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

6th 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/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 ≤ 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