



Consultation on Traffic Signs (Amendment) Regulations and General Directions (TSGRD) 2010 / Traffic Signs (Temporary Obstructions) (Amendment) Regulations 2010

A response by the English National Park Authorities Association December 2009

General Comments

1. The English National Park Authorities Association (ENPAA) welcomes the opportunity to comment on the Department for Transport's Traffic Signs (Amendment) Regulations and General Directions (TSGRD) 2010 and Traffic Signs (Temporary Obstructions) (Amendment) Regulations 2010. As you will be aware ENPAA exists to provide a collective voice for the nine English National Park Authorities. It is governed by the Chairs of the nine Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs). Any comments submitted by individual National Park Authorities will draw on the specific issues for their particular area.
2. ENPAA is aware that the amendment of the TSGRD is being undertaken in tandem with the Traffic Signs Policy Review being undertaken by the Department for Transport, and is intended to compliment that review. ENPAA welcomes the overall aims of the proposed amendments, and in particular the proposal to reduce the number of traffic signs needing special authorization. This should enable highway authorities to take a more flexible approach in undertaking signage schemes. Similarly we recognise the requirement to align signs with powers conferred by the Traffic Management Act 2004, and the need for other amendments relating to changing British Standards and new enforcement technologies.
3. ENPAA recognises that the Consultation is primarily intended to elicit views on Statutory Instruments and Amendments contained in Annexes A to D of the consultation document, and this document contains our views on these Annexes. However it should be noted that this response is given from the perspective of ENPAA representatives whose authorities are planning authorities but not highway authorities.
4. One of the main concerns expressed by Transport Policy Officers representing National Park Authorities is the urbanization of the countryside by obtrusive and inappropriate signage schemes. Therefore it would be useful if as part of the review of TSGRD, that Highway Authorities were reminded of their duties under Section 62 of the Environment Act (1995), and Section 85 of the Countryside and Rights of Way Act (2000) and encouraged to use a minimalistic approach within protected landscapes such as National Parks and AONBs.

Consultation Document

Part 2: Details of the proposed amendments to the Traffic Signs Regulations

Variable Message Signs

5. Amendment of regulation 58 – Variable Message Signs; the requirement for the whole of the message to be displayed upon a single aspect is recognised, as a method of reducing the distracting effect of a scrolling sign. However, this element does raise a concern with regard to the size of signs that may be required to display such messages. Whilst new technologies such as Vehicle Activated and Variable Message Signs have their merits, they are often much larger than normal road signs, and requiring of passively safe poles. In protected landscapes such as National Parks and AONBs the use of such signage can be extremely visually intrusive, and the requirement for the whole message to be displayed on a single aspect will almost certainly require the signs to be even larger than at present.

Savings

6. The timescales given for the replacement of certain signs do appear to be reasonable on the whole; however, the requirement to replace certain signs within a two year period may place undue financial pressure on highway authorities in the current economic climate.

Part 3: Details of the proposed amendments to the Traffic Signs General Directions

6. Amendment of direction 11 – Repeater Signs, Bullet Point 2, Point of Clarification, the text states that “*Repeater signs for national speed limits (diagram 671) need not be placed along defined short lengths of carriageway*”. Does this relate to short stretches of carriageway within a largely urban / suburban setting between lower speed limited areas? If this is not the case, is there an assumption that there will be a requirement for repeater signs on long sections of rural carriageway where the National Speed Limit is in force? A requirement for national speed limit repeaters on long stretches of rural road, particularly within National Parks and other designated landscapes would be of some concern to ENPAA.

Annex A – The Traffic Signs (Amendment) Regulations and General Directions 2010

7. Schedule 1 (Warning Signs) – Diagrams 530, 531.1, 532.2, 532.3; whilst ENPAA recognise the need for both imperial and metric units to be displayed giving maximum headrooms, the utilisation of two signs may cause confusion. Where possible, the use of one sign to display both metric and imperial units may be easier to read, and require less signage clutter to adequately display the required information, as per Diagram 818.3 (Schedule 4).
8. Schedule 3 (Signs for Railway and Tramway Level Crossings) – Diagram 784.1; the amount of defining information contained on this sign makes it appear cluttered, and reduces its ease of reading.
9. Schedule 4 (Miscellaneous Informatory Signs) – Diagram 818.5; the display of both metric and imperial measurements on the same signs but within two triangles requires quite a large sign, and may be confusing for the driver. The provision of both measurements within one warning triangle might produce a less cluttered and more easily understood sign.
10. Schedule 4 (Miscellaneous Informatory Signs) – Diagram 820A; the requirement of supporting text for this sign makes for a relatively large sign, is there any scope for using the symbol alone – this should be a clearly understood symbol.

11. Schedule 5 (signs for bus, tram and cycle facilities) – Diagrams 960.1 and 960.2; the arrow denoting bicycle contra flow to the one-way order should be of equal size to the one-way arrow. At present the smaller size arrow suggests that cycles have less priority, or should give way to other traffic.

Annex B – Traffic Signs (Temporary Obstructions) (Amendment) Regulations 2010

12. The change of permitted size for temporary “keep right” signs from 900mm to 600mm appears to be a sensible response to the problem of 900mm temporary signs moving due to airflow produced by passing traffic.

Annex C – Additional Proposals

13. Direction 11 – this proposed revision would appear to take a common sense approach to the issue of repeater signs, and might remove anomalies where a speed limit repeater sign appears within 10m of a change in speed limit. It is important that any changes to the direction enable Highway Authorities to feel confident of achieving and enforceable Traffic Order without recourse to repeater sign ‘overkill’.
14. Schedule 19 – the proposed revision to allow all buses operating to a published timetable to make use of bus stop clearways would appear to be a sensible approach.
15. Diagram 2716 – the revision of this sign to allow additional directional information would prove useful to road users following a diversion. However, it is important that there is some degree of consistency, so that road users know what to expect from a diversion sign. The over-provision of information may be as confusing as too little information.
16. Diagram 7283 and 7284 – the use of stacked roundels to show both imperial and metric under these circumstances would appear appropriate, however, the use of a combined roundel such as 7283.1 and 7284.1 might be less confusing.
17. Red VMS Signs Displayed on Police Cars – allowing a 3 year period during which the LED systems on police cars can be changed is a sensible approach, particularly in the current economic climate.

Annex D – Draft Impact Assessment

18. ENPAA has no comment to make regarding Annex D.