienneighbour@gmail.com](mailto:adrienneighbour@gmail.com)

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Rt. Hon Mike Penning MP  
Criminal Justice/Policing Minister  
Home Office  
2 Marsham Street  
London  
**SW1P 4DF**

21<sup>st</sup> January 2016

Dear Mr Penning,

**DEPLOYMENT STRATEGIES**  
**Police Road Safety Speed Camera Schemes**

1. Disappointingly, it is now for the third time now that I write to you requesting a meeting to discuss the evidenced lack of transparency nationally concerning the use and impact of community road safety speed camera schemes and ways in which to improve the same; this despite representations made by my MP on my behalf for such a meeting.
2. My letters to you dated 6<sup>th</sup> November 2015 and 18<sup>th</sup> December 2016 sets out that a requirement on the part of police forces to publish deployment strategies combined with a suggested 'rated performance' methodology in respect of road collision information (as opposed to the publication of raw road collision data) would:
  - (i) Greatly improve public transparency in relation to the use and impact of speed cameras.
  - (ii) Provide an opportunity to evaluate nationally the effectiveness of such schemes and to promote best practice.
  - (iii) Provide an opportunity to ensure a consistent approach in the development of such Deployment Strategies through the adoption of those professional standards set out by the Association of Police Chief Officers (ACPO) and the Dept for Transport, and in so doing would:

ACPO: [http://www.info4u-bucksspeedcameras.co.uk/resources/ACPO\\_HO\\_Speed\\_Enforcement\\_Guidelines\\_2011-2015\\_%282%29.pdf](http://www.info4u-bucksspeedcameras.co.uk/resources/ACPO_HO_Speed_Enforcement_Guidelines_2011-2015_%282%29.pdf)  
(Sections; 6.2 & 9.1)

DfT: <http://www.info4u-bucksspeedcameras.co.uk/resources/postpn218.pdf> (Page 2, Box 2)
  - (iv) Serve as a powerful management tool, acting to drive up performance standards through the adoption of a systematic and integrated approach to road safety *enforcement, education and engineering*, whilst securing value for money in terms of the deployment of scarce and valuable public resources.

In closing, if it is any help I live only a 15 minute car journey from Hemel Hempstead, where coincidentally my mother, who is taking a keen interest in this matter, is a constituent of yours.

I look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized 'A' followed by a series of loops and a final flourish.

**Adrian Neighbour**

cc: Rt.Hon David Lidington MP

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Rt. Hon Mike Penning MP  
Criminal Justice/Policing Minister  
Home Office  
2 Marsham Street  
London  
**SW1P 4DF**

6<sup>th</sup> November 2015

Dear Mr Penning,

**DEPLOYMENT STRATEGIES**  
**Police Road Safety Speed Camera Schemes**

1. I understand that as a Minister within the DfT you were responsible for the introduction of speed camera Deployment Strategies with the aim of promoting transparency and accountability of responsible public bodies.
2. It is in your current capacity as Policing Minister that I write to you requesting a meeting to discuss as a matter of public policy:
  - (i) The 'requirement' of police services in England to publish Deployment Strategies in relation to speed camera schemes.
  - (ii) The nature and content of Deployment Strategies and the case for HMIC to conduct an Independent review.
  - (iii) The adoption nationally of a uniform 'Rated Performance' methodology as a means of 'enriched' public information as opposed to data-dumps.
3. Whilst I have contacted my MP regarding my local police service's stated position of *not intending* to publish a Deployment Strategy, I write to you concerning researched evidence which clearly shows at a national level (England), that a majority of police services are operating speed camera schemes in the absence of any published systematic policy frameworks governing risk and performance management; this contrary to professional guidance as set out in ACPO's Speed Enforcement Policy Guidelines (2011-2015) and DfT guidance governing the systematic location of speed cameras based on road casualty rates (the latter guidance understood to be no longer mandatory as the result of closure of the Hypothecation Scheme ).

[http://www.info4u-bucksspeedcameras.co.uk/resources/ACPO\\_HO\\_Speed\\_Enforcement\\_Guidelines\\_2011-2015\\_%282%29.pdf](http://www.info4u-bucksspeedcameras.co.uk/resources/ACPO_HO_Speed_Enforcement_Guidelines_2011-2015_%282%29.pdf)

<http://www.info4u-bucksspeedcameras.co.uk/resources/postpn218.pdf> (see Box 2, p.2)

As someone like myself with a background in the fire service, you must find troubling the fact that so many schemes nationally fail to demonstrate compliance with current professional policing standards governing speed camera enforcement which are fundamentally rooted in risk and performance management.

4. Clearly, schemes operating without Deployment Strategies militate against the need for public trust and accountability; which would otherwise serve to improve the efficiency, effectiveness and economy of such schemes, whilst ensuring **proper safeguards** are in place in terms of their nature and scope: this against a financial background of a changing funding formula and forthcoming Comprehensive Spending Review.

## **SECTION 1: REQUIREMENT TO PUBLISH**

5. You may recall as a Minister within the DfT you commissioned a working group, which included ACPO, with the aim of improving the transparency and accountability of public bodies in relation to the use and impact of speed cameras, this through a requirement that such bodies publish specified information. (see link, Section 5. Deployment Strategies).

<http://www.info4u-bucksspeedcameras.co.uk/resources/working-group-speed-camera-report.pdf>

6. This Working Group recommended that the police should be '*encouraged*' to publish a Deployment Strategy where local authorities are not contributing to the cost of speed camera enforcement (s.5.5.6).
7. However since the introduction of Police & Crime Commissioners (PCC) it is my understanding that community safety funding previously held by local authorities, now comes under the auspices of PCC's and raises the question as to whether, this does or should, place the police under a 'requirement' to publish Deployment Strategies?

## **SECTION 2: NATURE AND CONTENT OF DEPLOYMENT STRATEGIES**

8. In relation to Deployment Strategies the Working Group's recommendation is, through its broad generality, quite vague (s.5.5.2). By way of securing compliance with ACPO's Speed Enforcement Policy Guidelines (2011-2015), it is suggested that Deployment Strategies should as a matter of course set out the following key principles:
  1. Scheme – setting out **what** (policy) and **how** (systematic procedure/process).
  2. Take into account the need for targeting in order to maximise the potential for scarce police resources and make a substantial contribution to the multi-agency road death and injury reduction effort.
  3. Sets out clear linkages/thresholds between the interventions of enforcement, education and engineering (see para.13).
  4. Pertinent monitoring and evaluation so that costs and benefits can be properly assessed and future decision making enhanced
9. In relation to the nature and content of speed camera Deployment Strategies it is argued that Her Majesty's Inspectorate of Constabulary is best placed to conduct an independent review in order to secure the efficiency, economy and legitimacy of such schemes through uniformity of good practice. From a public interest perspective, given the annual numbers of road fatalities and casualties, the case for such a review is overwhelming and would constitute a legitimate use of the Inspectorate's resources.

### SECTION 3: REQUIREMENT TO PUBLISH INFORMATION

10. There is clearly a distinction between data and information. Whilst police services are required to publish road collision and speed data at camera locations; they appear not to have developed or enriched this data to give clear and easily understood public information as to the impact and use of speed cameras locally.
11. The Parliamentary Office of Science and Technology (Postnote: Number 218, May 2014) in its overview sets out the difficulties of conflicting interpretations of the available data relating to speed camera effectiveness. The principle difficulty arises from regression to mean value and relatively small datasets.

<http://www.info4u-bucksspeedcameras.co.uk/resources/postpn218.pdf> (see Overview)

12. One suggested solution can be seen from my own analysis of Thames Valley Police (TVP) road collision data, which avoids the use of averages through a **Rated Performance** system. This approach based on the 'net cumulative year-on-year change in road collisions over the life-time of a camera' is simple, honest and has the advantage of being easily understood as it reflects both the direction and magnitude of published road collision data over time.

The measured effectiveness of each speed camera has then been rated using the following criteria:

**Good:** Where the net change in recorded collisions is  $\leq (-2)$ .

**Weak / No Change:** Where the net change in recorded collisions is  $\leq 0$  and  $> (-2)$ .

**Poor:** Where the net change in recorded collisions is  $> 0$ .

13. By way of illustration, from the table below which is based on published TVP Scheme data (1992 to 2010), this **Rated Performance** methodology could provide a useful management tool to inform the appropriateness of speed intervention strategies be it enforcement, education or engineering, whilst also acting as a **safeguard** against poorly performing camera sites that yield significant levels of income.


In Buckinghamshire it is clear that performance data for those failing cameras has not been used to inform a systematic approach to multi-agency deployment interventions, such as engineering, where over many years enforcement and education appear to have failed.

Rank	District	Type	Camera Location	Active (Yrs)	Offence rate 2010	Income* 2010	Rated P'rfmce
1	S.Bucks	Mobile	TV2406:North.Orbital.Road, Denham	10	2211	£132,660	Good
2	Wyc	Mobile	TV2329:Holtspur.Lane, High Wycombe	5	1123	£67,380	Weak
3	Ayl	Mobile	TV2131:Tring.Road, Aylesbury	8	1056	£63,360	Poor
4	Ayl	Fixed	TV2110: Elmhurst.Rd Aylesbury	15	1023	£61,380	Poor
5	Ayl	Fixed	TV2117: London.Rd, Buckingham	11	872	£52,320	Good
6	Wyc	Fixed	TV2311: A40 West.Wycombe.Rd, High Wycombe	11	706	£42,360	Poor
7	Ayl	Mobile	TV2137:B4009, Halton	4	680	£40,800	Poor
8	Ayl	Mobile	TV2143:London.Road, Aston Clinton	3	667	£40,020	Weak
9	Wyc	Fixed	TV2302: A4155 Little Marlow.Rd, Marlow	17	643	£38,580	Good
10	Ayl	Mobile	TV2125:Gatehouse.Road, Aylesbury	10	612	£36,720	Weak

14. It is argued that the adoption nationally of a uniform '**Rated Performance**' methodology, whilst providing meaningful public information in an immediate and accessible form, would also serve to overcome the inherent difficulties set out in para.11 above and enable the Home Office and DfT to assess overtime the true impact of speed camera schemes nationally and highlight locally good and bad practice.

I welcome the opportunity to discuss these matters with you in the near future.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'A Neighbour', written in a cursive style.

**Adrian Neighbour**

cc: Rt. Hon David Lidington MP

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Rt. Hon Mike Penning MP  
Criminal Justice/Policing Minister  
Home Office  
2 Marsham Street  
London  
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18<sup>th</sup> December 2015

Dear Mr Penning,

**DEPLOYMENT STRATEGIES**  
**Police Road Safety Speed Camera Schemes**

1. I refer your reply addressed to my MP David Lidington, who wrote to you on my behalf concerning the above matter.
2. Disturbingly, your response falls significantly short of the professional standard I would have expected from a Minister of the State. Your response, presumably prepared by your private office, singularly fails to demonstrate any intellectual grasp or rigour in respect of the issues set out in my letter to you dated 6<sup>th</sup> November 2015 (see attached).

**Again I request a meeting with you at your earliest convenience to discuss the issues raised within sections 2 and 3 of my letter dated 6<sup>th</sup> November 2015.**

3. As Minister for Policing I would respectfully remind you of the seriousness of the issue I raise and would bring to your attention a recent report published jointly by the RAC Foundation and the Parliamentary Advisory Council for Transport Safety, entitled 'Road Safety Since 2010'; which highlights a growing trend nationally in road casualty rates. Could there possibly be a correlation between these worsening road casualty rates and a surveyed (FOI) paucity of police forces that operate to a published Deployment Strategy?
4. I would remind the Minister of the need to ensure 'Value for Money' in relation to such schemes, whilst ensuring proper safeguards are in place regarding income generation; here I would refer you to paragraph 13 of my letter dated 6<sup>th</sup> November 2015.
5. The hyperlinks you refer to in your reply relate to technical manuals covering speed camera boxes, to include an appreciation of the 'Cosine Effect' when positioning speed detection devices. It is clear that the issues set out in my previous letter to you relate to public transparency and accountability of speed camera schemes and would not relate to the physical or technical aspects of road camera devices.
6. As a Minister of State for Transport you are on record as stating the importance and need for greater transparency and accountability in relation to the use of speed cameras and set a mandatory requirement for local authorities to publish Deployment Strategies and under certain circumstances that Police Forces should be '*encouraged*' to publish such strategies.
7. My letter to your dated 6<sup>th</sup> November 2015 raised the question as to whether Police Forces nationally should be mandated to publish Deployment Strategies in relation to Speed Camera Schemes.

8. Your reply serves to highlight several self evident inconsistencies regarding the current policy framework in which local authorities are required to publish a 'joint' Deployment Strategy with the police to reflect local need:

- (i) Consequently, in theory a Police Force with several local authorities within its geographic area would be required to operate under numerous separate and distinct Deployment Strategies. By way of example this would require Thames Valley Police (TVP) to operate under **nine** separate and distinct deployment strategies.
- (ii) In reality and under such circumstances, it is understood that the Police Forces act to determine a 'unified' strategy.
- (iii) The question then arises as to whether one Deployment Strategy published by a police force should replace the need for each local authority in a policing area to publish their 'joint' strategy with the police separately?

I would add here that my own police force (TVP) have been unable to direct me to any published Deployment Strategy and have stated on record that they have 'no current plans' to publish one. To further complicate the issue of accountability, it is understood that Thames Valley Police operate a Joint Roads Policing Unit with Hampshire Constabulary.

- (iv) Under the current policy framework it is not clear what role and responsibilities Police & Crime Commissioners (PCC) have in relation to Deployment Strategies.

It is my understanding that as a matter of local policing policy, PCC's are required to set strategy. It is also my understanding that community safety funding previously held by local authorities, now comes under the auspices of PCC's.

9. **In conclusion, it is argued for the reasons as set out under paragraph 6 above, that Government set out a mandatory policy framework requiring PCC's to publish Speed Camera Deployment Strategies, that whilst set locally, conform to a national standard incorporating Government and professional policing standards as set out in my previous letter dated 6<sup>th</sup> November 2015.**

10. Finally, I have copied this letter to your consistency office in order that you have personal sight and knowledge of the issues raised.

I wait in anticipation of our meeting early in the New Year.

Yours sincerely,



**Adrian Neighbour**

cc: Rt.Hon David Lidington MP