

The proposed Traffic Signs (Amendment) Regulations and General Directions 2010

Response to Consultation



This document is the formal response of the Institute of Highway Engineers (IHE) to the above consultation.





It is the result of an appeal for input to its entire membership, with the response moderated and collated by its Traffic Signs Committee, the group responsible for awarding the Professional Certificate in Traffic Sign Design and for running the annual conference on traffic signs. This response also has the approval of the British Parking Association.

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 As from: De Morgan House, 58 Russell Square, London WC1B 4HS
 22 December 2009

We are content that the Traffic Signs (Amendment) Regulations and General Directions 2010 should be implemented as published in the consultation draft, with the following exceptions.

Page	Ref/diag.	Comment
11	s32(3)	<p>We suggest simplifying the proposed text for paragraph 7(2): “where the box junction is at a junction between two or more roads (but not at a roundabout)” to: “where the box junction is not at a roundabout”.</p> <p>Reason: if there is no road junction, the only case where one could be waiting to turn right is into a private access. In our opinion, it would be inconsistent, confusing, difficult to explain to the public, and cause enforcement difficulties to insist that those few motorists needing to turn right into a private access at a box junction (not at a road junction) should wait before the marking. For a long marking it could be dangerous, making the judgement of a suitable gap very tricky so far back from the actual turn, and legally problematic for the driver who changes his mind about the suitability of a gap after entering the marking.</p> <p>Alternatively, the existing TSRGD 2002 wording for Schedule 19 (II), paragraph 7(2) could be retained, as it does not appear to conflict with the proposed new use of box junctions at fire stations, etc.</p>
12	629.1	<p>For consistency, the vehicle length limit should be amongst those for which a new diagram is provided showing, alongside each other, signs with imperial and metric units, with the option to position them vertically.</p>
Insert on p14	7283 & 7284	<p>For consistency, the height and width limits on Schedule 12 signs should also be expressed in both imperial and metric, so</p>

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		<p>diags. 7283 and 7284 should be withdrawn and numerous other diagrams incorporating diag. 7283 modified to include instead diag. 7383.1. Alternatively, these diagrams should be amended to show both imperial and metric roundels (stacked vertically), as proposed in Appendix C.</p>
24 & 27	637.2A & 663.2	<p>The permitted variants for the Restricted Zone entry sign, 663.2, do not allow for the general loading restriction to have different times of operation from that for waiting. But the repeater signs, 637.2A show these times varying. TSM Chapter 3 (13.5) recommends omitting all mention of the loading restriction from the zone entry signs in these circumstances. The existence of the loading restriction and the times for which it applies would then be discernable only from the repeater plates.</p> <p>This does not seem satisfactory, as it would lead to inconsistency between the signing of loading restrictions at different Restricted Zones. We therefore recommend that permitted variants be added to diagram 663.2 allowing the times of the loading restriction to be specified independently of those for the waiting restriction:</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;">  <p>Version A (for use where only loading bays are provided)</p> </div> <div style="text-align: center;">  <p>Version B (for use where bays permit both parking and loading)</p> </div> </div> <p>We recognise that CPZ entry signs omit the details of a loading restriction that has different operational times from that of the waiting restriction. However, there are two important differences that make this an unsuitable precedent for Restricted Zone signing:</p> <ol style="list-style-type: none"> 1. A loading restriction within a CPZ (but omitted from its entry signs) will be marked with kerb blips and vertical signs in exactly the same manner as such a restriction outside a CPZ. Therefore the road user is not

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		<p>disadvantaged in any way by this omission from the entry signs.</p> <p>2. A Restricted Zone loading restriction is a blanket restriction on the whole area (except where marked otherwise), but in a CPZ a loading restriction is likely to be of limited extent: probably only at obstructive positions and on heavily trafficked roads.</p>
24	637.2A	<p>It will frequently be the case that the times of enforcement in a Restricted Zone are identical for waiting and for loading. In these cases, a simplified repeater plate would be desirable to avoid the need to repeat the operational times, thereby reducing the sign area. We propose Version B below in these circumstances (but possibly with a yellow background to the words <i>No loading</i>, for consistency with diags. 636.1 & 640.1):</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;">  <p>Version A (as proposed in draft 2010 Amendment Regs, varied to show times from diag. 663.2)</p> </div> <div style="text-align: center;">  <p>Version B, for use where waiting and loading are prohibited during the same hours.</p> </div> </div>
26	660.8	<p>The new regulatory sign for car club requires a shade of light blue that may be difficult to achieve using normal traffic sign manufacturing techniques and which is not covered by EN 12899-1. We strongly recommend that the colour of this symbol be changed to 'standard' blue, for the reasons below.</p> <div style="display: flex; justify-content: space-around; align-items: center; text-align: center;"> <div data-bbox="565 1394 922 1751">  <p>Approximate symbol colour in draft amendment regulations</p> </div> <div data-bbox="954 1394 1312 1751">  <p>Standard blue is much preferred</p> </div> </div> <p>The use of a non-standard colour obviously adds cost and uncertainty at various stages of the design and manufacturing process, including the difficulty of ensuring that the Regulations</p>

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		<p>themselves give an accurate rendition of it.</p> <p>Another problem is enforcement. Arguably road users will be able to appeal to an adjudicator on the basis that the shade of blue is not right (or possibly has faded since the sign was erected).</p> <p>As chromaticity and luminance for only one shade of blue currently exists in EN 12899-1:2007, the DfT would need to provide the colour specification of the new colour. We suggest that the Pantone system would not be an appropriate way to do this, as (a) it a proprietary system of one company (and competing colour matching systems are available), (b) it was designed for printed reproduction on paper and similar materials and is not appropriate for sign manufacturing processes, and (c) it would be inconsistent with the chromaticity and luminance specification used in EN 12899-1 for the standard colours.</p> <p>The two main suppliers of software for UK traffic sign design Buchanan Computing and Key Traffic Systems are both of the view that providing the additional colour within their software would be undesirable. There are two particular disbenefits:</p> <ol style="list-style-type: none"> 1. The time and cost involved would detract from the ability to provide other enhancements to the software; 2. There is a danger that inexperienced users might select the new colour inappropriately (for signs other than car club), leading to more cases of incorrect traffic signs appearing on the highway. <p>The two trade bodies for traffic sign manufacture: ARTSM and LASMA are also against the proposal to introduce an additional colour, and the Chair of the relevant British Standards Committee (B509/3) has pointed out that pale colours are particularly subject to fading and have not been tested to BS EN 12899 for longevity.</p> <p>The introduction of a new colour might cause a demand for or expectation of further new colours on traffic signs in the future, whereas the precedent has already been set with the ParkMark symbol that a standard colour should be used on traffic signs even though the owner of the symbol (British Parking Association) would have preferred a lighter colour to correspond with the shade used on their own publicity and on signs within car parks.</p>
49	2505	<p>Item 4: change: “7. Tourist information “i”” to: “7. The “i” symbol” Reason: to help resolve the contradiction that exists in TSRGD 2002 between diags. 2502 and 2505 regarding the meaning of a black “i” symbol on a parking sign. Diag. 2502 states that the</p>

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		black “i” is for general (not tourist) information, whereas diag. 2505 (and in consequence of Schedule 16 item 34 (5) most directional signs incorporating the “P” symbol) refers to it as “Tourist information”.
51	2601.1	Alignment of mileages should normally occur for the ahead and left directions on a stack-type sign (TSM 7 Fig 4-11). We suggest the “½” is moved as far as possible to the right without making the sign wider than it currently is.
52	2602.1 (and variants of 2601.1, 2608)	<p>For journey times to be useful, there needs to be national consistency on how these are calculated for different surfaces, gradients, etc, so DFT guidance will be essential if this sign is introduced. We suggest that distances are more helpful to most cyclists and pedestrians, so that time (where given) should be additional to distance rather than replacing it.</p> <p>For longer distances in particular, the variation in the walking or cycling speed of different road users will make the indication of journey time less useful or even misleading. We suggest that, for this reason, this sign should not be permitted to indicate a journey time in excess of 30 minutes.</p>
82	Direction 16(3)	<p>In areas where the demand for parking by permit holders is high, it is likely to significantly reduce the usefulness of the new PPA (permit parking area) if a disabled bay cannot be marked within one. It could mean that a disabled person moving into such a road (or a person already living there becoming disabled) could require the whole PPA to be removed and replaced with conventional signs and markings.</p> <p>It is noted that a double yellow line is permitted within a PPA, a provision that we support (to allow for PPA parking on one side only of a narrow road, for example), but that this might usefully be extended to single yellow lines and loading blips that apply for at least the period of operation of the PPA.</p> <p>The list of markings that cannot be used within a PPA therefore seems unnecessarily restrictive. The essential point is that any unmarked carriageway is subject to PPA restrictions (in much the same manner as for a Restricted Zone, but with no public parking available anywhere within the PPA during its times of operation).</p>
84	Direction 44A	We recommend adding diagrams 7016 and 7019 to the list of signs that may be mounted on a traffic signal pole.

Page	Ref/diag.	Comment
Insert on p 84	-	Direction 42(b) of TSRGD 2002. We suggest that this opportunity is taken to make clear that any labels, lettering, etc. on the back of a traffic sign must not be retroreflective. This paragraph needs to be amended anyway to remove the reference to the superseded standard BS 873.

Appendix C Additional Proposals

We are content that these additional proposals should be implemented, with the provisos listed below.

Direction 11

We agree that the law needs clarifying to permit authorities to have considerable flexibility in the positioning and spacing of repeaters. We would suggest that any provision regarding placing repeaters on alternate sides of the road should be advisory rather than mandatory, as there may be lengths of road for which it is impractical, or where additional posts might be required in street lit areas. Particular provision may need to be made for dual carriageways where lamp columns are likely to be either all on the nearside verge or all on the central reservation, so mounting signs on alternate sides of the carriageway would be impractical.

Diagrams 7283 and 7284

This proposal has merit, but would result in signs to TSRGD 2002 diagrams 629 and 629.2 being retained only for use on temporary Schedule 12 signs. As a result, such roundels might over time become less familiar and less easily recognised by drivers.

The proposed Traffic Signs (Temporary Obstructions) (Amendment) Regulations 2010

We are content that these regulations should be implemented as published.