

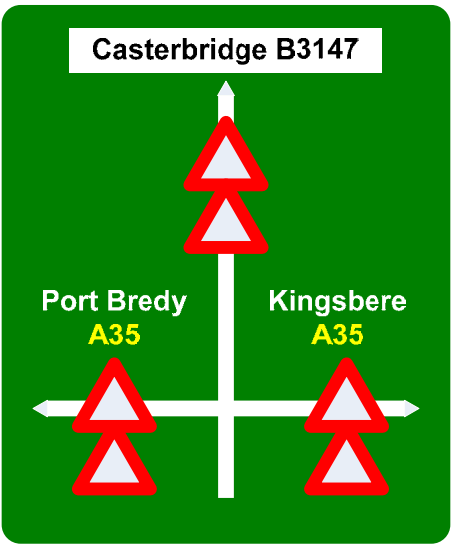
Q	Consultee response	No.	comments	comments
1	<p>Given that repeater signing is there to remind drivers of a limit of speed.</p> <p>The changes to Direction 11 (2) are interesting. It may be a done deal but, there will be a number of locations where traffic will enter a network of roads - an estate, where the roads may well be short and the route, given the content of this amendment, may not be signed.</p> <p>My concerns are quite obvious, some 'rural' village roads are unlit, two or three unlit linked roads may well be 200 metres or so long, leading into another 'unlit' road, the question would be, where would the repeater be required even if that road was more than 200 metres long.</p> <p>Consequence, drivers may well presume on an unlit road without repeater signing the 30 mph limit did not apply, in the absence of signing to the contrary they may assume that the national speed limit applies and emerging from the 'estate' may well find themselves subject to enforcement.</p> <p>Not all vehicles are driven by one driver, crews change. Not all drivers attending a location are familiar with it. After all, signing is intended to provide guidance.</p> <p>I understand the concept but I anticipate the pitfalls and excuses. It should create quite an interesting time</p>	8	<p>1st e-mail - This is another direction 11 issue which we can discuss. I think the situation that is describing is unusual. Once the length of the unlit road falls below 183m, it will be within a system of street lighting and repeaters are not required anyway. Once the length is over 200m, a repeater sign is required. appears to be describing a 200m unit road joining another 200m unlit road so that a driver travels more than 200m without seeing a repeater sign. The unlit section could commence at the beginning of the speed limit, hence there would be a 30mph terminal sign. If the unlit section commences at the end of a lit section also subject to 30mph, then there is the problem of a driver not seeing a sign, but is it a problem? If any speed limit (not necessarily 30mph) commences in a side road , say, 100m before a junction, and the major road has the same speed limit, it is possible that a driver could travel more than the distance shown in table 14-4 before seeing the first repeater sign (on the major road) as it is unlikely that there would be a repeater sign in the side road where the length of road subject to the speed limit is only 100m. To ensure that no driver travels further than the recommended distances between terminal sign and the first repeater, or between two consecutive repeaters, the distances in table 14-4 would have to apply to a route rather than to a road. The same would have to apply to the proposed distance in direction 11 where repeaters are not required. Do we want to do this?</p>	Any consideration of Direction 11 and Schedule 19 will be deferred until later.
1	<p>Thank you for acknowledging my comments, they were short and deliberately not case specific. If you feel them anecdotal and not reflective of the facts, I can provide case specific examples given that many local authorities: Have only put up one repeater on mile long limits.</p> <p>Put up no repeater signs on roads they deem 'not to need them' because of their geometry.</p> <p>Erect no repeater signs in compliance with Direction 5, oh and also provide no terminal signs as they feel they are an excessive waste of public money.</p> <p>Refuse to light terminal signs because of costs. Refuse to replace signs that had to be removed by 1972 (flat top 3 30 mph terminal sign) because courts convict anyway. Fail to repeater sign national limits on lit roads. Nationally (671) repeat lit roads subject to restricted road status My comments reflect the fact that the distances set by the DfT will obviously be exceeded as many authorities just treat your legislative work as 'guidance'.</p> <p>Lets not forget, the Regulations are only a guidance document for the information of wise men and blind obedience of fools' (a quote applied to signing more than once).</p> <p>I just love the way excuses are raining down at the moment. What everyone is being asked to forget is that the term 'ignorance of the law is no defence' only applies to Statute Law, the new exception being - except if you are a driver. With no legal aid, no cost recovery, I suspect we will all soon know or be closely related to people with criminal convictions applied by trial by cheque book and spin.</p> <p>But, as I keep saying, whilst I am being seen as a pain to your Department, my job, as I see it is to provide an honest brokerage with absolute loyalty to the assistance of the courts, not to misquote the law and requirements to suite a purpose. I will leave that to 'others'.</p>	8	<p>2nd e-mail - I would just like to remind everyone (not that I need to) that speed limit signs come under section 85 of the RTRA. This is drawn to the attention of traffic authorities in para 14.1 of Chapter 3.</p>	

	<p>The Crown and RSS Ltd has, and continually tries, to convince courts that signing assumptions do not just apply to Reg 10 signs and their witnesses so often state that 'any' signing will give adequate guidance this intended relaxation should assist their criminal conviction rates.</p> <p>Oh, and by way of a comment, a recent Crown expert witness recently said words to the effect that: It is not a non-prescribed sign, it is just a prescribed sign without a lighting unit and even if it was non-prescribed it is clearly recognisable and as such in my opinion will give a driver adequate guidance.</p> <p>The prosecutor was also at pains to point out it is for the defence to 'prove' a sign is none prescribed, which as you know involves your organisation - not something you as a body contribute comment upon or assist the public with understanding.</p> <p>However, I did find it amusing that the special case prosecutor for the CPS stated, being a qualified lawyer that section 36 RTA 1988 applied to all signs and to say otherwise I was misleading the Court.</p> <p>Sadly for him, he was corrected in open court, mid trial by both the defence solicitor and Court Advisor, section 36 (as we all know) only applies to specific signs in Reg 10 and those giving effect to an enactment or Local Act, neither of which applies to restrictions imposed by a TRO.</p> <p>I realise these points may frustrate many, including many within or linked to your organisation but, with changes in law proposed, who knows, maybe that will be modified too.</p> <p>Until then, I will continue to assist with regard to the facts and the actual requirements and leave the spin and misdirection to others.</p>			
1	<p>I agree with your comments on the pedantic interpretation of the phrase ‘regular intervals’ which has caused confusion at court.</p> <p>I would suggest not only the word ‘regular’, which some have argued suggests exactly equal, but also that the word ‘intervals’, not interval (singular), suggests that there must be at least three repeater signs along any length of road in order that there are intervals between them. The argument is that because having only one repeater sign means that there is no interval, having two repeater signs means that there is one interval (singular) and therefore, the only way to have intervals(plural) between repeater signs is to have at least three. I would suggest that this is a ridiculous situation which would result in a length of road subject to a 20mph speed limit which is 201m long having 3 pair of repeater signs along its length whereas the proposal in the draft TSRDG (amendment of Direction 11 page 78,79) is for a length of road shorter than 200m (199m for example) with the same speed limit having no repeater signs at all.</p> <p>May I respectfully suggest that the phrase ‘appropriate spacing’ or just ‘appropriately’ be used instead?</p> <p>We have table 14.4 in Chapter 3 of the Traffic Signs Manual to refer to for the guidance of the spacing and in fact ‘spacing’ is the word used in that Chapter to describe the intervals.</p> <p>Could I also ask you to be aware of the use elsewhere of the phrase ‘regular intervals’ or ‘intervals’ which would also require amending - In direction 11.5 TSRDG 2002, the Traffic Signs (Amendment) General Directions 2008 (Direction5) and in the draft 2010 TSRDG page 79 Para8 (amendment of direction 11) sub para (8)(a),(b) and (9).</p> <p>Could I suggest that these sub sections and those parts of direction 5 TSRDG 2008 would not be required if the phrase ‘regular intervals’ is removed completely from direction 11, and that the inclusion of these sub sections reinforces the suggestion that regular means precise by excusing signs that are not precisely a set distance apart. I would point out that the inclusion of the exceptions in the Traffic Signs (Amendment) General Directions 2008 (Direction5) ‘... even if such an additional sign affects the regular intervals....’ has already been used to suggest that there <u>is</u> a pedantic requirement in the phrase ‘regular intervals’</p>	11	<p>I have covered most of the points raised here in my own TSRGD comments (comment (26)). With regard to direction 11, I am of the view that the amendment should be a complete substitution of the direction rather than amendments and additions relating to individual paragraphs. We are going to discuss the amendments further. With regard to street lights mounted on electricity poles (they are not normally telegraph poles), there is also the problem of lights mounted on buildings etc. The problem is that we can’t change the definition of a restricted road in the RTRA and we would have to be very careful if we changed the definition of street lighting in the TSRGD (e.g. to “street lighting mounted on columns provide specifically for that purpose”) to ensure correct interpretation. Traffic authorities would then be required to provide additional 30mph repeater signs as appropriate. This would impose an extra burden and would require consultation. I’m not even sure that this would be a good idea anyway. There is one possible solution to this problem and to providing reminders generally of a 30mph speed limit, and that is to allow the road marking roundel to be used on its own at the discretion of the traffic authority (similar to allowing upright signs indicating permit parking within a permit parking area). This could be done, I think, by amending the entry in column (1) of item 18 in table 1 in direction 18(1) to “1065 (other than when indicating a speed limit of 30 miles per hour)”. I seem to recall that I have suggested this before and that it didn’t go down too well. This is possibly something for the Traffic Signs Review.</p>	
1	<p>Direction 11 - Clear and regular signage is essential to overcome this issue envisaged. Why not continue to use the word 'regular' and add the words 'and after every junction'. To remove the word 'regular' implies irregular. An example of the above is on bus lanes where signs should be placed every 300 metres (max) plus after each junction.</p>	13	<p>Direction 11 has come up again, but retaining the word “regular” is likely to cause problems of interpretation. We will, of course, be discussing direction 11.</p>	
1	<p>Schedule 19 - The consultation proposes to allow non-local bus services operating to a published timetable to</p>	16	<p>Schedule 19 - we do need to look at this again. I think we have</p>	

	<p>use bus stops, in addition to the current facility of only allowing local buses to use the stop. We request that the DfT adopt a new definition of local bus in London which restricts use of stops in London to buses that form part of the Transport for London bus network and specifically excludes tourist buses parking at bus stops when not dropping off or picking up passengers. A more stringent definition of “local bus”, will enable the Council to locate stopping places for other bus services, such as long distance coaches, airport buses and tourist buses, at appropriate locations taking into account local need and the impact on traffic congestion.</p> <p>Diagrams 7283 and 7284 – Whilst the consultation has noted that putting both imperial and metric units on triangular signs is not feasible, we believe we should be given the option of using one larger sign rather than having to use two signs.</p>		<p>authorised signs (not necessarily bus stops) with the legend “TfL buses” or similar. However, are there any local buses in London that are not TfL operated?. If I have read the Transport Act 1985 correctly, a local service is one where stopping places (bus stops) are less than 15 miles apart. I presume that the proposed amendment to allow buses operating to a published timetable will allow long distance service buses that travel more than 15 miles between towns without stopping to use bus stop clearways. If “except local buses” is not appropriate to London, then I suppose we could authorise “except TfL buses”, but do we want to prescribe this in the Amendment TSRGD 2010? Probably not (although we do prescribe informative TfL bus stop signs as diagrams 973.2 and 973.3). I don’t think we should change the definition of “local bus” - it has implications for existing signs and for bus lanes etc.</p> <p>Diagrams 7283 and 7284 - I don’t understand this comment or rather I don’t think [REDACTED] understood the proposal. The idea is to reduce the width of the sign, so larger signs are not appropriate (in any case, if larger signs are OK then diagrams 7283.1 and 7284.1 would be used). Triangular signs haven’t been proposed.</p>	<p>It was agreed that diag 7283 and 7284 issues will be reviewed separately by [REDACTED] and [REDACTED] with [REDACTED]</p>
1	<p><u>Diagrams 7283 & 7284.</u> Use of these diagrams should be discontinued. Account must be taken of the fact that vehicle manufacturers state the dimensions of their products metric measures. I drive a car 1.93 m wide. I am bemused as to why I cannot correlate this information to that given on signage through road works. The safety argument applied to changing diagrams 629 and 629.2 can equally be applied to 7283 and 7284. The argument that using 7283/1 and 7284/1 will increase the weight of the signs, e.g. combination signs as diagram 7201.1, to an unacceptable level can be easily overcome by the use of metric signs only.</p>	18	<p>Diagram 7283 and 7284 - I think we do need to draw up signs showing the two roundels just to see the effect on the height of the sign. I will be amending diagrams 7201 etc. At the end of the day it is the HA that is affected the most by this change (motorways and dual carriageway roads), but there are local authorities with some high speed dual carriageway roads (and even motorways). We will need to discuss this with the HA and consider the following possibilities:</p> <p>(1) no change to the TSRGD 2002.</p> <p>(2) remove 7283 and 7284 altogether (consistent with permanent signing).</p> <p>(3) add the metric symbol to the imperial symbol as proposed with the option to show imperial only.</p> <p>(4) add the metric symbol to the imperial symbol as proposed without the option to show imperial only.</p> <p>(4) (5) add the metric symbol to the imperial symbol as proposed with or without the option to show imperial only and to remove diagrams 7283.1 and 7284.1 so that we have a consistent method of showing dual widths and heights on road works signs.</p>	
1	<p>Direction 11</p> <p>We suggest that requiring repeater signs for diagrams 956 & 957 is excessive in some circumstances. For instance, repeater signs would not be necessary for segregated or shared use facilities where these are in rural areas alongside main roads, or along a shared use cycle track through a park. Repeater signs in these</p>	27	<p>Diagrams 956 and 957 - the regulatory purpose of these signs is to prohibit motor vehicles. However, they are probably more useful as reminders to pedestrians that a footway is also used by cyclists. The road marking to diagram 1057 is also used as a repeater, but is not included in direction 11. Interestingly</p>	

	<p>instances may not be achieving anything more than adding cost and sign clutter.</p> <p>This is particularly true for segregated facilities, where a kerb line or colour/texture change will be present to indicate the presence of cyclists.</p> <p>We propose that the requirement for repeaters with signs to diags 956 & 957 should be relaxed to allow for repeater signs to be provided at the traffic authority's discretion (rather than prescribing repeaters to be provided at regular intervals).</p>		<p>diagram 956 can be used without diagram 1057, but diagram 957 cannot (it has to be used to emphasise which part of the segregated route is for use by cyclists). The draft Chapter 5 states that the road marking to diagram 1057 may be repeated more often than the upright signs. I think we established that as long as there are upright signs along the route, having more road markings still satisfies the requirement that the marking cannot be used without an upright sign (i.e. they do not have to be co-located). When considering direction 11, I think we should make it clear that diagrams 956 and 967 do not have to be provided at regular intervals. Chapter 3, says "regular intervals" without specifying any distance between the signs". The current TSRGD requires terminal signs to be illuminated within an area of street lighting. I think this is unnecessary and is rarely done. Perhaps we should consider amending Schedule 17. This would be a relaxation and allow local authorities the choice of direct illumination or reflectorisation.</p>	
1	<p>Our main comment relates to red VMS signs displayed on police cars.</p> <p>A lead in period of three years for existing signs to be modified or replaced is insufficient time. Most of our vehicles fitted with VMS would have a life of five years and the lightbars will also be re-used.</p> <p>If the assumption is that the message boards are required to comply with Regulations regarding colour, what about the size of the text and the scrolling, it would not be possible to obtain the height of text required either in a roof mounted light bar or mounted in the rear window where visibility would be severely restricted.</p> <p>If the Metropolitan Police were required to change the message matrix boards in all affected vehicles, the cost would be in the region of £30k.</p> <p>All our marked Traffic vehicles have a red rear facing Matrix. They are red because all rear facing vehicle lights must be this colour. To display a white to the rear of a vehicle is an offence and as such a white matrix would be illegal. With reference to amber matrix we believe the suggestion is they are more readable.</p> <p>It should be noted that the current rear facing Red LED matrix also double up as Rear Red illumination. When not displaying a message they can be set to either flash as a block red light, or alternate side to side half block. Both of these options add greatly to the rear visibility of the vehicles. This is particularly relevant under motorway conditions when all blue lights should be switched off leaving only the Rear Reds being used. A rear facing amber matrix would not be able to be used in this way and would therefore detract from the overall visibility of the vehicle.</p>	33	<p>VMS on police cars - no comment.</p>	<p>██████████ to contact ██████████ for confirmation of line to take.</p> <p>██████████ to email the full response from no 33 to ██████████</p>
1	<p>Direction 11 will assist with the enforcement of Civil Parking Enforcement</p> <p>Schedule 19 – this is a worthwhile clarification that will assist us</p> <p>Diagram 2716 – Free text is good news but in Wales this will need to be bilingual.</p> <p>Diagrams 7283 & 7284 are both good suggestions</p> <p>VMS Signs on Police Cars – again this is a good suggestion especially if it improves the visibility of the cars when the message is being displayed</p>	40	<p>Diagram 2716 - I don't think the sign will have free text (legend to suit the circumstances), but specific permitted variants. Bilingual signs will be a matter for WAG.</p>	
1	<p>Stacking of 7263 and 7284 – believe that only one measurement is needed, else exacerbates street clutter, is an additional cost burden and wastes material.</p>	43	<p>Diagram 7283 and 7284 - might need to reconsider this proposal (something that ██████████ has also raised).</p>	
1	<p>Schedule 19 - It is important to distinguish between Buses providing a scheduled service to individual fare paying passengers and buses that are used to provide touring or excursion services (which are often timetabled).</p> <p>Some consideration or a check needs to be made for buses used to provide a service required by Section 104 of the Planning Act (Green Travel Plans) for some new developments, currently a blind eye is turned to these buses using bus stops. These may not be included in the current definition of local service because separate</p>	46	<p>Bus stop clearways - the points raised by ██████████ need to be considered.</p>	

	fares are not always paid. If touring or excursion service buses were able to use Bus stops/stands the bus service timetables would simply not be met and sustainable public transport services could not be maintained, Excursion buses are often timetabled.			
1	Schedule 19 – Whilst the proposal to expand the scope of bus services permitted to use bus stop clearways to include all timetabled buses from using these facilities, we would strongly advocate further relaxation of this regulation to include community transport vehicles also. These vehicles do not generally operate to a fixed timetable, but often replace bus services, particularly in rural areas, as a more cost effective means of delivering accessibility to sparsely populated rural areas. To enhance the efficiency of these services, permission to use bus stop clearways in urban areas would reduce journey time delay and increase the attractiveness of these services as an alternative to the private car, particularly for those who either do not have access to a timetabled bus service, or who are unable to use timetabled bus services due to mobility reasons	47	Bus stop clearways - as there is increasing support for allowing other buses into bus stop clearway perhaps we should allow either all buses or local buses to use these and not restrict them the buses using a published timetable. It would then be up to traffic authorities to decide whether a particular bus stop should be used by all buses or just local buses.	
1	The revision of 11 (2) in relation to the word regular is to be welcomed as it will lead to engineering judgement particular to a site. However it must be made plain that signing should be as 'equal' as possible.	48	Direction 11(2) - we will be considering the wording of this to ensure that adequate signing is provided, but it has to be a balance between General Directions and advice in Chapter 3.	
1	This is particularly pertinent with regard to parking, loading and waiting restrictions. The number and spacing of repeater signs should be reviewed, and in most cases a single sign be required for a parking bay of less than 25m (5 car lengths), located anywhere within the designation. For lengths up to 100m a pair of signs located within 25m of each end of the designation is considered appropriate. For longer lengths of parking bay, one additional sign should be required per additional 100m.	51	Direction 11 - we will be considering this.	
1	<p>Since diagrams 629 and 629.2 are to be withdrawn, the road works variants of these signs (including diagrams 7283 and 7284) should also be withdrawn.</p> <p>It would be inconsistent to allow roundel diagrams that are being withdrawn from use on other road signs to still remain in use for road works signs. This is particularly important in motorway contra-flow situations, where foreign lorries travelling in narrow lanes are potentially a major hazard.</p> <p>The suggestion of vertically stacking restriction roundel diagrams on road works signs would add at least 600 mm to the height of the sign. This would make such signs less stable and more likely to be blown down in high winds.</p> <p>The benefit of a reduction of 150 mm on sign width, by not using dual unit roundels, could still be achieved if the regulations were amended to permit the use of clear metric-only roundels.</p>	60	<p>These are mainly metrication issues. I support the following:</p> <p>Diagrams 780A, 780.1A (and, by default, 780.2A) - always show both metric and imperial dimensions.</p> <p>Delete diagram 826.</p> <p>Amend diagrams 7201, 7201.1, 7210, 7212 and 7235 so that they show dual units.</p> <p>Do not show journey times on cycle signs.</p> <p>My other comments are:</p> <p>Diagram 629.1 - this is one to consider and probably for the Traffic Signs Review. We have yet to design a dual sign.</p> <p>Diagrams 7283 and 7284 - we do need to consider whether we should retain imperial only signs. I might need to draw up a the proposed arrangement of two signs (one imperial and one metric) to see what it actually look like.</p> <p>Diagram 7014.1 - the sign with triangles would be much larger than the one that is proposed. I wouldn't change the design.</p> <p>Using symbols on diagram 7014 and "Exception plates" - something to consider in the Traffic Signs Review.</p> <p>Diagram 2711.1 - yards should be used as on any other sign.</p> <p>Driver location signs - we could prescribe these, but they are used mainly on trunk roads and motorways and will have been authorised by the HA, so there is no pressing need.</p>	

1	<p>Diagrams 7283 and 7284</p> <p>Where there are multiple warning triangles on one sign, it is suggested that the red boundaries on pairs of metric and imperial signs actually overlap so that the pairs of triangles appear as a single element. The amount of overlap can be up to the thickness of the red perimeter. This will reduce the number of elements on a signs which might well become over-complicated.</p> <p>The diagram on the right is based on a real road sign close to Haslemere where the available width is at a premium.</p> <p>This might have to be notified to the Vienna Convention on Road Signs, but as the United Kingdom is the only country in Europe to use dual measurements on road signs, this should not be a problem.</p> <p>Symbols for hours and minutes (2602.1)</p> <p>In this diagram the time is written as “1 hr 15 mins”. The EU directive and international convention demands that the symbol for hours is “h” not “hr”, while there should not be a “s” at the end of “mins”.</p> <p>Under international convention, the symbols for hours, minutes and seconds are not mixed. It is suggested that this particular time should be written either as “75 min” or as “1h15 ”, both of which are universally understood and which is more compact. It is further suggested that</p> <ul style="list-style-type: none"> For times up to 90 minutes, either hours or minutes may be used That all the units of measure on a particular sign should be the same – thus on the sign in question, the sign writer would have the option of either writing “Glastonbury 15 min; Wells 75 min” or “Glastonbury 0h15; Wells 1h15”. 		64	<p>More metrication issues. The issue of “min” “mins” might have to be considered if we going allow journey times (what have we authorised?), but my recommendation, of course, is that we now longer proceed with this. We currently use “mins” on parking signs.</p> <p>We will not be overlapping warning triangles on directional signs.</p> <p>As previously stated, I think we should take the opportunity to change “T” to “t”.</p> <p>Supplementary eye level signals at traffic lights - not one for me to comment on.</p>	
1	<p>Appendix C Additional Proposals</p> <p>We are content that these additional proposals should be implemented, with the provisos listed below.</p> <p>Insert on p14 7283 & 7284 For consistency, the height and width limits on Schedule 12 signs should also be expressed in both imperial and metric, so 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> <p>Diagrams 7283 and 7284</p> <p>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.</p> <p>Direction 11</p> <p>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 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.</p>	72	<p>Diagram 7283 and 7284 - we do need to consider whether imperial-only versions should be replaced by the proposed twin signs (metric and imperial) or with drawn altogether. I agree that signs which include diagrams 7283 should be amended to show diagram 7283.1.</p> <p>Direction 11 - these points should be considered when re-drafting direction 11.</p>		
1	Consider Busway -such as Cambridge - Graham Harper can advise further	73	Busway - I don't know how this affects bus stop clearways. If the route is reserved for buses only or is a guided busway, are bus stop clearways required anyway? What is the HA involvement?		
1	I am in support of the changes to Direction 11, Schedule 19, Diagram 2716, Diagrams 7283 & 7284 and have no comments to make regarding Red VMS signs displayed on Police cars.	74			
1	Not being a 'sign' engineer I found the proposal for 7283 and 7284 confusing. I could not see how mounting	75	Diagram 7283 and 7284 - we are in effect proposing to		

	one above the other saved 150mm in width.		prescribe two different ways of showing dual metric/imperial sizes. I hope this will not be confusing.	
1	<p>Diagram 2716:</p> <p>We welcome the ability to use a greater variety of information on the sign, but would urge caution that this is not at the expense of the sign being clear and simple, and ‘accessible’ to all road users. For example the use of names of local junctions/landmarks that may not be familiar to long distance traffic.</p>	78	Diagram 2716 - the actual place names etc shown on the sign will be a matter for the traffic authority. They should design a sign that is appropriate and can be understood by all drivers.	
1	<p>Yes.</p> <p>Direction 11 -Agree in principle, is there any possibility to include reference to individual repeater sign spacing advice, e.g. TSM Ch. 3?</p> <p>Diag. 7283 17284 -Very concerned that increased height of signs will make them more unwieldy to operatives and prone to wind damage. Would prefer status quo to remainLEDs -Assume 3 years is an appropriate and viable phase-out period.</p>	79	<p>Direction 11 - need to consider whether repeater spacing should be in the direction. It might be too restrictive. Also a missing repeater (not necessarily the fault of the traffic authority) would make the speed limit unenforceable.</p> <p>Diagrams 7283 and 7284 - we are not going to please all of the people all of the time on this one. We do need to consider very carefully the various options, including do nothing</p>	
1	<p>Yes. Direction 11</p> <p>It is agreed that the current use of the word “regular” in direction 11 does not express precisely what is required. It is sufficiency rather than regularity that is important in the placement of repeater signs. One way of expressing this would be to specify the maximum distance between successive signs using the distances shown in the draft regulation as not requiring a repeater, extended to other sign types as appropriate.</p> <p>Schedule 19</p> <p>The proposed changes result in a regulation of extraordinary complexity (incorporating a triple negative!) to little obvious benefit. Given that there are many more local services than scheduled long distance services at most bus stops, it is difficult to see why a more straightforward definition cannot be adopted to allow any scheduled service bus to stop provided the two minute limit and other restrictions are maintained. How many people will appreciate the difference between a bus and a local bus?</p> <p>Diagram 2716</p> <p>It is agreed that there should be as much flexibility as possible to allow diversion routes to be signed in the way best suited to the locality.</p> <p>Diagrams 7283 and 7284</p> <p>The suggested flexibility could easily be achieved by adding Schedule 16 Item 2 to the permitted variants for each sign and there appears to be no logical reason to prevent two signs being used, especially as this is the only permitted way of achieving the same effect with the equivalent permanent signs.</p> <p>Red VMS Signs Displayed on Police Cars</p> <p>The suggested regulation permitting existing signs to be used for a three year period is entirely reasonable and in line with the savings normally applied when diagrams are changed.</p>	89	<p>Direction 11 - as for comment on response from [REDACTED] need to consider whether repeater spacing should be in a direction. It might be too restrictive. Also a missing repeater (not necessarily the fault of the traffic authority) would make the speed limit unenforceable.</p> <p>Bus stop clearway - I presume all comments on Schedule 19 will be collated so that an informed decision can be made on the re-drafting of the schedule etc.</p> <p>Diagrams 7283 and 7284 - adding these two signs to item 2 of Schedule 16 it might seem to be a simple way of dealing with the addition of a metric sign, but the description in column (3) would have to be changed. For diagrams 7283 and 7284 it would have to specify that the metric sign is placed below the “non-varied” sign. It is much easier to amend the diagrams to show the two signs in each case and add a permitted variant written in item 4 of the table “The metric sign maybe omitted” (if that’s what we want).</p>	
1	<p><u>Direction 11</u></p> <p>We fully support any change which would remove the clear implication that ‘regular’ means ‘precisely equal’. We clearly voiced these concerns during the consultation for the previous amendment regulations which created the implication but the wording was retained. For the repeater speed limits sigs the spacing requirements should be no more restrictive than that included in the un-amended TSRGD 2002 and TSM Chapter 8: 2009</p> <p><u>Diagram 2716</u></p> <p>This diagram should be amended in line with previously submitted proposals to remove the remaining restrictions on combinations of routes, locations and junctions.</p> <p><u>Diagrams 7283 and 7284</u></p> <p>In principle of the option of stacking of imperial and metric versions of diagram 7283 or 7284 roundels on top of each other has been suggested for both clearance and road worker safety issues.</p>	93	<p>Diagrams 7283 and 7284 - I assumed that the new versions would be alternatives to diagram 7283.1 and 7284.1 and that imperial-only signs might also be retained. If this is so, then the appropriate version should be chosen to produce the best sign layout.</p>	

	<p>However, there may be practical issues in accommodating a second roundel on the relevant signs which are: diagrams 7201, 7201.1, 7210, 7211.1 and 7212. Working drawings showing two roundels been should be produced for identify if they are feasible.</p> <p>See also the response to Q11 below regarding adding road works signs showing both metric and imperial units to the Amendment Regulations.</p>			
1	We recognise the use of the word 'regular' is overly prescriptive. Will there be guidance on minimum and maximum distances apart for signs to avoid different approaches being taken by different authorities?	95	Direction 11 - local authorities should be following the guidance in Chapter 3.	
1	<p>Yes. Diagram 2716 – greater flexibility for diversion route signing is welcomed.</p> <p>Diagram 7283 and 7284 – use of both metric and imperial roundels has been raised as an issue from LCC highway structures team – “we ought to be withdrawing imperial width/height restriction signs altogether, instead of using both. We have been decimal for 40 years now.”</p>	101	Diagram 7283 and 7284 - metric-only signs is a matter for the Traffic Signs Review	
1	<p>Yes. Schedule 19:</p> <p>We welcome the clarification of the scope of bus services permitted to use a bus stop clearway. However the introduction of a maximum two minute stopping time will lead to operational problems for bus operators:</p> <ol style="list-style-type: none"> At bus stops designated as 'timing points' (whether for all or just a subset of the services using the stop), buses are required by the Traffic Commissioner to ensure they leave no more than one minute early. In some cases this may mean the bus stopping for more than two minutes, especially in quiet periods such as evenings or weekends, when buses may otherwise start running ahead of time. There will be issues in busy times in that it is common for buses to stop for more than two minutes simply due to the number of passengers boarding and paying for fares. There will be problems at city centre stops designated as termini and dedicated to one particular service. Buses here are often scheduled to wait for significantly longer than two minutes in order to provide a service for passengers and to encourage bus use. These stops should still be designated clearways in order to prevent anything blocking the stop whilst there is no bus present. <p>In likelihood, the bus operators would ignore the two minute clause anyway, it then leaves the way open for over-zealous enforcement officers to start issuing inappropriate PCNs.</p> <p>There are some sites where, for safety reasons, we would wish school buses to be able to stop and drop off/pick up their passengers. In these instances we would still wish to designate the stop as a bus stop clearway. However, it appears that the new 'Service Bus' definition contained within regulation 4 does not make provision for school buses. Is there scope to amend this definition to accommodate school buses at certain locations?</p> <p>Diagram 2716:</p> <p>We welcome the ability to use a greater variety of information on the sign, but would urge caution that this is not at the expense of the sign being clear and simple, and 'accessible' to all road users. For example the use of names of local junctions/landmarks that may not be familiar to long distance traffic.</p>	109	<p>Bus stop clearways - it seems that Leics CC does not understand the current Schedule 19 in respect of the two minutes. The time limit does not apply to passengers boarding or alighting, or to a change of crew. The two minutes applies to maintaining a published timetable, and if the time is likely to be longer, the bus stop should be marked and signed as a bus stand. Why does [REDACTED] think we are introducing a 2 minute time limit? The point about school buses has previously been noted and should be taken on board (no pun intended). However, what is the current practice as school buses cannot use bus stop clearways except for those introduced by a TRO made before the TSRGD 2002 came into force.</p> <p>Diagram 2716 - this is a copy of the response from [REDACTED] [REDACTED] I commented that the actual place names etc shown on the sign will be a matter for the traffic authority. They should design a sign that is appropriate and can be understood by all drivers.</p>	
1	<p>Yes. Direction 11</p> <p>The removal of the word 'regular' in itself is not advisable, and we are not aware of any confusion previously over the term 'regular'. If it was to be removed, it should be replaced with a word such as 'frequent' or 'appropriate'. However, we support the intent of this change.</p> <p>Diagrams 7283 and 7284</p>	113	<p>Direction 11 - when redrafting, we do intend to ensure that that “regular”, by any other description will be the order of the day. The recommended spacing is given in Chapter 3.</p> <p>Diagrams 7283 and 7284 - the width saving is 150mm because we are proposing to use two signs, one above the other, with a diameter of 750mm rather than a dual sign (7283.1 or 7284.1) with a diameter of 900mm.</p>	

	On the last line of the text, we presume that the reference should be to saving 750mm on sign width.			
1	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’.	120	Annex C Additional Proposals - nothing to comment on.	
1	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.	120	Annex C Additional Proposals - nothing to comment on.	
1	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.	120	Annex C Additional Proposals - nothing to comment on.	
1	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	120	Annex C Additional Proposals - nothing to comment on.	
1	Direction 11 - support sense of 'regular' (though not at precisely equal) intervals. Unclear what alternate sides of road mean since this will depend on types of prohibition present on each side. The length of the road is not defined in the existing legislation. Diagram 2716 - permitted variations useful, but give examples of each in the regulations.	121	Direction 11 - the updated direction should be much clearer. Diagram 2716 - examples will be shown on a revised working drawing.	
1	Schedule 19 – Bus Stop Clearways Will there need to be a variation of the upright sign to Diag 974 such as “except timetabled buses”? I would actually prefer that Sch 19 be worded to allow any bus, and if the authority wishes to be more prescriptive it may do so may making a TRO. There may need to prescribe be a variant “except authorised buses” to take account of the latter case	122	Bus stop clearway - where different restrictions are applied by a TRO they will need to be indicated on the upright sign which we would have to authorise. We will need to collate all comments on bus stop clearways (including mine) to determine which buses are to be allowed to stop and include these in Schedule 19. We might need three types of bus, for example; “except buses”, “except service buses” and “except local buses”.	
1	Repeater signs – The schedule should ideally provide guidelines as to the frequency of repeater signs. The new arrangement may provide too much flexibility leading to inconsistencies between different Local Authority areas, and potential issues with the local Parking Adjudication Services. Signs to diagram 7283 and 7284 – Is it not possible to provide one sign with both imperial and metric measurements as opposed to separate roundels	125	Direction 11 - the relevant guidance on sign spacing is given in Chapter 3. Perhaps we need to do more to ensure that local authorities are aware of the Traffic Signs Manual. Diagrams 7283 and 7284 - [REDACTED] seems to have missed the point here. Dual signs already exist. The proposal is to provide a narrower sign (but increase the height).	
1	Direction 11: there should certainly be a requirement for speed limit repeater signs to be placed on alternate sides of the road, as used to be a statutory requirement in the Traffic Signs (Speed Limits) General Directions 1969. This would help drivers keep within speed limits, as they would be less likely to fail to see a repeater sign because of obscuration by large vehicles travelling in front of them. When the 1969 Speed Limits Regs were subsumed into TSRGD 1994 there were many inadvertent omissions, some of which were corrected in subsequent Amendment Regs, but this never was. It's also sensible to allow for non-regular spacing where side roads require extra repeater signs on the main road. Diagram 2716: can't see why not, as long as they don't start writing books on the sign so drivers won't have time to read it. Perhaps set maximum number of words? Diagrams 7283 and 7284: I'm not convinced this is a good idea, and will be inconsistent with the practice you're introducing everywhere else. Red VMS: [REDACTED] and I pointed this out at what was probably the last trial I was paid to attend! Three years seems plenty of time to phase it out.	126	Direction 11 - I think we should look at the TSRGD (speed limit signs) 1969 to see if it can be used as a guide when redrafting direction 11. Before specifying “alternate sides” we must be sure that no problems will arise. Diagram 2716 - there has been concern by others that the sign could be confusing to drivers not familiar with the area. We need to be careful how we describe the new permitted variants. Diagrams 7283 and 7284 - see my comments on the response from [REDACTED] above. We need to be sure that this is the right path to go down.	
1	In regards to signs 7283 and 7284 we would support the inclusion of stacking of these signs.	129	Diagrams 7283 and 7284 - supports the proposal to place an imperial sign above a metric sign.	

1	Agree with better definition of 'regular' intervals for speed limit signing. Further clarification please re: other amendments to direction 11 and speed limit signing.	134	No comment from [REDACTED]	
1	<p><u>Direction 11</u></p> <p>We fully support any change which would remove the clear implication that 'regular' means 'precisely equal'. We clearly voiced these concerns during the consultation for the previous amendment regulations which created the implication but the wording was retained. For the repeater speed limits signs the spacing requirements should be no more restrictive than that included in the un-amended TSRGD 2002 and TSM Chapter 8: 2009</p> <p><u>Diagram 2716</u></p> <p>This diagram should be amended in line with previously submitted proposals to remove the remaining restrictions on combinations of routes, locations and junctions.</p> <p><u>Diagrams 7283 and 7284</u></p> <p>In principle of the option of stacking of imperial and metric versions of diagram 7283 or 7284 roundels on top of each other has been suggested for both clearance and road worker safety issues.</p> <p>However, there may be practical issues in accommodating a second roundel on the relevant signs which are: diagrams 7201, 7201.1, 7210, 7211.1 and 7212. Working drawings showing two roundels been should be produced for identify if they are feasible.</p> <p>See also the response to Q11 below regarding adding road works signs showing both metric and imperial units to the Amendment Regulations.</p>	135		
1	This is inconsistent with removing imperial only signs and could be misleading to drivers, it also means that they need to be able to read both signs, which may not be possible at 600mm diameter	36	Diagrams 7283 and 7284 - the size will be 750mm, not 600mm. The x-heights for a 750mm roundel with a single width or height will be about the same as the x-heights for a 900mm sign showing both metric and imperial widths or heights, so legibility will not be a problem. We will be looking at various options for these signs. Also, we will need to find old drawings showing metric-only width or height so that we know what the x-heights should be.	
2	We welcome the ability to use portable traffic signals with pedestrian facilities but care will be needed in their use. In particular, we would welcome clarification from the DfT as to the legal liability in case of accident involving portable pedestrian signals.	16	Portable signal-controlled pedestrian facilities - liability. Not for me to comment.	Question 2 to be reviewed with [REDACTED] and [REDACTED] at a later date
2	This should also allow for provision of portable 'toucan' facilities, so cycle facilities can be maintained throughout road works as well as pedestrian facilities.	27	Portable signal-controlled pedestrian facilities - I'm sure there must be a reason for not extending this to Toucan crossings. I have no comment to make.	
2	TSRGD states a minimum height for pedestrian signal heads. Temporary signals are reduced height so will the pedestrian signal heads be at standard height or do we use near side pedestrian facilities. Where portable light signals are used at pelican, puffin or toucan crossings clarification is required as to whether temporary road markings are required as prescribed at permanent sites.	39	Portable signal-controlled pedestrian facilities - is the mounting height issue something to consider and should we be giving guidance? It does appear that the signals to diagram 3000.1 could be mounted lower than those to diagram 4002.1. Nearside signals are not prescribed for this facility. Also, portable signals are not used at Pelican, Puffin, and Toucan crossings. Is there a misunderstanding here (on both counts) and is this something that should be clarified in guidance?	
2	Some guidance ought to be given to enable highway authorities to justify giving authority for the use of such a facility. Every effort should be made to ensure that pedestrians are not forced to cross over the road, for example by implementing temporary walkways within the carriageway, as increasing the occasions whereby pedestrians are directed to cross the carriageway near to temporary road works may increase the potential road safety risk to pedestrians.	41	Portable signal-controlled pedestrian facilities - no comment	

2	In principle agree but not sure if we would have to advertise the intention to provide these facilities as we would do in a permanent situation. If we had to advertise there is obviously the issue of cost	48	Portable pedestrian facilities - I would have thought that these would be treated in the same way as portable signals. No doubt guidance on procedure will be given.	
2	There is a concern that portable signal controlled pedestrian facilities may be used in inappropriate locations and question whether there may be a liability issue on a Highway Authority if they were shown to be used in an inappropriate location. Clearly, where they are replacing existing signals or used on risk assessed areas such as school patrol sites, they will be a welcome addition. However, there may be pressure to use them in other locations and it should be ensured that strict guidance on their use is also issued.	50	Portable pedestrian facilities - no doubt guidance will be given.	
2	<p>This change is very welcomed, given the safety implications associated with the loss of controlled pedestrian crossing facilities when permanent traffic signals are switched off and the Network Management Duty introduced by the Traffic Management Act 2004. The current arrangements with temporary traffic signals only giving facilities for vehicles causes significant problems for pedestrians.</p> <p>The proposed amendment should be widely publicised with accompanying Highways Agency Specifications, Traffic Advisory Leaflets and updates to the Pink Book – An Introduction to the Use of Portable Vehicle Signals.</p> <p>This is welcomed. It is very important that pedestrians are given facilities at temporary traffic signals as a matter of urgency. The height of temporary traffic signals for vehicles is generally much lower than permanent traffic signals and it may be advisable to give flexibility where the clearances at temporary traffic signals are smaller.</p>	51	Height of portable pedestrian signals - [REDACTED] raised the issue of signal height and as I pointed out, the vehicle signals could be lower than the pedestrian signals. Do we need to specify a minimum height for diagram 3000.1 when used at a portable pedestrian facility?	
2	Response far too lengthy to include here. Copy sent to [REDACTED] for consideration.	54	This is too complex for me to consider. No doubt [REDACTED] will be looking into this. I note that there is no comment on the propose amendment to direction 55(11) which would require two sets of signals at all locations, not just pedestrian crossings.	
2	Portable pedestrian crossings must be implemented in accordance with local highway needs. It is important that their implementation does not create undue congestion. Local Highway Authority authorisation of their use therefore remains important. They must also be signed in a way that is made obvious to drivers that they are in operation and are for the purpose of facilitating pedestrian crossings.	55	Signing of portable pedestrian crossings - I presume that the guidance will state that advance sign with diagram 543 should always be provided as with other portable signals. Do we need a supplementary plate "Temporary pedestrian crossing" (new diagram 543.2)?	
2	<p>It is our suggestion that this proposed amendment should not be released without accompanying Highways Agency Specifications and Traffic Advisory Leaflets, and of course an update to the Pink Book – An Introduction to the Use of Portable Vehicle Signals.</p> <p>Whilst we understand why portable pedestrian signals are being legislated, we are keen to work closely with the DfT to ensure that the implementation of such facilities is done as safely and effectively as possible.</p>	56	This is the same response as that from [REDACTED] (both from Westminster), so no further comment at this stage, even if there might be some differences.	
2	<p>Portable pedestrian facilities should meet the recommendations for permanent facilities in terms of accessibility for blind and partially sighted people and other disabled people. Portable pedestrian crossings should have the recommended visual, audible and tactile signals for blind and partially sighted people to be able to use safely and independently. They should also be placed at logical, convenient, accessible and safe points to assist with ease of locating and accessing them.</p> <p>Clear concise signage is also required for pedestrians to be able to navigate where works are being carried out. The implications for blind pedestrians must also be considered.</p>	70	Portable pedestrian facility - one for [REDACTED] to comment on?	
2	Yes, I support the proposal	74		
2	I am not sure whether there needs to be other indications of their legality with the use of studs? Could there be a lower standard of markings permitted when these are installed	75	Portable pedestrian facilities - one for [REDACTED] to comment on.	
2	Yes. The introduction of portable pedestrian facilities is welcomed especially at road works. However, the benefit at events where there are large crowds of people leaving an event at the same time would not be as beneficial.	76	Portable pedestrian facilities - whether or not these would be used at large events would be a matter for the traffic authority. It would be a tool that was available in controlling pedestrian movements, but there might be other more appropriate	

			solutions such as closing the road to vehicular traffic.	
2	<p>We are fully supportive of the provision for portable pedestrian facilities, providing that the pedestrian routes to, from and at the crossing point are accessible for all. E.g. accessible by wheelchairs, buggies, the blind and elderly. It may also be appropriate to allow a slightly longer intergreen and crossing period in these instances due to the number of drivers who contravene the red light at temporary traffic signals and the unfamiliarity of the layout.</p> <p>The tables in schedules 3 and 8 have been amended to stipulate that a stop line (Diag. 1001) and crossing studs (Diag. 1055) may be used in conjunction with portable signals. Clarification is required as to whether the positioning of these road markings in relation to the signal pole is the same as for a static signalised crossing (as per The Zebra, Pelican and Puffin Pedestrian Crossings Regulations and General Directions 1997). If so, a relaxation may be required to reflect the variety of locations and situations where portable signals may be used.</p>	78	<p>Portable pedestrian facilities - extended inter-green and crossing period, and position of road markings - for [REDACTED] and [REDACTED] to comment on. I presume there will be clear guidance on how these crossings are to be set out. As you know I have some concern about the use of both diagrams 1001 and 7011.2 together - which will be the legal stopping place if they are not lined up?</p>	
2	<p>Generally a good idea. Some concerns re: implementation of street equipment. The signal layout has to conform with the appropriate pedestrian crossing regulations, particularly in regard to road markings, the distance from stop line to signal head and to the crossing location, and the number, height and location of signal heads.</p> <p>Regulation 4 advice re: signing and road markings noted. Should at least a diag. 1001 marking also be a necessity (use of diag. 1055.1 is noted). Suggest use of diag. 7017 also be included. Practicalities of this should be considered, i.e. are there reasonable temporary DfT approved products on the market to cater for this?</p> <p>Should responsibility for control of operational parameters be included?</p> <p>Consideration should be given to requiring portable pedestrian facilities to display a message to motorists along the lines "temporary signals with pedestrian crossing facilities" What will be displayed to pedestrians when the temporary facilities fail? Consider warning message to pedestrians?</p>	79	<p>Portable pedestrian facilities - mainly for [REDACTED] and [REDACTED] to comment on. There is also my concern about using both diagrams 1001 and 7011.2 together.</p>	
2	<p>Yes. Portable pedestrian facilities could potentially be very useful when road works in a busy urban area necessitate the temporary closure of a controlled crossing. Their introduction is welcomed.</p>	89		
2	<p>Yes. We are generally in favour of these proposals, although it was believed that the trend was now to include the red/green man symbol on the same side as the push button, rather than on the opposite side of the crossing. It was also thought advisable to give consideration to extending the blackout / crossing times on these crossing to enable elderly and disabled people to cross safely in what might be an unfamiliar location.</p>	90	<p>Portable pedestrian facilities - more support for extended inter-green and crossing times. There must be a valid reason for using far side signals rather than nearside signals.</p>	
2	<p>Yes. Agree with proposals. Requirements for the use of temporary signs, road markings and studs considered appropriate.</p> <p>The introduction of portable pedestrian facilities is welcomed especially at road works and is a welcome safety improvement for vulnerable road users, who are often disadvantaged by road works. However, the benefit at events where there are large crowds of people leaving an event at the same time are questionable.</p>	106	<p>Portable pedestrian facilities - whether or not these would be used at large events would be a matter for the traffic authority. It would be a tool that was available in controlling pedestrian movements, but there might be other more appropriate solutions such as closing the road to vehicular traffic.</p>	
2	<p>Yes. We are fully supportive of the provision for portable pedestrian facilities, providing that the pedestrian routes to, from and at the crossing point are accessible for all. Eg accessible by wheelchairs, buggies, the blind and elderly. It may also be appropriate to allow a slightly longer intergreen and crossing period in these instances due to the number of drivers who contravene the red light at temporary traffic signals and the unfamiliarity of the layout.</p> <p>The tables in schedules 3 and 8 have been amended to stipulate that a stop line (Diag. 1001) and crossing studs (Diag. 1055) may be used in conjunction with portable signals. Clarification is required as to whether the positioning of these road markings in relation to the signal pole is the same as for a static signalised crossing (as per The Zebra, Pelican and Puffin Pedestrian Crossings Regulations and General Directions 1997). If so, a relaxation may be required to reflect the variety of locations and situations where portable signals may be used.</p>		<p>Portable pedestrian facilities - this is a copy of the response from [REDACTED] I commented - extended inter-green and crossing period, and position of road markings - for [REDACTED] and [REDACTED] to comment on. I presume there will be clear guidance on how these crossings are to be set out. As you know I have some concern about the use of both diagrams 1001 and 7011.2 together - which one will be the legal stopping place if they are not lined up?</p>	

2	<p>Yes. At road works on a single carriageway, where there is traffic signal control and the works occupy one lane of the carriageway, pedestrians crossing maybe at risk from drivers who may deem it safe to “run” the lights, unless the lights on the pedestrian crossing are interlocked with the traffic signals controlling vehicle flows.</p> <p>If the crossing is located at works in a built up area, with many pedestrians, the action of those pedestrians using the crossing may further compound delays on motorists held up by the road works.</p>	111	Portable pedestrian facilities - at least the sign to diagram 7011.2 includes the words PEDESTRIAN CROSSING which should help. No doubt there will be full guidance on the use of the signals.	
2	<p>Yes The concept of this would appear to be welcome, however, we have some reservations about this. There would appear to be two different potential scenarios, namely, at road works and for use at special events. The specific detail requires to be clarified and more information is required to identify the different proposed uses. Our general comments are as follows:-</p> <p>The Amendment Regulations do not actually show the nearside light signals to be used at portable signals.</p> <p>Drivers negotiating temporary road works generally have enough distraction from observing temporary coning and signing, as well as workers on the road, so may not always be fully aware of temporary pedestrian facilities within the works Regardless, drivers should not be stopped within road works.</p> <p>At road works controlled by temporary traffic signals, there is usually always a large inter-green phase that allows pedestrians to cross.</p> <p>Further, if within portable signals, the pedestrian phase timings would have to be linked to the vehicular signs.</p> <p>Another issue is that, particularly within North Lanarkshire Council, most pedestrian signals are being changed to Puffin Crossings, therefore pedestrians are becoming less familiar with far-side green/ red man aspects.</p> <p>If approved, the equipment and arrangements would require to state the type approval that would be required.</p> <p>We certainly agree that, if approved, portable pedestrian facilities would require the prior approval of the local road authority.</p>	113	Portable pedestrian facilities - one for [REDACTED] / [REDACTED] to comment on	
2	<p>New Regulation 47A describes the use of controlled pedestrian signals at portable signals, subject to the approval of the highway authority. This is a new provision and, although portable signals are not managed by GMUTC, the provision of pedestrian facilities at temporary signals is a matter of concern. The highway authority will have to ensure that the providers of such portable signals are competent in setting up the pedestrian facilities in terms of physical layout (location of crossing, lack of obstructions and tripping hazards etc) and in terms of the signal settings (green man times, clearances before and after the green man) to ensure safe operation. The approval process (method statements, proposed layouts) would presumably need to be more rigorous than portable signals without pedestrian signals and then checked by a competent member of staff.</p>	114	Regulation 47A - for [REDACTED] / [REDACTED] to comment on.	
2	<p>Yes. Agree with proposals. Requirements for the use of temporary signs, road markings and studs considered appropriate provided proper control exercised regarding specification and operation.</p> <p>The introduction of portable pedestrian facilities is welcomed especially at road works and is a welcome safety improvement for vulnerable road users, who are often disadvantaged by road works. However, the benefit at events where there are large crowds of people leaving an event at the same time may not be as beneficial.</p>	116	Portable pedestrian facilities - whether or not these would be used at large events would be a matter for the traffic authority. It would be a tool that was available in controlling pedestrian movements, but there might be other more appropriate solutions such as closing the road to vehicular traffic.	
2	<p>Yes. We agree with the GMUTC, who we understand are responding separately, that this is a matter of concern in terms of safety and that a more rigorous approval process would be needed to ensure the competence of the portable signal providers.</p>	119	Portable pedestrian facilities - not for me to comment	
2	<p>If the footways are narrow, to have portable signals on both sides may require space in the carriageway for the signals themselves, causing a loss of carriageway width. Preferable to include in Chapter 8 a recommendation that two sets of signals should be provided.</p>	122	Portable pedestrian facilities - not for me to comment except to ask if the number of signals should always be covered by the TSRGD and not left to guidance.	
2	<p>The absence of the usual road markings means such crossings will inevitably be less safe than permanent crossings; the sign to diagram 7011.2 will be liable to being displaced (as diagram 7011 sometimes is), with potentially serious consequences for vulnerable (soft) road users. The question is presumably whether an iffy crossing is safer than none at all.</p>	126	Portable pedestrian facilities - perhaps we should consider whether a stop line to diagram 1001 should always be provided and supplemented by diagram 7011.2. The latter would no longer have the meaning of being a stop line. However, this would cause problems for facilities that are provide for short	

			periods of time. We could prescribe an alternative larger size for diagram 7011.2, but would that just cause an obstruction? The guidance on portable pedestrian facilities will have to be very clear and emphasise the road safety implications.	
2	In the majority of the situations supported. However, at sites where alternative safe pedestrian crossing facilities could be provided, no portable signal would be supported. It would impose delay to vehicular traffic, contrary to TMA 2004 objectives.	133	Portable pedestrian facilities - a traffic authority does not have to approve the use of these at a particular site where alternative measures are more appropriate. I presume guidance will be given.	
2	Has this facility been trialled? Stringent control and guidance required.	134	No comment from [REDACTED]	
2	<p>The proposals indicate a specification to “pelican” far sided signals. This is restrictive and the specification should allow for future use of “puffin” near sided when appropriate.</p> <p>Further, the demand unit described in 4003 is not appropriate. It should be a simple demand unit such as AGD 941. The 4003 demand unit is old fashioned, out dated, cumbersome, and prone to damage.</p> <p>Prescribing the 4003 effectively prohibits the use of Portable Pedestrian Crossings.</p> <p>AGD941-style is well recognised by the public, serves all purposes, and allows for the very short term nature of “portable” pedestrian facilities to be transported, erected, and dismantled with little interruption.</p> <p>The specification should make clear there is no requirement to provide (a) dropped kerbs, (b) zig-zags, (c) or other semi-permanent road markings</p>	137	For [REDACTED] to comment.	
3	The opportunity exists for the replacement of capital “T” by lower case “t” on all signs referring to mass. E.g. as diagrams 622.1, 7282, etc. (For verification see http://www.nmo.bis.gov.uk/Docs/Legislation/Units%20of%20Measurement/Gnotes%20for%20public%20sector%20on%20use%20of%20metric.pdf) and British Standard 350:2004	18	“T” or “t” - I have previously suggested that we should perhaps change “T” to “t” now. It will apply only to new signs and replacement signs as the changeover would not be time limited	Agreed to replace upper case T with lower case t, existing signs to remain for life. ([REDACTED] will double check [REDACTED] advice on this). Will need to instruct lawyers to remove reference to this in TSRGD Reg 17 (10)
3	However, we are keen to be consulted on forthcoming Highways Agency Specifications. As yet we are not aware of when these will be published, but presumably it can be no later than the “coming into force” date of this Statutory Instrument, and is an integral part of making the amendments pertaining to portable pedestrian facilities practicable.	51	No comment from [REDACTED]	
3	However, we are keen to be consulted on forthcoming Highways Agency Specifications. As yet we are not aware of when these will be published, but presumably it can be no later than the “coming into force” date of this Statutory Instrument, and is an integral part of making the amendments pertaining to portable pedestrian facilities practicable.	56	See above.	
3	The 1968 Vienna Convention on Road Signs and Signals no longer permits imperial units to be used on width, height, or length restriction signs. The proposed replacement of imperial-only restriction signs with dual unit signs means that, even after being amended, restriction signs will still fail to comply with the Vienna Convention. All restriction signs should be replaced with metric-only signs, as required by the Convention. (See Annex I (Road Signs), Part C. Prohibitions or restrictions, " Descriptions, 1. Prohibition of entry, paragraph (e), Diagrams C5, C6 and C9 on pp. 39/40 of the consolidated text).	60	No comment from [REDACTED]	
3	<p>The current TSRGD is at variance with EU directive 80/1781/EEC (as amended by directive 2009/3/EC). In particular:</p> <p>Weight Restrictions</p> <p>The EU directive (which is consistent with ISO 31) requires that the symbol “t” be used to denote tonnes (and “T” to denote teslas – a measure of magnetic field strength). Although the TSRGD permits either, the author has yet to see “t” being used on a British road.</p>	64		

	<p>Width, height and length prohibition and restriction signs</p> <p>The EU directive (which is consistent with ISO 31) requires that feet and inches be demoted by the symbols “ft” and “in”. The TSRGD uses single and double apostrophes, symbols that both the EU directive and ISO 31 reserves for minutes and seconds of arc. It has been noted that the DfT is ensuring that all width, height and length restriction and prohibition signs show both metric and imperial units.</p> <p>Use of “m” to denote “miles”.</p> <p>The EU directive and ISO 31 states quite clearly that the symbol for “metres” is “m” and the symbol for “miles” is “mile”. There are many instances where the TSRGD requires that miles are represented by the symbol “m” rather than “mile”.</p> <p>Use of imperial units on footpaths, bridleways and cycle tracks.</p> <p>The EU directive permits the use in the UK of miles, yards feet and inches for purposes of “Road traffic signs, distance and speed measurement”. The directive does not define what is meant by a “road”. The author has been unable to find an EU-specific definition of a “road”, but the OECD definition of a road is:</p> <p>Definition: <i>Line of communication (travelled way) using a stabilized base other than rails or air strips open to public traffic, primarily for the use of road motor vehicles running on their own wheels.</i></p> <p>Context: <i>Included are bridges, tunnels, supporting structures, junctions, crossings and interchanges. Toll roads are also included. Excluded are dedicated cycle paths.</i></p> <p>This definition explicitly excludes cycle tracks from its definition and implicitly excludes footpaths and bridleways.</p> <p>The 1972 European Communities Act states that British courts are required to interpret any directive in the manner that the European Court of Justice would interpret the directive. The author believes that the OECD definition is the one that would be used which implies that the use of imperial units on cycle track, footpaths and bridleways is in conflict with the EU directive.</p>			
3	Yes. As far as we can see, this covers all relevant superseded British and European Standards.	90		
3	<p>Direction 42: Mounting and backing of signs</p> <p>Paragraph 1(b)(ii) refers to BS 873. All parts of this BS have been withdrawn. The requirement to give information about the manufacture of signs is now included in BS EN 12899-1:2007 (Section 9.2).</p> <p>Direction 57: Studs</p> <p>Paragraph (4) refers to EN 1463-1:1997. It appears that this has been superseded by BS EN 1463-1:2009. Since paragraph (4) refers to a table in paragraph (5) it may be a good idea to check that with the change in the BS that the requirements in the table do not need changing.</p> <p>BS EN 1463-2:2000 is still current</p>	93		<p>██████████ will confirm that this is correct. Lawyers will need to be instructed to correct this.</p>
4	<p>Travelling at 60 miles/h (or 52 knots or 97 km/h) one travels 88 feet (or 27 metres) in one second. The DfT recognises that during a brief lapse of concentration on the road ahead while using a mobile phone one can cause an accident.</p> <p>Why does it also not recognise that that studying unnecessarily numerous and complex road signs can also cause a lapse of concentration on the road ahead and can cause an accident.</p> <p>While using a phone, the eyes remain on the road, only the attention is challenged; but while studying traffic signs, not only is the attention challenged, but also the centre of vision is displaced from the road ahead. If attention is taken away from observation of conditions ahead for just half a second, the vehicle can move 44 ft into danger without the driver realising. It is thus necessary to ensure that there is not an unnecessary excess of signs and that signs are clear.</p> <p>The most crazy excess of signage is caused by the duplication of information by giving it in Imperial and metric</p>	3	<p>(2) Dual signs - we are fully aware of sign overload and clutter. Sign recognition and information assimilation is already based on a driver not looking away more than 10 degrees. We are fully aware that a drivers must keep their attention on the road ahead. This is the basis for choosing the appropriate sign size and x-height. This response from ██████████ is nothing more than a metrication argument and should be dealt with in the usual way. No doubt a time will come when we can dispense with dual signs.</p>	<p>Question 4 to be reviewed separately.</p> <p>██████████ suggested a compromise of keeping the sign on the bridge for 4 years but the advance signs for a longer period.</p> <p>Must consider the</p>

	<p>units; either by having separate signs, or by crowding both systems onto a single sign. Instead of just reading a single height or width, one has to work out which signs, or parts of signs, are which; and then read the relevant ones. This can add good half second to the reading time, perhaps even longer when the sign is dirty, the visibility poor or the light bad.</p> <p>SCHEDULE Regulation 34 New diagrams for insertion into the schedules to the 2002 regulations PART 1 Regulation 34(2) New diagrams for Schedule 1 to the 2002 regulations SCHEDULE—PART 3 Regulation 34(4) New diagrams for Schedule 3 to the 2002 regulations</p> <p>The first proposal for a decimal system of measures was first made by █████ Wilkins (English) in 1668. In 1783 James Watt (Scottish) called for a global system of measurement. As the British Government failed to act, in 1882 the French government engaged the British firm Johnson, Matthey & Co supply 30 standard metres and 40 standard kilograms. In 1884 the British Government signed the Metre Convention. In 1897 a Select Committee recommended that metrication become compulsory by 1899.</p> <p>In 1902 the Empire Conference decided that the metric system should be compulsory across the Empire. In 1904 Lord Kelvin collected 8 million signatures for metrication. By the middle of the last century almost all scientific work was carried out in metric units. In 1959 the standards for Imperial units were abolished and the units were redefined as multiples of their metric equivalents. [E.g., by definition 1 lb = exactly 0.453 592 37 kg]</p> <p>In 1965 the formal policy of metrication in all areas was started. The UK undertook to drop the use of non-metric units for the selling of goods by 1979. With the exception of the pint, this was eventually achieved in 2000. The mile, yard, foot and inch remain allowed non metric supplementary units for UK road signs and marking (but not as measures for the sale of goods). Everybody up to the age of 65, who was educated in England, has been taught the metric system. The metric system has been used almost exclusively in the schooling of all under 40s. The over 65s have had plenty of time to get used to metric units. I am 67, and find them far easier to use than Imperial units. It is quite absurd to litter our roads with duplicate signage in Imperial units. Not only do they increase the chance of traffic accidents, duplicate signs further spoil the street scene (or countryside) and they double costs. If the DfT is to insist on duplicating information it should fully reimburse the extra costs it imposes on local authorities.</p>			effect of Direction 44A and saving of lawful signs.
4	We are technically able to replace all affected signs within the four years allocated, but, if the period for replacement were extended to ten years, our costs would reduce by around 57 per cent.	16	Savings - I have already suggested some amendments to the proposals in my own comments. If we receive further comments on this we could look at the timing for some of the signs.	
4	The four year requirement for metric heights and widths to be added to existing imperial signs is too short a time scale	17	Savings - it now seems that we do need to reconsider the timings in respect of imperial-only signs (see my comment in respect of the consultation response from ██████████ above).	
4	No specific comments on the proposed timetables but funding the changes required will be a further pressure on already limited budgets.	21	More support for extending the savings dates. Perhaps we should make the first date 1 January 2015 rather than 1 January 2013 (my equivalent of 2 years).	
4	<p>Our Association wishes to respond to the above consultation, with specific reference to the use of dual imperial-metric height and width restriction signs. BWMA is a non-profit organisation that campaigns for the retention of British weights and measures.</p> <p>According to the Department for Transport, the purpose of mandatory dual imperial-metric signs is to reduce the incident of bridge strikes. However, DfT's proposal and accompanying evidence provides no theory or explanation as to why signs in both feet and inches and metres would dissuade a driver from driving into a low bridge, anymore than signs giving restrictions in feet and inches.</p>	22	No comment.	

<p>Such accidents happen for two reasons:</p> <p>i) Height or width restriction signs <i>are not seen</i>. This can occur because the driver is using a mobile phone, suffering from overtiredness, or that the sign itself is obscured (e.g. by foliage). Adding metric figures to a height sign will not avert a bridge strike in these type of instances.</p> <p>ii) The driver does see the sign, but makes a <i>conscious decision to proceed</i> because he regards it as safe. This can occur when the vehicle has been overloaded without the driver's knowledge, thus raising its height, or when the bridge has a narrow arch, causing the edge of the vehicle to strike, rather than the top. Again, metric information would make no difference, since the height restriction, already known to the driver, is being disregarded intentionally.</p> <p>The nearest DfT comes to providing a rationale is the statement '.... <i>approximately 10-12% of bridge strikes involved foreign lorries. This is disproportionately high in terms of the number of foreign lorries on the road network</i>' (paragraph 55). We interpret this to mean that DfT believes a possible cause of bridge strikes is that foreign lorry drivers are educated in metric; therefore, metric information is a solution.</p> <p>Such reasoning is unlikely to be correct for two reasons:</p> <p>First, foreign lorry drivers are more likely than British lorry drivers to be involved in all manner of accidents and driving offences. According to government and police sources (eg. VOSA), foreign lorry drivers have lower standards of training, a lower regard for the law, drive excessive hours and suffer more fatigue. This has been acknowledged by the Road Safety Minister Jim Fitzpatrick:</p> <p>"Enforcement figures show that heavy goods vehicles from overseas are more likely to be unroadworthy, overloaded or being driven in excess of drivers' hours rules than their UK counterparts" (October 2008).</p> <p>Therefore, a higher incidence of bridge strikes by foreign lorry drivers need not be significant; rather, it is a reflection of a wider trend.</p> <p>Second, use of measurements for height and width restrictions is not intuitive. An example of intuitive use is estimating someone's height; British people can estimate a person's height in feet and inches but not in metric, and vice-versa for continental Europeans. In the case of height and width restrictions, however, the driver is not being asked to estimate what 13 feet or 4.4 metres looks like, so whether the driver has a background in imperial or metric is irrelevant.</p> <p>Signs remove the need for estimation by providing drivers with numbers that can be <i>compared</i>. The driver compares the number on the sign to the number displayed inside his cab. Aside from the two circumstances described above (i and ii), we see no reason why a driver of a 14' 3" lorry should drive at a 13' 9" bridge any more than a driver of a 4.5m lorry should drive at a 4.3m bridge.</p> <p>In view of the above points, we wish also to respond to Question 12; "Does the draft impact assessment cover all the costs and benefits arising from the proposals?" We have asked DfT for its research or information on the types of signs (imperial-only or dual imperial/metric) that were displayed on bridges struck by lorries, British and foreign driven. DfT replied: "<i>The Department does not hold information on the signing in place at locations where bridge strikes have occurred, nor has such research been carried out</i>" (email, 10 November 2009).</p> <p>The draft impact assessment cannot be said to be meaningful without this research, and we have expressed this view to the Consultation Coordinator.</p> <p>Conclusion Our Association does not oppose different units for different purposes, but we can oppose use of different units for the <i>same</i> purpose. Dual height and width restriction signs are one such instance: the government is proposing is to use <i>different systems concurrently for the same purpose</i>.</p>			
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	<p>Therefore, we make two counter-proposals:</p> <ul style="list-style-type: none"> • That the government withdraws its plan to make metric signs mandatory • That it instead explores the logical alternative which is to simply remove optional metric signs and use feet and inches solely. The advantage of this is that it removes uncertainty from the minds of drivers as to the measurement system on British signs, and uses one system for one purpose. 			
4	In the current fiscal climate the timescales for replacement of all low bridge signs seems short. Possibly the timescale should be 6 years for any bridges that have no recorded incidents or signs of impact damage. The caveat that we would add to this is the bridges should either be within 0.25m of the necessary 5.0 metres or over a non classified 30 mph road (or less).	40	Savings - so far some authorities are happy with the savings, and others, as here, say they need longer. I have suggested before that we might need to extend the savings. No need to specify the height of the bridge or the type of road - savings will apply to all existing signs.	
4	<p>Further information on the first bullet point on page 17 should be provided to ensure clarity on which signs this applies to.</p> <p>Why do signs 554.3 and 620 need to be removed within 2 years when they only need to be changed if they are erected in conjunction with diagram 629, which it is suggested can be changed within 4 years?</p>	41	Savings - at last, someone has picked up my point that the two-year saving for the supplementary plates does not make sense.	
4	The time saving is unlikely to be effective; councils are unlikely to prioritise replacement of a warning sign unless it is damaged or otherwise ineffective. The replacement time should recognise financial impediments and suggest it is a non prescriptive replacement timeline.	43	Further support for reconsidering the time periods for savings.	
4	<p>I have looked through the suggested amendments and most of the changes seem sensible, but one concerns me on both aesthetic and safety grounds; this is the change to Diagram 530, requiring two separate signs (one metric and one imperial) to be used in all cases. Visually, this will only increase clutter. On the safety side, it could reduce legibility – it's more difficult to focus on two separate signs and digest the information quickly, particularly if the first sign the driver sees is in 'foreign' units. Is it not possible to produce a sign using both sets of dimensions (along similar lines to Diagram 629.2A)? I accept this may increase the overall size, but I believe it would generally be preferable.</p> <p>This is an individual view – I have not discussed it with anyone else within the company.</p>	45	Diagram 530 - we have never attempted to show dual measurements within a warning triangle. If we could do this it would result in withdrawing existing diagram 530 and lead to quite a few changes to the draft TSRGD. I don't think it would be appropriate to look into this now, but it is perhaps something to be considered as part of the Traffic Signs Review.	
4	Bearing in mind the survey work & ordering required we do not think that the 2 year timescale is adequate with current resources. There is no signs inventory list for this County.	47	Savings - more support for extending the time limits.	
4	<p>The proposed 'saving' time of 4 years is not sufficient to carry out this task especially in this time of reducing budgets and priorities having to be set for very limited budgets. I would suggest at least 8 years which would mean that most of the existing signing would reach the end of its natural life.</p> <p>It will probably be necessary (unless you advise otherwise) to also change any existing TRO's which will involve cost</p> <p>Although not quantified at the moment the saving of 2 years to provide zig zags at crossings which do not have them is too short.</p>	48	Savings - we will have to reconsider the time limits.	
4	The timescale for the upgrade being implemented is short, bearing in mind the cost cutting measures that will impact on budgets over the next 5+ years. The consequences of non-compliance in respect of Third Party Claims is one which doesn't appear to have been considered and is likely to outweigh the benefits of these changes	49	More support for extending the time periods for savings.	
4	<p>This will increase street clutter and is not supported. A phased approach to the provision of metric only signs should be adopted. A phased approach to the provision of metric only signs should be adopted.</p> <p>This is not supported. The driver of a high vehicle should be subject to greater penalty when a bridge strike occurs as it indicates that they are driving without due care and attention.</p> <p>This is not supported as it will increase street clutter and unnecessary signage. The "New roundabout ahead" sign and all such signs should be withdrawn from use in urban areas on roads subject to a 30 mph or less speed limit.</p>	51	Metric/imperial signs - many bridges already have dual signing. I don't think this is a signing clutter issue. It is not appropriate at this stage to change to metric-only signs.	
4	Local authorities will be best placed to advise on the financial and practical implications of complying with these timescales, which range from 2 – 10 years. Clear guidance is needed for local authorities to ensure that they are aware of how and when traffic signs and lines which have been withdrawn need to be replaced, and how they can be compliant in the meantime. Consistency with other neighbouring authorities and ease of	55	No comment from ██████████	

	understanding for the road user also needs to be considered.			
4	It is unclear as to why savings for the sign changes which are related to width and height restrictions, have been divided into periods of 2 and 4 years. Suggest for simplicity that all of the sign changes which are related to width and height restrictions be made 4 years i.e. move signs 554.3, 620, 954 into item 35(2)(b).	57	Savings - [REDACTED] has picked up the time discrepancy, but as I have already said, plates don't need to be saved.	
4	This is a safety-related upgrade, and should be carried out without unnecessary delay. We would therefore urge that a compliance period of 12 months -and certainly no longer than 2 years should be adopted, rather than the proposed 4 years. It does not seem unreasonable that 12 months should be sufficient time to achieve this upgrade of what is actually a relatively small number of signs (3800 spread over more than 200 Highway Authorities).	60		
4	I think that the 4 years saving for imperial only signs is a very long time. It would be better if imperial-only restriction signs were phased out quicker (e.g. 1 year). Even better still would be to authorise and place metric only signs as soon as possible	63	No comment from [REDACTED]	
4	No, Re: amendment to maximum headroom signing – The Authority is facing budget cuts and struggling with a lack of staff resources therefore feels the 4 year time period seems unrealistic to comply with the changes. I would like to suggest possible revised time periods: 5yrs for principle roads and 10yrs for non principle roads.	74	Savings - more support for extending the time periods	
4	With respect to the introduction of the requirement for both metric and imperial signing to be introduced within four years. This will create a significant capital budget pressure so, although the change is supported in principle, we would like to see the length of time for completion to be extended, to possibly ten years from the date at which the regulation come into force.	78	Savings - yet more support for extended time periods.	
4	No. Funding could be an issue re: diag. 530 etc. signs. Most warning signs will double in size requiring potentially substantial reposting & lighting works. There may also be considerations for passive safety requirements to existing standards. Many ADS signs including diag. 530 imperial-only warning signs will also require replacement with considerably larger counterparts -there may be considerable stresses on limited resources.	79	Savings - more support for extending the time periods. Do we need to consider the implication of increased post sizes? This was also raised by [REDACTED] (HA).	
4	No. Proposed amendments to signing of width and height restrictions with both metric and imperial dimensions would have cost and sign proliferation issues, particularly in rural areas. Is there any evidence that the current signing of these is causing confusion? Suggest that the new rules should only apply to new or replacement signs. However, if all signs have to be replaced then the timescale to achieve this is not considered sufficient	80	Savings - more support for extending the time periods. We might even have to consider no time period for bridge signs. The problem with a time period, in the case of bridge height, is that if a traffic authority leaves the replacement until the eleventh hour and then does not have the funds or resources to make the changes there could be liability problems. Width restrictions would not be enforceable.	
4	Replacing all bridge height restriction signing within 4 years involves significant expenditure that cannot be afforded in the present economic climate.	82	Savings - more support for extending the time periods.	
4	No. Possible budget issues need to clarify whose responsibility, particularly with respect to the railway industry. Has the railway industry been consulted?	85	Savings - more support for extending the time limits	
4	No. The only change in diagrams 554.3, 620, 954 and 954.2 is that they may no longer be used as a supplementary plate to diagram 629. Diagram 629 has a four year saving and so the ability to use supplementary plates with it should also have a four year saving. The change in the agency name on diagrams 832.1A and 832.2A is immaterial to their effectiveness as road signs. The agency name could easily change again during the life of the sign and in order to avoid unnecessary waste and carbon emissions it is recommended that the saving should be increased to 10 years. In order to avoid this happening again, it is suggested that the agency name should be omitted from the sign in future rather than changed. The change to the default symbols on diagram 2310.1 is immaterial to its effectiveness as a road sign. In order to avoid unnecessary waste and carbon emissions it is recommended that the saving should be increased to 10 years. It is noted that a ten year saving is proposed for diagram 2919.1 where the proposed change is identical and for consistency the same saving should be applied to diagram 2310.1. The function of traffic signs is to provide traffic information, not to promote a brand. The current signs to diagrams 2511 and 2512 are at least as informative to the public as the new versions and could be saved for considerably longer than two years without detriment to their effectiveness. A saving of ten years could be prescribed on the basis that the cost of a premature change during the life of the sign should not fall on the traffic authority and the signs should only be changed early if the car park operator provides the funding. The	89	The error regarding the time period in respect of diagrams 554.3, 620, 954 and 954.2 has been spotted, but not the fact that these don't need to be saved at all (see [REDACTED] comment 22). In respect of diagrams 832.1B and 832.2B, VOSA would need to advise us whether it would be appropriate to drop their name. I have already said that diagrams 2310.1 and 2919.1 should have the same saving and that it should be ten years (see [REDACTED] comment 22). Diagrams 2511 and 2512 - this is not branding in the conventional sense, it is the name given to an ACPO approved secure car park scheme. The Park Mark logo is already being used at car parks (even in little Newark). The change was agreed with the BPA. I don't recall seeing any "Secured" signs, so the number of signs being saved is likely to be minimal.	

	<p>fact that a change is needed only serves to emphasise the point that branding should not generally be used on traffic signs.</p> <p>Four Year Savings</p> <p>All the proposed four year savings relate to the introduction of a mandatory requirement for metric dimensions to be provided for width and height restrictions. Consistency is important here and it is agreed that a four year saving is appropriate for all changes involved in the introduction of this measure. As noted above, this should also be applied to diagrams 554.3, 620, 954 and 954.2 for consistency.</p> <p>Ten Year Saving</p> <p>The change from diagram 2919.1 to the generally similar 2919.2 with different default symbols is immaterial to its effectiveness as a road sign. The proposed ten years saving is appropriate and for consistency should also be applied to diagram 2310.1 where the change is the same.</p>		<p>Bridge height saving of four years is supported here on the grounds of consistency. However, I don't think that is a valid argument in this case as all we are doing is to add metric dimensions to a bridge that already has imperial dimensions indicated. This argument would be more valid if we were removing imperial signs and dual metric/imperial signs, and replacing them with metric-only signs. I think the argument of extending the time period on the grounds of cost, as put forward by other consultees, wins the day.</p>	
4	<p>No. WSCC operate a policy of replacing signs as and when they require it. As these signs have a life expectancy far in excess of the four-year period within which this work is expected to be complete, this changeover would require a significant extra effort, especially as there is evidently no extra funding to be obtained for this purpose.</p>	90	<p>Savings - the statement "As these signs have a life expectancy far in excess of the four-year period" applies only to signs erected this year. There will be many signs that are much older. However, I still support the extension of the time period.</p>	
4	<p>I have one comment on the proposals which is on the proposal to require width and height signs to show both imperial and metric dimensions.</p> <p>This development is long overdue, and I welcome it with three comments.</p> <p>Firstly, the proposal in the consultation did not include length restrictions, possibly inadvertently. The requirement should be extended to these, as the current signs are not fit for purpose – as shown by the photograph below.</p> <p>PHOTO HAS NOT PRINTED OUT - JUDITH</p> <p>Secondly, the proposals should give the option of metric only height and width restrictions. Metric only signs are very commonly used in the unregulated private sector. In particular, the vast majority of restriction signs on petrol station canopies display metric units only. The public is therefore very familiar with and accepting of dimensions given in these units.</p> <p>Thirdly, there needs to be a small change to Regulation 10 of the Road Vehicles (Construction and Use) Regulations so that, where a notice showing the vehicle height needs to be displayed in the cab (vehicles over 3m high) this should be in metric units as well as feet and inches. This change would, for negligible additional cost, provide additional ensure that drivers have this essential information to hand when encountering low heights throughout Europe (including the UK where, as already mentioned, many signs on private land display height restrictions only in metric units.</p>	94	<p>Metric issues - we can look at diagram 629.1 (it was something we tried to do for the 2002 TSRGD) but metric-only signs are a non-starter at this stage.</p>	
4	<p>No. With the limited budgets available to local authorities, the 4 years permitted to change the height limit signs would stretch the maintenance budget.</p>	98	<p>Savings - more support for extending the time periods</p>	
4	<p>The overall proposals in general, are helpful and will provide the necessary updates to signing requirements, facilitate the requirement under the TRA and revise specifications to bring these in line with current British and European Standards. There is however three issues that are of concern to this authority that I would make comment on:</p> <p>The requirement to sign height and width restrictions in metric and imperial measurements.</p> <p>It is estimated that there are over 40 bridges within Suffolk that would require updating to include imperial and metric signing. Most of those bridges are under the ownership of Network Rail. Changes to signing will require Network Rail approval and basic asset protection agreements to carry out works as well as the traffic management arrangements for road traffic. In many cases there are additional requirements such as the illumination of signs and changes to advance signing.</p> <p>The draft impact assessment assumes a traffic sign life expectancy of 10 years. Micro prismatic materials now</p>	102	<p>Covering letter:</p> <p>Savings - we will be reconsidering the timescale.</p>	

	<p>carry a warrantee of up to 12 years and in reality they will have a functional life well in excess of the guarantee period.</p> <p>The average sign replacement costs in table 7 of the evidence base summery sheets does not take into account additional illumination requirements, advance signing and the basic asset protection requirement costs that generally require the presence of a line watchman. It is also unlikely that more than one bridge would be resigned in any one day.</p> <p>It is expected that the cost for the full signing works that would be necessary to sign all bridges within this county with imperial and metric measurement would be in the region of £100,000 to £150,000 p.a. over the 4 year savings period. You will appreciate in the current financial climate, local government finances are under significant restraints and in view of this, the requirement to include metric measurement for all height and width restrictions within 4 years of the making of the TSRAGD should be reviewed or special funding arrangements should be put in place by Department for Transport to enable the works to be carried out.</p> <p>Illumination requirements for traffic signs.</p> <p>The TSRAGD 2002 included a relaxation to the illumination requirements for a limited number of warning signs provided that they were erected on a non-principle road and within a 30mph speed limit. The draft TSRAGD 2010 does not include any further relaxations. This authority prides itself by working towards making Suffolk the greenest county and it considers, with the introduction of micro prismatic materials, that there are opportunities that could be taken to reduce current illumination requirements that will contribute towards carbon reduction without compromising safety.</p> <p>Use of "Except Cycles" plate with No Entry signs.</p> <p>The introduction of cycle contra flow lanes using "No motor vehicle" signing (diag.619) where physical segregation can not be accommodated has led to enforcement issues and safety concerns that can influence the future provision of contra flow cycle lanes. Although the need to maintain the respect and meaning of the "No Entry" sign is accepted it is considered that the "Except Cycles" sign (diag. 954.4) and the "Except for Buses and cycles" (diag. 954.3) should be included as a supplementary plate for use with a "No Entry" sign. This would also remove the technicality that a horse and carriage could access a road where a contra flow cycle facility has been provided with no physical segregation at the start of the contra flow facility.</p>		<p>Illumination - a matter for the Traffic Signs Review</p> <p>No entry signs - a matter for the Traffic Signs Review</p>	
4	<p>No. The signing of all height and width restrictions with imperial signs within 4 years of the new regulations is likely to have a significant impact on staff resources and funding. The majority of height restrictions involve structures under the ownership of Network Rail. The required consultations and agreement for those works is complex and works require Basic Asset Protection Agreements with British Rail as well as traffic management. Whilst the benefits of the changes to signing are noted the requirement to replace all signs by 2014 should be excluded from the TSRAGD 2010 or extended. Alternatively special funding arrangements should be put in place by Department for Transport for the works to be carried out.</p>	102	Savings - more support for extending the time periods.	
4	<p>Proposed changes to height & width restriction signing</p> <p>The proposal is that all height & width restrictions will display both imperial & metric dimensions and that this shall be in place within 4 years. Whilst fully endorsing the aim of this proposal, to reduce the number of bridge strikes, significant additional funding will be needed to implement such changes.</p> <p>Work on the signing attached to almost all low bridges requires the road to be closed with consequential traffic management and diversion route signing costs. On most routes carrying significant traffic volumes, this work has to be carried out at night further increasing the costs. There can be particular issues and delays associated with work on signs attached to rail bridges.</p> <p>Doubling the number of triangular warning signs on the approaches to low bridges will require the upgrading of the size of the existing posts and also a possible need for vehicle protection. Some large advance direction signs carry warnings of height restrictions and indicate alternative routes. Increasing the number of warning triangles on the signs may not be possible without the complete renewal of whole signs, the replacement of large diameter posts and traffic management all of which would increase costs</p>	103	Bridge height signs - more support for extending the savings time periods. Judging by the amount of comments received, it does seem that we have under-estimated the cost and this is a factor in the timescale for up-dating the signs. Do we have a record of bridge strikes indicating those bridges with imperial-only signs and those with dual signs. If so. Are we able to draw any conclusions.	
4	<p>No. There is a cost implication to Councils when changing signs and we would prefer to change signs when they are worn or damaged. However, if a timescale has to be implemented we think 10 years would be</p>	106	Savings - more support for extending the time periods.	

	appropriate as the safety implications of not changing them earlier are likely to be small.			
4	No. Bridge height signs when mounted on bridge parapets can be difficult and are costly to replace as they usually require a temporary road closure to undertake the work. Depending on the number across the County, a four year timescale for completion may not be realistic.	107	Savings (bridge height signs) - more support for extending the time periods	
4	No. There is a cost implication for road authorities in changing signs. We would prefer to replace signs only when necessary due to damage, wear and tear. The safety implication of not updating this type of sign is minimal.	108	Savings - more support for extending the time periods.	
4	No. It may not be a question of time but more one of expenditure for local authorities being required to replace what may be deemed to be serviceable signs.	111	Savings - more support for extending the time periods an the grounds of cost.	
4	No. Perhaps some time to enable a change of signs when worn or damaged would be useful, in the order of 10 years. This would reduce the financial burden on roads authorities	112	Savings - more support for extending time periods on grounds of cost.	
4	<p>No. There are resource implications, both in terms of funding and staff, to facilitate these changes, particularly in view of the significant budget cuts to be imposed on local authorities over the next few years. The timescale to make the changes should therefore be extended, not least to enable signs to be replaced only when they are damaged or worn.</p> <p>There does not appear to be any significant reduction in the signs required, and hence no seeming reduction of sign proliferation. It is understood that one of the aims of the TSRGD refresh was to reduce the number of signs and the amount of sign clutter/ proliferation, however that does not seem to be the case. Rather, it would appear that there will be an increased burden for local authorities, at least in the short term, to arrange for signs, and poles, to be revised/ replaced to comply with the new requirements.</p>	113	Savings - further support for extending the time periods	
4	No. There is a cost implication to Councils when changing signs and we would prefer to change signs when they are worn or damaged. However, if a timescale has to be implemented we think 10 years would be appropriate as the safety implications of not changing them earlier are likely to be small. May need to clarify responsibility particularly with respect to the railway industry. Have they been consulted.	116	Savings - more support for extending the time periods.	
4	No. There is a concern particularly relating to the height and width restriction sign amendments that the 4 year period is not sufficient. While an initial review of the data held identified only a small number of cases where signs do not already display metric measurements, it also highlighted possible gaps in the information. To comply with the amendments, a full review of relevant signage in the borough will be needed which, along with any works identified in the review, will have budget implications over the course of this period.	119	Savings - more support for extending the time periods. A valid point about reviewing the signs on all bridges.	
4	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	120	Savings - we will be reviewing the time periods.	
4	There will be costs involved in replacing or providing additional signage. With intense pressure on local authority budgets, any proposals for additional expenditure will be most unwelcome. Allow extra time for the change, and hope that the economical climate may ease.	122	Savings - more support for extending the time periods.	
4	<p>It's unconventional to specify a time from the coming into force of these Regulations. It means that some signs have replacement dates fixed for the 1st January in a specified year, and others will have random dates. Did you consider picking the next 1st January after these Regulations come into force and adding x years to that?</p> <p>It seems odd that highway authorities get only two years to replace 2310.1, yet the MSA operators are allowed ten to replace 2919.1 – although they're likely both to have been installed at the same time and be equally knackered. It's not as if MSAs change the whole sign every time they change their name for another; the replacement header board is simply nailed over the earlier one. That doesn't seem right.</p>	126	Savings - [REDACTED] has raised the same point as me about the actual dates. We will need to change these to 1 st January - that's the proper way of doing it.	
4	The problem of lorries and other large vehicles, particularly foreign ones, taking inappropriate routes has been increasing and as a result is a growing concern of our branches. We very much support the new signs for routes that are unsuitable for HGVs and the proposals to include metric figures for restrictions.	131	No Comment from [REDACTED]	
4	In Part 1 of the overview – item 24 it states that variable message signs will be required to display their entire message on a single aspect, in order to reduce the distraction to drivers caused by scrolling or paging messages' Is there a requirement to replace any existing signs that display message in parts or does this apply to new variable message signs only?	134	No comment from [REDACTED]	

4	<p>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).</p>	120	<p>Diagrams 530 etc - I now want to look at the possibility of prescribing a single metric/imperial warning sign. The implication for sign clutter/sign overload (in respect of providing two separate signs) does not just apply to actual bridges, but to directional signs that include warning triangles. If we can quickly come up with a suitable design, I hope we will be able to include it in the TSRGD without further consultation.</p>	
5	<p>Further to our telephone conversation today re: Changes to TSRGD in particular Annex C - Additional Proposals to Schedule 19.</p> <p>In para. 3 - the legend 'local buses' you say would be included in diagrams 974 & 975 as this is likely to be the most common use. However, here in West Yorkshire the common use is 'except buses'. We do not differentiate between buses local or otherwise.</p> <p>We have some 3000+ of the 'except buses' signs in West Yorkshire and replacing them or re-advertising TRO's to make them compliant would incur considerable costs. I can see merit in the argument that 'any bus' could stop at a bus stop eg. a stretch limo or mini bus as the definition of a bus is anything over 8 seats, but could we not amend regulation 4 to define 'service buses' as "a bus with 12 or more seats being used in the provision of a service for which there is a published timetable", and then leave it to the relevant authority to decide which text they use ie. 'local buses' or 'buses'. This would really help</p>	25	<p>Any bus stop that has signs “except buses” must have been provided before the 2002 TSRGD and have a TRO. Changing the bus stops to those prescribed by the TSRGD would not mean making new TROs, just revoking existing ones. I came across the website of one county where they had had revoked all their bus stop clearway orders. This response does raise the question of the expression “except buses” not having the same meaning in the TSRGD 2010 as existing signs which are covered by a TRO. If we are going to allow non-local buses to use bus stop clearways, but restrict the type of service operated, then we do need a new term such as “except service buses”. I’m not sure why we have to define “service bus” by the number of seats. We will need to discuss this and make sure we get it right.</p>	Question 5 to be reviewed separately.
5	<p>We agree to the proposal to permit the use of bus stop clearways to other bus services operating to a published timetable providing as outlined in Annex C that the option to restrict the use of clearways to local buses only is preserved.</p>	41	<p>Schedule 19 - “except local buses” will, of course, still be an option.</p>	
5	<p>I am writing on behalf of Rhondda Cynon Taf County Borough Council’s Integrated Transport Unit (ITU) in response to the above consultation exercise. The ITU has responsibility for the provision and maintenance of bus stops across Rhondda Cynon Taf, as well as procuring socially necessary local bus and home to school transport services funded by the Council.</p> <p>It is noted that the proposed amendments to the Traffic Signs Regulations may potentially affect the way in which bus stops are protected by Clearways and the ‘type’ of buses that can stop at these locations. This issue is of considerable concern to Rhondda Cynon Taf Council. Bus stop clearways are an important tool in enabling the Council to tackle inconsiderate parking at bus stops, problems which in turn, prevent buses from pulling up alongside the kerb, thereby causing difficulties for passengers with restricted mobility.</p> <p>Furthermore, the ITU would like the Bus Stop Clearway Regulations to be widened to cover buses operating dedicated mainstream school transport journeys, as well as those on registered (timetabled) local bus services. Whilst the former type of bus service is not available to the general public, the Council’s network of mainstream school transport services is based on the picking up and setting down of pupils at recognised bus stops across Rhondda Cynon Taf and operating to set timetables, copies of which are published in paper and electronic format. The majority of these stops are currently protected by Clearway orders.</p> <p>This arrangement has improved the operation of the mainstream school transport services. It has also improved the safety and comfort of pupils by ensuring that they wait at well-lit locations that have a footway, a bus stop sign and, in many cases, a bus shelter – thereby minimising the risk of any confusion arising as to where the pupils should wait for their bus.</p>	44	<p>Bus stop clearways - we need to consider school buses when defining what is meant by “except buses”. At the moment, “except buses” are those covered by TROs made before the 2002 TSRGD came into force.</p>	
5	<p>We fully support the proposal to modify Schedule 19, Paragraph 3 to provide greater flexibility of use. However, we would advocate further relaxation of this regulation to include community transport vehicles also. These vehicles do not generally operate to a fixed timetable, but often replace bus services, particularly in rural areas, as a more cost effective means of delivering accessibility to sparsely populated rural areas. To enhance the efficiency of these services, permission to use bus stop clearways in urban areas would reduce journey time delay and increase the attractiveness of these services as an alternative to the private car, particularly for those who either do not have access to a timetabled bus service, or who are unable to use timetabled bus services due to mobility reasons.</p>	47	<p>See above.</p>	
5	<p>The requirement to sign clearways should be removed, and the need to sign local buses only should be removed. See covering letter.</p>	51	<p>Bus stop clearway - how can you eliminate signs unless the bus stop clearway includes all buses (or the same group of buses) and operates 24/7 (or at the same times at every bus stop)? Not</p>	

			a sensible suggestion. Local authorities need the flexibility to sign local buses only.	
5	It appears sensible to make changes to Schedule 19 to allow additional services to use bus stop clearways at the discretion of local authorities. However there is a question of whether broadening the Schedule to simply including other bus services operating on a published timetable, presumably coaches, goes far enough. Demand responsive public transport services or other community run public transport do not always run to a published timetable. Further thought should be given to whether these should be included and if not how their needs might be served.	55	Bus stop clearways - it seems that “to a published timetable” may be too restrictive, but it is a relaxation on the present arrangement (local buses only). We do need to look at this again?	
5	Yes, I support this proposal please see previous notes for Schedule 19 above.	74		
5	The ‘no stopping’ relates only to the carriageway. There have been instances where motorists have parked on the footway behind a bus stop and in the absence of underlying waiting restrictions, a CEO is unable to issue a fixed penalty. Aside from making an Order, can provisions be made as part of the bus stop clearway so that the effect extends to the back of the footway? If there is an ‘underlying’ prohibition of waiting restriction operating along the same length of road as the clearway, clarification is required as to whether a terminal mark is required for the single/double yellow line adjacent to the commencement of the solid yellow line to Diag. 1025.1	78	Bus stop clearway - is parking on the footway really a problem? REDACTED solution - a bus shelter and pedestrian guard rail. However, Chapter 3 recommends that the time period on any waiting prohibition signs should not overlap the operational period of the bus stop clearway. In other words, you wouldn’t have a waiting restriction operating at exactly to same time as the bus stop clearway just to protect to footway (in fact there would be no sign available for a 24/7 restriction). Is there some merit in considering an amendment to Schedule 19 or can the offence of footway parking on a footway adjacent to a bus stop be covered under different legislation. In the meantime, use street furniture. The T-bar issue is being covered under the Traffic Signs Review. At the moment I would suggest that a T-bar is provided - this is the guidance in the current draft of Chapter 5 (2010), although this refers to bays and does not specifically mention bus stops.	
5	Yes. However, there may be situations where bus stop clearways will still need to be used by only local bus services operating to a time table. Will there still be the ability to sign this?	80	Bus stop clearways - this response suggests that the current wording of Schedule 19 is not clear. We will be updating this when taking on board other responses.	
5	No. Definition of what constitutes a local bus needs to be clarified.	85	Bus stop clearways - local bus is defined in regulation 4.	
5	<p>I refer to the DfT communication dated 17 September 2009 which launched the public consultation on proposed amendments to the Traffic Signs Regulations and General Directions 2002 (TSRGD).</p> <p>This is the response of the West Yorkshire Local Transport Plan (WYLTP) partnership of City of Bradford Metropolitan District Council, Calderdale Metropolitan Borough Council, Kirklees Council, Leeds City Council, City of Wakefield Metropolitan District Council and Metro.</p> <p>You will recall our correspondence earlier this year regarding challenges that have been made to the enforceability of bus stop clearway signage as currently specified by the WYLTP partners. Your advice at the time was that clearway signs needed to include the legend ‘except local buses’ in order to be compliant. However you also advised that the DfT was seeking various amendment regulations, including an expansion of the type of bus services permitted to use designated bus stop clearways under schedule 19. This proposed course of action was welcomed as it would enable the vast majority of the clearways signs provided in West Yorkshire in recent years, which do not include the word ‘local’, to be compliant. This in turn would avoid the need for this existing signage to be replaced at considerable costs to district councils.</p> <p>Having now reviewed the ‘Annex C’ consultation document, I have to inform you that there are concerns held by the WYLTP partners about the stated additional proposal to include the legend ‘local buses’ in diagrams 974 and 975 of Schedule 19 ‘as this is likely to be the most common use of these signs’. This is not the case in West Yorkshire, where there is currently over 3000 clearways signs depicting ‘except buses’. The view in West Yorkshire therefore is that this specific proposal will increase, rather than resolve, current ambiguities and uncertainties over correct interpretation of the regulations, and hence challenge the confidence of the respective highway authorities in West Yorkshire to actively enforce clearway restrictions. In this regard one authority has already confirmed that the proposals as they currently stand would not lead to a change in its current policy, which involves enforcement only taking place at stops provided with signs incorporating the</p>	88	Bus stop clearways - there seems to be confusion over the use of “except local buses” and “except buses” on signs to diagram 974 and 975. We will be prescribing both, as at present. The final wording of Schedule 19 will determine which version is shown in the diagram. This consultee supports the limited use of bus stop clearways by non local buses (rather than to allow all buses to use the bus stop). By defining “bus” in regulation 4, we have to be careful that there is no conflict between schedule 19 and the expression “bus” on signs to diagram 974 and 975.	

	<p>legend ‘except local buses’.</p> <p>It is therefore important that both the TSRGD and Chapter 3 of the Traffic Signs Manual are consistent in making it absolutely clear both in the document text and accompanying diagrams that both of the ‘except buses’ and ‘except local buses’ signage variants are permitted. This would provide explicit confirmation that signs not including ‘local’ within the displayed text will also in future be compliant with the revised regulations and hence fully enforceable, thereby helping to resolve current uncertainties and ambiguities which might influence future Adjudicator decisions.</p> <p>With regard to the additional Annex C proposal to provide a definition in Schedule 19, regulation 4 of the type of service bus that would be permitted to stop within clearway lengths, it is suggested that the following form of words should be incorporated:</p> <p>‘ a bus with 12 or more seats being used in the provision of a service for which there is a published timetable and/or which has been registered with the Traffic Commissioner’.</p> <p>This would provide more certainty and clarity on permitted vehicle types and ensure that registered services in West Yorkshire operated by vehicles with limited seating capacity such as the Metro Local and Accessbus community services will also be exempt, whilst excluding smaller mini-buses that are not (i) operating to a published timetable and (ii) registered as running a public service with the Traffic Commissioner.</p>			
5	<p>Yes. It is agreed that there should be a relaxation to make it possible for longer distance scheduled bus services to stop in bus clearways. However, keeping the option of restricting stopping to “local services” results in a very complicated regulation incorporating a triple negative. Given the limit on the permitted length of stops, it would probably be better to keep it simple and allow stopping by all scheduled services in all cases</p>	89	<p>Bus stop clearways - I am sure that we can avoid the confusion by carefully rewording Schedule 19 (I never liked the way it was done) rather than taking the drastic action of removing the “local bus” option. Also not allowing local bus only clearways might result in problems where an “any bus” clearway is provided in a “local bus” lane or just at the end of a “local bus” lane.</p>	
5	<p>Yes. The extra discretion that these changes will allow are welcome; a permitted variant is required so that non-scheduled/timetabled school buses can be permitted to use clearways as well as scheduled services.</p>	90	<p>Bus stop clearways - more support for allowing them to be used by school buses.</p> <p>Diagram 816.1 - I don’t understand the reference to CPZs. I wonder if the diagram number has been misquoted and should be 663.3 (permit parking area). The definition of permit parking area refers to “area” and “each entrance” which implies that it apply to a network of roads. Guidance in Chapter 3 will be updated. If the comment is about diagram 816.1, then this is a matter for guidance, not the TSRGD.</p>	
5	<p>No. Please see Q1. Also:</p> <p>The ‘no stopping’ relates only to the carriageway. There have been instances where motorists have parked on the footway behind a bus stop and in the absence of underlying waiting restrictions, a CEO is unable to issue a fixed penalty. Aside from making an Order, can provisions be made as part of the bus stop clearway so that the effect extends to the back of the footway?</p> <p>If there is an ‘underlying’ prohibition of waiting restriction operating along the same length of road as the clearway, clarification is required as to whether a terminal mark is required for the single/double yellow line adjacent to the commencement of the solid yellow line to Diag. 1025.1</p> <p>Diag 1025.1 Bus Stop Bay Marking: The 2002 TSRGD removed the provision of non regulatory bus bay markings (previous diag 1025) This marking was very useful in rural situations where buses are infrequent and nearby residents are generally aware of the times the bus operates, but an advisory marking just serves as a reminder. It should also be noted that in rural areas the enforcement of bus stop markings is rare. Suggest using similar to diag 1025.1 without the 200 mm yellow edge line and associated sign to diag 970 – 975 and removing the associated regulation.</p>	109	<p>Footway parking at a bus stop clearway, and T-bars - this is a copy of a response from [REDACTED] I commented - is parking on the footway really a problem? [REDACTED] solution - a bus shelter and pedestrian guard rail. However, Chapter 3 recommends that the time period on any waiting prohibition signs should not overlap the operational period of the bus stop clearway. In other words, you wouldn’t have a waiting restriction operating at exactly to same time as the bus stop clearway just to protect to footway (in fact there would be no sign available for a 24/7 restriction). Is there some merit in considering an amendment to Schedule 19 or can the offence of footway parking on a footway adjacent to a bus stop be covered under different legislation. In the meantime, use street furniture. The T-bar issue is being covered under the Traffic Signs Review. At the moment I would suggest that a T-bar is provided - this is the guidance in the current draft of Chapter 5 (2010), although this refers to bays and does not specifically mention bus stops.</p> <p>Advisory bus stops - I fully support this proposal and have done since 2002. We have such bus stop markings in Newark that were put down after 2002. It is probably something for the Traffic Signs Review.</p>	

5	Yes. However, there may need to be a definition of what constitutes a local bus	116	Bus stop clearways - local bus is defined in regulation 4.	
5	Yes. If you selected no, please explain the difficulties the changes would create below: However, we also support the GM Traffic Manager's additional request to not require 24hr clearways to have sign diagram no. 974, to help enforcement. The situation is similar to double yellow lines, where no plates are required. (Again, we understand the GM Traffic Manager is responding separately.)	119	Bus stop clearways - unless the default situation without an upright sign is "except buses", a sign is needed to differentiate between "except buses" and "except local buses". The best this proposal would achieve is that signs would be dispensed with only where the clearway is 24/7 and is not used solely by local buses. How many signs would be saved? Probably not that many. This should be considered as apart of the Traffic Signs Review.	
5	The Council does not object to allowing the highway authority discretion over the type of services permitted to use clearways. However, route licensing applies in London (deregulation of bus services under the transport Act 1983 has not been applied in the capital), and stopping patterns are subject to agreement with TfL.	121	Bus stop clearways - does this response have any effect on the way we redraft Schedule 19?	
5	The use of the word "local" on the upright sign may lead to confusion if this is expanded to include timetabled services. Will "timetabled services" be deemed to include those which are advertised as running "every 10 minutes" or "between 5 and 6 services per hour"? Will a statement as to the time when first and last bus is timetabled to leave the bus station of origin (at the start of the route) be sufficient to fall within this definition	122	This response shows that we need to be very careful when redrafting Schedule 19 and adding new definitions. The legend on the upright signs must accord to the definitions in the Regulations, including the word "bus" on its own.	
5	We have some concerns that this will permit coaches to use bus stops, particularly in the City Centre if the rules change. We do not want holiday coaches, often from outside the local area but nominally "timetabled", such as those collecting from outside Central Station to be able to park on service bus stops. Would prefer to stick with the "local registration" definition with reference to Traffic Commissioners.	125	Bus stop clearways - "except local buses" will still be an option. Would this satisfy Newcastle City?	
5	Aren't you going to ask about the changes to Part II (para 32?) I don't agree with that; it's now far too wide, and allows yellow box markings to be placed absolutely anywhere, including on the wrong side of the road at a side road junction, or at any kind of access, like the Council car park (handy for the Chief Executive)! Surely that can't be intended? This needs to be modified it to extend the use to fire, police or ambulance station accesses, by specifying these. Road narrowings or width restrictions can be dealt with by defining these as places which are not junctions but where priority alternates between vehicles travelling in opposing directions.	126	Yellow box markings - [REDACTED] has a point - perhaps we should be more specific and describe the locations where yellow box markings can be used. We can consider further relaxations as part of the Traffic Signs Review.	
5	The Local Transport Act 2008 brought much needed new flexibility to the way public transport can be delivered, especially in rural areas. It is not clear from the consultation whether Demand Responsive Transport, which may not operate to any timetable, Private Hire Vehicles that are operating a bus service (but not otherwise), or Community Transport services would be able to stop at bus stop clearways or indeed use bus lanes. We believe that these forms of public transport, which can be particularly important for access to rural areas, should be given the same rights as buses to stop at bus stop clearways etc. The impact of the proposed changes to the wording in Schedule 19 on unconventional public transport services is unclear. We believe that regulation 23 (Bus lanes) and the definition of 'local bus' and 'local service' should be updated with reference to the new public transport options created by the Local Transport Act 2008.	131	Bus stop clearways - consider the points raised here when redrafting Schedule 19.	
6	Please see attached re CPZs and RZs. Please also see the report that your department commissioned in 2003 by TRL Ltd FEF PR/T/041/03 which is also attached.	13	I agree 100% with [REDACTED] comments about CPZs, but they are for the Traffic Signs Review and are not relevant to the Amendment TSRGD. [REDACTED] also seems to have mistaken the title "The Traffic Signs (Temporary Obstructions) (Amendment) Regulations 2010" as being the main Amendment TSRGD.	Question 6 all ok – [REDACTED] confirmed that the highway authority can use any size sign but the minimum is 600mm.
6	Dependant on the nature of obstruction a keep left sign may also be appropriate.	14		
6	This is fine for urban road but is not suitable for High Speed Routes	40	Temporary Obstructions Regs - no comment.	
6	It might be appropriate to permit both sizes so that the 900mm size sign can still be used on high speed roads.	43	Temporary Obstruction Signs Regs - seems to be a sensible suggestion to prescribe both sign sizes.	
6	No. (00mm size should be retained for breakdown vehicles used on dual carriageways and motorways.	85	Temporary Obstruction Regulations - I think [REDACTED] means that the 900mm size should be retained as an alternative. This has also been suggested by [REDACTED] It seems to be a sensible	

6	<p>It is proposed to amend the requirement of regulation 55 that road danger lamps conform to the withdrawn BS3143 with the requirement that they conform to BS EN12352:2006. But 12352 is not a simple equivalent of BS3143; it's really not so much a standard as a catalogue of products, and includes specifications for many products that would not be appropriate or acceptable as substitutes for the RDLs specified in BS3143. For a start, it comprises, if my memory is correct, no fewer than fourteen different types of lamp, only two of which can be tailored to be equivalent to current UK practice. Moreover, it permits a wide range of flash rates, dwell times and other variables, so there are hundreds of available permutations.</p> <p>I agreed the way forward with REMA (████ Thompson and a REMA technical specialist, Barry someone) many years ago. You should find the detailed spec on RED 13/8/18. We need to specify flash rate (it might be class F2) and on-time (O1?). It's no use me guessing, you need to look at the simple list of alternative classes that I determined to be as closely approximate to UK practice as it's possible to get (the UK rep on WG4 was unco-operative when I tried some fifteen years ago to ensure that UK needs were precisely catered for in the Standard).</p> <p>The Amendment Regs will need to specify the precise performance classes in a table, just as they do in regulation 33 and direction 57 for other products.</p> <p>I'm not familiar with the July 2008 corrigendum; I assume you've checked what it says.</p>	87	<p>suggestion</p> <p>Being dealt with by █████</p>	
6	Yes. It is believed that the modification from min 900mm to min 600mm will be of little negative impact to motorists on low to medium-speed roads, and the smaller diameter will be more practical for its portability	90		
6	<p>It is important that signs are of sufficient size for drivers to be able to see and understand when travelling at speed. The paragraph included in Part 6 of the consultation document says that "<i>It is considered to be acceptable on safety grounds.... to place a 600mm diameter sign</i>". What is the evidence for this?</p> <p>A reduction from a 900mm to 600mm diameter diagram 610 sign will <u>more than halve</u> the area of the sign seen by approaching drivers.</p> <p>Section O7 in Chapter 8 of the Traffic Signs Manual deals with incidents, including breakdowns, and paragraph O7.2.56 says:</p> <p><i>07.2.56 The size of "keep left/right" signs used shall be as defined in Table A1.2 (Appendix 1) or otherwise the largest size available at time of deployment. Under no circumstances shall the size of "keep left/right" signs be less than 600 mm in diameter.</i></p> <p>Table A1.2 referred to says that the sign should be at least 900mm diameter on high speed (50mph) roads and that a 600mm diameter sign is only appropriate on roads with a speed limit of 30mph or less.</p> <p>Surely, since safety is paramount, the Regulations should only be changed if it is <u>impossible</u> to design a lightweight "roll up" sign that can be carried in a normal vehicle and that can resist displacement by wind or vehicle slipstreams.</p> <p>The paragraph included in Part 6 of the consultation document says that the use of a 900mm sign "<i>is impractical in many instances</i>". Presumably this means that there are some designs of "roll up" sign that are practicable and the use of these should be encouraged rather than permitting the area of the sign to be more than halved.</p> <p>Finally, if practitioners are lobbying for smaller signs, why is the use of the option of a 750mm diameter sign not being proposed rather than 600mm?</p>	93	<p>Temporary Obstruction Regulations - there has already been suggestion that the existing size of 900mm be retained as an alternative. Should we also consider prescribing a 750mm size?</p>	
6	No. We would prefer to see the 900mm size retained for breakdown vehicles used on dual carriageways and motorways.	116	Temporary Obstruction Regulations - as the change is only to the minimum size, other larger sizes as prescribed by the TSRGD, including 900mm, can still be used.	
6	Camden's contractors have already changed their signs and Camden Transport Services need to be aware of the changes as it is our view that our mechanical sweepers retaining 900mm as the norm.	121	Temporary Obstruction Regulations - as the change is only to the minimum size, other larger sizes as prescribed by the TSRGD, including 900mm, can still be used.	
6	There are other amendments to these Regulations which have long been promised. I even had a meeting with	126		

	<p>George MP at which undertakings were given to consult on further amendments when these were next amended. You should find the details on RED 13/5/07.</p>			
6	<p>It is important that signs are of sufficient size for drivers to be able to see and understand when travelling at speed. The paragraph included in Part 6 of the consultation document says that <i>“It is considered to be acceptable on safety grounds.... to place a 600mm diameter sign”</i>. What is the evidence for this?</p> <p>A reduction from a 900mm to 600mm diameter diagram 610 sign will <u>more than halve</u> the area of the sign seen by approaching drivers.</p> <p>Section O7 in Chapter 8 of the Traffic Signs Manual deals with incidents, including breakdowns, and paragraph O7.2.56 says:</p> <p><i>O7.2.56 The size of “keep left/right” signs used shall be as defined in Table A1.2 (Appendix 1) or otherwise the largest size available at time of deployment. Under no circumstances shall the size of “keep left/right” signs be less than 600 mm in diameter.</i></p> <p>Table A1.2 referred to says that the sign should be at least 900mm diameter on high speed (50mph) roads and that a 600mm diameter sign is only appropriate on roads with a speed limit of 30mph or less.</p> <p>Surely, since safety is paramount, the Regulations should only be changed if it is <u>impossible</u> to design a lightweight “roll up” sign that can be carried in a normal vehicle and that can resist displacement by wind or vehicle slipstreams.</p> <p>The paragraph included in Part 6 of the consultation document says that the use of a 900mm sign <i>“is impractical in many instances”</i>. Presumably this means that there are some designs of “roll up” sign that are practicable and the use of these should be encouraged rather than permitting the area of the sign to be more than halved.</p> <p>Finally, if practitioners are lobbying for smaller signs, why is the use of the option of a 750mm diameter sign not being proposed rather than 600mm?</p>			
7	<p>We have some concerns about this proposal unless suitable advice is issued in the appropriate chapter of the Traffic Signs Manual. We have moved from having ATS junctions with closed associated secondary lights as the exception, to having them as a rule, because of a lack of understanding of their correct function. We would be concerned about a proliferation of taller poles springing up “because we can” rather than because they are necessary unless guidance is issued to keep them in check.</p>	33	Mounting height of traffic signals - no comment.	Question 7 to be reviewed with [REDACTED] and [REDACTED]
7	<p>If I am the driver of the first vehicle that has been stopped by traffic lights, I often find it difficult to crane my neck to see the lights unless the lights are on the opposite side of the carriageway. I would very much like to see the French concept of supplementary mini traffic lights [my wording] that are level with the driver’s window.</p>	64	Supplementary eye level signals at traffic lights - not one for me to comment on.	
7	<p>Inclusion to specifically allow two signal heads, one at current permitted levels, the other at a higher level, mounted on one post facing the same approach.</p>	69	Mounting standard height and tall signals on the same post - is this something to consider? It is done when there is a brow of a hill (or bridge) before a set of signals.	
7	<p>Yes. Generally agree. Might suggest the slight alteration of proposed Schedule 16 Item 37A to 'Where the character, layout or topography of the road ... "</p> <p>Consideration should be given to allowing the use of taller poles and or additional warning signs</p>	79	Tall signal posts - I consider that “character” covers “topography” and therefore no change to the description in Schedule 16 is required.	
7	<p>Yes. We agree that high level repeater signs would be of benefit when there are large numbers of pedestrians at the kerb side. However, we would like to point out that in Norwich we have converted to using near-side signals for pedestrians and this has caused a large amount of confusion and reportedly many miss-judgements by pedestrians.</p>	99	Pedestrian crossings - it seems that Norwich has problems with near side signals. As a pedestrian, I prefer far side signals.	
7	<p>Yes. The changes to permit the use of signals at a higher level in certain circumstances should be extended to clarify that signal heads mounted on the same post in the lower prescribed height range must accompany them.</p>	106	Tall signal posts - this raises the issue of two signal heads on the same post. Not all tall posts will require standard height signals. I have commented on this before as follows: Mounting standard height and tall signals on the same post - is this something to consider? It is done when there is a brow of a hill (or bridge) before a set of signals.	
7	<p>Yes. We would like to see changes to allow two signal heads, one at current permitted levels and the other at a</p>	116	Tall signal posts - this raises the issue of two signal heads on	

	higher level, mounted on one post facing the same approach. There is concern that one signal head mounted at a higher level might distract a driver instead of watching the vehicle in front.		the same post. I have previously suggested that we might need to consider this. It is done where there is a brow of a hill (or bridge) before a set of signals, but is it necessary in other situations where the secondary signals can clearly be seen? What have been the circumstances where we have authorised tall posts?	
7	This approach would be preferable to the stacked approach undertaken in some locations, including within some National Parks. However, there needs to be some consideration given to the visual impact on protected landscapes and Conservation Areas, with the height of such signals being the minimum necessary to provide the necessary information.	120	No comment from [REDACTED]	
7	Concern that signal heads mounted on tall poles may lead to drivers failing to react. Conventional signal heads should be included, to supplement tall poles.	134	Diagram 3000 - another request to allow two signal heads on tall posts (one at normal height). Have any of the authorisations given in the past allowed for this?	
8	84 Direction 44A We recommend adding diagrams 7016 and 7019 to the list of signs that may be mounted on a traffic signal pole.	72	Diagrams 7016 and 7019 - I agree that these should be added to direction 44A. See also my comment on the response from [REDACTED] in respect to diagram 7019. This will apply also to diagram 7016 (i.e. a separate paragraph for signs mounted on signal posts when the signals are not operational).	<p>Agreed but need to check with [REDACTED] what signs are permitted to be mounted on signals in the ZPPPCRGD 1997.</p> <p>Agreed that special direction could be issued to allow any signs to be used that are mentioned in the responses to this question.</p> <p>Agreed to amend Sch 17 so that diag 543.1 has to be reflected when placed on signal post.</p> <p>Agreed to add 300mm diameter to diag 616 and need to give some consideration about temporary signs and must specify which part of Reg 53.</p> <p>Question 8 to be reviewed with [REDACTED] and [REDACTED]</p>
8	Either or both of signs 619 and 955 should be permitted where there are signals for cycle routes.	7	Direction 44A, diagrams 619 and 955 - figure 16-6 in existing Chapter 5 shows diagram 955 mounted separately (no change in the proposed 2010 edition). I don't see why this sign needs to be mounted on the signal post etc. However, there is one possible scenario where at a crossroads the ahead direction is cycles only. Should we consider the possibility of allowing diagram 619 or 955 to be mounted as an internally illuminated sign in the secondary signal head where the cycle-only route commences (similar to diagram 616)? This then leads on to	

			bus-only routes and tram-only routes etc, so where do you stop. Larger free-standing signs are probably better, but could these be mounted on signal posts?	
8	Signs like diagram 638 should be allowed to be affixed to signal poles as a sign is required close to the end of a single yellow line / loading restriction before a signal controlled crossing (diag 1055). The signs would be at 90 degrees to a signal head and would therefore not distract drivers and it would mean that sign post clutter is minimised.	9	Direction 44A - Signal-controlled crossings have a controlled area with zig-zag lines, so I don't understand this comment. The amendment to direction 49 means that free-standing pedestrian-only crossings not covered by the ZPPPCRGD will now require zig-zag lines. At road junctions where controlled areas are not provided, a sign mounted on a signal post is likely to be a distraction or not seen at all. If there is pedestrian guard railing at the junction, then that is the best place for the sign.	
8	No signs should be affixed to traffic light columns in my opinion, as any sign would be likely to divert driver's attention from the signals.	13	I think [REDACTED] may have misunderstood by what we mean by fixing signs to traffic signals. Most of the signs are relevant to traffic movements and form part of the signal head (e.g. "no right turn"). It wouldn't be a good idea to remove these.	
8	<p>It should be possible to place the pedestrian signal on Toucan crossings on the opposite side of the road as it is very difficult for those of us with limited turning ability (eg stiff necks or arthritic backs) to see the ones to the side of the crossing entry while being ready to cross on the green light. As a cyclist it is also easier to see, with the right focussing distance of the eyes for riding, when the signal indication is straight across the road. The preference for opposite side indication shows up particularly well on a cross roads in Leamington where traffic is constrained to go straight on only and pedestrians keep head up and watch for the vehicle light change on the other carriageway.</p> <p>Another problem with Toucans is if the low level indication faces the traffic as I have noticed in one or two cases, the low level indication is in the drivers sight line exactly where, in France, the repeater signal is placed and I have seen drivers misconstrue the sign as permitting them to proceed (I have only seen it when there are no pedestrians waiting). This is obviously not a problem when the signal is facing the pedestrian across the road.</p>	15	The question of drivers misinterpreting pedestrian repeater signals was also raised by [REDACTED] of the London Borough of Camden. Is this known to be a problem ([REDACTED] may know)? In this case, [REDACTED] is referring to the existing "low level" nearside signals, but it is the same problem. With regard to near side signals versus far side signals, as a pedestrian, I must say that I am more comfortable with the latter. Are there any known problems with near side signals? They have been around for a long time now. I think these issues are really for the Traffic Signs Review and not the Amendment Regulations, although we could decide not to prescribe the repeater near side signals on the grounds that issues have been raised by two respondents (might be more by the end on the consultation period) and that it would be premature to include them in the Amendment TSRGD 2010. What does [REDACTED] think?	
8	We agree that, in general, traffic signal posts should only be permitted to have signals and signs relating to the signal, e.g. no left turn or no right turn, attached to them. However, we believe that temporary signs, for example, bus diversion signs should also be able to be fixed on signal post mountings as long as these are approved by the Local Authority in which they are sited.	16	Signs on signal posts - I can see that it might be appropriate to place certain (but not all) temporary signs, such as "buses on diversion" or "Diverted traffic" on signal posts, particularly direction signs on secondary signals on the far side of the junction. It might be better to deal with this as a special direction although it would make more work for both traffic authorities and the DfT. Something to consider and discuss.	

8	<p>This direction would appear to be overly restrictive, and if followed is only likely to result in signs being erected on additional posts immediately adjacent to the signal post, increasing clutter and not achieving the aim of the direction.</p> <p>We suggest that this proposed direction be omitted, and that the responsibility to ensure drivers are not distracted with excessive information be kept by traffic authorities. If it is to be retained, we suggest consideration should be given to permitting the following additional signs:</p> <ul style="list-style-type: none"> a) Waiting/loading restriction time plates (these signs are small and not aimed at moving traffic) b) Any sign mounted on the reverse of a traffic signal (i.e. such that a traffic signal and a sign on the same post are not viewed together from the same direction - for instance, signs controlling entry into a street or warning of a hazard in that street, the exit of which being controlled by traffic signals). c) End of bus lane (diag 964 – for use at bus gates and where a bus lane is brought up to a stop line but ends there) <p>These signs are either relevant to the operation of the junction or are not viewed at the same time as the signal head (and therefore unlikely to provide a distraction).</p> <p>There are also other instances where it may be desirable to co-locate signs and signals, for instance, at a crossroads where the straight-ahead route is prohibited to goods vehicles, the signs indicating the HGV ban are likely to need to be placed in a similar location to secondary signal head(s) – it would appear to serve little purpose to require separate posts for each.</p> <p>From a cycling perspective, it is a concern that the additional posts likely to be required in order to meet the requirements of this proposal provide needless additional obstructions in cycle tracks (and footways), and an additional obstacle to visibility of cyclists at junctions, marginally increasing risk of cyclists not being seen, for apparently no benefit. There are also wider street clutter / aesthetic issues.</p>	27	<p>Direction 44A - I don't support these comments. I don't see the point of putting waiting restriction signs on signal posts. There will be few locations where the "back" of signals would be suitable for mounting signs. Mounting prohibition signs, particularly zone entry signs on signal posts would mean that the sign would be too low or the signals too high. I can see where this is coming from, but is it really a problem? However, see my comments on the response from [REDACTED] (28 October).</p>	
8	<p>Sign to diag. 614, "No u-turns for vehicular traffic", should be permitted as it is regularly required at signal junctions.</p> <p>It should also be made clear that it is still permitted to mount signs on the back of the signals, where there are no other signals, thus reducing street clutter.</p>	36	<p>Direction 44A - diagram 614 is included in this direction. I have said before that we should consider giving a special direction for any other sign to be mounted on a signal post.</p> <p>Amendment direction 35 (savings) - standalone pedestrian crossings not prescribed by the ZPPPCRD (i.e. not Pelican or Puffin) do not currently require zig-zag markings. Direction 49 is being amended to include diagram 4002.1 and the saving is to give two years to provide the zig-zag markings. This should be made clear when the amendment TSRGD comes into force.</p> <p>Positioning of zig-zag markings near roundabouts etc is a matter for guidance in Chapter 5.</p>	
8	Mounting other signs on signal posts should be severely restricted	48	No comment from [REDACTED]	
8	Within urban areas, subject to a speed limit of 30 mph or less this is not appropriate and will lead to a	51	Signs on signal posts - signals are safety critical and should not	

	proliferation of additional posts.		be cluttered with traffic signs except for those already permitted.	
8	<p>We would suggest that Diagram 7019 – often known as an “Out-of-Order board”, is included in this provision.</p> <p>We would also suggest that Diagram 7014 – which in this instance would be varied to “Signal Priorities Changed” be considered.</p> <p>As well as Diagram 7020 – which in this instance would be varied to “SIGNAL NOT IN USE”? We should also point out that the permitted variants of Diagram 7020 do not allow for “SIGNALS NOT IN USE”, from experience we have noted that this would seem to be better suited to the use of this sign. Otherwise grammar would dictate that this sign would have to be placed in each individual signal post.</p> <p>We would suggest that Diagram 620 – Except for Access, be considered to be included in this provision.</p> <p>We would suggest that Diagram 619 – Motor vehicles prohibited, be considered to be used in the same way that a Diagram 616 has currently been proposed.</p>	51	<p>Diagram 7019 - Para D5.10.13 of Chapter 8 clearly states that this sign should be mounted on the signal post. So should this diagram be added to direction 44A? I would suggest a separate paragraph (5) to cover this as the sign is mounted on the post only when the signals are not operational.</p> <p>Diagram 7014 (signal priorities changed) - I don't think it is appropriate to mount this on the signal post (although it might encourage local authorities to remove it after 3 months (the one in Newark as been there for at least 7 years and still hasn't been taken down).</p> <p>Diagram 7020 (signal not in use) - this is intended for matrix signals on motorways etc, not for traffic signals prescribed by regulation 33.</p> <p>Diagram 619 and 620 on signal posts - we shouldn't allow this at the present time. Also, see my comment on the response from [REDACTED] (direction 44A).</p>	See our reply to response no 105
8	<p>We would suggest that Diagram 7019 – often known as an “Out-of-Order board”, is included in this provision.</p> <p>We would also suggest that Diagram 7014 – which in this instance would be varied to “Signal Priorities Changed” be considered.</p> <p>As well as Diagram 7020 – which in this instance would be varied to “SIGNAL NOT IN USE”? We should also point out that the permitted variants of Diagram 7020 do not allow for “SIGNALS NOT IN USE”, from experience we have noted that this would seem to be better suited to the use of this sign. Otherwise grammar would dictate that this sign would have to be placed in each individual signal post.</p> <p>We would suggest that Diagram 620 – Except for Access, be considered to be included in this provision.</p> <p>We would suggest that Diagram 619 – Motor vehicles prohibited, be considered to be used in the same way that a Diagram 616 has currently been proposed.</p>	56	See above.	
8	<p>We place certain signs on the back of our signal poles to reduce street clutter. The rules we adopt are that they must be on the back of a pole, must not create a visual distraction for drivers approaching the lights (grey backing and not too offset), preferably obscured by the head cluster and the sign in no way must be seen. This reduces street clutter which is a challenge placed upon us by the recent developments in shared surface thinking and political pressures. I have enclosed 4No photos that show examples of where no entry signs have been lit by the signal pole at a junction where many signs were needed.</p> <p>I would be grateful if you would consider that the placement of signs on traffic signal poles be left to Local Highway Authority approval subject to guidance issued by the Department.</p>	58	Signs on signal poles - we are allowing diagram 616 on signal poles and the photographs accompanying the consultation response show how this can be done effectively. This will only work in certain situations where the signs are not placed alongside secondary signals. Whether or not we should extend this to other signs should be a matter for the Traffic Signs Review and clear guidance.	
8	We welcomed the de-cluttering the highways and one of the proposals was to use existing posts within the highways to put up signs etc. While recognising the requirement to restrict mounting of signs on signal posts the implications for use of additional posts on the footway should be considered	70	Signs on signal posts - I don't expect the proposal will result in many additional posts. Allowing no entry signs on the posts as shown in the photographs from [REDACTED] shows how this can be done effectively and possibly eliminates sign posts.	
8	We suggest that sign to diag. 953 should also be permitted to be affixed to traffic signals or mounted on traffic signal poles. This may then be used where there is a bus gate controlled by traffic signals.	78	Direction 44A - I have mentioned before that there might be scope to include signs such as diagram 953. However, I think the best approach is to allow this by special direction. This will enable the likely demand to be assessed and help to develop best practice.	
8	Yes. "Except trams"?	79	Direction 44A - see my comments on the response from [REDACTED] above. In some cases it will be appropriate to mount signs such as diagram 953 and 953.1 on signal posts, but as I	

			have said before, this is best left to special directions so that we can see what is actually needed and to develop best practice.	
8	Yes. A traffic signal post often marks the end of yellow lines indicating the end or a break in waiting & loading prohibitions. Signs indicating waiting and loading prohibitions should therefore be permitted to be put on signal poles. The signs are mounted parallel to the kerb and so do not distract drivers attention from the signals + not allowing them on the signal pole may require an additional post within 15 metres that might obscure the view of the signal head + will increase street clutter.	82	Direction 44A - I can't see how mounting a waiting prohibition sign on a signal pole will help. A driver's attention should be on the signals and the road junction and not be distracted by a sign mounted parallel to the kerb. Also this is an unlikely location for a driver to be tempted to park. Looking at the response to question 12, it seems that Leicester City Council already mount waiting restriction signs on signal posts	
8	No. It is important to ensure that signals are as visible as possible, and it is likely that the addition of extra signs to signal posts could distract driver attention away from the signals themselves. In addition to this, it is possible that the signs may obscure impending hazards for motorists.	90	No comment from [REDACTED]	
8	<p>Thank you for giving us the opportunity to comment on the above. Our specialist interest group dealing with this area has met to consider the proposals. We believe that the revised regulations are broadly positive and acknowledge the work and commitment that must have been involved. There are two specific areas of concern however,</p> <p>1. Regarding the affixing of signs to traffic signals</p> <p>Reflective equipment has recently been replacing illuminated bollards at traffic signals sites. The logic behind this seems simple; the traffic signals are lit and the driver is expected to stop at the red light anyway so an illuminated 'go left' bollard is not necessary. The next logical step is to remove the reflective bollard entirely and mount the sign on the traffic signal pole. This might not be the intention of the new direction 44A, but it certainly might be interpreted in such a way.</p> <p>Is there any evidence of an increase in collisions with traffic signals poles following the removal of lit bollards in favour of reflective equipment? It could be argued that the change in the overall visual effectiveness of the site could lead to a risk of vastly increased costs in fitting passively safe poles where previously they were not required and an increase in carbon footprint caused by the removal of damaged equipment and disposal of damaged vehicles, not to mention the increased risk of injury.</p> <p>We are currently unaware of any study into the effect of removal of illuminated bollards at traffic signals sites but could not detect any reference to the possible effects in the impact assessment on the consultation web site.</p> <p>The removal of distraction at traffic signals sites by regulating permitted signage seems to us to make sense. To include the blue sign, white arrow family of signs in this situation seems to increase risk without adding to the intended benefit, i.e. 'to reduce street clutter'.</p>	96	Not for me to comment.	
8	Yes. Restricting the signs that can be erected on traffic signal posts will prevent their use for waiting & loading plates at locations where restrictions operate.	98	Direction 44A - it would seem that Enfield mount waiting restriction signs on signal posts. In accordance with direction 36(1) of the amendment TSRGD 2010, existing signs will not need to be removed (or will they - see my comment on the response from [REDACTED] below). However, I find this direction difficult to understand. It would be much clearer if the wording was similar to that in direction 5 of the TSRGD 2002.	
8	Yes. Consideration should be given to the permitted fixing of road safety messages that reinforce such messages as "Cross only with green figure". Such signs to be affixed to signal posts at pedestrian crossings with high recorded pedestrian injury rates.	101	Direction 44A - not sure what the current policy is on road safety signs, Anyway, it isn't something we could put in the TSRGD. It might be possible to issue a special direction to dis-apply direction 44A if we agree to a particular safety message being attached to a signal post.	

8	<p>Yes. We would suggest that Diagram 7019 – often known as an “Out-of-Order board”, is included in this provision.</p> <p>We would also suggest that Diagram 7014 – which in this instance would be varied to “Signal Priorities Changed” be considered.</p> <p>As well as Diagram 7020 – which in this instance would be varied to “SIGNAL NOT IN USE”? We should also point out that the permitted variants of Diagram 7020 do not allow for “SIGNALS NOT IN USE”, from experience we have noted that this would seem to be better suited to the use of this sign. Otherwise grammar would dictate that this sign would have to be placed in each individual signal post.</p> <p>We would suggest that Diagram 620 – Except for Access, be considered to be included in this provision.</p> <p>We would suggest that Diagram 619 – Motor vehicles prohibited, be considered to be used in the same way that a Diagram 616 has currently been proposed.</p>	105	<p>Diagram 7019 - Para D5.10.13 of Chapter 8 clearly states that this sign should be mounted on the signal post. So should this diagram be added to direction 44A? I would suggest a separate paragraph (5) to cover this as the sign is mounted on the post only when the signals are not operational.</p> <p>Diagram 7014 (signal priorities changed) - I don't think it is appropriate to mount this on the signal post (although it might encourage local authorities to remove it after 3 months (the one in Newark as been there for at least 7 years and still hasn't been taken down).</p> <p>Diagram 7020 (signal not in use) - this is intended for matrix signals on motorways etc, not for traffic signals prescribed by regulation 33.</p> <p>Diagram 619 and 620 on signal posts - we shouldn't allow this at the present time. Also, see my comment on the response from [REDACTED] (direction 44A).</p>	No, agreed that it should be placed in advance.
8	No. No additional signs to be permitted other than the absolute minimum for network management and safety reasons	106	No comment from [REDACTED]	
8	Yes. We suggest that sign to diag. 953 should also be permitted to be affixed to traffic signals or mounted on traffic signal poles. This may then be used where there is a bus gate controlled by traffic signals.	109	Direction 44A - this is a copy of a response from [REDACTED] I commented - I have mentioned before that there might be scope to include signs such as diagram 953. However, I think the best approach is to allow this by special direction. This will enable the likely demand to be assessed and help to develop best practice.	
8	<p>No. On Diagram 3000.2, the minimum clearance height to the underside of the vehicle aspect is noted as 2.1M; however, the requirement under the Roads (Scotland) Act is that nothing should be erected on the footway at less than 2.25M. We would suggest that the minimum height is changed to 2.25M on the Diagram.</p> <p>We normally anyway restrict the mounting of signs on signal posts to those relating to the signals themselves, so we agree with the additional Direction 44A.</p>	113	Diagram 3000.2 - I don't think a change is necessary because (a) there will be sites where the signals are not mounted within a footway, (b) 2.1 metres might be appropriate in England and Wales (we would need to consult if increasing the minimum), and (c) the measurement is a minimum, therefore Scotland can specify any height they wish and the signals are still lawful. I don't think there is conflict between the TSRGD and the Roads (Scotland) Act in this case.	
8	No. No additional signs to be permitted other than the absolute minimum for network management and safety reasons	116	No comment from [REDACTED]	
8	Yes. Cycle signs such as 956 facing the footway. Banning such signs being used will increase clutter as additional posts will now be required.	118	Direction 44A - I don't know how common it is to mount cycle signs on signal posts, but if it is done then any existing signs will be saved but cannot be replaced (but see my comment on the response from [REDACTED] below). This is a sign post clutter matter. Are we being premature in bringing this direction? I think we should still go ahead and use a special direction (dis-applying direction 44A) where we are satisfied that in a particular case mounting a sign on a signal post will not be detrimental.	
8	Signs fixed to traffic signal heads/poles should be restricted to an absolute minimum (Movement and Regulatory signs only?	123	No comment from [REDACTED]	
8	Does this requirement mean that old pelican crossing facilities will all have to be upgraded to puffin crossings if the old opposite side facing pedestrian signals are no longer permitted. If so will there be a timescale associated with this.	125	Direction 44A - I presume [REDACTED] is talking about far side signals. If so, this is covered by direction 44A(4). However does this direction cover signals prescribed by the ZPPPCRGD? Should	

			direction 44A(4) refer to signals and signs prescribed by the ZPPPCRGD?	
8	We support the proposal to restrict the mounting of signs on traffic signal posts. This should not, however, prevent the use of 'Trixi' mirrors on signal posts that reduce the risk of people cycling being obscured in blind spots of large vehicles. We support the proposal for high-level repeater signals at crossings for non-motorised users, to help improve safety.	131	No Comment from [REDACTED]	
8	We have used worded signs e.g. 'right turners give way to oncoming traffic' at accident sites which have been effective. These still relate to manoeuvres at signals and reinforce the message to driver's at the most appropriate point.	134	Direction 44A - this is something to consider. I have come across signs on signals (particularly in Nottinghamshire) with instructions for drivers turning right, including RIGHT TURNERS WAIT FOR SIGNAL. I don't know the legality of these signs, but they are put up for safety reasons (see my comment on the response from [REDACTED] above). There may be other signs that we have overlooked, particularly those on the back of signals. Is this direction going to cause problems for some Traffic authorities. Does amendment direction 36(1) save signs complying with the TSRGD 2002 , but not with the amendment TSRGD 2010? I am referring here to those signs that have not been withdrawn and are not listed in amendment direction 36(1)(a).	
9	Sec 4(a) requires that the signals are operated by, or under control of a Police Constable in uniform. This is not always practical. We would suggest that it is also permissible for a suitably qualified operative to operate or be in control of temporary signals.	14	I didn't personally comment on direction 53, but I am a little puzzled by it. Both the existing and proposed directions are difficult to understand. What is the difference between new sub-paragraphs 3(a) and 3(b) in respect of the traffic authority's approval? The traffic authority has to be "satisfied" in both cases. Does it mean that specific site approval is not required for the circumstances listed in paragraph 4? We may have got into a bit of a muddle here (the original direction 53 is not much better). Written approval has to be given, but what is the difference between "written approval" and "written approval for a particular site". The former (where new para 3(a) applies) seems to relate to approval being given to a contractor to place the signals anywhere whenever appropriate (so could be numerous sites) and the latter (where new para 3(b) applies) seems to relate to a specific site (mainly three-way or four-way control). What is not really clear, does para 3(a) mean that a contractor has to apply for approval for each contract (but can move the "shuttle-working" signals to different locations within the site), or apply just the once and use the signals on any contract until such approval is withdrawn? Chapter 8 Part 1 (para D5.10.3) offers some clarification. Turning to the particular point raised by [REDACTED] I think that an operative other than a constable in uniform is covered by paragraphs 3(b), 4(b), 4(c) and 4(d).	Question 9 to be reviewed with [REDACTED] and [REDACTED]
9	We agree that prior permission for placing the signals should be required, except where vehicle-only signals are placed in a case of urgency.	16	Direction 53 - no further comment here	
9	The proposed revision means that simple shuttle section portable signals will now require written approval (at present only multi way signals require approval – simple shuttle just notification). This conflicts with the requirements (statutory) in the Safety at Street Works and Road Works CoP (NRSWA s.65). It will also massively increase operational difficulty and delay in supplying utility customer services. There are no timescales in the draft Direction 53 for local authorities to respond to requests, and typically even simple requests can currently take days for some authorities to process, which contravenes maximum notice response times. If such a regime is to be introduced then there must be statutory rules. They should be in accord with the noticing/permit response timescales for the type of work involved, i.e. 2 days for Minor, 5 days for Standard Works etc. This will ensure consistency whilst offering sufficient time for impact analysis. Also, traffic management is an integral part of the impending Permit schemes and these	35	Even I have been confused by the requirements of direction 53. I think we should look at this and make sure we get it right. I didn't think we were trying to change the approval procedure, just clarify it. I'm surprised that NJUG did not pick up on direction 55(11) and the requirement to provide secondary signals at shuttle working.	

	same response timescales are mandatory for the granting of permits under those schemes.			
9	NRSWA91 only requires works promoters to notify us of use of two way temporary lights but these Regulations require us to give permission so there is a conflict in the legislation. What is the penalty for not gaining permission???	47	Direction 53 - we really have got to look at this again.	
9	It is suggested that the duration of portable signal installations, particularly in relation to whether line-markings (and particularly Diagram 1055.1 and 1001) should be placed with the portable signals, should be prescribed within TSRGD, or at the very least within an accompanying Traffic Advisory Leaflet. The guidance needs to assist where portable pedestrian signals are placed at locations where all standard line markings could be missing to avoid safety implications being overlooked. It is also suggested that Regulation 4 – Interpretation, should include definitions of road, building and engineering works (with durations?). It is suggested that ‘urgency’ is replaced with ‘emergency’, which is defined in the New Roads and Street works Act 1991, to avoid any misinterpretations. There is concern that a utility may interpret ‘urgency’ simply as an expedient to undertake works which were, or should have been, a planned activity and thus have required permission to be given in writing in advance by the traffic authority.	51	Portable light signals - no doubt guidance will be provided. I have previously suggested that we ought to look at re-drafting direction 53. We should consider whether “urgency” should be changed to “emergency”.	
9	the portable signals, should be prescribed within TSRGD, or at the very least within an accompanying Traffic Advisory Leaflet. We have concerns over the safety of a portable pedestrian signal installation where all standard line markings could be missing. It is also suggested that Regulation 4 – Interpretation, should include definitions of road, building and engineering works (with durations?). It is suggested that ‘urgency’ is replaced with ‘emergency’, which is defined in the New Roads and Street works Act 1991, to avoid any misinterpretations. There is concern that a utility may interpret ‘urgency’ simply as an expedient to undertake works which were, or should have been, a planned activity and thus have required permission to be given in writing in advance by the traffic authority.	56		
9	The situation as to whether permission is required or not has been a major issue between certain highway authorities and work promoters. I just hope clarity is achieved and everyone understands what ‘permission’ means rather than notification as used today. I am not sure what the final sentence means by “Limitations” as any departure from regulation could become another issue.	75	Direction 53 - we will be looking at this again. It even confuses me!	
9	Yes. Please retain clause allowing permission to be given orally.	79	Direction 53 - I have already said that we need to look at this again.	
9	We welcome this revision as it fully clarifies the requirement for those wishing to place any Portable Light Signals, (including shuttle working), on the Traffic Authorities network, to apply formally to the Traffic Authority. This will undoubtedly positively assist Traffic Authorities to enable the improvement of Health and Safety at Street Works/Road Works and to fulfil their Network Management Duty to coordinate works and minimise traffic disruption on their networks.	84	Direction 53 - [REDACTED] seems to understand this direction, many do not	
9	As a result of permitting portable pedestrian signals will amendments be made to Chapter 8 of the Traffic Signs Manual, Safety at Street Works and Road Works: A Code of Practice and An Introduction to the Use of Portable Vehicular Signals?	95	No comment from [REDACTED]	
9	Yes. It is suggested that the duration of portable signal installations, particularly in relation to whether line-markings (and particularly Diagram 1055.1 and 1001) should be placed with the portable signals, should be prescribed within TSRGD, or at the very least within an accompanying Traffic Advisory Leaflet. We have concerns over the safety of a portable pedestrian signal installation where all standard line markings could be missing. is also suggested that Regulation 4 – Interpretation, should include definitions of road, building and engineering works (with durations?). It is suggested that ‘urgency’ is replaced with ‘emergency’, which is defined in the New Roads and Street works Act 1991, to avoid any misinterpretations. There is concern that a utility may interpret ‘urgency’ simply as an	105	Portable light signals - no doubt guidance will be provided. I have previously suggested that we ought to look at re-drafting direction 53. We should consider whether “urgency” should be changed to “emergency”.	

	expedient to undertake works which were, or should have been, a planned activity and thus have required permission to be given in writing in advance by the traffic authority.			
9	Yes. Clarification of the term “urgency” is essential. Perhaps a situation falling within the definition of emergency works in the New Roads and Streetworks Act would be appropriate	106	Direction 53 - we will be looking to amend this direction and consider whether “emergency” is more appropriate than “urgency”.	
9	Yes. Permission is likely to be granted electronically rather than in writing. Some clarification of “urgency” is required. It is suggested that a situation falling within the definition of emergency works in the New Roads and Streetworks Act would be appropriate.	108	Direction 53 - we will be considering a redraft.	
9	Yes. We agree that prior permission should be obtained for placing the signals, therefore there needs to be some clarification as to what constitutes a “case of urgency”.	113	Direction 53 - more support for clarifying this direction.	
9	Yes. Clarification of the term “urgency” would be appreciated. Perhaps a situation falling within the definition of emergency works in the New Roads and Streetworks Act would be appropriate.	116	Direction 53 - another request to consider clarifying what is meant by “urgency”. We will be looking at redrafting this direction	
9	<p>Yes. The proposed revision means that simple shuttle section portable signals will now require written approval (at present only multi way signals require approval – simple shuttle working is just “notified” to a HA. This conflicts with the requirements (statutory) in the Safety at Street Works and Road Works CoP (NRSWA s.65). It will also substantially increase operational difficulties and delays in supplying utility customer service. There are no timescales in the draft Direction 53 for responding to requests and typically even simple requests can currently take days/weeks for some authorities to process which contravenes maximum notice response times.</p> <p>If such a regime is to be introduced then there must be statutory rules. They should be in accord with the noticing/permit response timescales for the type of work involved, i.e. 2 days for minor, 5 days for Standard works etc. This will ensure consistency whilst offering sufficient time for impact analysis. Also, traffic management is an integral part of Permit schemes and these same response timescales are mandatory for the granting of permits under such schemes. The additional requirement for written approval of simple shuttle section portable signals will increase costs for both utilities/contractors and local authorities – whilst only small on an individual basis, the cumulative costs could be considerable. However, more importantly, the potential delays to the delivery of utility services could have significant cost implications for both utilities that are required to provide connections within certain prescribed timescales, and indeed to businesses waiting for their utility services.</p>		Direction 53 - Comments from Thames Water Utilities Ltd to be taken on board when redrafting the direction.	
9	<p>The revision of direction 53 gives local traffic authorities the ability to control the conduct of works in the spirit of the Traffic Management Act 2004 since prior permission for placing the signals is required. However, there should be sanctions (FPNs?) where this permission is not sought.</p> <p>If works are planned these would normally be carried out with permission from Camden. If signals were needed this may fall under a TTO in which case the company would have permission to place temporary signals. The only instance where permission was not sought would be when there is an extreme emergency such as a gas leak in which case the company would be covered by current legislation. The power already exists to prosecute ‘any person who erects any object or device (on public land or private land adjacent to public land) which has the appearance or intention of guiding, warning or directing road users). Camden is also tasked under the legislation to secure the removal of such signs or devices. It is Camden’s view that this covers the FPN question, and that we have the legislation which and have used it this year to remove illegal traffic signs without the need for any form of FPN. Companies have been successfully prosecuted by Camden for such offences.</p>	121	Direction 53 - do the comments from [REDACTED] affect the way we will redraft this direction?	
9	There will be costs involved in giving the permission in writing. With intense pressure on local authority budgets, any proposals for additional expenditure will be most unwelcome. Allow extra time for the change, and hope that the economical climate may ease.	122	Direction 53 - we must get this direction right in the redraft.	
9	<p>Portable traffic lights (not at Pedestrian Crossing facilities) are required on a “temporary” short-term basis. They are almost always at sites where the motorist is not necessarily expecting the lights to be. There is a requirement to have an array of signs up to 275- 450metres from the traffic lights, giving advanced notice to drivers.</p> <p><u>The most dangerous time for the operative is when placing the signs and signals.</u></p> <p>The more time the operative spends setting-up the lights, the more exposed to danger he is. The more signals</p>		No comment from [REDACTED]	

	<p>required, the more time it takes, the more dangerous the operation becomes for the operative.</p> <p>Similarly, when dismantling the signals.</p> <p>On 2-way, 3-way and 4-way simple systems, there is absolutely no need to expose operatives to this danger.</p> <p>For the motorist, when the traffic light system is in operation, there is absolutely no benefit of 2 signals per approach. 1 signal is appropriate, along with the warning and marker signs 275-450metres in advance.</p> <p>There are NO statistics that prove 2 signals per approach are safer than 1.</p> <p>There is no need to try to imitate “permanent” signal set-ups at “portable” sites. The cost increases dramatically – transportation to site, time to set-up, manpower, etc all increase.</p> <p>Moreover, the environmental cost of transport, fuel, electricity etc is damaging.</p> <p>Naturally, if whoever initially proposed this idea had any experience with traffic management and safety, this proposal would not be contained in this draft TSRGD.</p> <p>However, a number of questions arise and need answering in relation to 2 signals per approach:</p> <ul style="list-style-type: none"> (a) How far apart should the signals be? (b) Should each signal be on OPPOSITE sides of the road? (c) On narrow country roads, will 2 signals each direction obstruct traffic exiting the zone ? (d) Should the signals be identical i.e. with Detectors etc ? (e) What is the legal status of the system if 1 signal does not work: Legal or illegal ? (f) What should the lights system do if 1 signal fails: continue as normal, fail to All-Red, continue with a controller warning, etc ? (g) Finally, what are the reasons for suggesting 2 signals per approach: bulb failure, visibility to drivers, cable damage, brightness etc ? <p>This is an abnormal proposal that is ill-conceived, illogical, unsafe, and riddled with potential on-site shortcuts. It will boost the profits of manufacturers. It will double the administration problems at traffic management companies. It will consume a logistics manager’s day. It will be a Health &Safety officer’s dream. It will be a tax-payer’s expensive nightmare forever.</p>			
10	<p>We are not clear as to why portable signals would need to be mounted on posts which are coloured yellow or painted in a non-reflective metallic finish. We believe that this element of design does not need to be prescribed and that authorities should be allowed to choose a finish which would fit in with the local streetscape and be visible to motorists.</p>	16	<p>Colour of posts for portable signals - the last thing that a traffic management contractor wants is to be told what colour the posts should be. Because of their temporary nature and the fact that they are used more than once at difference locations, it wouldn't be appropriate to specify various colours. I don't think this is a practicable suggestion. HOWEVER, this does raise a particular issue with regard to diagrams 3000, 3000.2 etc which show signals mounted on posts. As these posts are illustrated, are they part of the prescribed sign? If so, they can only be of the colour shown. Any other colour referred to in direction 46 should be a permitted variant. Therefore should these signals have a permitted variant (in item 4 of the table below or alongside the diagram) that says “The post my be varied to any colour as specified in direction 46” or similar? This depends on the interpretation of “light signals” in regulation 33 etc.</p>	<p>Question 10 to be reviewed with [REDACTED] and [REDACTED]</p>
10	<p>It would be preferable to maintain the requirement for the yellow colouring as the base or tripod may extend into the pedestrian areas and create a tripping hazard. Also, temporary signals may be more prone to failure and therefore a conspicuous base would be of benefit to drivers if this occurred.</p>	40	<p>Direction 46 - my reading of the current direction is that paragraph (6) applies to portable signals and that yellow (paragraph (8)) is optional as it says “may”. Therefore in the Amendment TSRGD we are reducing the number of colours being used. There is also the question of diagram 3000.1 showing a yellow post and whether this is in conflict with direction 46. With regard to trip hazards - signals should no be located so that the tripod becomes a trip hazard.</p>	

1 0	<p>It is recommended that consideration should be given to nature of the “support” of the portable signals.</p> <p>Previously portable signals have been limited to Red-Amber-Green or RAG signals, which were typically placed in the carriageway. Now that portable pedestrian signals are being proposed to be prescribed, there is a likelihood that these signals will be located on pavements and footways, which makes them susceptible to movement, either intentionally or unintentionally.</p> <p>It is proposed that wording is considered that implies a degree of permanence of these signals, such that they cannot be “wheeled” away by unauthorised persons. A saving could be made for existing portable signals, or an exception could be made for RAG signals.</p>	51		
1 0	<p>It is important that portable signs are easily visible to road users, especially because portable signals will be in places road users might not expect. Consideration should be given to whether a yellow and a non-reflective metallic finish is the most suitable for all road users. The needs of older drivers are an important consideration, especially as they are growing as a proportion of the overall population. The needs of the UK’s ageing population also needs to be considered more generally when thinking about the design and sighting of signs.</p>	55	No comment from [REDACTED]	
1 0	<p>It is recommended that consideration should be given to nature of the “support” of the portable signals.</p> <p>Previously portable signals have been limited to Red-Amber-Green or RAG signals, which were typically placed in the carriageway. Now that portable pedestrian signals are being proposed to be prescribed, there is a likelihood that these signals will be located on pavements and footways, which makes them susceptible to movement, either intentionally or unintentionally.</p> <p>It is proposed that wording is considered that implies a degree of permanence of these signals, such that they cannot be “wheeled” away by unauthorised persons. A saving could be made for existing portable signals, or an exception could be made for RAG signals.</p>	56	See above.	
1 0	<p>This appears to be over prescriptive. Grey or black posts should also be considered as being equally acceptable.</p>	57	No comment from [REDACTED]	
1 0	<p>We are concerned that yellow on its own may not provide effective contrast against its surroundings in bright weather conditions. The use of two colours such as yellow and black should be considered to improve visibility in whatever weather conditions it is placed</p>	70	No comment from [REDACTED]	
1 0	<p>Yes. The posts should be non-reflective however, there would be little benefit in proscribing a specific colour. This is due to the likelihood that post will be masked by traffic management coning and signing. In addition, during the hours of darkness or poor light conditions the posts will not be visible due to lamp brightness making the posts appear in the shadow.</p>	76	Direction 46 - no comment	
1 0	<p>Yes. It is recommended that consideration should be given to nature of the “support” of the portable signals.</p> <p>Previously portable signals have been limited to Red-Amber-Green or RAG signals, which were typically placed in the carriageway. Now that portable pedestrian signals are being proposed to be prescribed, there is a likelihood that these signals will be located on pavements and footways, which makes them susceptible to movement, either intentionally or unintentionally.</p> <p>It is proposed that wording is considered that implies a degree of permanence of these signals, such that they cannot be “wheeled” away by unauthorised persons. A saving could be made for existing portable signals, or an exception could be made for RAG signals.</p>	105	No comment from [REDACTED]	
1 0	<p>Yes. Existing portable signals conforming to the previous direction should be permitted to continue in use. The amended direction should apply to signals manufactured after the implementation date.</p>	108	Direction 46 - this is a tricky one. The savings in the General Directions certainly applies to permanent signs, but what is the situation with temporary signs and signals? It would seem that they have to comply with the current Directions when placed at a new site. How does direction 36 in the amendment TSRGD 2010 apply in this case?	
1 0	<p>Yes. We agree that the posts should be non-reflective, but do not immediately appreciate the option for posts to be yellow.</p>	113	Colour of portable signal posts - yellow is often associated with “temporary” and in any case diagram 3000.1 currently shows yellow posts. If North Lanarkshire Council don’t want to use yellow posts they can always use a non-reflective metallic finish.	

1 0	Yes. The posts should be non-reflective.	116	No comment from [REDACTED]	
1 0	It is Camden's view that the post should be yellow and reflective to be as obvious as possible, whilst Camden use black to blend into the background for fixed posts temporary signals need to be as clear and apparent as possible	121	Direction 46 - not for me to comment.	
1 0	In order to be as visible as possible, particularly when not in use (E.g. during installation or take down) temporary signal poles should be coloured yellow or another suitable conspicuous colour.	123	Direction 46 - this does give the choice of yellow or metallic. However, does a local authority have the power to specify the colour when signals are provided by a utility company etc (as opposed to a term contractor working for the local authority on highway maintenance)?	
1 0	I wonder if there isn't a case for requiring all temporary signal posts to be yellow, with no alternative. It would help to emphasise them, in the absence of any Stop line, especially as the WAIT HERE" sign is prone to being displaced or laid flat, especially on windy days.	126	Direction 46 - something to consider, we need to collate all the comments on this direction to see what the consensus is.	
1 1	I know that you are working on a new sign for electric vehicle bays but I've just had an enquiry from Coventry asking whether the signage will only be allowed to say "Permit holders only" after the electric bay stuff or whether the sign can just say electric vehicles only. Their concern is that the permit holders only element will be quite restrictive as EV owners from other local authorities etc may want to use the facilities but will be unable to do so unless they apply for a permit, which suggests a level of forward planning that may be unlikely for a casual car trip.	23	Not an official response, but raises issue of 660.9. It would appear that Coventry would support the proposed permitted variant that allows the bay to be used by non-permit holders.	Agreed to amend legend to read "recharging".
1 1	<p>We refer to the draft amendments to TSRGD which are currently out for public consultation and comment and there are two proposed amendments to the Regulations that we feel require further consideration. The first of these we consider essential and the second highly desirable. They cover Road Danger Lamps and Road Cones and we should perhaps state that we are the only UK trade association representing the manufacturers of these products and that virtually all of the UK manufacturers of these products are members of REM A.</p> <p>Road Danger Lamps</p> <p>The draft proposes to replace the current reference in Regulation 55 to BS 3143 Parts 1 and 2 with references to BS EN 12352. However, whilst this European standard has superseded the old British Standard, it is not directly equivalent and includes a number of performance classes that would not be acceptable to the DIT for lamps used on UK roads. For this reason a national annex to the BS EN 12352 has been written in consultation with the DIT ([REDACTED]) and this has now been published by BSI. In order for the amended Regulation 55 to prescribe the same types and performance of lamps as it does currently, it will therefore be essential for the new reference to require compliance with this national annex to the standard. One way of achieving this might be to incorporate tables NA.1 and NA.2 from the National Annex into the Regulation though we would point out that there is an error in Table NA.2 and that the publication of a corrigendum is awaited.</p> <p>The amendments to Regulation 55 still retain the description of the products as Road Danger Lamps. The European Standard uses the term "Warning and Safety Light Devices" and the 2009 revision of Chapter 8 therefore refers to "Warning Lights", retaining the old term "Road Danger Lamps" in brackets to indicate the change. For the sake of consistency it would be preferable for the Regulation to do the same.</p> <p>Road Cones and Cylinders</p> <p>TSRGD is currently silent with regard to the visual performance of the reflectorised area/s on cones and cylinders. BS 873 6 and 8 provided of retroreflective performance for cones and cylinders, though only the two upper levels are now used (and permitted by the Red Book). British Standard has now been superseded by BS EN 13422 which includes equivalent performance classes to these two levels. BS 13422 also includes performance/design classes that would not be acceptable for use in the UK and a National Annex to the standard has therefore been written and published, specifying the classes appropriate for the UK and indicating that cones and cylinders deployed on high speed and dual carriageway roads should be to the higher of two classes of retroreflectivity.</p> <p>The only reference to BS 873 in Regulation 56 relates to marking of products that may be needed to comply with the standard. We note that it is proposed to amend this section to refer to the new European standard but we feel that Regulation 56 should be further amended to require broader compliance with the visual performance requirements of BS EN13422 and with its UK National Annex. Currently there is a lack of direction in the UK with regard to the selective use of the two levels of retroreflective performance specified in the standard. It may be that the ongoing revision of the Red Book will address this but it seems to us that TSRGD should be setting the requirement. It is clear from market reaction to the National Annex to BS EN 13422 that many users are ignoring its recommendations and will continue to do so until compliance becomes mandatory.</p>	38	One for [REDACTED] to comment on.	Noted that there may be changes to instructions as a result.

1 1	<p>The proposed sign to inform divers that a route is unsuitable for HGV's using SatNav does not send a strong enough message. The trials of the sign incorporating a Satellite symbol associated with the barred Lorry symbol have been very effective in my Authority area. The proposed sign is simply a revised version of the existing and is not sufficiently different to have an impact on driver behaviour. See also 820.A.</p> <p>Account should be taken of the feedback from Local Highway Authorities in England and Wales.</p>	49	<p>Diagram 820A - we do not want to use the satellite symbol. This was obviously authorised by WAG. Ian says the trials have been successful, but have they tried using diagram 820A? That might be just as successful. Have we had feedback on the signs we have authorised?</p>	<p>Agreed that bus symbol will not be added to diag 820A when asked.</p>												
1 1	<p>Paragraph 2 – 6: The use of separate warning signs for maximum heights would appear to add to highway clutter, although the practicalities are understood.</p> <p>Paragraph 12: In Diagram 1001.2A it would appear that a vehicle would block access to a cycle if stopped close to the stop line.</p> <p>Contraflow cycling with an advisory lane is often disliked by cyclists, without an advisory lane it is considered dangerous</p>	50	<p>Metric/imperial signs - many bridges already have dual signing. I don't think this is a signing clutter issue.</p> <p>Diagram 1001.2A - we will be reconsidering the design. The other option is to provide a continuous stop line and make it lawful for cyclist to cross it (anywhere). This is sometimes done (and is no doubt currently unlawful, unless it has been authorised).</p> <p>Contra-flow cycling - this is not new. Local authorities will have the choice whether or not to mark an advisory lane. There is current criteria in relation to not providing any lane markings (e.g. traffic speeds below 25mph) - see Chapter 3.</p>	<p>Agreed that anything to do with diag 1001.2A will be considered after [REDACTED] and [REDACTED] have discussed design issues. Reg 43 needs to be re-considered, see [REDACTED] comments</p> <p>Agreed for contraflow cycling to amend direction 17 item 14a col 3 remove 1004 whole of Pt B.</p>												
1 1	<p>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.</p> <table><tr><td>Page</td><td>Ref/diag.</td><td>Comment</td></tr><tr><td>11</td><td>s32(3)</td><td>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”. 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 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.</td></tr><tr><td>12</td><td>629.1</td><td>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.</td></tr><tr><td>24 & 27</td><td>637.2A & 663.2</td><td>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.</td></tr></table> <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>	Page	Ref/diag.	Comment	11	s32(3)	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”. 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 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.	12	629.1	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.	24 & 27	637.2A & 663.2	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.	72	<p>Yellow box junctions - we have received sufficient comments on this to look at amending the proposals.</p> <p>Diagram 629.1 - we will need to consider whether now is the time to remove the imperial-only version and either design a new dual sign or amend existing diagram so both metric and imperial signs have to be provided.</p> <p>Diagram 663.2 - I can appreciate the problem here, but the designs proposed by [REDACTED] look overloaded. A similar situation arises with pedestrian zones, although in this case access is restricted. The possible alternative to Simon's proposal are:</p> <p>(1) Ensure that diagram 637.2A is visible when entering the zone (guidance-only).</p>	<p>Agreed that both roundels should be in amendment regs. Schedule 16 item 2 now needs to be removed or “not used”.</p> <p>Agreed design of diag 637.2 is consistent with ped zone and what has previously been authorised, so no change. Agreed leaving diag 663 as is, no change.</p>
Page	Ref/diag.	Comment														
11	s32(3)	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”. 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 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.														
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<p>(SIGN DIAGRAMS HAVE NOT PRINTED OUT – JUDITH)</p> <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> <p>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 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> <p>24 637.2A</p> <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> <p>(SIGN DIAGRAMS HAVE NOT PRINTED OUT – JUDITH)</p> <p>25 660.8</p> <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> <p>(SIGN DIAGRAMS HAVE NOT PRINTED OUT – JUDITH)</p> <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 themselves give an accurate rendition of it. 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 is 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 disadvantages:</p> <p>1. The time and cost involved would detract from the ability to provide other enhancements to the software;</p> <p>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> <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</p>	<p>(2) Prescribe signs for use only where there are no loading restrictions or where loading restrictions operate at the same time as the waiting restrictions (other circumstances would still require authorisation).</p> <p>Diagram 637.2A - changing the design as proposed wouldn't be consistent with diagram 637.2. An alternative might be to use the legend "No waiting and no loading" on a yellow background (I don't like the white panel for "No loading" placed directly on the yellow background). Omitting "No waiting" in this case might lead to enforcement difficulties. There is a precedent for "No waiting" in diagram 650.2, although there is a precedent for using "No loading" only in diagram 640.1. We need to consider the design of diagram 637.2A in conjunction with diagram 663.2 above.</p> <p>Diagram 660.8 - I agree that we should use the standard blue for the symbol.</p> <p>Diagram 2505 - the services signs refer to the "i" symbol as "tourist information". There is a general inconsistency in using a white "i" on a brown background, on a blue background and black "i" on a white background. Using the convention adopted for diagram 857 it would seem that tourist information only should be on a brown background. Any other colours should be used for other information (which may include tourist information, but not solely tourist information). How do you define other information? A bus timetable could be classed as tourist information. If you visit another town or city for whatever reason are you a tourist? If we keep tourist information brown, then the "i" symbol on services signs needs to be on a brown tile. This is perhaps something to consider as part of the Traffic Signs Review. The suggestion made by [REDACTED] is a change to the existing TSRGD 2002 and not to the proposed amendment TSRGD 2010. Therefore it is perhaps best to leave things as they are.</p>	<p>Agreed, use standard blue. Need to clarify with [REDACTED] whether Sch 16 Item 39A can be removed or placed in table, should not be used for single sign.</p>
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	<p>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> <p>49 2505 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 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”.</p> <p>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.</p> <p>52 2602.1 (and variants of 2601.1, 2608) 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. 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> <p>82 Direction 16(3) 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. 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. 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> <p>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</p>		<p>Diagram 2601.1 - the ½ mile distance can be moved to the right, but it won't line up exactly with the 1 mile distance in the upper panel. I can do this easily and if the sign looks OK then it is probably a good idea. It would be in the spirit of the optional design rule shown in figure 4-1 of Chapter 7.</p> <p>Diagram 2602.1 - this highlights the problem of including journey times. I would still recommend that we do not show journey times on cycle signs.</p> <p>Permit parking areas - if the disabled bay was also a permit bay, the entry sign would not be affected. New direction 25(3) currently prevents a parking bay from being marked on the carriageway. One way to deal with this is not to make any amendment to the direction (apart from allowing single yellow lines and kerb blips to be used) and to issue a special direction whenever a local authority puts in a request. In future we might permit other types of bay to be provided, but this is a matter for the Traffic Signs Review. The issue regarding single yellow lines etc is already in hand.</p>	<p>Agreed to proceed with times but [REDACTED] to sort our design issues = min or mins</p> <p>Agreed to amend Dir 25(3) to allow diags 117, 1019 and 1020.1. Authorisation or special direction needed to allow disabled parking bay marking in area.</p> <p>Agreed, [REDACTED] to provide new working for [REDACTED]</p>
1 1	<p>English Heritage welcomes the opportunity to respond to the consultation on the Traffic Signs (Amendment) Regulation and General Directions (TSRGD)2010 and the Traffic Signs (Temporary Obstructions) (Amendment) Regulations 2010.</p> <p>English Heritage is an Executive Non-Departmental Public Body sponsored by the Department for Culture, Media and Sport, with our funding agreement signed by CLG and DEFRA. We work in partnership with central government departments, local authorities, voluntary bodies and the private sector to conserve and enhance the historic environment, broaden public access to our cultural heritage, and increase people's understanding and appreciation of the past.</p> <p>We are the UK Government's statutory advisor and a statutory consultee on all aspects of the historic environment and its heritage assets. This includes archaeology on land and under water, historic buildings sites and areas, designated landscapes and the historic elements of the wider landscape. <i>Conservation Principles</i> http://www.english-heritage.org.uk/server/show/nav.9181 sets out the guidelines for engagement with</p>	91	Nothing to comment on	

	<p>the historic environment which have informed the consultation draft of Planning Policy Statement 15 (PPS15).</p> <p>English Heritage has an interest in streetscape as part of our drive to improve the public realm. Excessive numbers of signs can be a contributing factor in poor quality streetscapes due to the unnecessary clutter they create. The positioning of signs or choice of backing board can also affect their impact on the public realm. We recognise the need to authorise additional signs both for administrative ease, and to ensure that the appropriate signs are available to local authorities to meet their needs. In some instances this may lead to a reduction in the number of signs used, as one succinct sign may better convey the message previously carried by a greater number of signs. However, we do have some concern that although a few signs are to be discontinued, overall the number of signs available is steadily increasing. Some of the provisions, such as the requirement to include both metric and imperial signs for height restrictions, are understandable in safety terms but will lead to a doubling of sign numbers in these situations. Very often these are likely to be historic bridges which may be in sensitive locations.</p> <p>The inclusion of these new signs in the TRSGD therefore provides an opportunity for DfT to reinforce the message, already addressed in much of its recent guidance, about the need to continually review or audit existing sign provision and reduce clutter where possible. Some of the new sign authorisations, such as provision to mount direction signs on bollards, will help in this aim. As well as public realm benefits, evidence (for example, from the RAC Foundation) suggests that this can also bring about safety benefits by limiting the amount of information drivers need to absorb.</p>			
1 1	Make the signs all plastic then they will not attract thieves	1	Not applicable to TSRGD.	
1 1	<p>My concern is with the Puffin Signals additional signage for pedestrians. Although I appreciate the need for a secondary signal, placing it higher on the same post is not the best position. Better positions would be on the secondary, shorter post (to the left of waiting ped), or straight ahead as per pelican crossing. I strongly feel that the design of the puffin crossing needs to change, and by the DfT accepting a higher secondary on same post as adequate and standard will not provide an opportunity for review.</p> <p>I do not approve of the higher signal, as it is angled in the same direction as the signal head above. This means vehicles approaching the crossing can see 3 different signals at a height that concerns them. Possibly 2 red and 1 green. If the vehicle signals are obstructed by prior street signs or overhanging foliage, or if there were a dead bulb, a driver may see 1 red and 1 green, which would cause confusion and a danger to crossing peds.</p>	2	<p>Supplementary pedestrian signals etc - this is probably one for [REDACTED] to comment on. I think the concern is that if the primary signals on the near side for drivers are obscured, then the supplementary pedestrian signals on the off side (mounted higher than normal near side pedestrian signals) will be facing drivers and could be mistaken as signals for them (this applies only to a two-way road and assumes the driver sees only the colour and not the symbol shape - I am assuming that the pedestrian signals are positioned so that pedestrians are always looking towards on-coming traffic). However there will be secondary signals for drivers.</p>	
1 1	<p>SCHEDULE—PART 4</p> <p>New diagrams for Schedule 4 to the 2002 818.4.</p> <p>In 1870 the International Committee on Weights and Measures adopted the symbol “t” for the (metric) ton(ne). The UK has adopted SI.</p> <p>The (metric) ton is a not a true SI unit, but a convenient multiple of an SI unit.</p> <p>However it is classified as a unit accepted for use with the International System.</p> <p>SI units, and other units accepted for use with them, have standard symbols. Those symbols are case dependent.</p> <p>“7.5 t” means “7.5 ton(nes)”.</p> <p>“7.5 T” means “7.5 tesla”. The tesla is a unit of magnetic flux density.</p> <p>The sign, as shown, indicates the prohibition of vehicles carrying anything producing a magnetic flux density of 7.5 tesla. If I were a driving a 40 t lorry and came across this sign, I would drive on in the knowledge that 7.5 tesla is such an intense magnetic field that I could be sure nothing on my lorry would come anywhere near that flux density.</p> <p>The sign should show “7.5 t”.</p> <p>The old Imperial or long ton is no longer in use in the UK, but even if it was and that were intended, the symbol t would be acceptable.</p> <p>I cannot understand why you want to require local authorities to put up signs with the wrong unit on them. Please would you explain!</p>	3	<p>(1) Tesla - this was raised during the consultation on Chapter 3. We sought legal advice and no answer was forthcoming. The TSRGD does allow the option of using “t” rather than “T” (regulation 17(10)). There is a cost implication in changing all the existing signs. Do we want to encourage traffic authorities to use “t” for new signs? We could amend the relevant diagrams in TSRGD to show “t” rather than “T” and amend regulation 17(10) accordingly (or remove this regulation and save existing signs using “T”). Even if we continue to prescribe both “t” and “T”, we ought to amend the working drawings to include the lorry symbol with “t”.</p> <p>(2) Dual signs - we are fully aware of sign overload and clutter. Sign recognition and information assimilation is already based on a driver not looking away more than 10 degrees. We are fully aware that a drivers must keep their attention on the road ahead. This is the basis for choosing the appropriate sign size and x-height. This response from [REDACTED] is nothing more than a metrication argument and should be dealt with in the usual way. No doubt a time will come when we can dispense with dual signs.</p>	Use of T and t previously agreed.
1	Cycling Issues	4	Diagram 960.1 includes a continuous edge line which means it	Nothing to comment

1	<p>12. Prescribing a sign to permit contra-flow cycling either with or without an advisory lane marked on the carriageway. Sign to diagram 960.2 – One-way traffic with contra-flow pedal cycles.</p> <p>The Kent Police view is that provision is already provided with sign 960.1 (One-way traffic with contra-flow cycle lane). Inclusion of the new sign, 960.2 in TSRGD 2010 should not be considered. We believe that that the installation of this sign, with or without an advisory lane marked on the carriageway would be hazardous and conflict will occur between pedal cyclists and other vehicular traffic.</p>		<p>is suitable only for mandatory contra-flow cycle lanes. Working drawing 960.2 was produced in 1995 (so it is definitely not a new sign) and is shown in TAL 6/98. However, because Kent Police have raised safety issues (whether these have been proved to be real or not over the last ten years or so), I have recommended in my own TSRGD comments that we should give further consideration to the illumination requirements for diagram 960.2 and possibly diagram 960.1 (my comment (14)).</p>	on.
1 1	<p>Regarding the proposed changes to Direction 11, clarification of ‘regular intervals’ would be welcome but should include statutory minimum spacing of repeater signs according to speed limit. There could be a tolerance to allow for difficulties in siting signs due to junctions, etc, e.g. a minimum interval of 250 metres +/- 30 metres. There would be no objection to additional repeater signs as suggested.</p> <p>Part 3, paragraph 8, amendment of Direction 11. There are two issues of concern:</p> <p>The proposal to allow additional repeater signs without compromising the regular intervals requirement, in order to comply with Direction 9(5), is not opposed in itself but the ABD would prefer to see Direction 9(5) revoked altogether. If a driver enters a major road from a side road without passing signs indicating a higher speed limit, there can be confusion, especially if the major road is lit and it is not immediately obvious whether the road is a restricted road. If costs have to be incurred installing additional repeater signs to comply with the direction, it would be better for the money to be used towards providing terminal signs instead.</p> <p>The proposal to remove the need for repeater signs to diagram 671 on short lengths of road could exacerbate the already unsatisfactory situation that often arises along short, street-lit sections of rural road at, for example, junctions, where highway authorities fail to provide diagram 671 signs to indicate the road is not restricted. Since case law has ruled that terminal 30 mph signs are not required at the beginning of a street-lit restricted road, drivers must assume that street lights indicate a 30 mph limit unless there are signs to the contrary. The ABD would like the regulations tightened or clarified to specify that terminal signs are mandatory at the entry to every speed limit, including restricted roads, and terminal signs to diagram 671 should be provided at the start of any street-lit section of road subject to the national speed limit, however short.</p>	5	<p>I tend to agree with most of these comments. It has already been agreed that we shall look to further amending direction 11. Remember that this direction applies also to waiting restriction repeater signs that are generally mounted on lamp columns and not at precise intervals.</p> <p>With regard to short lengths of street lighting (e.g. at a road junction) where the speed limit does not change, para 14.21 (last sentence) states that a repeater sign (other than 30mph) should be mounted on or in line with the first lighting column. We need to consider whether or not we should include this requirement in direction 11 (it’s a balance between advice in the Traffic Signs Manual and a mandatory requirement in the General Directions).</p> <p>With regard to providing full signing at a road junction and dispensing with direction 9(5), there is a cost implication if this were to apply to existing signs. To be effective, this change would have to apply to existing junctions and there would need to be long time-limited saving (say 10 years). In fact, as we have not specifically consulted on this, and because it imposes a further burden on traffic authorities, I don’t think we could make this change. The choice of using full signing is referred to in para 14.13 and shown in figure 14-8 in Chapter 3. Considering that other types of restrictions (e.g. lorry bans) have to have full signing, it does seem strange that speed limits, which are safety critical, apply to all drivers and enforced by speed cameras, can have a relaxation of signing. This does not apply, of course, where the major road has street lighting and is subject to the national limit (direction 10 requires terminal signs viewed by drivers leaving the side road).</p> <p>With regard to a mandatory requirement to provide a terminal sign to indicate that a road with street lighting has a 30mph limit, the case law on this is rather strange, since a sign is required to indicate that the speed limit on the approach has terminated (i.e. changed to another limit). If the road subject to a 30mph speed limit, including the approach to this limit has street lighting, how is a driver to know where the speed limit changes from, say, 40mph to 30mph. I can understand why a terminal sign might be omitted if the 30mph speed limit and the street lighting start at the same place, but this is still misleading. I would have thought that direction 8(2) makes it clear that terminal signs must be provided. A 30mph speed limit on a restricted road is a “speed limit”, and diagram 670 (not a lighting column) is an “appropriate sign”. If we decide to specifically</p>	

			mention “restricted roads” in direction 8, then we would need to add a definition (referring to the Road Traffic Regulation Act) in direction 3(1), otherwise we would have to use wording similar to that in direction 11(4)(a). I think it is worth addressing this problem.	
1 1	CSS Lighting Group offers its wholehearted support to the Statutory Instrument proposal to amend Direction 41 and regularising the use of either internally illuminated traffic bollards, or bollards illuminated by retro reflective materials, conforming to BS 8442 (we would question whether the regulations should be future proofed by removing reference to BS 8442 / 2006).	6	No comments	██████ to consider inclusion or otherwise of dates and to double check wording of the direction that it conveys the intention of illuminating the sign on the bollard.
1 1	<p>The proposals for sign 2601.1 should allow “T” series brown tourist symbols to be added to the panel sign. This would allow advanced directional signage for cyclists to tourist destinations in a similar manner to sign 2608.</p> <p>The proposals for 2601.1 should also allow the route number patch to be replaced with a pictorial patch for a recognised national/regional route such as the Trans Pennine Trail in Merseyside or Pilgrim’s Trail in Portsmouth.</p> <p>In additional change, which is not within the current proposals is needed:</p> <p>Sign 965 “End of Route” should be amended to allow variants “End of cycle lane” and “End of cycle track” consistent with the permitted variants of sign 962.1</p>	7	Diagram 2601.1 - the only advance direction tourist signs that can include the cycle symbol are diagrams 2210 and 2213. I think it would look rather odd and cluttered to add a tourist symbol (Schedule 16, item 24) to diagram 2601.1 The question is then should we allow the same permitted variant for diagram 2602.1 as you wouldn’t normally mix and match diagrams 2601.1 and 2608. We could consider allowing the cycle symbol to be added to diagram 2202, but this wouldn’t allow for x-heights less than 60mm. There is the option of prescribing a new all-brown tourist advance direction sign for cycles, but do we want to go down this path? It seems to me that any further changes to cycle signs should be a matter for the Traffic Signs Review. This applies also to route logos, which I presume we are currently authorising. Lets just leave things as they are - adding journey times is bad enough!	Agreed, leave as is.
1 1	<p>Diagram 1005 has also been used as guidance markings at the entrance to roundabouts which is currently not prescribed. Due to the wide use of this road marking some thought should be given to including this as a prescribed use of the road marking.</p> <p>No max width or given for the cycle entry on proposed Diag 1001.2A, so theoretically it could be as wide as a traffic lane, thus meaning vehicles would not have to stop at the first stop line. I would suggest that the cycle entry should be no wider than 1.5m.</p> <p>Can a permitted variation to diagram 954 be “Except trams”?</p> <p>Consideration given to including the “Dragons Teeth” / ”Gateway” road markings as a prescribed road marking as these have been widely used by many local authorities.</p> <p>Diagram 864.1 also has the text “The Vehicle Inspectorate” does this sign require the same alterations that have been amended as per point 26.</p>	9	<p>Diagram 1005 at roundabouts - I presume ██████ is talking about markings which extend the lane lanes on the approach to the roundabout beyond the give way line. These markings cross those on the circulatory carriageway and are intended to guide drivers into the correct circulatory lane. Chapter 5 refers readers to TA 78/97. There are no diagrams in the TA that show this arrangement, although I have seen this done. As I recall, diagram 1005 is used in preference to diagram 1004 as the latter could confuse drivers already circulating on the roundabout. As this layout is not in the TA, I’m not sure if this is good practice. However, as diagram 1005 is effectively being used as a lane line (in the same way that diagrams 1004 and 1005 are used on the circulatory carriageway), I don’t think the caption to the diagram needs to be changed. If they are not prescribed, then we couldn’t authorise them anyway as it would be changing the meaning of the marking. I think this is a case of do nothing.</p> <p>Diagram 1001.2A - the width of the cycle entry shown in the new diagram is 1.8m and this accommodates three diagonal marks. If you think it is a good idea to limit the width, then I would suggest 1.8m rather than 1.5m. However, this would be shown as a maximum dimension and a tolerance could not be applied, so, for example, a marking where this width measures 1.82m would be unlawful. The permitted variants allow the number of diagonal marks to be varied, but I would expect at least two, and four would not be possible if the entry width were</p>	

			<p>to be restricted to 1.8m. Is it best to leave the diagram as it is and give guidance in Chapter 5, or just make the permitted variant “The number of marks in the diagonal line may be reduced to two”? The latter would prevent the entry from being too wide. A single mark with a 300mm diagonal space either side (i.e. the mark does not join up with the stop line) would result in an approach width of aprox 800mm. If we were to do this the diagram would need to be amended to indicate that the mark in the diagonal line does not have to join the stop line. Diagram 954 - as the firm that [REDACTED] works for is based in Nottingham, and not far from his office there is a sign to diagram 616 with a plate “Except trams”, this is probably where the suggestion has come from. There is a particular problem at this tram route location in Nottingham as trams leave the public highway and enter a tram-only viaduct. Several cars have become stuck on the viaduct because drivers are ignoring the signs. I think there may be other locations (not necessarily in Nottingham) where this combination of signs is in use or has been requested. My view is that where the tram route is not safety critical, then diagrams 953.1 and 953.2 should be used (i.e. in locations where car drivers won't come into difficulty). Where car drivers ignoring the signs could either end up on tram tracks not suitable for road vehicles, or where the tram-only route passes through a signal-controlled junction with signals for tram drivers only, then there may be a case for a sign combination of diagram 616 and “Except trams”. It depends on our future policy on the use of diagram 616. My recommendation is that would do not include “Except trams” in the Amendment TSRGD and that we consider each case on its own merits and authorise the plate where we think this is appropriate. There won't many applications for authorisation (if any at all).</p> <p>“Dragon's teeth” haven't been considered to be road markings and have been treated in the same way as coloured surfacing (for bus lanes etc).</p> <p>We decided not to include diagram 864.1 in the name change to VOSA etc. In future I think we could remove this sign from the TSRGD as it is used only at garage premises carrying out MOTs. I wouldn't be at all surprise if many existing signs still say “Ministry of Transport”. I would treat this sign in the same manner as the railway station sign when not used on directional signs - i.e. it is an advertisement, not a traffic sign. In the meantime we could include this sign in the Amendment TSRGD and change the name to VOSA and include the permitted variant that allows for a future name change. Please let me know what you wish to do.</p>	Ignore, not in amendment regs.
1 1	<p>Further to our conversation the other week, I have canvassed my colleagues within the Metropolitan Police Service, Traffic Management Units, and we are in agreement that the use of the "Zip Merge" signs with the plates:- "Stay In Lane" and then "Merge In Turn" would be a useful addition for use if required, in the Chapter 8 layouts for Temporary Road Works situations, as prescribed within Schedule 12, Traffic Signs Regulations and General Directions 2002</p> <p>A number of us recall these signs being used on an experimental basis some years ago and would ask that they be considered for permanent adoption.</p>	10	<p>Worded “MERGE IN TURN” signs are included in Chapter 8 and treated as regulation 53 signs. I produced working drawings in 1994 for signs including arrows and symbols, and I presume these are the “Zip Merge” signs referred to. They can be found on drawings NP7257.1, NP7257.2, NP7257.3, NP7257.4 and NS103. The HA would need to be consulted, but I don't think it is appropriate to include this type of sign in the Amendment TSRGD.</p>	Ignore, not in amendment regs.

	<p>Queuing motorists are often frustrated by the many vehicles that pass them, when they have duly adhered to the lane closure countdown signs. The use of these signs and plates would lead to a formality of the arrangement, and hopefully remove some of the stress from today's driving, frequently resulting in outbursts of "road rage".</p> <p>I would therefore ask that these signs be proposed within this Consultation.</p>			
1 1	<p>I have three additional comments which refer to Direction 9,10 and 11.</p> <p><u>Dir 9 (4) and 10 (8)</u> There are more and more occasions when I am coming across wide junctions with a dividing island between carriageways (not a dual carriageway) at the junction. Because of the distance between the nearside and offside of the relevant road (side road) at this point the temptation is to place the offside speed limit terminal sign on the central island and omit the offside sign because it cannot be seen due to its distance away or the topography of the junction. This has led to the argument at court that the speed limit on the other road (main road) is not lawful because it is not correctly signed at a junction.</p> <p>My suggestion would be amending the wording of Dir 9(4) and Dir 10 (8) to read "...on each side of the carriageway of the road <i>or, if there is a traffic island at the junction, on the nearside and on the central traffic island if this is considered to be more visible</i>, by which traffic may pass....."</p> <p><u>Dir 9 (5)(b)</u>. This is another direction which has been used by the defence to deem that the whole speed limit on the other road (main road) is unlawful because the signing coming from the relevant road is not complying. When a relevant road joins the other road which is a dual carriageway with no provision to turn right or, on joining a roundabout or gyratory system, local Highway Authorities have not placed a repeater sign within 100m to the right of the junction on the other road because it is considered superfluous as it would not be seen by drivers having to turn left. This seems logical because, on a standard junction where traffic can turn left or right from the relevant road, the driver would still only see one of the repeaters depending on which way they turn. Could I respectfully suggest that the wording of Dir 9(5)(b) be amended to read ".....in accordance with direction 11 to the left of <i>and if it is possible to turn right, to the right of</i>, and not more than 100 metres from, the junction."</p> <p>Finally, <u>Dir 11(4)(a)</u> the placing of repeater signs on roads with a system of carriageway lighting. On some occasions I am asked to consider the enforcement of a 30mph speed limit on a road where the lamps are secured to telegraph poles in rural and semi-rural areas. With the surrounding trees, during daylight hours when the lamps are not illuminated it becomes extremely hard to see the lamps and therefore to identify the road as a restricted road. On one occasion I could only see the lamps whilst walking along the road and that was when I was actively looking for them!</p> <p>I would like to see an amendment of Dir 11(4)(a) which reads, ".....is subject to a speed limit of 30mph <i>unless the lamps cannot be clearly seen in daylight</i>; or....."</p> <p>Having seen the attempts at altering the lengths and spacing of centre line road markings to diagram 1004, 1004.1 etc to comply with a reduction in a speed limit and the fact that certain web sites have suggested that failure to change the dimensions could be a cause to plead not guilty to speeding offences I am very pleased to see the amendment in Schedule 6 relating to these markings.</p>			<p>Direction 9(4)/9(5b) agreed.</p> <p>Direction 9(4) to be re-written, [REDACTED] to do this.</p>
1 1	<p>Part of paper looks at the Traffic Officers being able to proceed under a red X. In the South East region we have a number of locations with no hard shoulders (M25) that require the Officers to proceed under the red X's to reach the incident to clear it.</p> <p>Would you be able to give a time scale that you hope to complete your work and if this recommendation is accepted when might it become lawful.</p> <p>The other area that causes us problems is the advisory speed limits. We are not allowed to exceed them but often members of the public do, which put our Officers at risk when carrying out their duties. Would your work be able to cover this issue at the same time? Look forward to hearing from you.</p>	12	[REDACTED] not seen this.	<p>1st para – dealt with.</p> <p>Not for TSRGD</p>
1 1	<p>Diagram 1028.3 disabled bays to be painted yellow and be enforceable without a Traffic Regulation Order.</p> <p>Diagram 1027.1 School Keep Clear Markings to be enforceable without a Traffic Regulation Order.</p> <p>The quality of signs reflectivity is such that the requirements of Schedule 17, item 1 relating to illumination of regulatory signs within the built up area should be removed. The cost and energy savings to be gained from</p>	14	The other points raised by [REDACTED] (diagrams 1028.3 and 1027.1, sign illumination, warning signs as road markings and broken yellow lines) are matters for the Traffic Signs Review and not the Amendment TSRGD 2010.	Ignore, not in amendment regs.

	<p>this will be significant.</p> <p>Consider the authorisation of warnings signs being used as road markings.</p> <p>Introduce a broken yellow line to be used along the edge of carriageway to indicate where diagram 1032 (parking bay) is present, that there are time restrictions on waiting.</p>			
1 1	<p>(Para 6) We welcome the new pictorial sign to identify routes which are inappropriate for HGVs as this will result in a more universally recognised sign, especially for those whose first language is not English.</p> <p>(Para 11) Although we do not oppose “Highway Agency” traffic officers being given greater flexibility to carry out their role, we would like clarification that this role is restricted to trunk roads and not roads for which the borough or Transport for London is the Highway Authority.</p> <p>(Para 12) We welcome the proposal for sign 960.2 to become a prescribed sign. This sign is used to inform road users that cyclists are coming in the opposite direction in a one-way street without a cycle lane.</p> <p>(Para 13 and 14) We oppose amendments that create the need for more road markings. These include the definition of “designated lanes” to allow the use of existing road markings at other types of priority lane such as High Occupancy Vehicle lanes; the use of ‘end of bus lane’ arrow markings where a bus lane continues through a junction; and the use of yellow box markings at sites other than road junctions such as fire stations. Although we do not oppose the addition of motorcycles to the bus lane sign as an additional sign, for use at the discretion of the local authority, we would oppose this addition if it were a mandatory change to the standard bus lane sign as this would mean that all bus lanes had to allow motorcycles.</p> <p>(Para 16 to Para 19) The changes proposed to the parking signs seem eminently sensible. Signs for restricted zones, permit schemes in cul-de-sacs, car clubs, electric vehicle charging points and variable messages are, or are becoming, commonplace. Therefore removing the need for special authorisation is welcome.</p> <p>(Para 25) We request that the DfT prescribe that unlit reflective signs, such as blue ‘keep left’ signs, are allowed to be used in areas of good lighting, in much the same way as the orange ‘keep left’ reflective self-righting bollards have been prescribed. In a modest way, this will assist local authorities to reduce their carbon footprint.</p> <p>Whilst not included in the consultation, we would like to make the following points.</p> <p>We are pleased to have been given the opportunity to test the combination of the use of sign 616 (no entry) and sign 954.4 (except cycles).</p> <p>We would like the DfT to standardise the information given to pedestrians after the invitation to cross (Green Man) time has expired. Currently, for junctions there is a blackout period, and for pelican crossings there is a flashing green man. The use of puffin crossings, where the red and green man is on the nearside, confuses matters even more. The increase in number of aspects of puffin crossings is also detrimental to the streetscape. We believe the answer lies in Countdown pedestrian signals which can be used at all types of crossing. We are also pleased that Transport for London have been given permission to trial Countdown pedestrian signals and hope that the trial will be successful and these signals will be able to be rolled out across the borough.</p> <p>It would be useful if the DfT made clear in the regulations that one set of controlled parking zone entry signs situated on a borough boundary road can be used by both authorities - as long as the respective boroughs’ zone hours are identical.</p> <p>It would also be beneficial if we no longer had to put two signs up for “No Entry” signs, controlled parking zone entry signs and other signs where this is a requirement.</p> <p>We would like to request that signs associated with diplomatic parking, such as ‘diplomatic cars only’ become a prescribed sign.</p> <p>We would also like to request a new sign denoting pedestrian priority at single surface or shared space locations and would be happy to assist the DfT in producing such a sign for use in Exhibition Road and at other</p>	16	<p>Traffic officers - the definition of “traffic officer” appears to be in section 2 of “The Removal and Disposal of Vehicles (Traffic Officers) (England) Regulations 2008”, not section 100(5) of the Road Traffic Regulation Act 1994 (as amended?). Section 100(5) appears to define “local authority”. Perhaps “traffic officer” has been added, but I couldn’t find it. The definition of “traffic officer” refers to the designation of traffic officers in section 2 of the Traffic Management Act 2004. Section 1 of the TMA 2004 makes it clear that traffic officers can operate only on roads for which the Secretary of State is the traffic authority. This probably answers the point raised by [REDACTED] I note that “traffic officer in uniform” is not an expression that is used in the TMA (you know how I feel about that).</p> <p>Amendments that create more road markings - this is very strange comment .Designated lanes in themselves do not create more road markings. Diagram 1050 is currently used at intermediate junctions where the bus lane becomes a left turn lane for all vehicles. The change is to allow the marking to be used without the “End of bus lane” sign. Not all junctions will have diagram 1050. Would Kensington and Chelsea turn down a request from the fire service for a yellow box outside a fire station where the road is continually blocked? There is clearly no intention to make motor cycles use all bus lanes. If [REDACTED] has misread the proposed TSRGD, is this a result of the Regulations not being consolidated or just a lack of understanding of the TSRGD?</p> <p>Relaxing illumination requirements is not a matter for the Amendment TSRGD.</p> <p>CPZs at borough boundaries - perhaps further guidance could be given in Chapter 3. Similar considerations apply to other TROs such as a lorry ban. If the two local authorities concerned introduce a TRO that have the same provisions then it should be possible to sign a CPZ as a single zone if it is not too large. Any pay and display regimes etc have to be the same. If the boundary runs down the middle of the road, there could be problems with pay and display where drivers might use the wrong ticket machine. The other situation is where the boundary crosses the road. Should there be zone entry sign if the restrictions are the same?</p> <p>Pairs of signs (no entry etc) - these are required on roads over 5 metres wide to ensure that they are seen by drivers. The “no entry” sign is safety critical. The counter argument is “you only need one speed limit sign when turning into a side road”. I don’t like the fact that we relax on speed limit signs when they are also safety critical.</p> <p>“Diplomatic cars only” - one for the Traffic Signs Review?</p>	<p>Ignore, not for consultation.</p> <p>Para 25 – NO!</p> <p>Ignore all, not for consultation.</p>

	<p>sites in the borough.</p> <p>We would like the mini-roundabout diagram (1003.4) to be simplified so that we do not need display the white arrows showing the direction of the roundabout. We would also like to use granite sets for the mini-roundabout dome without special approval.</p> <p>We request more flexibility in the design of yellow box markings at junctions as the current regulations do not accommodate all possible permutations of design, e.g. the markings cannot be used to cover the whole junction, for junctions which have more than four arms.</p>		<p>I think we have turned down “pedestrian priority” signs before because it can have safety implications. The home zone sign is intended to indicate that no-one has priority. It has to be give and take.</p> <p>Removing arrows from diagram 1003.4 could lead to serious trouble.</p> <p>Yellow box markings - I have already raised the question in my own comments whether diagrams 1043 and 1044 need to be amended to make the design more flexible in respect of their use outside fire stations. This could also apply to irregular-shaped junctions.</p>	
1 1	<p>There is little logic in providing time rather than distance on cycle direction signs. There is a significant variation in the speed that cyclists travel</p>	17	<p>Journey times on cycle signs - as you would expect, I totally agree with this comment, but it won't change anything will it. If Northumberland CC doesn't want to show journey times, they don't have to.</p>	
1 1	<p><u>Part 1 Paras. 2 – 6 inc.</u> The mandatory inclusion of metric dimensional information is eminently sensible and long overdue but should be extended to include other dimension related areas. For example: as in diagrams 826, 7283, 7284, 629.1, etc. Use of a <u>single</u> dimension system for signage would increase clarity (and thus safety) and reduce street clutter.</p> <p><u>Part 1 Para. 12.</u> Diagrams 2601.1 and 2602.1 as proposed are highly in-exact since distance cannot be represented by time without reference to a velocity. Since the principal reference for pedestrians and cyclists is the Ordnance Survey Landranger series of maps, which are based upon a grid square of one kilometre, it is suggested that time be discounted in favour of metric distance. Either that or a reference velocity must be stated. (E.g. 4.5 km/h for pedestrians). Please note also that the internationally accepted abbreviation for hour is h and min for minutes (see http://www.bipm.org/en/si/si_brochure/chapter4/table6.html) for both the singular and plural.</p>	18	<p>Remove imperial-only versions of signs such 629.1, 826 etc - I agree that this could be done and I want to look at a dual single sign for diagram 629.1.</p> <p>Journey times on cycle signs - I am recommending that we do not proceed with this. I am treating this response as being against add journey times. The issue of how hours and minutes should be abbreviated has been raised again (see response from [REDACTED] Note that we use “mins” on parking signs and I don't recall that ever being challenged.</p> <p>Metric-only signs - a matter for the Traffic Signs Review</p>	.
1 1	<p>Page 6 Paragraph 6 – we’ve had difficulties in relation to the use of the term ‘heavy goods vehicles’. As far as we can determine it has been replaced with the term ‘large goods vehicles’! We were considering including both HGV and LGV in our new regs.</p> <p>Page 7 Paragraph 14 – has any thought been given to difficulties arising from parking adjudicators expecting the boxes to be the exact shape as shown in the TSRGD.</p> <p>Page 13 Regulation 55 Road Danger Lamps – suggest including sequentially flashing lights which are authorised.</p> <p>Page 13 Regulation 56 Cones, Delineators and Cylinders – point of accuracy, flat traffic delineators don't seem to be covered by any current standard either European or British.</p> <p>Page 7 Regulation 55, see comment above (include sequentially flashing lights).</p> <p>Page 8 Regulation 56, see comment above (query flat traffic delineators).</p> <p>Pages 15 - 19 No comment to be made with reference to the signs though we would ask why the following signs are not being treated similarly? :- Diagrams 629.1, 780A, 780.1A, 780.2A, 826, 826.1, 2027, 7210, 7211.1, 7212, 7235, 7283, 7284. Diag. 784.1 If the term “SOS” is used on sign 784.1 should its use also be included in variants of 787 and 788? Diag. 786 As previous. Diag. 820A Please see comment above about HGVs /LGVs.</p>	19	<p>Large Goods Vehicles (LGV) - this expression is used for the driving test. HGV is still in common usage. Any possible change should be a matter for the Traffic Signs Review. There is a possible problem that some drivers might think that the abbreviation LGV on a sign means “light goods vehicle”. Initially, I think we would have to use “large goods vehicles” in full.</p> <p>Yellow box markings - I have previously said that we might need to make diagrams 1043 and 1044 more flexible.</p> <p>Diagram 629.1 - I was beginning to wonder last week (when going through Chapter 7 for updates resulting from TSRGD 2010) why we are still allowing imperial-only signs. When drafting the 2002 TSRGD we were unable to come up with a suitable design for a dual metric/imperial sign. I'm prepared to have another go, but probably not for the Amendment TSRGD. Using two separate roundels is probably not a good idea, although it is recommended “where practicable” in Chapter 3. Interestingly, the x-height used on diagram 629.1 is smaller than that on 629/629A and 629.2/629.2A.</p> <p>Diagrams 780A, 780.1A, 780.2A - good point, particularly as diagram 784.1 has to show both imperial and metric sizes.</p> <p>Diagrams 826 and 826.1 - we could delete 826 and save it</p>	<p>Road Danger Lamps – [REDACTED] to check if included in amendment regs.</p> <p>Agree to leave, not an amendment issue.</p>

<p>Diag. 958A I don't know if this applies in GB but we use the term 'permitted taxi' as our legislation precludes certain types of taxi here (although this may a NI peculiarity in terms of what we call taxis – our alterative to your 'mini-cabs (PHVs?)' are entitled 'private hire taxis'. Suggest that the cycle symbol may be omitted. Suggest that the motorcycle symbol may also be omitted and if so, that the cycle symbol, if retained, be placed on the left hand side. Suggest allowing 'taxi' to be centered. Diag. 959A Comments as Diag. 958A. Diag. 962.2 Item 28 is still in table, although comment in consultation indicates its removal. Did the consultation commentary mean to say item 38? Diag. 2027 Could this show the two warning signs – was this changed to regulatory sign due to space restrictions on the page? Diag. 2310.2 Ref Diags. 2313.1, 2313.2, 2313.3, 2313.4, 2313.5, & 2313.6 – does the disabled facilities requirement not also apply to other service areas? Diag. 2608 Diag. 2310.2 does not have a wheelchair symbol! These amendment regulations remove it! Suggest Diag. 2313.2, although if this also applies to non-motorway service areas then we cannot use 2313.2 either. Diagram 2113 might be appropriate but the symbol would need to be reversed. Diag. 2609 As 2608. Diag. 7009.1 We recently authorised this but included a range of speed limits (10, 15, 20 and 30mph) to allow for greater flexibility.</p>	<p>without time limit. It might be worth considering now that flooding appears to be more of a problem. It doesn't affect any regulations, directions or other diagrams.</p> <p>Diagram 2027 - this has been changed to a dual metric/imperial sign and Schedule 16, item 31 amended accordingly.</p> <p>Diagrams 7210, 7211.1, 7212, 7235, 7283 and 7284 - applies also to 7201 and 7201.1. Diagram 7211.1 already shows a dual sign. When we consider two roundels, one above the other, as an alternative to diagrams 7283.1 and 7284.1, we need to consider whether to continue to use imperial-only signs. It is a safety issue in respect of giving adequate information to drivers, as opposed to reducing sign height. It could be argued that these signs will be used on roads (dual carriageways and motorways) where there are the largest number of foreign lorry drivers. Chapter 8 (para D4.10.19) says “Dual unit signs should be used wherever possible.” Diagram 7292 has to show length in both imperial and metric units.</p> <p>Diagrams 784.1 and 786 - the addition of SOS to these signs came from RSSB via [REDACTED] It does seem to make sense to add SOS to diagrams 787 and 788 (and should the background be orange as in diagram 2713.1?). This is one for [REDACTED] to respond to.</p> <p>Diagram 958A and 959A - this is a with-flow lane and therefore the omission of the cycle symbol should be a matter for authorisation. We would give an authorisation only where we are satisfied that there are safe alternative facilities for cyclists. I don't think we want to get involved with “taxi” definitions at this stage. If motor cycles are not allowed to used the lane, then diagrams 958 and 959 should be used. [REDACTED] comment and that of [REDACTED] above on motorcycle and bus lanes seem to imply that they think diagrams 958A and 959A are replacing diagrams 958 and 959 respectively. This is not the case. Is this a problem of not having consolidated TSRGD and could it confuse others? The signs follow standard layouts and it isn't appropriate to centre the legend “taxi”.</p> <p>Diagram 962.2 - [REDACTED] has spotted a typo in the consultation document. Of course it should be schedule 16, item 38 and not item 28.</p> <p>Diagram 2027 - I don't think it is a good idea to shown two warning triangles on this sign. Where the low bridge indicated is an arch bridge, I would prefer to used new diagram 818.5. There is nothing, however, in the TSRGD to prevent the use of two warning triangles similar to figure 4-13 in Chapter 7 (shown on a stack-type ADS). At the time the decision was taken to amend diagram 2027, we may still have been pursuing consolidated TSRGD, in which case there wouldn't have been room to on the current page in TSRGD 2002 to show two triangles.</p>	<p>Ignore, not for amendment regs.</p> <p>[REDACTED] to check on disabled facilities requirement</p> <p>Agreed to SOS on two diagrams.</p> <p>Did no agree on their authorisation.</p>
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			<p>Services signs and the wheelchair symbol - I think this is one for [REDACTED] to answer. As I understand it, it is a requirement for MSAs to have facilities for the disabled. The all-purpose road services signs as currently prescribed assume that some services may not have facilities for the disabled. I don't now whether this is still the case.</p> <p>Diagrams 2608 and 2609 - oh dear, Mr Mackintosh must have had a senior moment. This came about because the incorrect reference to diagram 2311.1 was originally changed to existing diagram 2010.1. With the change to diagram 2919.1 to 2919.2 (to omit the wheelchair symbol) it was necessary to change 2010.1 to 2010.2. I therefore automatically changed the reference in diagrams 2608 and 2609 from 2010.1 to 2010.2 without thinking - and no-one spotted it!</p> <p>Diagram 7009.1 - one for [REDACTED] to comment on.</p>	
1 1	<p>1. Lane closure signs.</p> <p>The dangerously misleading use of "Road narrows" sign should be banned before lane closures and be replaced with "lane closed" signs, either square information or, better triangular warning "lane closed". The sign, usually on dual carriageways, often used is the red triangular warning "Road narrows to the right". This leads to the danger of drivers assuming that, despite the road narrowing, the number of lanes remains the same. This has led in my experience to dangerous attempted overtakes. Examples of this misleading sign appear in Worcestershire on the A449 between Worcester and Kidderminster, a photograph of which is attached.</p> <p>I recall that the WCC HD response was that my point was understood but there was no budget available to replace the signs. However, since our correspondence, further such misleading signs have been erected on further lane closures on the same road!</p> <p>The square information sign "Right hand lane closed" is a more meaningful and safer option. Examples of this appears in Worcestershire on the A491 between Bromsgrove and Hagley and on the A38 Droitwich bypass. I suggest that an even more logical option would be a red triangular warning sign "Lane closed" which I believe is not currently authorised.</p> <p>2. Contradictory advisory speed limit and statutory speed limit signs.</p> <p>There should be a ban on statutory speed limit signs just before a bend or other situation when driving at that speed would be too high.</p> <p>A dangerous example of that exists in Worcestershire on the B41 97 from Great Witley to Bromyard at Stanford Bridge. Before a left hand bend when travelling West and entering Stanford Bridge from Great Witley there is left hand bend sign which quite properly has an advisory speed plate of 25 mph. This was quite acceptable when the road speed limit was 60 mph as there was no other sign to confuse. However, just before the bend and AFTER the advisory 25 mph there is now a statutory 40 mph sign! I attach photographs of these signs. My experience with many drivers is that, upon seeing the statutory 40 sign they forget the previous advisory 25 and omit to correctly read the bend, which is misleading as it tightens and is downhill, and hence enter at a dangerous speed.. The WCC HD response was that a national speed limit is only a maximum speed if safe for a length of road and that drivers must drive at appropriate speeds for varying conditions. Although I accept this statement, their response failed to address my point of the bad placement of the 40 sign just before a 25mph bend.</p> <p>3. Confusing uses of different signs for pedestrians crossing the road.</p> <p>The use of "Pedestrian Crossing" sign should only be allowed at statutory crossings and that a new warning sign "Pedestrians crossing point" (as in the "Pedestrian Crossing" sign but omitting the road studs) be the only one permitted at non statutory crossing points.</p> <p>There are numerous examples of the use of three different signs for pedestrian crossing points where there is no statutory crossing:</p>	20	<p>Lane closure signs - Chapter 8 shows wicket signs, not road narrow signs for lane closures on dual carriageway roads and motorways. The use of road narrows signs has been abandoned for some time. Worcestershire CC should read the Traffic Signs Manual (the current one).</p> <p>Contradictory speed limit signs. - this is a good point. Not only is it an issue for Chapter 3, it is perhaps something we should consider when reviewing direction 11. Traffic authorities shouldn't be erecting speed limit repeater signs in inappropriate locations. I can see it now - a repeater sign mounted on the same post as a bend warning sign with and advisory speed limit plate (see para 1.26 in Chapter 3).</p> <p>Pedestrian Signs - as part of the Traffic Signs Review, we could consider whether the "Pedestrians crossing" plate could be used with a new warning sign that shows only the walking figure, but it might be mistaken for diagram 544. Also it wouldn't be suitable for an uncontrolled pedestrian/cycle crossing - you would need two warning signs. I think we may have previously authorised a plate "Pedestrians and cycles crossing" for use with diagram 962.</p>	<p>Ignore, not for amendment regs.</p> <p>Ignore, not for amendment regs.</p> <p>Ignore, not for amendment regs.</p>

	<p>“Pedestrian Crossing” which should logically only be used for a statutory crossing. e.g. zebra. pelican etc.</p> <p>“Pedestrians in the road” which should logically only be used where there is no footway alongside the road</p> <p>“Other Hazard” with “Pedestrians crossing” plate, which is more logical, but lacking the impact of a pictorial sign. I suggest that the simple solution is to authorise a warning sign “Pedestrians Crossing” with the pictorial single pedestrian as in the “Pedestrian Crossing” sign but omitting the road studs.</p> <p>I have previously written to Worcestershire County Council Highways Department (WCC HD) on items 1 and 2, receiving only insubstantial excuses of why not to change.</p>			
1 1	Dundee City Council officers considered the proposed changes and are generally satisfied with them. It is particularly welcomed that direction 41 allows the use of self righting bollards and this may be a cost saving to the council as electrical power and maintenance is not needed where previously the internally illuminated bollards have a high maintenance cost associated with the electrical connections	26	Supports the use of self-righting bollards. I have raised before the need to amend Schedule 17 to accommodate these. I note that such bollards have now found their way to Newark!	Need to clarify the bollards point with [REDACTED]
1 1	<p>Para 9</p> <p>We support the prescription of high level repeater signals, as the safe operation of the crossing relies in unobstructed view of the demand unit. We would like to see further research into the relative merits of near-side and far-side signals at Toucan crossings.</p> <p>Para 10</p> <p>This is particularly useful, although push buttons should be used in addition to and not instead of conventional detection (e.g. loops or AGDs).</p> <p>Para 12.</p> <p>ASLs with gate option (1001.2A)</p> <p>In our view ASL lead-in lanes are equally important as the ASL reservoir itself, in that they provide cyclists with real convenience and opportunity to pass queuing traffic, particularly during peak hours. TSRGD should only permit this solution where all efforts to provide a lead-in lane of adequate width and length have been exhausted. We are concerned that some designers may have a tendency to look at the layouts in TSRGD and copy them without thinking – designers may see the option for no lead-in lane and implement that as a first option because it’s easy. Would this be better prescribed in a similar vein to narrow disabled parking bays? (e.g. as a permitted variant in the text)</p> <p>Stack type signs (2601.1)</p> <p>The proposed variant of this diagram to allow for more than one panel is very helpful. Could a map type cycle direction sign be provided for as well? Can a 25mm x-height be included for the stack and other cycle direction signs?</p> <p>Journey times on signs (2602.1)</p> <p>We are concerned that the format shown leads to large signs. We suggest that only times below one hour should be shown, with distances for further destinations – this will help keep sign sizes reasonable, and cycling times over one hour are (a) are likely to vary considerable amongst different types of cyclist and (b) are possibly not as relevant as distances to the type of cyclist undertaking a journey of that length. Also, it is not clear how separate times for pedestrians and cyclists will be shown clearly as required by the permitted variants, which again will lead to large signs.</p> <p>Contraflow signing (960.2)</p> <p>We support inclusion of this sign.</p> <p>Cyclists Dismount (966)</p> <p>The proposed variant CYCLISTS REJOIN CARRIAGEWAY is helpful – however we recommend that the illustration for this diagram shows the REJOIN CARRIAGEWAY variant, with the DISMOUNT being described in</p>	27	<p>Toucan crossings - interesting point about research - is it more difficult for cyclists to see near side signals than far side ones?</p> <p>Cycle crossings - is the provision of detectors a matter for specification/type approval rather than the TSRGD?</p> <p>Diagram 1001.2A - we could specify a maximum traffic lane width, so that for wider lanes diagram 1001.2 would have to be used. However, it would be difficult to know what this maximum should be. I think this should be a case for guidance in the revised Chapter 5. It isn’t possible to prescribe diagram 1001.2A as a permitted variant of 1001.2 as the design is different and has to be specified in the illustration. Also, I have previously raised the point that diagram 1001.2A has to be treated differently from diagram 1001.2 in regulation 43 because diagram 1001.2A does not have an approach cycle lane - therefore the two markings need to have different diagram numbers.</p> <p>Diagram 2601.1 - map-type cycle signs generally take the form of diagram 2601.2. These can be very complicated and are currently subject to authorisation. As I recall, we have often asked for signs that have been submitted for authorisation to be re-designed and simplified (or replaced by a series of signs guiding cyclists through a complex junction). It is too soon to prescribe such signs and should be considered as part of the Traffic Signs Review. Also, I wouldn’t reduce the x-height to 25mm. If we did, we would also have to reduce the x-height of pedestrian signs (diagram 2610 and 2610.1 are the only pedestrian signs that can have an x-height of 25mm). An x-height of 25mm would mean that route number patches and route names would have an x-height of 20mm. An x-height of 30mm can be read from a distance of 18 metres, 25mm from 15 metres. Any reduction in x-height should be considered as part of the Traffic Signs Review.</p> <p>Diagram 2602.1 - I never did like the idea of adding journey times. It gets even more complicated when including the pedestrian symbol. If journey times for cyclists were to be restricted to under one hour that would be three hours for pedestrians (assuming 9mph for cyclists) and 3mph for pedestrians or even four hours (10mph for cyclists and 2.5mph for pedestrians). How will local authorities determine journey times? We already know that the signs will be large. This is something that we need to discuss. [REDACTED] has been looking</p>	<p>ASLs – discussing separately.</p> <p>Agreed with cyclists dismount suggestion.</p>

	<p>the table as a permitted variant. This will mean designers will be prompted by the regulations to consider ‘rejoin carriageway’ signs before considering the use of cyclists dismount signs. Ideally we would like the CYCLISTS DISMOUNT sign to be removed from TSRGD. We propose that the 40 and 50mm x-heights be removed on both options of Diag 966 Cyclists Dismount and Cyclists Rejoin Carriageway, as 30mm is adequate for cyclists speeds. We also suggest the wording to Diag 966 be changed from "at the end of break in cycle lane track or route" to “where it is not practical to authorise continued cycling off-carriageway”</p> <p>Para 13c</p> <p>We are very concerned about the introduction of diagram 958A and 959A (motorcycles in bus lanes) as there are continued safety concerns about this and this practice should therefore remain an exception rather than the norm. We therefore propose that these signs be treated as a variant of 958 and 959 with a note permitting the inclusion of the motorbike symbol.</p> <p>Para 17</p> <p>Can diagram 663.3 be varied to allow for short-stay parking for non-permit holders? Not allowing this variation may compromise the usefulness of this sign (although we appreciate it may be rather wordy for a sign to be read from moving vehicles if this variant is permitted). Such signs are likely to be beneficial in shared space areas (which may be of benefit to cyclists) as they are developed, so having as much flexibility as possible with the restrictions that can be signed is supported.</p> <p>Para 25</p> <p>There seems to be a lack of guidance on the use of bollards at islands etc. It would be helpful if this were addressed upon the revision of the regulations concerning this.</p>		<p>into the design of these signs.</p> <p>Diagram 960.2 - although Kent police oppose this sign, it will be prescribed and, as expected, it has the support of Sustrans.</p> <p>Diagram 966 - CYCLIST DISMOUNT is used on shared footways at subways and on bridges (there is a location very close to where I live where a shared footway/cycle route crosses the A1 on a road bridge and the footway, between the parapet and the safety fence along the edge of the carriageway, is too narrow for cyclists to ride on their bikes alongside pedestrians). The sign is also used in Newark where a shared footway/cycle route ends on the right hand side of the main carriageway at a signalled junction. Therefore, we need to continue to prescribe this sign. The only problem I have is that there is no sign to indicate the point where it is safe to remount. 30mm x-height has been added because it is generally used on directional signs for cyclists. However, there would be issues in removing the larger sizes at this stage, i.e. we haven’t consulted on this, savings would be required for existing signs, target value needs to be considered etc. The caption proposed by Sustrans is not suitable as it is subjective (i.e what is the interpretation of “practical” - or rather “practicable” ?). in any case “authorise” would need to read “provide”. We could change the illustration to the new variant, but is it worth it?</p> <p>Diagrams 958A and 959A - the suggestion by Sustrans doesn’t achieve anything - whether the motor cycle sign is a permitted variant or a new diagram, it is still prescribed. As the design of the sign changes when the motor cycle symbol is used, it is much better to prescribe a separate sign. The only option is not to prescribe motor cycle bus lanes at all on the grounds that they could be dangerous to cyclists, but is this a real concern?</p> <p>Diagram 633.3 - this is a case of step by step. Any relaxation on the type of parking within a permitted parking area should be a matter of authorisation. In the future I would like to think that we could provide loading, disabled and limited waiting bays within a permitted parking area (e.g. by modifying the entry sign to “except in signed bays” as for restricted zones), but this would encourage more vehicles to enter the area. This is a matter for the Traffic Signs Review and could be trialled in the first instance.</p> <p>Use of bollards - this is a matter for the Traffic Signs Manual.</p>	<p>Motorbike symbol – policy decision, not for now.</p> <p>Para 17- not for amendment regs, for Review.</p>
1 1	<p>I welcome the DfT's overdue recognition of the fact that the entire world (apart from the USA) works in metric, and that our government claims that the UK completed its transition to being an officially fully-metric country in 1995! My comments below are mostly confined to the parts of the changes to the 2002 Regulations involving the mandatory addition of metric measurements to the height and width restriction warning signs.</p> <p>I would like to point out that though I obviously take a pro-metric stance, I am not a member of any pro-metric pressure group. My points of view stem mostly from being the father to an inquisitive 8-yr old son whom I wish to see learning his weights and measures successfully as he grows up and not be confused by the mess of imperial units still used all over our road signs. I am however realistic enough to know that converting the roads in general cannot be done quickly, and I welcome the steps being taken by the DfT in this consultation.</p>	28	<p>These are all metrication issues and perhaps should be taken on board as part of the Traffic Signs Review. I think if we were to make all the changes suggested, we would have to re-consult. At least his approach is to refine the dual imperial/metric system rather than a wholesale change to metric only. He has raised an interesting point about cycle and pedestrian signs for the Olympics in 2012. Are we considering the authorisation of metric signs? He also raises an interesting point about Welsh bilingual signs. I can respond to some specific points as follows:</p>	Ignore, not for amendment regs.

<p>I would request though that the DfT stops making its press releases look like they are pandering to the likes of Mr Derek Clark (the UKIP MEP) and his Luddite anti-metric friends in the BWMA (and other like-minded pressure groups). The press releases that accompanied the announcement of this consultation were plastered with "reassurances" that "this is not the thin end of the wedge" for the complete metrication of the UK's roads.</p> <p>Mr Clark (MEP)'s outdated attitude seems to assume that metrication in any form is a "EU plot" against the UK, ignoring the fact that the metric system was invented by an Englishman (Rev. █████ Wilkins, Bishop of Chester and a founding member of the Royal Society) in the 1660's and that the entire world (apart from ourselves and the USA) realised that it was the way forward and now use it for everything.</p> <p>So, it's clearly nothing to do with any EU plot....</p> <p>Please would the DfT note that for every anti-metric Luddite, there are at least as many of us road users out here who have been looking forward to the metrication of our roads since 1973 when it was originally supposed to have happened.</p> <p>I can sum up my contributions very quickly (in no particular order) as follows:</p> <p>1) I live in Wales as do two and a half million other folk. There is a requirement to have signs in English and Welsh in this country,</p> <p>and the design of some proposed new signs will make for a terrible confused mess. They need a bit more thought.</p> <p>2) I don't care what Mr. Derek Clark, MEP thinks - for the sake of our children's education if nothing else, it must be made obvious that metric measurements on signs are the primary measurement and that the old imperial version is just there (temporarily I hope) to aid the transition. It's not an E.U. plot, Mr Clark. It's the modern world. Get used to it.</p> <p>3) We're also confusing our children by using the symbol "T" for tonnes on weight limit signs - it should be "t". This can be fixed for free by deprecating the old signs and specifying replacement versions, but not forcing the removal of the old ones (yet). The cost impact will thus be zero, and slowly the incorrect signs will just get replaced as they wear out.</p> <p>4) Really really REALLY do not allow estimated journey-times on cycleway and footway signs! Please just bite the bullet, and allow</p> <p>the switch to metres and kilometres on these routes instead. The Olympic Games are coming in 2012 with swarms of foreign visitors using those routes around the Olympic sites. Mr. Neil Kinnock MP has already made the plea for metric signs in time for the Olympics and he's right.</p> <p>5) There is one case I found of a truck-length sign in imperial only and a depth-of-ford sign in imperial only, both of which could (and should) be made dual-unit in this version of the Regulations - the impact would be very minor, and it's illogical to miss them out from this long-overdue modernisation.</p> <p>6) I found a few other height-restriction signs (for overhead power cables and the like) which had been missed out. If bridge-strikes are considered a problem (and they are), then cable-strikes are at least as bad if not worse.</p> <p>7) We must stop using "m" for miles on road signs immediately. It's confusing our children, because it clashes with the proper use of "m" for metres on the new height and width restriction signs. It's also blocking the route to being able to metricate the rest of the road signs in a future revision of the Regulations (hopefully coming soon - like next revision maybe?).</p> <p>Below then, are my point-by-point comments:</p> <p>(Page numbers refer to the pages of Appendix A to the discussion document, September 2009.)</p> <p>Bottom of Page 8, Top of Page 9:</p> <p>-----</p> <p>(4) In item 6-</p> <p>(a) no comment</p> <p>(b) no comment</p> <p>please add:</p> <p>(c) in paragraph (2) of column (2), for</p> <p>*Distances may be expressed as "yards", "yds", "mile", "miles", "m", "YARDS", "YDS", "MILE", "MILES", or "M"</p>	<p>“T” or “t” on diagram 622.1A etc. - “t” is currently prescribed as a permitted variant. I have already commented on this (response from █████ - 27 October). The TSRGD 2010 could be a starting point to encourage traffic authorities to start making the change-over.</p> <p>Changing the relative positions of metric and imperial signs - I don't think we could take this on board at the present time. The least we could do is to give the option of placing the metric sign either “above or below” or the “left or the right” of the imperial sign. That wouldn't require any savings for the existing arrangements, but would the inconsistency be confusing?</p> <p>Using “Mi” for miles - I don't think this is appropriate for the TSRGD 2010 - something to consider in the Traffic Signs Review.</p> <p>Dual length limit sign - we tried to come up with a design for the TSRGD 2002, but were unsuccessful. We could treat this sign the same as diagram 530 and prescribe imperial/metric signs together. It does seem odd that this will now be the only vehicle size sign that can be shown as imperial-only. I don't know how often this sign is used. It doesn't have implications for bridge strikes, except, perhaps, where there is a dip in the carriageway below a bridge.</p> <p>Diagrams 780A, 780.1A, and 780.2A - I agree that it would make sense to remove the permitted variant that allows the metric heights to be omitted.</p> <p>Diagram 826 - I agree that this diagram could be removed (and saved without a time limit).</p> <p>Cycle directional signs - █████ isn't the only person who doesn't like the idea of adding journey times - I support him on this one. Perhaps we should abandon this idea for now and see what authorisations we receive. This should give us time to design more sensible signs. Even Sustrans wants to limit the length of time shown.</p>
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<div>substitute *Distances may be expressed as "yards", "yds", "mile", "miles", "YARDS", "YDS", "MILE", "MILES", or "Mi"(d) in paragraph (3) of column (3), for the abbreviation "m" shall be used to indicate those distances expressed in miles substitute the abbreviation "Mi" shall be used to indicate those distances expressed in miles. Lowercase "m" (used as an abbreviation for "mile(s)" previously) is expressly forbidden..</div> <div>Top of Page 9, rewrite (5) as follows: -----</div> <div>(5) In item 8- (a) in paragraph (1) of column (2), for "2310.1" substitute "2310.2"; and for "2919.1*" substitute "2919.2*". (b) in paragraph (2) of column (2), for *"1m" permitted variant substitute *"1Mi" permitted variant (c) column (3), for "½m" may be varied to "2m", "1½m", "1m", "2/3m" or "1/3m"substitute"½Mi" may be varied to "2Mi", "1½Mi", "1Mi", "2/3Mi" or "1/3Mi"</div> <div>My reasoning for the above is that "m" is the international symbol for "metres", and though (as of this 2010 revision of the Regulations), metric distances are still tragically not going to be permitted on our road signs in general, the Regulations should (and must in my opinion) make a start now in clearing the ground for their eventual introduction (hopefully in the next revision?).The anomalous misuse of "m" for "mile(s)" must be discontinued immediately -especially now that this revision of the Regulations mandates metric height and width warning signs for the first time, with "m" being used correctly for "metres" of course.</div> <div>I suggest "Mi" for "miles" rather than "mi" because: 1) As I understand it, the USA uses this abbreviation, so there is prior art 2) "mi" would look too similar to "m" and would be likely to cause confusion.</div> <div>Notice that in most cases, existing signs can just be plated-over as "Mi" need not take up much more space than "m" if it's permitted for it to appear one font size smaller than the "m" it replaces. My comments on your suggested changes to the Schedule to the Regulations: Schedule: Part 1 (starting on page 15): -----</div> <div>Diagram 530: Diagram 531.1: Diagram 532.2: Diagram 532.3:</div> <div>The signs should be required to be fitted the other way about: metric above the imperial, or the left of the imperial.</div> <div>In the cases of diagrams 530 and 531.1, the permitted variant (item 4) should require the imperial sign to be to the right of the metric one, not the other way about. I would suggest also that diagram 530 should specify that the imperial sign be one size smaller than the metric sign it accompanies in order to draw attention to the metric sign and hopefully get people used to them more quickly. This eases the route towards being able to withdraw the imperial "translation" sign in (hopefully) the next revision of these Regulations. Schedule: Part 3 (page 29): -----</div> <div>Diagram 784.1: In the explanatory box below the blue sign, the metric measurement should be placed first with the imperial translation in parenthesis afterwards. The metric measurement should be specified to just a single decimal place (much as I suspect the imperial measurements are rounded up to the nearest three inches). No-one would know their vehicle's dimensions any more accurately than that anyway. Specifying height or width to the nearest centimetre is silly and clutters the sign. You wouldn't specify an imperial measurement to the nearest half-inch would you? Schedule: Part 4 (starting on page 30): -----</div> <div>Diagram 818.3: Good - the metric measurement is given above the imperial (see my comments on Part 1 of the Schedule</div>		
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<p>above).</p> <p>It would be good to see the imperial measurement required to be in parenthesis and one font size smaller than the metric measurement.</p> <p>Diagram 818.4:</p> <p>The truck shown on the sign apparently has a magnetic field strength of 7.5 Tesla! The S.I. symbol for tonnes is "t" (lowercase).</p> <p>This revision of the Regulations and Schedules could and should take the opportunity to fix this longstanding mistake.</p> <p>The same error is of course present in every sign mentioning tonnes. See for instance Diagrams 626.2A, 665, 666, 818.4, 2108, 7282</p> <p>This is a schoolchild error, and any youngster copying the what he or she sees on road signs when answering GCSE science questions would lose points! This is not good for our children's education and needs fixing if for that reason alone. It is certainly inexcusable to introduce a new sign bearing this old mistake.</p> <p>Diagram 818.5:</p> <p>Metric to the left please. The 'permitted variants' should be modified to read "The imperial diagram 530 symbol may be placed centrally below the metric symbol" (and preferably, it should specify that it is to be one size smaller).</p> <p>Schedule: Part 7 (starting on page 47):</p> <p>-----</p> <p>Diagram 2027:</p> <p>Good - the metric measurement is given above the imperial (see my comments on Part 1 of the Schedule above).</p> <p>It would be good to see the imperial measurement required to be in parenthesis and one font size smaller than the metric measurement.</p> <p>Diagram 2310.2:</p> <p>The "1/2m" indicator should be changed to read "1/2Mi" in accordance with my suggested changes to Schedule 16, Item 8.</p> <p>Diagram 2601.1's 'variations' item (4), also Diagram 2602.1:</p> <p>No, for God's sake, No!</p> <p>There can be no place on a road sign for subjective judgements on how long it will take to get somewhere. People cycle or walk at wildly different speeds: their journey times are obviously not going to be the same. Additionally, in Wales these time estimates would need to be translated into Welsh, and the signs would become huge, ugly and expensive.</p> <p>Please do not allow this so-called "innovation" under any circumstances.</p> <p>Far better would be for the DfT to use the cycleways and footpaths to make the first forays into proper 21st century metric-only signs, and to mandate the distances be specified in km or m (using correct lowercase letters throughout for the abbreviations). This has an advantage in Wales in that "m" and "km" won't have to be translated into Welsh in the way that "miles" and "yards" do currently (an unnecessary burden on the taxpayer caused by the DfT's refusal to allow "km" and "m" on road signs in general).</p> <p>Additionally, the cycleways ought to have a fair proportion of school-age users, and we should be showing youngsters that the metric measurements that they learn every day in school do have some application outside school too! By 'youngsters' I suppose I mean anyone under the age of 50 who have been taught in metric only at school since the 1970's.</p> <p>Users of footpaths and cycleways are more likely than motor-vehicle drivers to be making journeys with the aid of Ordnance Survey maps.</p> <p>These fine maps have been metric since the 1940s and its crazy to be signposting the footpaths and cycleways in imperial units 70 years later! The Olympics are coming in 2012 and the footways and cycleways around the</p>			
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<p>Olympic parks in London and elsewhere will be busy with visitors from all parts of the world. We should at least permit cycle and foot routes to be flagged in metric before those games commence, and this revision of the Regulations and Schedule is our only chance to make that change in time for it to be usable. The new signs should be metric-only preferably, to avoid clutter.</p> <p>The current 2002 regulations are making it possible for Luddite vandals (see URL below) to hold us in the past - see: http://www.democracyforum.co.uk/ukip/52544-campaigner-paints-over-sandbach-s-metric-signs.html</p> <p>(Plenty of people in Sandbach were very happy with their metric footpath signs, but the 2002 Regulations worked against them, allowing that vandal to turn up from another town and impose his 18th century views on them with little chance of finding himself in trouble with the Law.)</p> <p>Diagram 2919.2: The "1/2m" indicator should be changed to read "1/2Mi" in accordance with my suggested changes to Schedule 16, Item 8.</p> <p>Schedule: Part 10 (starting on page 74): -----</p> <p>Diagram 7014.1: Two points: 1) If you must go ahead with this design, then the metric measurement should come first with the imperial translation in parenthesis afterwards, preferably with the imperial measurement written one font size smaller than the rest of the sign.</p> <p>2) However, it's a very wordy sign which will all have be translated into Welsh if used in Wales. That will double its area at least, and render it almost incomprehensible at a glance, and it will have to be mounted on much thicker poles to stop it being blown over.</p> <p>Surely it would be better to have a simple red-background sign bearing the Diagram 530 signs (but metric above imperial, or metric to the left of imperial - see my comments above). This would usually need no accompanying words, and therefore no need for a Welsh translation.</p> <p>Omissions: -----</p> <p>Other than the points above, I find a couple of missed cases in the existing 2002 Regulations of height or width restriction signs which should have dual-units versions specified:</p> <p>Diagram 629.1 should have a dual-units version specified (as Diagram 629.1A?) and reference to Diagram 629.1 should be added alongside the several references to revocation of diagrams 629 and 629.2 throughout the document. Diagrams 7212, 7235 need to be revised to produce dual-measurement signs (as 7212.1, 7235.1?). Diagrams 7212, 7235 themselves need to be revoked.</p> <p>Diagram 780A should be revised to put the metric on the left and the imperial translation in parenthesis (and preferably one font size smaller) to the right. Item 4 of the 'variations' for this sign claims that the metric measurement may be omitted: this item needs to be revised to require the metric measurement. After all, if trucks hitting bridges is deemed a problem then cranes and trucks hitting power lines ought to be seen as an even bigger problem - probably causing the death of the unfortunate driver who didn't understand the archaic imperial measurement. Not to mention the fact that some of the locality (or the railway) loses its electricity until the cables are fixed.</p> <p>Diagrams 780.1A, 780.2A should be revised to put the metric on the left and the imperial translation in parenthesis (and preferably one font size smaller) to the right. Item 4 of the 'variations' for these signs claims that the metric measurement may be omitted: this item should be revised to require the metric measurement.</p>			
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	<p>Diagram 7292 should be revised to put the metric on the left and the imperial translation in parenthesis (and preferably one font size smaller) to the right.</p> <p>Diagram 2002 should be revised to put the metric roundel on the left, imperial roundel on the right (and smaller). On this sign it looks as if the metric measurement is an afterthought (which it shouldn't be).</p> <p>Diagram 826 should be revoked (depth indicated in feet at a ford). It's already paralleled by 826.1 in dual units, so that should be no problem.</p> <p>Diagrams 832.6, 832.7, 2011, 2012, 2013, 2017, 2020, 2021, 2101.1, 2115, 2116, 2117, 2310, 2313.1, 2313.3, 2313.5, 2903, 2904, 2905, 2908, 2908.1, 2909, 2914.1, 2917, 2918, 2919.1 show distances as "1/2m" and should be changed to "1/2Mi" as explained above in my comments on Schedule 16, Item 8.</p> <p>Diagrams 7210, 7283, 7284 should be revoked. I hope you didn't mind trawling through all this material! I will be happy to respond to any critique that you may have regarding my comments. I hope that what I say above is taken into account. I have tried to keep my own opinions at a minimum and let logic and facts speak for themselves in the comments that I made. We are after all, living in (allegedly) an officially metric country since 1995. If our children are to grow up with a decent education then it is the duty of the DfT and every other official body not to undo what they are taught in school the minute they step out of the school gates. Failure to use "t" for tonnes and "m" for metres would be plain irresponsible. Thank you in anticipation of some positive first steps towards modernising our road signs at last,</p>			
1 1	<p>The UK Lighting Board offers its wholehearted support to the Statutory Instrument proposal to amend Direction 41 and regularising the use of either internally illuminated traffic bollards, or bollards illuminated by retro reflective materials, conforming to BS 8442 (we would question whether the regulations should be future proofed by removing reference to BS 8442 / 2006).</p> <p>In the draft Statutory Instrument, the UK Lighting Board would suggest a reversal of the order of sub-paragraphs a) and b) of Direction 4, Paragraph 3A, to emphasise the benefits of the retroreflective option.</p>	29	No comment other than to repeat what I have said previously that Schedule 17 needs to be amended to accommodate self-righting reflective bollards.	Dealt with previously.
1 1	<p>General comment to all mentioned in Part 1, will the Traffic Signs manuals also be updated with the new amendments. If not there could be confusion in guidance given between the publications</p>	30	Updating the Traffic Signs Manual - the lists I have produced so far show that there is a need to produce updated guidance as soon as possible. How this is to be done has still to be decided.	
1 1	<p>I would request that paragraph 3A (a) be amended to take account of product produced by ourselves (and at least one other manufacturer) which :-</p> <p>1) internally illuminates the sign face of a Retroreflective Self Righting Bollard and is currently given blanket authorisation by the DfT. This offers :-</p> <p>The full retroreflectivity as outlined in BS 8442 The additional benefit of internal illumination of sign face and conspicuity panels meeting the requirements of BS EN 12899-1 and using only 7 Watts.</p> <p>Internal illumination unaffected by 100 K/h (62mph) drive through to BS EN 12767 2007 occupant safety level NE4.</p> <p>The ability to have the same bollard throughout schemes which have illuminated and RSRB bollards.</p> <p>Requested Changes shown in red.</p> <p>(3)</p> <p>After paragraph (3), insert—</p> <p>“(3A) The signs shown in diagrams 606, 610, 611, 616, 951, 955, 956 and 957 may be mounted on—</p> <p>(a) a bollard which—</p> <p>(i) is illuminated by means of internal lighting; and</p> <p>(ii) conforms to British Standard BS EN 12899-2:2007; or (iii) conforms to British Standard BS 8442</p> <p>Sign 616 (No entry) is specified at 300mm diameter Signs 606, 610, 611, 951, 955, 956 and 957 are specified in Diameters of both 270mm and 300mm whereas sign 616 (No entry) is specified as 270mm diameter only. At least 3 manufacturers of Retroreflective Self Righting Bollards offer 300mm diameter sign faces and would require this sign be legal at 300mm diameter.</p> <p>Attached you will find a Model Specification and picture of the product currently on file with, and given blanket authorisation by, the DfT. Also a picture of the product at a site given authorisation is attached for your</p>	31	<p>If it is agreed that this type of bollard should be included in direction 41, then it will be necessary to amend diagram 616 to include a 300mm roundel. This would also allow the sign to be placed on a signal head (similar to diagram 606 etc) under direction 44A. In this case it would be a secondary signal at a junction where the road beyond the signal is the exit from a one-way street.</p>	<p>Addressing issue of clarifying the direction.</p> <p>No to changes in red – prescribing what is currently authorised.</p>

	<p>reference. An email outlining in paragraph 2 the DfT position in August 07. Report from TRL confirming 100K/h run through and conformance with BS 8442.</p>			
1 1	<p>Addition to my email of December 4 Please accept my apologies but in my haste I omitted a vital reference to BS EN 12899-1 which specifies the luminance of internally illuminated signs. This same reference is used in BS EN 12899-2 for transilluminated bollards. The Signface and Conspicuity Panel will conform to the recommendations of the National Annexe of BS EN 12899-1:2007, Table NA1, which states that the Mean Luminance will conform to Table 19, the Uniformity of Luminance will conform to Table 21 and the Luminance contrast of both body and head shall conform to Table 20. I have added this to the original text below, underlined in red for clarity.</p> <p>Requested Changes shown in red. (3) After paragraph (3), insert— “(3A) The signs shown in diagrams 606, 610, 611, 616, 951, 955, 956 and 957 may be mounted on— (a) a bollard which— (i) is illuminated by means of internal lighting; and (ii) conforms to British Standard BS EN 12899-2:2007; or (iii)conforms to British Standard BS 8442 and BS EN 12899-1,2007 Table 19, Table 20, and Table 21 .</p> <p>Sign 616 (No entry) is specified at 300mm diameter Signs 606, 610, 611, 951, 955, 956 and 957 are specified in Diameters of both 270mm and 300mm whereas sign 616 (No entry) is specified as 270mm diameter only. At least 3 manufacturers of Retroreflective Self Righting Bollards offer 300mm diameter sign faces and would require this sign be legal at 300mm diameter.</p> <p>I hope this specifies the requested change more precisely and once again apologise for not including it in my earlier email.</p>	31	No additional comments.	
1 1	<p>Para 2 deletes the imperial-only options for height and width restrictions. The changes proposed are welcome but incomplete because other imperial-only signs remain permitted. For example diagrams: 629.1 (length restriction), 780A, 780.1A, 780.2A (height restriction to cables) and P826 (gauge indicating depth of water at a ford). Please delete imperial-only options for all restrictions.</p> <p>Metric symbol on weight restrictions: The symbol ‘T’ is used to indicate tonne (e.g. diagram 622.1A). The international symbol ‘t’ is merely a permitted variation but is common on road signs in other countries and is used in the UK for non-road applications. Road signs in the United States also use the symbol ‘T’ but for a different weight. The use of ‘T’ to mean tonne creates a small but unnecessary inconsistency for UK drivers when going abroad and for foreign drivers coming to the UK. Please modify the TSRGD to use eliminate the use of ‘T’. Signs could be updated to the new symbol when replaced at the end of life. No additional cost would be incurred.</p>	32	Comments as for [REDACTED] above re diagrams 629.1, 780A, 780.1A, 780.2A and 826, and on the use of “t” rather than “T”. This is what we would expect from supporters of metric signs, but it is a small step that we should perhaps take.	Alter discussion decided to change T to t.
1 1	<p><u>Pedestrian, cycle and equestrian crossings</u> 9. We have concerns about this proposal, unless the high repeaters are adequately shielded from vehicular traffic. These are already being mounted so high that in the event of a red traffic light bulb failure, the sequence a driver can see on the offside light is amber and then a green signal from the pedestrian demand unit. We believe that in poor visibility the sequence could be misinterpreted by drivers with obvious risks. We have already raised this issue at safety audits. <u>Cycling issues</u> 12. We fully support the gate variant to allow access to the ASL. We would object to any suggestion of legalising contraflow cycling in one-way streets without lane markings on the carriageway. This would be a licence for cyclists to ignore their own and others safety. We are not opposed to providing cycle facilities but such schemes must also consider other road users. <u>Yellow Box Markings</u> 14. This is long overdue, as the actual meaning of a box junction is basically any car that enters when there is less than 5 metres clear space on the other side commits the offence; if people actually adhered to the existing definition there would be major traffic delays. Permitting their use at other sites could be a useful tool.</p>	33	<p>Repeater signals at pedestrian crossings - this has come up before and now the police are concerned. Do we need to abandon this proposal for now? Contra-flow cycling - this is the second police force to oppose this where a mandatory contra-flow cycle lane is not provided. This would be a change of policy . Guidance is already given in Chapter 3 on contra-flow cycling without road markings. This is nothing new - see figure 4 in TAL 6/98.</p> <p>Box junctions - I don't understand this comment. We are not changing the requirements for entering box junctions, just allowing them to be used at non-junctions, such as outside a fire station. VMS - no comment. Signs mounted on bollards - this is covered to some extent in</p>	Need to come back to ped, cycle and equestrian crossings

	<p><u>Variable Message Signs</u></p> <p>24. A good idea if the traffic is flowing, but will it prevent using scrolling messages at extremely slow moving traffic or closures after accidents where the additional information may be useful. Is it worth retaining a degree of flexibility?</p> <p><u>Miscellaneous</u></p> <p>25. We agree, but only if the bollard will not be obstructed from view, (they are considerably lower mounted than a standard sign), and if they are internally illuminated, but not if they are retro-reflective; these are not visible to certain vehicles and the standard of associated lighting with them is normally inadequate.</p> <p>26. This seems sensible.</p> <p>27. In view of the comments at 26 and global warming, would it not be sensible to dispense with the period altogether, to allow for any future changes in toad migrating patterns?</p>		<p>Chapter 3.</p> <p>Migrating toads - I know some signs are left uncovered all year round (and don't get me started on ice warning signs in July - actually I remember one July in the early 1980s when we had a heavy hail storm that left large ice packs on the road for a week). We could remove the requirement to display the sign only between January and May, and amend Chapter 4 to say that the signs should be covered or removed outside the migration season.</p>	There is no flexibility for VMS.
1 1	<ul style="list-style-type: none"> We support the introduction of a sign to help identify routes that are unsuitable for HGVs (the sat-nav issue). We question if the sign as proposed will have sufficient impact to be truly effective and ask that this be revisited. Can consideration be given to extending the powers being conveyed to HA Traffic Officers to LA officers a through clear and controlled means of delegation? The signage to promote contra-flow cycle ways is welcome, can this concept be extended by allowing a supplementary plate to be added to no entry signs (616) stating 'except for cycles'. We would like to see attention paid to the restricted zone signage for town centre / pedestrian zones to allow for signage that is clear and understandable for all, yet can deal with the varied restrictions on cycle and/or vehicular access, waiting restrictions and shared space issues, without undesirable levels of clutter. In the interests of reducing street clutter can the regulations be amended to allow one-way and other such directional signage, and waiting restriction repeater plates to be fixed or incorporated into street furniture and bollards in town centres, pedestrianised areas and home zones. We feel that further consideration need to be paid to the illumination of signage, this in the interests of reducing the environmental impact of illumination and reducing energy costs. Advances if the reflectivity of materials and increasing sensitivities to environmental concerns mean that the choice to illuminate or not ought to be at the Local Authority's discretion in most cases. <p>Can consideration be paid to a relaxation of the regulation regarding repeater signage and markings for 30mph limits in areas under street lights? 30mph roundels could usefully be introduced at some 'semi-urban/semi-rural' sites to reinforce the speed limit and reduce vehicle speeds to acceptable levels. Again this sort of measure is best introduced at the discretion of the Local Authority who are best placed to understand the sensitivities of each site, whilst seeking to provide a consistent message to the travelling public through signage.</p>	34	<p>Diagram 820A - it would have helped if [REDACTED] had indicated how he would have liked this sign to be improved. No satellite symbols, thank you.</p> <p>LA Officers having same powers as Traffic Officers - no comment.</p> <p>Contra-flow cycling - the support is welcome, but diagram 616 with "Except cycles" plate is being trialled, so it won't be permitted just yet (if ever).</p> <p>Restricted zones / pedestrian zones - further development should be a matter for the Traffic Signs Review. What we want to avoid at this stage is the signing of a street as both a pedestrian zone and a restricted zone in order to dispense with yellow lines (in a pedestrian zone that doesn't meet the conditions set out in direction 24). I have suggested that in such cases the road could be signed as a restricted zone with separate vehicle prohibition signs (e.g. 619 plus 620). Alternatively, it has always been my view that we should relax direction 24 when restricted zones were prescribed. We will need to consider this and give clear advice in Chapter 3.</p> <p>Reducing sign clutter - advice is generally given in the Traffic Signs Manual. I don't think the TSRGD needs to be amended. Signs don't have to be mounted on separate posts.</p> <p>Illumination of signs - relaxation of the illumination requirements is not something we should be considering at this stage.</p> <p>30mph repeater signs - without national consistency there could be enforcement problems. I have previously suggested that we could consider allowing diagram 1065 to be used without an upright sign on restricted roads (see my comments on the response from [REDACTED] of Hampshire Police (5 November)). I said then that this might be a matter for the Traffic Signs Review.</p>	Ignore all, not for amendment regs.
1 1	<p>Amendment of Direction 35 – this needs to be clarified as surely all standalone sites should already have the zig-zags. Does this relate to crossing on approaches or exits from roundabouts or if they are offset from a signal junction?. Do we need to state a distance requirement from the junction / roundabout where it is required to have zig-zags? Amendments to Schedule 6: Road markings – diags 1004, 1004.1, 1005, 1005.1, 1008, 1008.1. This change will be confusing for drivers while all markings are renewed, as it will take along time for this change to occur. Is it really that necessary?</p> <p>Amendments to Schedule 7: Directional signs - diag. 2602.1. How are the times to be judged, as this will differs for each cyclist? Retaining the distance measurements means that the cyclists can judge the times for</p>	36	<p>Diagram 1004 etc - oh dear, this proposal is causing confusion. No markings will have to be changed, We so need to made it clear what the change is and why. There will be a new Chapter 5. This ought to give an explanation of the change.</p> <p>Journey times an cycle signs - I'm counting this as a "no" to the</p>	Ignore.

	themselves.		proposal.	
1 1	It is considered that the opportunity for reducing the number of signs that have to be illuminated has been missed. With the quality of retro-reflective materials many signs do not benefit from illumination at night and the requirement results in unsustainable demands for maintenance and power consumption. Most warning signs with mounting heights below 3 metres, if not all of them, could be moved from Schedule 17 1 to 17 4. Most regulatory signs that are not on principal roads, are mounted below 3 metres or are subject to speeds 30 mph or less could also be moved from 17 1 to 17 4.	40	Relaxation of illumination requirements - one for [REDACTED] and not appropriate at the present time.	Ignore, not for amendment regs.
1 1	<p>We would like further clarification of when yellow box junctions can be used.</p> <p>We would also like clarification of the definition of "goods vehicles" for loading bays, as there have been cases of parking tribunals ruling that Pizza delivery scooters are goods vehicles.</p> <p>The DfT should consider the complete de-illumination of all bollards in the interest of carbon reduction and energy saving.</p> <p>One problem several authorities have faced is DfT's refusal to allow "except cyclist" plates under "no entry" signs. We have to replace them with the "no motor vehicles" (flying motorcycle) sign, which drivers understand and comply with much less than the "no entry" signs. We have had significant problems with this at one particular site (Sinclair Road, W14) We are aware of the DfT authorised a pilot in Kensington and Chelsea with "no entry except cyclists" signs and if this is successful they will allow their use elsewhere. We would like to see this general authorisation given as soon as possible.</p>	42	<p>Yellow box markings - we might need to specify in Schedule 19 exactly where yellow boxes can be used at locations other than junctions (a point raised by [REDACTED] We might need to consider whether any change to the diagram or caption is needed.</p> <p>Good vehicles loading bays - the definition of "goods vehicle" is given in regulation 4. I would have thought this to be adequate. If a scooter has been adapted to carry goods then it is a goods vehicle, otherwise it isn't.</p> <p>Illumination of bollards - surely new direction 41(3A) gives traffic authorities the choice - it covers all signs mounted in bollards.</p> <p>No entry except cycles - too soon the prescribe this combination of signs. We need to establish a future policy on the use of diagram 616 and this should be a matter for the Traffic Signs Review.</p>	<p>Ignore, not for amendment regs.</p> <p>Ignore, not for amendment regs.</p> <p>Suggestion is being trialled.</p>
1 1	<p>Sign to diagram 2310.2 has had the wheelchair symbol removed. However, other signs refer to the wheelchair symbol in diagram 2310.2 and are therefore incorrect. Signs 2608 and 2609 are affected.</p> <p>The logic of the signing signs for height and width restrictions in Metric dimensions as well as Imperial dimensions is not followed in sign to diagram 629.1. Shouldn't it be consistent with that logic and use a metric dimension as well?</p> <p>There is a proposed amendment to the table underneath sign to diagram 1012.2. However, there is no such text as detailed in diagram 1012.2 although there is in diagram 1021.1. Should the amendment therefore read diagram 1012.1?</p> <p>The amendment to diagram 670 refers to Directions 42(7)* and 55A. They are not detailed in the summary or seen in TSRGD 2002. The existing Direction 42(7) refers to backing boards for sign 2402.1 for a town or village nameplate. There doesn't appear to be a Direction 55A..</p> <p>Diagram 820A is missing from the summary. (New sign)</p> <p>The table in new diagram 1050 still details Direction 18(3) instead of Direction 18(1) in item 2.</p> <p>Width / Height restrictions - don't agree that 2 signs are needed (metric / imperial) and suggest you go straight for the metric warning sign. This will support the concept of reduced sign clutter, reduce the cost burden and save on material usage.</p>	43	<p>Diagrams 2608 and 2609 - yes we already know about this error - well spotted.</p> <p>Diagram 629.1 - prescribing only imperial/metric sign (or signs) and not imperial-only has been raised before and does need serious consideration, even though the removal of imperial-only signs is related mainly to bridge strikes.</p> <p>Diagram 1012.2 - [REDACTED] obviously isn't aware of the Amendment TSRGD 2005 (active traffic management). This is the type of problem that can arise when amending amendment Regulations. However, in this case, the amendment will become a substituted diagram rather than a written regulation, so the problem will go away.</p> <p>Diagram 670 - same problem as diagram 1012.2. Will people reading the amendment TSRGD 2010 know where to find direction 55A? It's in the amendment TSRGD 2005. The lawyers said that we could not consolidate the amendment TSRGDs into a single amendment TSRGD.</p> <p>Diagram 820A - I don't understand this comment. The sign is listed in the consultation document and in the TSRGD as an inserted diagram.</p> <p>Diagram 1050 - the consultation document is correct and the draft TSRGD is wrong. I have pointed out many times that it should now be direction 18(1) and not 18(3). This change was not made to the text of the TSRGD and consequently my artwork was changed (not by me) to show direction 18(3) and not 18(1) in the table.</p>	<p>Dealt with.</p> <p>Will change artwork.</p> <p>Will be eventually consolidated.</p> <p>Table has been corrected.</p> <p>No, not agreed.</p>



			Width/height restrictions - not appropriate to show metric-only signs at this time.	
1 1	<p>When routing Pedestrians and Cyclist through town centres from one side of the street to another where an existing crossing exists we would like to be able to use NCN, Regional and local route numbers to avoid confusion to visitors at crossing points. This signs would be no bigger in width than the post themselves and could be provided with stickers. But they would not obscure or confuse vehicular users as they would face cyclist and pedestrians only.</p> <p>We would also like to use brail (raised bumps on letters) numbers for the partially sited.</p>	47	Adding cycle route numbers to signal poles is not something for the amendment TSRGD.	Ignore, not for amendment regs.
1 1	<p>Generally consider that all proposed amendments will be beneficial to transport infrastructure users.</p> <p>We have a number of points that we wish to raise and have these added to the list of authorised changes you planning to make permanent.</p> <ol style="list-style-type: none"> 1. Use of cycle signs with NCN Route numbers within Bollards (not lit) along off road cycle tracks and shared use facilities. 2. Warning Sign 562 we would like to add additional variants to the plate below 563. A 'Lorries turning', B 'Cycles crossing', C 'Buses stopping' D 'Bus stop ahead' 3. 2601-2A & 2B Not Cycle friendly 4. When Pedestrian man used, times must be added, agree with this but feel when both pedestrian man and cycle used both should have times added using the 3mph for Peds and 10mph for cyclist ratio. This fits in with Cycling England & Sustrans Guidance. We also would add distance on a joint sign with any destinations as well. 5. Use of Thermoplastic signs on footpath surface to prevent sign clutter would recommend use of 956, 957,950,955, also route Numbers NCN(Red background), Regional (Blue background) and Local (Green Background) 6. Use of 816 or 616 with a supplementary plate 954.4 underneath. 7. Use sign 956 but without the cycle symbol for pedestrian use only to match 955. 8. A new sign blue background 'Cyclist Give way to pedestrians' 9. A new warning sign Showing a Bus stop ahead to go with a supplementary plate below as per No.2 above. <p>Samples will be provided attached on the above.</p> <p>Particularly in the case of permit holder type signage. Also, the improvements to sustainable modes signing will promote modal shift.</p> <p>We would also be interested to hear if you are willing to consider introducing highway signing for Businesses as we are continually being asked by elected members for such signing?</p>	47	All suggestions under question 11 are a matter for the Traffic Signs Review and not for the amendment TSRGD.	Ignore, not for amendment regs.
1 1	<p>Part 1</p> <p>(6) Uncertain of the benefit of a pictorial sign for 'unsuitable for HGV's'. The existing sign is clear.</p> <p>(11) Would this exemption also include CPE areas operated by Highway Authorities on Highways Agency roads. We have such a road which would mean changing our TRO</p> <p>(15) Obviously this sign should only be used at an average speed camera fixed site.</p> <p>(16, 17, 18,19) All proposals welcomed</p> <p>(23) Needs to be time limited.</p> <p>Any further relaxation in lighting signing is to be welcomed.</p>	48	<p>Diagram 820A - this is optional. We designed this sign as we did not want to authorise signs that show a satellite symbol as proposed by some local authorities.</p> <p>Traffic Officers - not sure what ██████ is asking. How are Civil Parking Enforcement areas affected?</p> <p>Diagram 7009.1 - diagram 7009 is already covered by direction 36. There is no need to add a time limit to diagram 7009.1.</p> <p>Illumination of signs - could consider removing the requirement to directly illuminate terminal signs to diagrams 955, 956 and 957 (Schedule 17, item 3) as this is rarely done.</p>	Ignore, not for amendment regs.
1 1	<p>TAG welcomes the opportunity to comment on the above consultation.</p> <p>Our response prepared by the Transportation Committee is guided by the principle, as articulated in the Traffic Signs Review, that the main aim is to communicate effectively with road users generally or with specific groups</p>	51	These are issues for the Traffic Signs Manual and the Traffic Signs Review. The amendment TSRGD 2010 is intended to be an interim SI aimed at reducing the need for sign authorisations.	Ignore, not for amendment regs.

<p>and to achieve this we need to:</p> <ul style="list-style-type: none">• have the minimum number of signs necessary to do the job effectively;• use the minimum size needed to do that job;• minimise the number of poles used – find other ways of mounting signs;• adopt the most effective height of mounting to communicate effectively with the intended user in particular types of streets;• avoid the impact of excessive signage on legibility, communication and on the visual environment, particularly in historically sensitive areas; and• minimise the use of illumination. <p>We are disappointed, however, that the consultation is very narrowly defined and that the expected root and branch review of Traffic Sign Regulations has not been undertaken. Extensive financial savings and reduced sign clutter could be achieved if the review was not so restrictive. It has been suggested that a new Zonal sign could be developed, which incorporated many currently stand alone signs, especially in the urban residential areas. This could even include a blanket wide 20mph zone associated with the presence of street lighting.</p> <p>In addition to comments on the detailed proposals contained within your consultation and attached to this letter we would like to make the following general comments and observations:</p> <p>Sign Mounting Height</p> <p>In the vast majority of streets the default setting should be the minimum height (2.1m above the footway) which communicates most effectively with motorists, cyclists and pedestrians – taller signs are only necessary on main roads and where the message is aimed at drivers in raised cabs (eg lorries) or where visibility is restricted - it is not sufficient to consider the risk to extremely tall people and potential vandalism, if by raising the height the signs performs poorly in ergonomic terms as well as being intrusive in environmental terms.</p> <p>Encouragement should be given to mounting “smaller signs” at a height appropriate to the environment and traffic speeds. In many cases this may be on bollards, hoops adjacent to the kerb. In particular most parking signs need only be visible from within a stationary car and these could be sited less obtrusively at the back edge of the footway.</p> <p>Smaller Signs</p> <p>Within residential areas subject to 20 mph and 30 mph speed limits it is considered appropriate to reduce the minimum size of signs to a size that is visible and appropriate at these speeds.</p> <p>Minimise the number of signs and lines</p> <p>This is particularly pertinent with regard to parking, loading and waiting restrictions. The number and spacing of repeater signs should be reviewed, and in most cases a single sign be required for a parking bay of less than 25m (5 car lengths), located anywhere within the designation. For lengths up to 100m a pair of signs located within 25m of each end of the designation is considered appropriate. For longer lengths of parking bay, one additional sign should be required per additional 100m.</p> <p>The need to provide metal signs at any time waiting restrictions (double yellow lines) and single yellow lines when they are concurrent with the controlled parking area has already been removed and is welcomed. A similar approach to remove metal traffic signs should be taken for:</p> <ul style="list-style-type: none">• At any time loading restrictions (just using double kerb blips);• Loading restrictions concurrent with the operational hours of controlled parking areas (just using single kerb blips);• At any time stopping restrictions (just using double red lines) on the Transport for London Road Network			
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	<p>(TLRN);</p> <ul style="list-style-type: none"> No stopping at bus clearways when they apply at all times (just using wide yellow line). <p>Within controlled parking zones the removal of the need to mark all places where stopping is prohibited and the introduction of a system where loading, waiting and parking is only allowed within marked bays similar to the approach being adopted in Special Parking Zones would be an appropriate approach. In sensitive and historic areas and an alternative to painted markings is the use of studs or different paving materials to demark bays. The type of parking or delivery allowed could be by recognised sets of tiles in the surface.</p> <p>Minimise the number of poles used</p> <p>Some of the proposals above would go some way to reducing the number of poles required, as well as, where appropriate, mounting signs and traffic signals on lampposts. However, greater benefits could be achieved if Local Authorities are granted powers to place signs on third party property (walls and railings) without the need to negotiate individual way leave agreements.</p> <p>Minimise the use of illumination</p> <p>We object to the need to light signs at well lit urban junctions. We often find regulatory signs, with photocell activated illumination, that do not come on because the ambient lighting is good at night under street lights. These regularly get raised by lighting scouts as “out of light”. These are working fine when we test them in day light hours. There is then an issue over claims for “no fault found” payments. This can result in sign lights being configured to “dayburn” (that is burn 24hrs a day bypassing photocell activation) so they are lit at night.</p> <p>In this age of carbon awareness the regulations force the Highway Authority to light signs at junctions where the lighting levels are above the level at which street lighting is activated. The regulations need to be relaxed to allow the Highway authority to use non illuminated signs at well lit, low speed, urban junctions.</p>			
1 1	This is not supported. The driver of a high vehicle should be subject to greater penalty when a bridge strike occurs as it indicates that they are driving without due care and attention.	51	Diagrams 818.3 etc - not a helpful comment. We need to provide information on how to avoid a low bridge, not let a driver hit it and prosecute him/her.	
1 1	This is not supported as it will increase street clutter and unnecessary signage. The “New roundabout ahead” sign and all such signs should be withdrawn from use in urban areas on roads subject to a 30 mph or less speed limit.	51	Diagrams 7014 and 7014.1 - not a sensible comment. Regular drivers need to be informed of road layout changes etc, whatever the speed limit.	
1 1	This is not supported. The absence of the sign will lead to the assumption that the route is suitable for HGVs and as such will lead to a proliferation of signs. Greater penalty should be introduced for HGV drivers who get stuck as they are driving without due care and attention.	51	Diagram 820A - not a sensible comment. If a sat-nav isn’t giving information appropriate to vehicle type, then a driver needs to be informed by a sign. These signs will be erected only where there is a known problem. In this economic climate, local authorities aren’t going to spend money on unnecessary signs.	
1 1	Local Authorities should be allowed discretion as to whether this aspect is required on a site by site basis. The detection system used at Puffin crossings to cancel a pedestrian demand if the pedestrian crosses after calling the demand against a pedestrian aspect should be allowed at other traffic signals with pedestrian signals, so that traffic is not held when there are no pedestrians waiting to cross.	51	No comment from [REDACTED]	
1 1	This should modified to state in uniform and in a marked vehicle.	51	Traffic officers - interesting point. Perhaps it is something to consider.	Change to be considered. Need to check.
1 1	The provision of journey time information for cyclists is inappropriate and information should be restricted to distances in miles (later km?), as with other traffic signs.	51	Journey times on cycle signs - I agree. I am now recommending that we do not proceed with this.	
1 1	Local Authorities should be given flexibility to include other classes of vehicle.	51	Designated lane - any other vehicles should be a matter for the Traffic Signs Review.	Ignore.

1 1	Greater flexibility should be allowed in the design of yellow boxes to accommodate site specific constraints. This may avoid some sites being non-compliant although the meaning is being clearly conveyed to the driver or rider.	51	Yellow box markings - I agree that we should consider more flexible layouts.	For later consideration
1 1	Greater flexibility should be introduced as described in the covering letter to ensure that local authorities can designate zones appropriate to their needs. For example by allowing visitor and resident parking in the same zone.	51	Restricted zones - I don't understand this comment. Various types of parking bay are permitted within the zone ("Except in signed bays").	
1 1	Similar signs for electric motorcycles, electric cycles, electric buses and electric goods vehicles should also be prescribed. A motif or diagram for Pay by Phone parking should be developed and prescribed.	51	Electric vehicles - the sign covers all types of vehicles and may be used with standard or wide bay markings.	
1 1	Welcomed, but 'Nearly Full' should not be withdrawn.	51	Car park signs - we have agreed that "NEARLY FULL" isn't helpful. More and more VMS will use actual number of spaces available.	
1 1	Within Urban Areas with speed limits below 30 mph scrolling and paging messages should continue to be allowed when visibility allows the full sign to be read. Similarly a smaller type face should be introduced.	51	No comment from [REDACTED]	Scrolling text - not permitted anyway.
1 1	The recent change to "No Stopping on school markings" should be reversed to allow them to state Term Time Only to ensure that kerb side space is not wasted in dense urban areas.	51	No stopping and entrance markings - term time is not appropriate; not all drivers will know when term time is - also it varies from one local authority to another.	Ignore, not for amendment regs.
1 1	A New Pedicab symbol should be authorised to allow existing regulations to be applied to pedicabs.	51	Pedicab signs - not appropriate at this time	Ignore, not for amendment regs
1 1	The definition of Advised Maximum Speed Limit on Motorway indicator signs should be amended due to widespread disregard and a mandatory speed limit introduced.	51	Motorway signals - not a sensible suggestion and could be considered only as part of the Traffic Signs Review.	Ignore, not for amendment regs
1 1	It would reduce complications and add simplicity if all Keep Left' signs could simply be reflective and versions with a light or PV cell and LED glow rendered unnecessary.	51	Keep left signs - signs are lit in order to be seen. One step at a time - the first step being reflective self-righting bollards.	Ignore, not for amendment regs
1 1	Park Mark is not a term in common knowledge by the public and as such causes confusion. Varying 'Secured Parking' to 'Secure' or 'Police Approved' or 'CCTV' might provide greater clarity to users.	51	Park Mark - car parks already include this symbol (e.g. in Newark). It will eventually be understood. This was agreed with the BPA.	No to suggestion.
1 1	<p>Para 12. We agree with ASL 'gate' option. The wording should be "not practicable" throughout, as opposed to "not possible" (as used in Section 6). However, it should not be compulsory to access the ASL via the 'gate' or lead-in lane. The journey time option to cycle direction signs is welcomed. A prescribed sign for contra-flow cycling (without a mandatory lane) is welcome. Can a 25mm x-height be included for the stack and other cycle direction signs? Can the 40 and 50mm x-heights be removed on both options of Diag 966 Cyclists Dismount and Cyclists Rejoin Carriageway, as 30mm is adequate for cyclists speeds? Can the wording to Diag 966 be changed from "at the end of break in cycle lane track or route" to 'where it is not appropriate to authorise continued cycling off-carriageway'? The proposed Diags 958A and 959A should have Item 4 changed to allow the omission of the solo motorcycle symbol as exclusion of P2Ws may be desirable for some bus lanes.</p> <p>In relation to Regulation 4, Interpretation, should include definitions of road, building and engineering works, particularly in terms of durations (as stated previously).</p> <p>Again, in relation to Regulation 4, Interpretation, as line-markings for pedestrians are not a requirement, consideration should be given to durations of these events when such markings are not necessary (as stated previously).</p> <p>In relation to Regulation 43, it is suggested that the proposed use of new Diagram 7011.2 be reconsidered. It is suggested that in the first instance this Diagram may not be as effective as the existing Diagram 7011.1 – "WHEN RED LIGHT SHOWS WAIT HERE", and perhaps this may cause the new Diagram to be perceived as less important, in a not dissimilar manner as Wig-Wag signals are perceived as not being as well understood or effective as RAG signals.</p> <p>In the second instance, it is agreed that the use of Diagram 7011.2 may be understood at a stand-alone</p>	51	<p>Cycle signs - an x-height of 25mm is not appropriate. This size is not even prescribed for pedestrian signs (except diagrams 2610 and 2610.1). With regard to diagram 966, traffic authorities can choose the appropriate x-height for a particular location.</p> <p>Regulation 4 - this covers definitions that are not included in other legislation or where the interpretation is different. There will already be a definition of "road" elsewhere.</p> <p>Diagram 7011.2 - we need to consider whether the sign design should be changed from "GREEN LIGHT" to "RED LIGHT". The former is used in diagram 7011.1 because the red signal is likely to show for a long time. In the case of diagram 7011.2, it might be better to follow the design of diagram 7011.</p> <p>Diagrams 1001.2 and 1001.2A - we should perhaps consider amending both captions. The caption to diagram 1001.2 doesn't mention other vehicles - should it or would this conflict with regulation 43? Perhaps the solution is to separate out diagrams 1001.2 and 1001.2A in regulation 43 (paras (2) and a new para (2A)) and refer to these regulations, as appropriate, in the</p>	<p>No, size is too small.</p> <p>Ignore, not for amendment regs</p> <p>[REDACTED] to check Reg 43 for wording and caption for both of these diagrams and to separate diagrams as suggested.</p>

	<p>pedestrian facility layout, there are junction layouts that may often require the pedestrian facility to be offset considerably from the vehicle stop-line or equivalent (drawings can be provided to demonstrate this), in this instance the new Diagram may not be as clear, as for motorists the pedestrian crossing facility may not be clearly visible.</p> <p>In relation to proposed Diagram 1001.2A, it is suggested that the explanatory text be reconsidered. Firstly, it references Diagram 1001, when it may be preferred to reference Diagram 1001.2. Secondly, the text suggests that there is a cycle stop-line and a vehicle line, when the Regulation pertaining to this marking does not indicate as much, indeed this is a common misconception. However consideration may be required to ensure that motorcycle access to the reservoir can be achieved in the future, if necessary.</p> <p>In relation to Schedule 2, Table, which dictates the minimum-number and placement of portable vehicular signals, consideration could be given to multi-lane approaches. Whilst we recognise that this may be something that is later covered in any accompanying Traffic Advisory Leaflets, or indeed that you suggest Traffic Authorities themselves consider creating their own local guidance, it is something that you may consider capturing in legislation. Clearly this was not a significant issue prior to the inclusion of portable pedestrian facilities, it is suggested that this is now a greater issue that is worthy of consideration. Again drawings can be supplied to illustrate the multi-lane scenario, but in essence the suggestion is that additional vehicular signal heads may be preferred for multi-lane approaches where vehicular occlusion has significance to visibility of pedestrians.</p> <p>In relation to Schedule 12 and Regulation 43, it is suggested that consideration be given to requiring pedestrian signage be placed with portable pedestrian signals. It seems that if an allowance has been made for vehicles when no stop-line (or other road markings) are present, then the same consideration should be made for pedestrians (when line markings are absent particularly – again highlighting the consideration for duration to be covered). Even if such signage is already considered to be in TSRGD, then it is suggested that these signs should be legislated in terms of their use in certain instances.</p>		<p>captions. Regulation 43 needs to be amended anyway because diagram 1001.2A does not have cycle lane.</p> <p>General Directions Schedule 2 - is it not intended to provide multi-lane approaches and should this be made clear? Also, the way in which Schedule 2 is drafted implies that staggered crossings and central refuges should not be used, but this isn't clear.</p> <p>Pedestrian signs at portable signal facilities - probably not necessary as the signals for pedestrians are the same as those at permanent crossings.</p>	<p>██████ to look at Reg 43 and provide suggestion for motorcycle access</p>
11	<p>We support the addition of destination and distance on sign 2601.1 (in Sch 7)</p> <p>We do not support the use of times instead of distances on sign 2602.1. The duration of a cycle depends on the speed and there will be large variation between different cyclists. It is nonsense to put an arbitrary time for a journey, when a precise distance can be given. (Sch 7)</p> <p>We are disappointed that the opportunity was not taken to authorise the addition of the horse symbol (diagram 622.6) to 2606.1 as a permitted variant. Often the National Cycle Network uses parts of public bridleways. It is certainly true that some walkers and cyclists take the signage to be limiting in scope so that omission of the horse symbol implies to them that horses are prohibited, and some will challenge riders who have every right to be using the route.</p> <p>⇒ Please add diagram 622.6 as a permitted variant on sign 2606.1.</p> <p>We are disappointed that the opportunity has not yet been taken to add National Bridleroute Network route numbering as a permitted variant/addition to of diagrams 2601.1, 2602.1, 2606.2, 2610, 2610.1, 2610.2.</p> <p>We consider that these changes are simple enough to be included in the DRAFT 2010 regulations and general directions, rather than wait for the results of the ongoing policy review.</p> <p>Sign 956, "Route for use by pedal cycles and pedestrians only" causes equestrians great difficulties. There is a pressing need for a sign indicating that a route is promoted for walkers, riders and cyclists. There are many places where the verge of a road is particularly suitable for all three user types, yet as there is no sign to <i>promote</i> the route for non-motorised users (as opposed to saying that motorised vehicles are prohibited), many local authorities use diagram 956 to encourage walkers and cyclists to use it. This leads to some walkers or cyclists thinking that horses should not be there. The regulation could be improved by taking two actions:</p> <p>⇒ Please remove the word 'only' from the sign's description, so that it reads "Route for use by pedal cycles and pedestrians".</p> <p>⇒ Please add as a permitted variant the use of a plate below diagram 956 saying "and horses" where the highway authority wishes to promote the use to all three user types.</p>	52	<p>Journey times on cycle signs - I agree. I am now recommending that we do not proceed with this.</p> <p>Bridleways - all suggestions should be considered as part of the Traffic Signs Review. The signs to diagram 2610 and 2610.1 can show the horse symbol. I'm not sure that horses can legally use cycle tracks and shared footways. Where a bridleway is used as a cycle route we have authorised signs - so it is something to consider at a future date.</p> <p>Restricted by-ways - we were waiting for the nod from DEFRA before prescribing purple signs. This now has to be done (DEFRA Circular 1/09 (October 2009)).</p>	<p>Ignore, not for amendment regs.</p> <p>Ignore, for the Review.</p>

	<p>We will be making proposals to the general policy review that there should be a new sign (perhaps based on the one for Quiet Lanes (diagram 884, introduced by SI 2006/2083, <i>The Traffic Signs (Amendment) Regulations 2006</i>), but the above changes could be achieved quickly and simply, and enable authorities to stop discriminating unintentionally against horse riders.</p> <p>The introduction of restricted byways in 2000 (legislation) and 2006 (implementation) means that there is a need for a coloured arrow for this status of highway. Diagram 2610.2 allows the use of red for restricted byways, but Natural England's guidance says Victoria plum (dark purple) should be used. The advice is reinforced by DEFRA's circular 1/09.</p> <p>⇒ Please add purple as a permitted variant instead of red for restricted byways for sign 2610.2, and for the chevron colour in sign 2610.</p>			
1 1	<p>D660.8 contains car club symbol which is shown as a different shade of blue to standard parking symbols and the Park Mark symbol.</p>   <p>However, both organisations show a similar shade of light blue on their respective web sites. We believe it would be advantageous to specifiers and sign manufactures to have the car club blue standardised to traffic blue as the Park Mark logo. This provides uniformity of colours and follows accepted colour coding in use today in the TSRGD such as Diag 2511 .</p>	53	Diagram 660.8 - I agree, we should use the standard blue.	Agreed already.
1 1	<p>Overall the changes proposed look to be helpful. Additional comments about specific points are detailed below:</p> <ul style="list-style-type: none"> - Width and height restrictions (para. 2-6): Proposals for both metric and imperial signs are welcome as this change should reduce the likelihood of bridge strikes, especially from foreign registered vehicles. To provide a lead time for changes is important, but there is a concern about national consistency of signs, especially as freight services relying on this information will be travelling across administrative borders. Additional advice to local authorities about phasing these changes, especially in relation to neighbouring authorities, should be provided. A pictorial sign identifying routes unsuitable for HGV traffic will be a welcome development for those areas affected, but its development does raise concerns about providing additional signage in areas that are likely to be environmentally sensitive. Again guidance for local authorities will be required. - Traffic officers (para. 11): Allowing Highways Agency Traffic Officers exemptions from certain prohibitions, similar to those available for the emergency services, is a welcome suggestion. - Cycling issues (para. 12): It is suggested that a sign will be prescribed to permit contra flow cycling either with or without an advisory lane marked on the carriageway. There are still unknown safety issues with allowing contra flow cycling, and public understanding (both cyclists and motorists) of the new changes will need to be addressed. The RAC Foundation would require concrete evidence that this change is not detrimental to road safety and is understood by all road users, before a sign is prescribed to allow local authorities to develop contra flow cycling arrangements. Consideration should also be given to how unsigned roads will be used by cyclists and whether there will be additional need for enforcement on routes not designated as a contra flow. Guidance on the circumstances in which a change in vehicle movements is warranted will also be needed. - Enforcement cameras (para. 15): Prescribing the legend 'Average speed check' to remove the need for site by site authorisations of these signs should only be done when there is adequate Government guidance on how average speed cameras should be used, which is particularly applicable beyond the strategic motorway network. - Roadwork signs (para. 22): Providing greater flexibility for road work signs to give more accurate and relevant information to road users is to be welcomed. <p>Variable message signs (para. 24): Requiring variable message signs to display their entire message on a</p>	55	<p>Contra-flow cycling - this is not new and guidance is already given in Chapter 3.</p> <p>Average speed check - do we give "blanket" authorisation for each traffic authority? If so, the RAC's comment isn't really valid. In any case we wouldn't refuse authorisation because that would be refusing the use of cameras. If cameras are justified then the new variant of diagram 878 is the appropriate sign. I like average speed cameras, they do work and keep speeds down along a length of road - I should know, we have plenty of them in Nottinghamshire and Nottingham City.</p>	No comments.

	single aspect would be a positive change to reduce road user distraction.			
1 1	<p>Para 10. We agree with the use of toucan push-button with pedal cycle-only traffic signals.</p> <p>Para 11. This refers to the Highway Agency's traffic officers in uniform. This should also include, "in a marked vehicle and displaying appropriate warning lights".</p> <p>Para 12. We agree with ASL 'gate' option. The wording should be "not practicable" throughout, as opposed to "not possible" (as used in Section 6). However, it should not be compulsory to access the ASL via the 'gate' or lead-in lane. The journey time option to cycle direction signs is welcomed. A prescribed sign for contra-flow cycling (without a mandatory lane) is welcome. Can a 25mm x-height be included for the stack and other cycle direction signs? Can the 40 and 50mm x-heights be removed on both options of Diag 966 Cyclists Dismount and Cyclists Rejoin Carriageway, as 30mm is adequate for cyclists speeds? Can the wording to Diag 966 be changed from "at the end of break in cycle lane track or route" to 'where it is not appropriate to authorise continued cycling off-carriageway'? The proposed Diags 958A and 959A should have Item 4 changed to allow the omission of the solo motorcycle symbol as exclusion of P2Ws may be desirable for some bus lanes.</p> <p>In relation to Regulation 4, Interpretation, should include definitions of road, building and engineering works, particularly in terms of durations (as stated previously).</p> <p>Again, in relation to Regulation 4, Interpretation, as line-markings for pedestrians are not a requirement, consideration should be given to durations of these events when such markings are not necessary (as stated previously).</p> <p>In relation to Regulation 43, it is suggested that the proposed use of new Diagram 7011.2 be reconsidered. It is suggested that in the first instance this Diagram may not be as effective as the existing Diagram 7011.1 – "WHEN RED LIGHT SHOWS WAIT HERE", and perhaps this may cause the new Diagram to be perceived as less important, in a not dissimilar manner as Wig-Wag signals are perceived as not being as well understood or effective as RAG signals.</p> <p>In the second instance, it is agreed that the use of Diagram 7011.2 may be understood at a stand-alone pedestrian facility layout, there are junction layouts that may often require the pedestrian facility to be offset considerably from the vehicle stop-line or equivalent (drawings can be provided to demonstrate this), in this instance the new Diagram may not be as clear, as for motorists the pedestrian crossing facility may not be clearly visible.</p> <p>In relation to proposed Diagram 1001.2A, it is suggested that the explanatory text be reconsidered. Firstly, it references Diagram 1001, when it may be preferred to reference Diagram 1001.2. Secondly, the text suggests that there is a cycle stop-line and a vehicle line, when the Regulation pertaining to this marking does not indicate as much, indeed this is a common misconception. However consideration may be required to ensure that motorcycle access to the reservoir can be achieved in the future, if necessary.</p> <p>In relation to Schedule 2, Table, which dictates the minimum-number and placement of portable vehicular signals, consideration could be given to multi-lane approaches. Whilst we recognise that this may be something that is later covered in any accompanying Traffic Advisory Leaflets, or indeed that you suggest Traffic Authorities themselves consider creating their own local guidance, it is something that you may consider capturing in legislation. Clearly this was not a significant issue prior to the inclusion of portable pedestrian facilities, it is suggested that this is now a greater issue that is worthy of consideration. Again drawings can be supplied to illustrate the multi-lane scenario, but in essence the suggestion is that additional vehicular signal heads may be preferred for multi-lane approaches where vehicular occlusion has significance to visibility of pedestrians.</p> <p>In relation to Schedule 12 and Regulation 43, it is suggested that consideration be given to requiring pedestrian signage be placed with portable pedestrian signals. It seems that if an allowance has been made for vehicles when no stop-line (or other road markings) are present, then the same consideration should be made for pedestrians (when line markings are absent particularly – again highlighting the consideration for duration to be covered). Even if such signage is already considered to be in TSRGD, then it is suggested that these signs should be legislated in terms of their use in certain instances.</p> <p>he amendments to Direction 41 will give discretion to traffic authorities to directly illuminate the signs mounted in bollards or use retro-reflective alternatives, this change is to be welcomed..</p>	56	See above.	No comments.
1 1	<p>Yellow Box Markings 14 – Diagrams 1043 and 1044 do not illustrate a priority working situation and is therefore likely to cause problems with interpretation. Our recommendation would be to include a separate</p>	57	Yellow box markings - [REDACTED] has picked up my point about amending the diagrams now that that can be used at	

	<p>diagram for the purpose of illustrating priority working. In order to use the marking at locations which are not junctions, such as at fire stations, then any reference to kerb lines will need to be removed from the diagram, except to illustrate the maximum cut-away.</p> <p>Parking Signs 18 – Diagrams 1028.3, 1028.4, 1032 and 1033 have not been amended to include diagrams 660.8 and 660.9. Amendments to directions 24 and 25 appear to be inconsistent and incomplete for diagrams 660.8 and 660.9. Also, clarity is required as to how the legends “Car Club Only” and “Electric Vehicles Only” are to be used with diagram 1033, given that the use of these legends would make for very wide parking spaces.</p> <p>Cycling issues 12 – Proposed diagram 1001.2A Item 4 the phrase “The number of traffic lanes may be varied” should be added.</p> <p>Road Works Signs 22 – All temporary signs in Schedule 7 and Schedule 12 should have a consistent minimum and maximum text heights in line with Regulation 53.</p>		<p>locations other than junctions.</p> <p>Diagram 660.8, 660.9 and parking bays - this, of course, is in hand.</p> <p>Diagram 1001.2A - how did I overlook this? “The number of traffic lanes may be varied” is a pv of diagram 1001.2, therefore it should apply to diagram 1001.2A.</p> <p>Temporary signs x-heights - I don’t agree that they should all have the same x-height as specified in regulation 53.</p>	<p>██████ to amend this.</p> <p>Ignore, not for amendment regs.</p>
1 1	<p>I am very concerned that the range of signs currently available for the signing of temporary waiting restrictions is very limited. In particular diagrams 636, 636.1 and 636.2 are a very blunt instrument and do not help authorities to provide necessary restrictions in a balanced manner which provides a customer focussed regime. Although 636.2 provides a facility for days and times etc this is apparently only in respect of No Stopping and does not extend to No Waiting or No loading. 636 and 636.1 need to include the same variations permitted for 636.2 in schedule 16 item 38.</p> <p>By way of illustration, it may be necessary to restrict waiting / parking / loading etc during the working day for such activities as road resurfacing but during the night time it may be perfectly acceptable to allow parking, especially in residential areas where residents like to park near to their homes. However, the current diagrams do not appear to allow the use of day and times (or dates) to enable authorities to implement a temporary restriction in advance of works or for intermittent periods.</p> <p>Although legal notices will be placed on site these are not what the public read and especially drivers of vehicles. Traffic signs are the source of their information.</p> <p>The simplistic signs therefore currently require that they are placed prior to the works start, sufficiently in advance such that all vehicles parked at the time of placing the signs will have been removed (hopefully) prior to the start of works. Our practice is to ensure that at the time of the placing of signs all vehicles parked within the restriction are identified and recorded. These vehicles are then exempt from enforcement either by way of PCN or removal (although at present we do not tow-away). This may result in vehicles being present at the time that the clear street is needed. To counter this it is necessary to implement the restriction well in advance of the needed time thereby inconveniencing the public or by risking compromising the restriction by advising residents that enforcement hours will differ from those of the restriction. The option to place signs which ‘announce’ temporary restrictions taking effect the following day or at a subsequent time would allow time for these vehicles to disperse and adequate warning to be given.</p> <p>Similarly it is necessary to retain the wholesale restriction in place until the works are completed since any vehicle parking during an intervening period when signs have been removed will be doing so without knowledge of the forthcoming repeat prohibition and we enter a repeat scenario of parked vehicles affecting works.</p> <p>We also have the situation where signage for events which are of known times / hours need to be placed 3 or more hours in advance of that which would be otherwise needed simply to ensure that any Blue Badge holders are removed prior to the time of implementation. This also causes inconvenience to others who may wish or need to park in the vicinity.</p> <p>Variation to the 636 and 636.1 signs would accommodate this need including the variation of 636 alone or in combination with 636.1. There are instances where loading within a works site is perfectly acceptable and can be accommodated and only a 636 restriction required whereas in other areas 636.1 would also be necessary. However the use of 636.2 would be unusual and if used as a workaround may, if challenged (which of course is increasingly likely these days), be found to be inappropriate and therefore unenforceable and thereby not allowed in subsequent cases.</p>	59	<p>Temporary waiting restrictions signs - I am sympathetic towards the addition of time periods etc to these signs, but I think it requires more thought and I don’t think there is time to consider this for the amendment TSRGD. Temporary signs are generally displayed on cones and adding times wouldn’t be appropriate. At some time we will have to consider temporary signs for the suspension of parking bays, therefore we ought to consider at the same time waiting restrictions on roads that do not have permanent restrictions. A suitable sign might be based on diagram 637.2 without the words “Pedestrian Zone”. This would work where there are suitable mounting positions such as lamp columns, but might be difficult to place otherwise (e.g. no street lighting or where street lighting is on one side of the road on a bend)</p>	Ignore, not for amendment regs.
1 1	<p>We believe that signs that can only be readily understood in a single country represent a significant safety issue for today's international traffic. We therefore commend the decision to withdraw imperial-only restriction signs as an important first step in the process of their replacement with internationally-understood metric signs, in accordance with the Vienna Convention.</p>	60		Ignore all, not for amendment regs.

<div data-bbox="121 75 546 107" data-label="Section-Header"><p>IN-CAB HEIGHT INDICATIONS</p></div> <div data-bbox="121 142 1590 415" data-label="Text"><p>The withdrawal of imperial-only restriction signs will be an opportune time for a further safety improvement regarding the regulations concerning the in-cab display in vehicles with an overall travelling height exceeding 3 m, SI 1997 No 530. As soon as all height restriction signs show metric units, it will become more useful for in-cab displays to show vehicle height in metric rather than imperial. This will enable in-cab displays to also be used when driving outside the UK. Currently the in-cab display is only of use when driving in the UK. The following changes should be made to TSRGD 2002 for reasons consistency with the withdrawal of diagrams 629 and 629.2:</p></div> <div data-bbox="121 487 270 518" data-label="Text"><p>Schedule 1</p></div> <div data-bbox="121 554 584 585" data-label="Section-Header"><p>ARCH BRIDGE WARNING SIGNS</p></div> <div data-bbox="121 623 1573 795" data-label="Text"><p>Diagram 530 item 4 -replace the words "Metric sign may be omitted or placed to the right of the imperial sign", with "The metric sign may be placed to the right of the imperial sign". Diagram 531.1 item 4 - omit the words "Metric sign may be omitted". Diagram 532.2 item 4 - omit the words "Metric sign may be omitted". Diagram 532.3 item 4 - omit the words "Metric sign may be omitted".</p></div> <div data-bbox="121 865 273 896" data-label="Text"><p>Schedule 2</p></div> <div data-bbox="121 934 474 966" data-label="Section-Header"><p>LENGTH RESTRICTIONS</p></div> <div data-bbox="121 970 1561 1104" data-label="Text"><p>diagram 629.1 Changes should be made to require both metric and imperial roundel signs to be used to indicate a length restriction, The metric variant diagram (629,1 sheet 2), which exists in the working drawing should be added to the TSRGD (currently only the imperial diagram is shown in the TSRGD),</p></div> <div data-bbox="121 1140 273 1171" data-label="Text"><p>Schedule 3</p></div> <div data-bbox="121 1209 418 1241" data-label="Section-Header"><p>OVERHEAD CABLES</p></div> <div data-bbox="121 1245 1427 1344" data-label="Text"><p>Diagram 780A item 4 - omit the words - "The indication of height in metric units may be omitted". Diagram 780.1A item 4 - omit the words - "The indication of height in metric units may be omitted". Schedule 4</p></div> <div data-bbox="121 1381 557 1413" data-label="Section-Header"><p>DEPTH OF WATER AT A FORD</p></div> <div data-bbox="121 1417 1602 1482" data-label="Text"><p>Diagram 826 should be omitted (this variant shows depth of water in feet only), Depth indications should use the same units as height restrictions.</p></div> <div data-bbox="121 1518 273 1549" data-label="Text"><p>Schedule 7</p></div> <div data-bbox="121 1587 822 1619" data-label="Section-Header"><p>DIRECTIONAL SIGN WITH HEIGHT RESTRICTION</p></div> <div data-bbox="121 1623 1080 1654" data-label="Text"><p>Diagram 2027 should include metric warning triangle as well as imperial.</p></div> <div data-bbox="121 1692 290 1724" data-label="Text"><p>Schedule 12</p></div> <div data-bbox="121 1728 676 1759" data-label="Section-Header"><p>LANE CLOSURES AND CONTRA-FLOW</p></div> <div data-bbox="121 1797 1513 1965" data-label="Text"><p>diagrams 7201, 7201.1, 7210, 7212, 7235 should all be replaced with diagrams that include width restrictions in metric units (as per diagram 7211.1)diagram 7283 should be omitted diagram 7283.1 wording should be updated so as to no longer reference diagram 7283 diagram 7284 should be omitted diagram 7284.1 wording should be updated so as to no longer reference diagram</p></div>			
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	<p>7284</p> <p>CYCLE ROUTE SIGNS</p> <p>Our opinion of the proposed new cycle route sign (new variant of diagram 2602,1), which shows distances using estimated journey times in "hrs" and "mins" , is that it has been poorly thought out, and will lead to an incoherent mix of miles and minutes across the National Cycle Network as a whole, It also makes unstated, assumptions about average walking or cycling speeds, whereas these will obviously vary according to the preferences and physical fitness of the individual pedestrian or cyclist, as well as prevailing weather conditions.</p> <p>The use of imprecise journey times is not what people expect to see on directional signage, which should use exclusively objective measures.</p> <p>It seems also that little consideration has been give to how cumbersome this sign will be when in its bilingual form.</p> <p>The Units of Measurement Regulations 1986 assigns symbols (h and min) for hours and minutes. These language-independent symbols should always be used on road signs to signify hours and minutes, rather than improvised language-specific abbreviations.</p> <p>BRIDGE HEADROOM REDUCED</p> <p>The proposed new sign (diagram 7014.1) indicating a temporary or permanent reduction in bridge headroom is a good illustration of what is wrong with many road signs. It relies on the use of text, instead of making use of standard symbols and pictograms. A driver unfamiliar with English could not be expected to know that the metric value in brackets (the key information of the sign) refers to a height restriction. Also, the sign uses symbols '(and ' ' which have an entire different meaning outside the UK. To non-British driver, the sign literally means "12 minutes 9 seconds".</p> <p>We have designed an improved version of the sign, keeping all the elements of the original design:</p> <p>Arguably, the sign would be clearer still by removing all text from outside the warning triangles, and by using only the metric warning triangle. For maximum understanding, the amount of language-specific text on signs should be kept to a minimum. There are many other current signs, e.g. the "NEW ROUNDABOUT AHEAD" sign (diagram 7014), that could be similarly improved by using standard warning triangles or roundels.</p> <p>In keeping with the principle that symbols should be used where possible instead of text, we would recommend that the words "Except buses" on diagrams 954 and 954.5 should be replaced with the word "Except" and a bus symbol. Similarly for diagrams 954.6 and 954.7</p> <p>PEDESTRIAN EMERGENCY EXIT</p> <p>For safety reasons, the pedestrian emergency exit sign on diagram 2711.1 should use the symbol 'm', as per the diagram in the Vienna Convention, rather than the word 'yards'.</p> <p>DRIVER LOCATION SIGNS</p> <p>Driver location signs are installed on many motorways, and some A roads. The Traffic Signs (Amendment) Regulations and General Directions 2010 presents an opportunity to add the specifications for these new signs to the TSRGD.</p>		
1 1	<p>Looking at GD 13A, I'm struggling to work out how to clearly sign a diversion for a closed exit or entry slip road, as shown on Plans SRC1 and SRC2 in Chapter 8, Part 1 that uses the main line of the motorway as part of the diversion route.</p> <p>I initially had great difficulty in deciphering which bits of a motorway 2703 to 2707 inclusive can be installed on – see 13A (2) - until I read page 19, item 10 of the consultation PDF. I wonder if 13A (2) could be worded better?</p> <p>Unless I'm missing something, as for signing a diversion for a closed motorway exit slip, as shown on Plan SRC1, I'm not convinced that NOT permitting use of 2703 on the mainline is a good idea. Traffic that has been instructed to “use J10” as per SRC1, is approaching J10 and sees what signs immediately before the J10 exit please? As I read the draft regs, the simplest sign we could use is a 2716, varied to simply show an angled</p>	61	<p>As I recall, the original proposal to allow diagrams 2703 etc on motorway slip roads came from the HA, the main reason being to provide follow-on signing at motorway to motorway roundabouts. The whole signing regime for motorway closures should be a matter for the HA. We will be adding more permitted variants to diagram 2716, so we could consider some of [REDACTED] suggestions.</p> <p>This is wrong; you do not ues diag 2703 but diag 2716.</p>

	<p>arrow and the text “Alternative route”. Note that the text would be at a smaller ‘x’ height than normal in relation to the arrow and border and might thus look odd. Traffic would then be presented with a 2703 of some description (typically just “Diverted traffic” with a U-turn arrow), on the exit slip at J10, to get them travelling back towards J9. Will drivers understand that the “Alternative route” and “Diverted traffic” signs are meant for them, or will the different text cause confusion. It’s not generally good practice to have inconsistent sign legends surely?</p> <p>The same situation holds for a closed entry slip. If the diversion route is via the next junction and then a U-turn to get back to the desired direction of travel, 2704s can be used to send traffic onto the opposite direction carriageway. Again, will the use of “Alternative route” signs at the junction where we want them to U-turn be misinterpreted by some drivers, who would then keep on driving in the opposite direction to the one they want to go in?! What if there’s a limited access junction between J9 and J10 that we want traffic to drive past to get to J10?</p> <p>In short, I’m not convinced we need 13A at all. The simple deletion of 2703 to 2707 from the existing GD 13(3) would allow use of either these signs or a 2716 variant on motorways as the situation requires. This would be far simpler, (and consistent with diversion signing practice on other roads), than using the mixture of legends mentioned above.</p> <p>Unless, of course, the proposal in Annex C re 2716 includes a variation to allow us to delete “Alternative route” and replace “follow” with “Diverted traffic” plus an angled arrow, in which case problem solved. This would require the caption at the side of 2716, Item 4 to read, “...”Alternative route may be varied to “To rejoin” or to, “To rejoin” and a route number, or omitted as appropriate.” Further down Item 4, “...”follow” may be varied to “use” or “via” or “Diverted traffic”, or omitted as appropriate.”</p>			
1 1	<p>Mandatory Disabled Parking Bays</p> <p>The TSRGD 2002 makes provision for mandatory disabled parking bays, for the benefit of disabled badge (blue) holders, to be identified using road marking 1028.3 and regulatory sign 661A in accordance with General Direction 7 (the effect of an Order etc).</p>	62	<p>This follows on from [REDACTED] above. I can’t see how we can amend the TSRGD at this stage just for Scotland. Could not the Act have been written in such a way that all existing advisory bays become mandatory (enforceable) without the need for a TRO and without a change of marking or additional signing?</p>	<p>Ignore, not for amendment regs.</p>
2	<p>Advisory Disabled Parking Bays</p> <p>Advisory disabled parking bays have been provided in Scotland as a 'courtesy' outwith the current TSRGD 2002. The practice of providing advisory bays predates Local Government Reorganisation in 1996 and was seen at the time as providing a workable solution to managing the needs of those drivers whose disabilities required that they could park on-street as close as possible to their homes. Experience has shown that when provided these advisory bays are adhered to by neighbours/visitors in the vast majority of cases. These advisory bays which only rely on a road marking (yellow or white) have the great benefit of being able to be provided relatively quickly (assuming the applicant satisfies the necessary criteria) eg within a matter of weeks. This is much more favourable to the disabled person when compared to the many months taken to promote the necessary Traffic Regulation Order (TRO) for a mandatory disabled bay, which is subject to objection and many ultimately fail to get approval. In addition, by having residential disabled persons parking bays as advisory, greater flexibility is provided. For example, people often move house and advisory bays can be easily removed and recreated at the new address. If the parking bay was mandatory then the existing TRO would require to be revoked and the process for a TRO at the new address set in motion with no guarantee that it would be promoted successfully. The disabled person and the Local Authority would therefore face the lengthy and costly process of implementing a new TRO. The advisory bays, as indicated above, only have the road marking, usually marked in yellow, whereas the mandatory bays have a white road marking plus an associated sign which is generally erected on a pole.</p> <p>At the present time the 'Disabled Persons Parking (Scotland) Bill' is being promoted by Ms Jackie Bailie MSP and if it becomes an Act there will be a requirement for all existing advisory disabled parking bays to be made mandatory.</p> <p>Both SCOTS and COSLA have done a considerable amount of work canvassing all Scotland's Local Authorities to try to assess the impact which the proposed legislation would have in terms of staff resources and costs to convert existing advisory bays to mandatory bays as well as enforcement costs thereafter. It has been estimated that in Scotland there are 12,732 on-street advisory bays which would</p>			

	<p>need the existing markings burned off, new markings installed and regulatory signs erected, together with 8,960 on-street advisory bays which would only need the regulatory signs. In both the foregoing cases the necessary TROs would have to be successfully promoted in each of the 32 Scottish Councils. By comparing costs across Scotland it has been calculated that, excluding future enforcement costs, a sum of roughly £10 m would be needed in order to promote the many TROs and thereafter install the associated lining and signing to make the advisory bays mandatory in accordance with the proposed legislation. This huge sum of money would be prohibitive at the best of times, but even more so during the present and ongoing recession.</p> <p>Assuming that the Private Member's Bill makes the statute books then the above figure of £10 m could be dramatically reduced to a value of £2 m if the need to promote the TROs together with the regulatory signs was removed. In other words amend the TSRGD 2002 to permit the use of road marking 1028.3 only and allow it to be enforceable without having to promote a TRO. Not only would such a change reduce the initial cost of providing mandatory disabled parking bays it would also reduce future costs when bays have to be removed. This would be similar to previous amendments to the TSRGD 2002 regarding yellow box junctions and bus stop markings.</p> <p>3 Requested Amendment to TSRGD 2002</p> <p>Regardless of the outcome of the Disabled Persons Parking (Scotland) Bill it is requested that in order to provide enforceable disabled on-street parking bays in a more cost-effective and flexible way the TSRGD 2002 be amended to allow road marking 1028.3 to be enforceable without the need to promote a Traffic Regulation Order. This proposed amendment should also remove the need to use regulatory sign 661A.</p>			Ignore, but will explain why.
1 1	<p>Many of the changes are helpful, but unfortunately I have to say “No” overall. This is because the following problems are not yet addressed:</p> <ul style="list-style-type: none"> • “m” being used to abbreviate miles is highly confusing, and this needs to be addressed. “m” is only supposed to be used as the symbol for metres. • Similarly, “T” the symbol for tesla has been used for tonnes, which is slightly confusing and also needs to be addressed. These signs should be corrected to “t”, the correct symbol for tonnes. • There are also too many wordy signs (e.g. the blue signs having in words “Weight limit 7.5 tonnes” or even “Width limit <distance> ahead”), these should be replaced with wholly symbolic signs and with words minimised as much as possible. This will make the signs much easier to look at, at a glance – and improve road safety as a result. • Wordy supplementary plates such as “Queues likely”, “Ice”, “Give way to oncoming vehicles”, and “Priority over oncoming vehicles”, are not necessary, because the pictogram in the sign above already explains the meaning. Those supplementary plates without any distances can be removed I believe (or replaced with the distances alone if applicable). • If we have a sign saying “Buses only” or “Buses, cycles and taxis only” we do not need a supplementary plate underneath saying “Only”. Supplementary plates saying “Only” are clutter and should be removed. • For <distance> plates (e.g. “For ½ mile” or “For 18 miles”) should be replaced with a language independent equivalent: ↑ <distance> ↑ (e.g. “↑ 800m ↑” or “↑ 28km ↑”). Similarly supplementary plates such as “Queues likely for 20 miles” can also be replaced simply by “↑ 32km ↑”. This can be read at a glance and would therefore benefit road safety. I would recommend introducing this as soon as possible. • No hours or minutes – time measures – on cycling distance signs please. Only distance measures should appear on distance signs. Metric distances (and metric-only) should be authorised (This comment refers to Annex C1). <p>A reminder that planning needs to begin for fully metric road signs – including km/h speed limit signs – as soon as it is practical to do so</p> <p>I am not in favour of having journey times instead of distances on cycle signs, I strongly suggest reconsidering this. It would surely involve extra expense just to include journey times for both pedestrians and cyclists, especially on the same sign.</p> <p>It is better if only distances are shown on cycle signs, and I suggest that metric-only versions of these signs should be authorised – in metres and kilometres. Metric signs are language independent and do not require translation in Wales for example.</p>	63	<p>It is the same metric issues that have been raised elsewhere. At least we have made a start.</p> <p>I agree that cycle signs should not show journey times.</p> <p>Direction 44 - “no right turn except buses” etc. is more or less the same as “buses only” so no need to take on board these suggestions.</p> <p>“T” or “t” - I have previously said that we should perhaps make the change now.</p> <p>Many of the suggestions under question 11 should be considered as part of the Traffic Signs Review. Some supplementary plates that are introduced to explain a new pictorial sign can later be withdrawn (as in the case of the side winds sign). “Only” was introduced to explain the meaning of a blue roundel, but removing it now might lead to enforcement problems. We would have to consult anyway.</p>	


	<p>I welcome the fact that imperial-only signs are to be phased out in favour of metric and imperial height and width restrictions. Given that it is a safety issue not to have metric restriction signs, it would be better if this work was completed much sooner.</p> <p>However, this imperial-only phase-out does not go far enough. Metric-only height, width, and length restriction signs and metric-only depth gauges should be authorised.</p> <p>The sign advising “Bridge Headroom Reduced” should be made more symbolic – that would have made it easier to read, e.g. “Bridge Headroom Reduced” with the symbols showing the new bridge height (in imperial and metric).</p> <p>In addition, all possible metric only signs should be authorised – including distance and speed limit signs – to prepare for any future changeover. Going fully metric will help me and other young people, people from abroad (including tourists, and people here on business including lorry and van drivers). We could save money every time we buy a car or import a car, and the long term benefits outweigh the short term costs.</p> <p>I learnt metric at school, so I would expect to see m, km, and km/h on the roads as well, not the remaining imperial measures which are highly confusing.</p>			
1 1	<p>In Schedule 16, Item 6 of the TSRGD 2002, the word “abbreviations” is used twice when the word should be “symbols”. The difference between the two is explained by example:</p> <ul style="list-style-type: none"> The term “VAT” (<i><u>V</u>alue <u>A</u>dded <u>T</u>ax</i>) is an abbreviation because it is comprised of a subset of the letters used and if the text is translated, then so is the shortened form. Thus, in Italian “VAT” it is written “IVA” (<i><u>I</u>mposta sul <u>V</u>alore <u>A</u>ggiunto</i>), <p>The term “km/h” is a symbol because it is not always a subset of the letters used. For example, the Italians, in line with international conventions, use “km/h” on their road signs even though it is written out in full as “Chilometri alla ora”.</p>	64	No comment from [REDACTED]	
1 1	<p>1.The British Horse Society (BHS) represents the interests of the 4.3 million people in the UK who ride or who drive horse-drawn vehicles. With the membership of its Affiliated Riding Clubs and Bridleway Groups, the BHS is the largest and most influential equestrian charity in the UK.</p> <p>2. The equine industry is estimated to be worth £4 billion and to employ 150,000 people[1].</p> <p>3. The BHS is committed to promoting the interests of horse riders and owners and the welfare of horses and ponies through education and training.</p> <p>4. The BHS works for safer on and off-road riding and carriage driving through an improved public rights of way network and seeking to create new opportunities of lawful off road riding and carriage driving; and safer use of our roads by all road users. The BHS works in partnership with other user groups, local and central government to make rights of way useful and open to all, and our roads safer for all users. It has numerous volunteers across the country working to achieve these objectives, in both rural and urban areas.</p> <p>5. The Strategy for the Horse Industry in England and Wales, published in December 2005, was prepared by the British Horse Industry Confederation in partnership with the Department for Environment, Food and Rural Affairs, the Department for Culture, Media and Sport and the Welsh Assembly Government[2].</p> <p>6. The Strategy includes the following aim:- Aim 5 'Increase access to off-road riding and carriage driving', including the encouragement and improvement of urban and suburban riding and carriage driving.</p> <p>General Comments:-</p> <p>7. The Society supports the addition of destination and distance on sign 2601.1 (in Sch 7)</p> <p>8. The Society does not support the use of times instead of distances on sign 2602.1. The duration of a cycle depends on the speed and there will be large variation between different cyclists. It is nonsense to put an arbitrary time for a journey, when a precise distance can be given. (Sch 7)</p> <p>9. The Society is disappointed that the opportunity was not taken to authorise the addition of the horse symbol (diagram 622.6) to 2606.1 as a permitted variant. Often the National Cycle Network uses parts of public bridleways. It is certainly true that some walkers and cyclists take the signage to be limiting in scope so that omission of the horse symbol implies to them that horses are prohibited, and some will challenge riders who have every right to be using the route.</p> <p>ð Please add diagram 622.6 as a permitted variant on sign 2606.1.</p>	65	<p>This response and that of [REDACTED] above are more or less identical (and so are my comments!).</p> <p>More support for not adding journey times to cycle signs (I agree, we shouldn't do it).</p> <p>Bridleways - as for my comments on the response from [REDACTED] above, all suggestions should be considered as part of the Traffic Signs Review. The signs to diagram 2610 and 2610.1 can show the horse symbol. I'm not sure that horses can legally use cycle tracks and shared footways. Where a bridleway is used as a cycle route we have authorised signs - so it is something to consider at a future date.</p> <p>Restricted by-ways - we were waiting for the nod from DEFRA before prescribing purple signs. This now has to be done (DEFRA Circular 1/09 (October 2009)).</p>	Ignore, not for amendment regs.

	<p>10. The Society is disappointed that the opportunity has not yet been taken to add National Bridleroute Network route numbering as a permitted variant/addition to of diagrams 2601.1, 2602.1, 2606.2, 2610, 2610.1, 2610.2.</p> <p>11. National Bridleroute Network numbers are just numbers prefixed by an 'H'. We recommend that they be the same as National Cycle Network numbers in terms of being white text on a red background, since cyclists can legally use bridleways (Countryside act 1968). These photographs show an example of the number added to diagram 2610. These particular signs are on parts of the H25 London Orbital Bridleroute.</p> <p>12. Because the National Bridleroute Network will need to use roads where bridleways do not join, it is important to have a variation of diagram 2601.1 as shown.</p> <p>13. An equivalent of sign 2602.2 is also needed :</p> <p>14. The Society considers that these changes are simple enough to be included in the DRAFT 2010 regulations and general directions, rather than wait for the results of the ongoing policy review.</p> <p>15. Sign 956, "Route for use by pedal cycles and pedestrians only" causes equestrians great difficulties. There is a pressing need for a sign indicating that a route is promoted for walkers, riders and cyclists. There are many places where the verge of a road is particularly suitable for all three user types, yet as there is no sign to promote the route for non-motorised users (as opposed to saying that motorised vehicles are prohibited), many local authorities use diagram 956 to encourage walkers and cyclists to use it. This leads to some walkers or cyclists thinking that horses should not be there. The regulation could be improved by taking two actions:</p> <p>• Please remove the word 'only' from the sign's description, so that it reads "Route for use by pedal cycles and pedestrians".</p> <p>• Please add as a permitted variant the use of a plate below diagram 956 saying "and horses" where the highway authority wishes to promote the use to all three user types.</p> <p>16. The Society will be making proposals to the general policy review that there should be a new sign (perhaps based on the one for Quiet Lanes (diagram 884, introduced by SI 2006/2083, The Traffic Signs (Amendment) Regulations 2006), but the above changes could be achieved quickly and simply, and enable authorities to stop discriminating unintentionally against horse riders.</p> <p>17. The introduction of restricted byways in 2000 (legislation) and 2006 (implementation) means that there is a need for a coloured arrow for this status of highway. Diagram 2610.2 allows the use of red for restricted byways, but Natural England's guidance says Victoria plum (dark purple) should be used. The advice is reinforced by DEFRA's circular 1/09.</p> <p>• Please add purple as a permitted variant instead of red for restricted byways for sign 2610.2, and for the chevron colour in sign 2610.</p>			
1 1	<p>In general the BPA supports the principle of adding those signs which are now routinely given special authorisation and including them in the new Traffic Signs Regulations and General Directions; and we agree that this will indeed help reduce the administrative burden on local authorities and the Department. However the BPA believes that some caution should be adopted before making universally available those signs which are known or understood to have caused some controversy with regards to their use and interpretation by motorists and or adjudicators. It would be wrong in our opinion to allow free use of signs which could be misinterpreted, misconstrued or poorly understood by traffic engineers and motorists alike as this will only lead to further problems with proper and effective enforcement.</p> <p>Equally true the Department needs to give proper and effective advice and guidance to highway authorities about the use of the new signs to ensure that they are used in accordance with situations that have been tried and tested and where there is little or no doubt that they are effective in those situations. Given that a fundamental review of the regulations is underway, where there is some doubt about the use of some signs which are presently subject to special authorisation these examples might be withheld from general use pending the outcome of the full review.</p>	66	Nothing to comment on.	Ignore.
1 1	<p>In view of the wide ranging nature of the proposals and the limited remit of Cycle Exeter, we have not responded to the specific consultation questions, but simply wish to express our support for the proposed changes in relation to cycle signs and markings. (It may be the case that Devon County Council will submit a separate response in relation to other aspects of the proposals.)</p> <p>In particular, Cycle Exeter supports the proposed extension of the range of “prescribed” signs which do not require the specific approval of the DfT. This is an entirely sensible proposal which recognises that local authorities are in the best position to judge what is appropriate in local circumstances. The proposals should reduce workload and the cost to local authorities, and we urge you to implement them as drafted.</p>	67	Nothing to comment on, although representing a cycling group, I presume [REDACTED] supports journey times on cycle signs, whereas many other (including myself) do not.	Ignore.
1 1	<p>1001.2A. The marking may be used only for a nearside approach for cycles.</p> <p>Whilst welcomed, the marking also needs to be allowed for central and outer lane approaches, otherwise ASL's</p>	68	Diagram 1001.2A - I have raised the issue in the past whether or nor we should allow cycle entry from all lanes (I'm sure that's	Dealing with this.

	that are the full width of the road can only be entered from the nearside lane which is dangerous (the signals may change). There is rarely room for non-nearside lanes of the ideal width. More flexibility is needed. Also welcomed are one-way traffic with contra-flow pedal cycles signs.		what I've seen in Nottingham). It makes sense to me, particularly where a cyclist is turning right, but I was told it is not to be. The problem is, on a busy road, how is a cyclist turning right to know that there is an ASL at the junction? I would imagine that most cyclists not familiar with the junction would approach in the right hand traffic lane and just cycle across the first stop line. Any chance in reconsidering this?	
1 1	If these signs are to be placed on bollards we hope this will not become a potential hazard and obscure the use and visibility of the bollards	70	Road works signs and bollards - no comment.	Ignore.
1 1	<p>I understand that the Department of Transport is receiving consultative approaches at the moment on the idea that it would be easier to implement disabled parking bays under the above-named Act if the need for traffic regulation orders were to be removed from the equation.</p> <p>Aberdeen City Council has been saying for some time now that the provisions of the 2009 Act do not sit well with the world of traffic orders, and that, if the need for orders could be dispensed with, it would be an enormous benefit, and restore a sense of clarity about the obvious virtues of the new Act in other ways.</p> <p>I am sure you are aware of the difficulties which orders bring to this situation, not least the need to treat statutory objections in a proper and fair way. I am aware that there has been some criticism of local authorities about perceived negativity towards the 2009 Act but I would like to say that Aberdeen City Council sees it as legislation of considerable virtue - we ourselves were inviting supermarkets to let us put their disabled parking areas into our off-street traffic orders years ago - and, insofar as this letter is concerned, our only concern is to plead the case for getting traffic orders out of the equation.</p>	71	This appears to be a legislative procedural matter concerning Scotland. I am unable to comment and it would seem that it has nothing to do with the proposed amendment TSRGD. It might be something that needs to be considered as part of the Traffic Signs Review	Ignore.
1 1	<p>The Traffic signs (Amendment) Regulations and General Directions 2005 No. 1670 contained amendments to permit certain types of widths of edge line markings to be used with actively managed hard shoulders to which diagrams 1012.1 and 1012.2 refer. These state that a managed hard shoulders to which diagrams 1012.1 and 1012.2 refer. These state that a managed hard shoulders to which diagrams 1012.1 and 1012.2 refer. These state that a 100mm wide line is to be used at the back edge of an actively managed hard shoulder. However, experience gained from the M42 ATM Pilot between J3A and 7 indicate that, taking into account the application of a maximum speed limit of 60mph on the Hard Shoulder when it is opened to traffic, it is more appropriate to apply a 150mm wide line to Diagram. 1012.2. IAN 111/09 includes this statement.</p> <p>The use of a combined fixed "Variable speed limit ENDS"/national speed limit sign is not contained within the TSRGD 2002 and is therefore a non prescribed traffic sign. The Highways Agency does not have delegated powers to authorise any non-prescribed speed limit signs. Therefore, until the appropriate NP drawing is published, DfT RUS Division approval must be sought prior to use. Include in amendment regulations.</p> <p>The sign shown in diagram 2919.1 must be replaced within ten years of the date on which these regulations come into force. Signs to Diagram 2919 (MSA sign showing both unleaded /leaded fuel) prescribed in the 1994 may already at the end of there effective life. Even assuming the design was just prior to 2002, the sign would be 7 years old. Is 10 years too long?</p> <p>2919.2 This sign replaces diagram 2919.1. Motorway service areas must always provide facilities for disabled persons. Therefore, it is no longer necessary to include the wheelchair symbol on the sign. The picnic area symbol, which is optional, has been added. Consider stronger wording than 'no longer necessary'.</p> <p>2711.1 Emergency exit for pedestrians from a tunnel - consider inclusion of variable distance in yards</p> <p>Fractions of miles Consider use of additional fractions of mile to other motorway signs - authorisations often given for 1/4, 3/4 when site constraints prevent ideal siting.</p> <p>660.8 Parking place for car club permit holders only. Times of operation may not be added to this sign as the</p>	73	<p>Diagram 1012.2 - this is confirmation from the HA why the width of the line when used at the back of an actively managed hard shoulder is being increased from 100mm to 150mm.</p> <p>Variable speed limit ends sign - [REDACTED] is producing a new working drawing. Do we want to include this sign in the amendment TSRGD?</p> <p>Diagram 2919.2 - the ten year saving for diagram 2919.1 is to cover signs erected this year or last. Signs can be changed before the ten year period expires.</p> <p>Diagram 2711.1 - variation of distance is already included in Schedule 16. Fractions of miles on motorway signs - this would involve adding ¼ and ¾ to item 7 of Schedule 16. Do we want to do this now? It would also include advance direction signs on all-purpose roads.</p> <p>Diagram 660.8 - the symbol is the approved symbol. I am recommending that we amend the colour to the standard blue following other consultee responses.</p>	<p>No, the Highways Agency can do national authorisation.</p> <p>2919.2 – this is wrong.</p> <p>Fraction of miles – do not agree. For the review.</p> <p>[REDACTED] will reply to these suggestions.</p>

	<p>parking place operates 24/ The colour of the logo is very pale against a white background. The logo could be miss-construed as specifying a time limit.</p> <p>532.2 consider reflectorisation of chord marking itself</p> <p>818.5 consider practicalities of fitting this sign on site compared to traditional warning signs & supplementary plates.</p> <p>2602.1 Lengthy sign - practicalities of fitting on site. Consider alternative layouts to reduce length</p>		<p>Diagram 532.2 - refectorisation of the chord marking is currently optional (Schedule 17, item 9). Do we want to make it mandatory or leave it for guidance?</p> <p>Diagram 818.5 - the purpose of the sign is to indicate location and an alternative route. A sign to diagram 530 with a plate such as “10 miles” is of little value by comparison. Diagram 2602.1 - I am recommending that we do not show journey times</p>	
1 1	<p>Yes. Para 9 – As it is recognise that masking of the push buttons at pedestrian crossings is potentially an issue, would this revision of the TSRGD not be an opportunity to introduce offside pedestrian aspects on Puffin Crossing? This would remove the need for repeater signals as suggested.</p> <p>Para 25 – Clarification is required whether the use retro-reflective self righting bollards also require post mounted lit signs to Diag 610.</p> <p><u>General</u> South Lanarkshire Council request that consideration be given to the inclusion within Schedule 19 of the Traffic Signs Regulations and General Directions 2002, a “Part III” which would allow the marking of a disabled persons parking bay to diagram 1028.3, with the worded message “disabled”, to convey the prohibition that no person shall cause a vehicle to wait within the area delineated by the bay marking, unless that vehicle is displays (a) a valid blue badge issued under section 21 of the Chronically Sick and Disabled Persons Act 1970, (b) a badge issued under a provision of the law of Northern Ireland corresponding to that section, or (c) a badge issued by any member State other than the United Kingdom for purposes corresponding to the purposes for which badges under that section are issued;</p> <p>The purpose of this proposal, is to relieve the council of its statutory need to promote a traffic regulation order on each and every occasion that it agrees to mark a disabled persons’ parking bay under the terms of the Disabled Persons’ Parking Places (Scotland) Act 2009. This amendment would also ensure that once the location of a bay was agreed, it could be marked, and would be enforceable immediately without the inevitable 6 to 9 month delay in following the procedures as detailed in the Local Authorities’ Traffic Orders (Procedure) (Scotland) Regulations 1999. This principle is currently adopted in relation to bus stops and box junctions, within Parts I & II of Schedule 19.</p> <p>In the use of Diagram 1018.1, the Traffic Signs Regulations and General Directions 2002 were amended such that the previously related time plate was no longer required. The lines alone convey the restriction. South Lanarkshire Council request that consideration be given to removing the need to use the sign to diagram 661A, when marking a regulated disabled persons parking bay. It is considered that the road marking to diagram 1028.3 is universally recognised and accepted as delineating a parking bay for the sole use of a vehicle displaying a valid blue badge and that the sign is redundant.</p>	76	<p>Puffin Crossings - I’m not the expert and we are not amending the ZPPPCRGD.</p> <p>Diagram 610 - the provision of a additional post mounted sign is currently guidance in Chapter 3 (para 4.28). I don’t think we should make this mandatory as there are likely to be locations where the provision of a second sign is not necessary or practicable. Updated guidance will be required in Chapter 3.</p> <p>Disabled bays - it is the Scottish issue again. I don’t know how we are going to deal with this. With regard to allowing mandatory bays without an upright sign, this is a matter for the Traffic Signs Review. An upright sign would still be required if a time period is to be shown.</p>	Ignore, not for amendment regs.
1 1	<p>Bridge Weight Limits:</p> <p>Since writing in my original set of comments about the longstanding technical error of using the symbol "T" for tonnes, I suddenly discovered an obscure clause in the current 2002 Regulations that (if changed slightly for 2010) would have the effect of fixing it. It originally might have seemed to you that my request for a change of tonnage symbol from "T" to "t" formed a hitherto novel change which I suspect would have counted against my request being considered.</p> <p>Paragraph (10) of Section 17 (Permitted variants of upright signs) of Section 3 (Warning, Regulatory and Informatory Traffic Signs) currently states:</p> <p>(10) Where an upright sign indicates a weight in tonnes using the symbol "T", that symbol may be varied to "t".</p>	77	<p>“T” or “t” - I have asked that we consider changing this now in the diagrams. Regulation 17(10) can either be omitted (and existing signs saved without time limit) or amended to allow “t” to be changed to “T”.</p> <p>The other issues may in part be related to “construction and use”. These are matters that need to be addressed as part of the Traffic Signs Review and not considered for the amendment TSRGD 2010.</p>	Ignore, not for amendment regs.

<p>So an option of using the <u>correct</u> symbol "t" for tonnes is already approved by the 2002 regulations! I hope this adds to the chance that the 2010 Regulations could incorporate my request. With this in mind, I'd like to suggest that this paragraph (10) should be changed to read:</p> <p>10) Where an upright sign indicates a weight in tonnes then the symbol "t" is to be used. The symbol "T" which was allowed in previous revisions of these Regulations is no longer permitted. In my original posting, I offered a list of signs for which the diagram showed a "T" for tonnes. These diagrams would still have to be modified, but I've since discovered that I'd missed diagrams 622.1A and 640.2A from that list. So it now reads: Diagrams 622.1A, 626.2A, 640.2A, 665, 666, 818.4, 2108 and 7282. (There may still be others that I missed.) I do consider that in light of the current contents of Paragraph (10) of Section 17, the DfT needs a serious reason not to implement this change. Basically we're in a situation where the current Regulations specify that tonnes should be abbreviated wrongly, backed up by the diagrams that I've listed (and maybe more), but with the obscure provision that "optionally" it can be done correctly (an option I've never seen taken in practice).</p> <p>It's just embarrassing! This really must be dealt-with, especially since the cost to the councils that have to implement the resulting change would be zero if the old (wrong) signs are permitted to remain until they have to be replaced, or (better) given a date some way in the future (say 2018) by which time they must be replaced.</p> <p>I also must express some unhappiness with the symbols "m. g. w" that appear on some weight limit signs (diagram 626.2A for instance) This seems to mean "maximum gross weight", but wasn't obvious to me the first time I saw it on a actual sign recently. Apparently the phrase "unladen weight" can appear on some signs too.</p> <p>Quite honestly, the appearance of either of these specifics on a road sign is confusing, and there really isn't any need for either. Basically, a bridge will collapse if the total mass on the bridge exceeds a certain number of tonnes, pure and simple. It doesn't matter a jot whether that is "unladen" weight or "maximum gross" weight (these are terms that might have relevance to taxation classes of vehicles, but not for this situation).</p> <p>What matters is the total mass of the vehicles in question at the time they attempt to cross the bridge. A truck driver should be expected to know what he or she is carrying on a given day, and should be expected to treat weight limits based on that knowledge alone. I'm not sure that a Romanian truck driver is going to realise what "m.g.w" means anyway (I didn't until I looked it up), but hopefully if he or she sees a bridge limit flagged as just plain "24t", and they know they're driving an 8t truck with 20t of bricks on the back, then they'll keep clear! The fact that the maximum gross weight of the vehicle is (say) 30t is irrelevant. After unloading the bricks, the driver can quite safely cross the same bridge (the truck now has a mass of 8t), despite the fact that the m.g.w of the vehicle is still 30t.</p> <p>We need fewer words (and obscure abbreviations) on road signs in general!</p> <p>An unrelated addition: -----</p> <p>The 2002 Regulations refer a couple of times internally to vehicle lengths and widths, giving those values in feet and inches, with a metric translation in brackets afterwards.</p> <p>These cases ought to be changed to be metric-only to fit with the rest of the Regulations which use measurements in metric-only throughout.</p> <p>The specified metric measurements themselves maybe should be reviewed. A vehicle length is specified as 18.75m in Section 3, Regulation 16, Paragraph (2)(a), but surely it doesn't make much sense being that specific? Rounding up to 19m would be neater, and would only change the existing value by 1.3%.</p> <p>Likewise the reference to 2.9m in Section 3, Regulation 16, Paragraph (2)(b). Again, surely there's no harm re-specifying this as 3m? The difference is no more than the width of a man's hand, but it all helps to make it look more like the regulations were drafted with the metric measurements in mind, not just blindly translated from imperial.</p> <p>Finally, there's a measurement in Section 3, Regulation 17, Paragraph (5) given as "between 1 foot 3 inches and 2 feet". This is the safety-difference between a power cable's actual height and the cable-height as</p>			
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	<p>displayed by the warning sign. To be frank, I'm not sure that it makes any sense to specify a pair of limits for a cable-clearance limit like this. The Regulation should surely just specify (say) "at least 600mm less than the height of the lowest part [...]" possibly stating in addition that:</p> <p>1) The value so obtained should be rounded down to the nearest 0.1m for printing on the sign (in accordance with the general idea that metric values on any signs should not be specified tighter than one decimal place)..and for the (hopefully short) period that the old imperial values are still permitted on the signs:</p> <p>2) The same "value so obtained" should be converted to feet and inches and then be rounded down to the nearest three inches for printing on the sign. You might like to ask for comments for the Health and Safety people on the issue of cable-clearances. Some account should be taken of the voltage being carried by the cable, for instance.</p>			
1 1	<p>Part 1, Paragraph 6: Whilst we support the introduction of a sign identifying routes unsuitable for HGVs, we question whether the sign is sufficiently explicit to be effective.</p> <p>Part 1, Paragraph 12: Further promotion of cycling within urban areas is welcomed. We would like to see the introduction of an 'except for cycles' plate to be authorised for use in conjunction with a 'no entry' sign.</p> <p>Part 2, Paragraph 7 (Amendment of Regulation 19): In general terms, we feel more needs to be done to address the issues around illuminated signs, in the interests of reducing energy costs and the effect on the environment. Advances in retro-reflective materials should lead to lesser reliance on mains powered signs, and it is felt that more power should be given to local authorities to decide on the necessity of illumination at each individual site, following assessment of the factors at that site.</p> <p>Part 3: Paragraphs 15 and 16 (amendments to Directions 24 and 25): With reference to the omission of markings within a permit parking area tabled in direction 25 (paragraph 2, column 2) and direction 24, paragraph (3), it is felt that clarification of a 'permit parking area' is required (i.e. "as defined by entry signs 663.3" or similar definition). For consistency and to avoid confusion, particularly in terms of enforcement, clarification is required as to whether markings and traffic signs need also to be removed from existing parking areas.</p> <p>Part 5: Schedule 6: We welcome the change in the warning lines schedule such that they do not need to be related to speed limit. (1004, 1004.1, 1005 etc)</p> <p>Restricted Zone Signage (Not covered in consultation document): We would welcome simplification on restricted zone signage for town centre and pedestrian areas, whilst still maintaining clarity. Signage must be clear and understandable, but still be able to deal with all the varied restrictions on cycle and vehicular access, waiting restrictions and shared space issues.</p> <p>'Bay hopping' (Not covered in consultation document):We would be interested to know if any work has been or will be carried out into modifications to parking restriction signing within zones to stop motorists moving every time their allocated free parking time expires from one part of a zone to another (or even from one side of a street to the other). This is a particular problem in areas where waiting is limited to 2 hours no return within 2 hours. Although the underlying TROs are written to prevent this happening, any challenge to the enforcement is normally upheld by the parking adjudicators. Technical inaccuracies (Not covered in the consultation document): Increasing numbers of Parking Appeals are succeeding based on technical inaccuracies of the lines and signs for parking restrictions. Whilst an Authority has responsibility for ensuring all lines and signs are correct, there are times when inaccuracies do creep in, or portions of line become worn or damaged. In these cases it is clear overall that a parking restriction is in place, but any small inaccuracy or inconsistency is used to lodge appeals. The Zebra, Pelican and Puffin Pedestrian Crossings Regulations and General Directions 1997 contain a clause stating "<i>Where, as respects a crossing or controlled area, the requirements of this Section of</i></p>	78	<p>Diagram 820A - the use of the sign is optional.</p> <p>Diagram 616 - the "Except cycle" plate is under trial. It will be considered as part of the Traffic Signs Review.</p> <p>Permit parking area - this is defined in direction 3 (may need to be moved to regulation 4). Guidance will be given in an update to Chapter 3.</p> <p>Restricted parking zones - the current guidance in Chapter 3 will be updated now that the signs are to be prescribed.</p> <p>Various parking issues - a matter for the Traffic Signs Review.</p> <p>Traffic Officers etc - I don't think we should be extending the powers to LA officers at the moment. Is this something to be considered as part of the Traffic Signs Review? 30mph speed limit repeater signs - I would personally allow use of the road marking roundel, but not the upright sign, in a street lit area, but perhaps this should be considered as part of the Traffic Signs Review (see my comment on the response from )</p>	Ignore, not for amendment regs

	<p><i>these Regulations as to the placing of traffic signs and road markings to indicate the crossing or controlled area have not been complied with in every respect, the crossing or, as the case may be, the controlled area shall nevertheless be treated as complying with these Regulations if the non-compliance .. is not such as materially to affect the general appearance of the crossing or the controlled area”</i> Can a clause similar to this be incorporated into the TSRGD in relation to parking bays?</p> <p>Disabled Bays (Not covered in the consultation document): It would save Authorities a significant amount of money if we were able to introduce a mandatory disabled bay without the need for an order, in the same way as for a bus stop clearway. As it is, the provision of a mandatory bay is so expensive that their introduction may be resisted on finance grounds rather than traffic management grounds, effectively leading to discrimination.</p> <p>Other points raised: Can consideration be given to extending the powers being conveyed to HA Traffic Officers to LA officers through a clear and controlled means of delegation? In the interests of reducing street clutter can the regulations be amended to allow one-way and other such directional signage, and waiting restriction repeater plates to be fixed or incorporated into street furniture and bollards in town centres, pedestrianised areas and home zones? Can consideration be paid to a relaxation of the regulation regarding repeater signage and markings for 30mph limits in areas under street lights? 30mph roundels could usefully be introduced at some ‘semi-urban/semi-rural’ sites to reinforce the speed limit and reduce vehicle speeds to acceptable levels. Again this sort of measure is best introduced at the discretion of the Local Authority who is best placed to understand the sensitivities of each site, whilst seeking to provide a consistent message to the travelling public through signage.</p>			
1 1	<p>Yes. Diag. 530 -would prefer their phasing out as an advance warning sign in favour of mandatory alternatives, e.g. diag. 818.3. Diags. 531.1 /532.1/532.3 and 530 (when mounted on bridge parapets) would still have their uses and could be used in combination with diag. 629.2A?</p> <p>Direction 41 (3A) -is there not potential for the likes of diag. 955/956 to be used on non-self-righting un illuminated bollards (e. g. Glasdon Ensign) on cycle routes? This specific direction does not cater for their use under such circumstances, does it categorically need to or is it satisfactorily covered under the rest of Direction 41?</p> <p>Diag. 1004/ 1004.1 / 1005/ 1005.1 / 1008/ 1008.1 -fully agree with proposals, this will resolve a frequent headache when speed limits are altered.</p> <p>Diag. 2310.2 -assume wheelchair symbol has been removed as such facilities should now be a given at service areas?</p> <p>Diag. 2602.1 etc -will advice be given in a Chapter 7 amendment or advice note on the choice of journey times or will it be discretionary?</p> <p>Diag. 2608/2609 new diag 2310.2 as referred to in item 4 does not include the wheelchair symbol either!</p> <p>Part 1 paragraph 24 Variable Message Signs. The Council operates speedvisor signs that flash "30" and would not wish these proposals to require the speed display to become a static display</p>	79	<p>Diagram 530 - signing for a particular bridge has to be consistent. Extending the time period for the saving for all signs is the best approach rather than differentiating between signs on bridge and signs in advance.</p> <p>Direction 41 - as far as I understand any sign can be mounted on a support that is not necessarily a post (e.g. pedestrian zone repeater signs on bollard). In the case of cycle signs, I would like to see the requirement to directly light terminal signs removed. That would enable a terminal sign to diagram 955, 956 and 957 to be mounted on a non-illuminated (non self-righting) bollard.</p> <p>Diagram 2602.1 - advice on sign design in respect of journey times will be given. However, my recommendation (as you know too well by now) is that we do not proceed with this proposal.</p> <p>Diagrams 2608 and 2609 - reference to wheelchair symbol - yes, we know about this - well spotted.</p> <p>VMS - not for me to comment</p>	Ignore, not for amendment regs.
1 1	<p>Yes. Whilst the proposed provision of a new (Diag 820A) sign is understandable, this is essentially the existing Diag 820 sign with the inclusion of a new symbol. It is not considered that this would be adequately effective in addressing the particular problems associated with HGVs being directed onto unsuitable routes by satellite navigation systems.</p> <p>There is concern regarding the understanding of the Diag 960.2 sign, particularly cyclists conflicting with motor vehicles when both are unsure of what the sign means. Is there any education/publicity surrounding this sign proposed.</p>	80	<p>Diagram 820A - another consultee saying that this sign is not adequate. However, no suggestion has been made on how to improve the sign. It is certainly clearer than its diagram 820 equivalent.</p> <p>Diag 960.2 - this is not a new sign and is intended for drivers, not cyclists. Guidance on its use is covered in Chapter 3.</p> <p>Signs on self-righting bollards - as I have previously mentioned,</p>	

	Interpretation of the new proposals suggests that where certain signs are mounted on a traditional style bollard then these would still have to be illuminated in street lit areas. However, the new regulations would permit the use of these signs on the self righting style of bollards. In these circumstances the signs would not need to be illuminated but would need to be retroreflective. Is this interpretation of the proposals correct?		self-righting bollards should be included in Schedule 17, item 7 (specifying that signs mounted on such bollards should be reflectorised). See my additional comments, item (6).	
1 1	The removal of the speed limit where Diag Nos 1004, 1004.1, 1005, 1005.1, 1008 and 1008.1 can be used will lead to inconsistencies. The length of the road markings need to relate to a speed limit.	84	Diagram 1004 etc - these are the only markings related to actual speed limits; arrows etc are not. The revised Chapter 5 will still relate to use of the markings to speed limits (as it does for other markings), but this will be guidance rather than being mandatory. Hopefully local authorities will use commonsense and not mix and match. The change overcomes the problem of introducing a temporary speed limit or a change in a permanent speed limit that would require a mandatory change in the line module.	
1 1	Yes partly. Change “speed cameras” to “safety cameras”. Requirement for illumination of signs should be reviewed in view of the widespread use of good quality reflective materials	85	Speed cameras - a change to “safety cameras” is a matter for RUS, but as I recall, we don’t refer to them as such. Further relaxation of illumination requirements - this is not a matter for the amendment TSRGD, except for my suggestion regarding cycle/pedestrian terminal signs.	
1 1	<p>By prescribing the additional signs which are regularly requested and authorised it will reduce the burden on local authorities who are required to apply for site specific approval for such signs.</p> <p>However I would also request the following amendment ...</p> <p><u>Diagram 1028.3 - Disabled Parking Bays</u></p> <p>1. Request to make disabled parking bays automatically enforceable where marked appropriately.</p> <p>As pressure on available parking in residential areas continues to increase, more and more requests are being received for Disabled Bays.</p> <p>The Disabled Persons’ Parking Places (Scotland) Act 2009 places duties on Scottish Local Authorities to make all Disabled Bays legally enforceable.</p> <p>At the moment this requires Authorities to promote Traffic Regulation Orders (TROs) to cover each disabled bay and then to ensure they are correctly marked to Diag 1028.3 and signed to Diag 661A.</p> <p>It is requested that the marking to Diag 1028.3 when showing the word “disabled” (and the associated sign to Diag 661A) be treated in the same way as “Bus Stop Clearway” markings to Diagrams 1025.1, 1025.2, and 1025.3 as set out in Regulation 10e of the TSRGD. This would make them automatically enforceable, where appropriately marked, without the need to promote TROs.</p> <p>2. Request to remove requirement of a minimum length for disabled bays.</p> <p>It is also requested that the minimum length of 6600mm for a disabled bay to Diag1028.3. should be removed, leaving the Authority to decide on an appropriate length depending on individual circumstances. In many cases when designating a bay at a particular property the vehicle involved is relatively short and to reserve the minimum length of 6600mm can often be seen as wasteful of precious parking space by neighbours, leading to confrontations and encroachment into marked bays.</p>	86	Disabled parking bays - this is the Scottish issue. The changes could not be brought in without consultation in England and Wales. Reducing the length of the bay would be appropriate for permit parking only - a general bay has to be available to all vehicles. These are matters for the Traffic Signs Review	
1 1	Yes. Overall it will be beneficial to change the regulations to incorporate variations currently routinely given site authorisation	89		
1 1	The Disabled Persons’ Parking Places (Scotland) Act 2009 places a new duty on local authorities to seek to make a disabled street parking order in respect of a street parking place from which there is convenient access to a qualifying blue badge holder’s address. This could potentially result in local authorities having to incur	89	Parking bays - too complex to be considered here. Will all parking issues raised in this consultation be taken on board as part of the Traffic Signs Review and passed on to the	

<p>substantial costs in making and revoking traffic orders to cater for large numbers of individual blue badge spaces. There will also be significant costs in installing and removing signs and markings. Political representations have already been made to the Scottish Government to seek changes in the regulations to minimise these costs. The following set of amendments to the Traffic Signs Regulations and General Directions are proposed in order to reduce the costs and administrative procedures necessary to implement this new legislation and to rationalise the marking of parking bays generally. Although the new legislation does not extend beyond Scotland, it is felt that the proposed amendments would have significant benefits and no adverse impact in other parts of the United Kingdom.</p> <p>TRAFFIC SIGNS AND ROAD MARKINGS FOR PARKING BAYS – POSSIBLE AMENDMENTS TO THE TRAFFIC SIGNS REGULATIONS AND GENERAL DIRECTIONS 2002</p> <p>1 1. Non statutory parking bays</p> <p>Since the publication of the Traffic Signs Regulations and General Directions 2002 (TSRGD), new ideas in the design of streets for people are becoming more widespread as a result of the introduction of home zones legislation and the publication of the Manual for Streets. Carefully planned use of parking places can often be used as a method of discreet traffic calming, for example the introduction of chicanes by providing parking blocks on alternate sides of a street. For this to be successful, it is vital that parking bays are clearly indicated. According to paragraph 8.3.19 of the Manual for Streets <i>“Indicating on-street car-parking spaces clearly through the use of road markings or changes in surfacing material can help to encourage good parking behaviour.”</i> Many of the most successful recent designs for main streets and residential areas make extensive use of carefully sited on-street parking areas in locations where no statutory restrictions on waiting times are necessary or desirable. Unfortunately, the current version of TSRGD makes no provision for the marking of on-street parking bays except to indicate the effect of a statutory provision. Diagrams 1032 and 1033 prescribe markings to be used for on-street parking bays and diagram 1028.3 prescribes markings that can be used to provide a parking bay suitable for large vehicles. However, despite the implication to the contrary in the title of diagram 1033 <i>“Echelon parking spaces subject to such conditions, if any, as may be in force”</i>, direction 7 indicates that all these markings may only be used to indicate the effect of a statutory provision.</p> <p>The reasons for this restriction are probably rooted in history. Originally, the marked on-street bays were only prescribed for use where charges were made for parking. Their use was then extended to include locations where parking was free but other restrictions on parking, for example time limits, applied. With the increased use of parking for traffic calming purposes, bays are now commonly marked in other locations with no parking restrictions. This has proved to be extremely successful and road users are already familiar with this type of usage. It is time the regulations were updated to bring them in line with what is already common usage of the road markings indicating parking bays. Where there is a statutory restriction on the use of a bay, this can continue to be indicated by the appropriate regulatory signing from schedule 2. It should be noted that it is not suggested that there should be any change in the requirement for relevant regulatory signs from schedule 2 to be used only in conjunction with the appropriate road markings to define the extent of the bay.</p> <p>It is recommended that Direction 7 should be amended to exclude diagrams 1032 and 1033 and 1028.3 from the list of signs in paragraph (2)(a). Item 2 on diagrams 1032 and 1033 and 1028.3 should be amended to exclude the reference to Direction 7.</p> <p>2. Minimum Dimensions of Parking Bays for Disabled Badge Holders</p> <p>The Disabled Persons’ Parking Places (Scotland) Act 2009 has introduced a right for qualifying disabled badge holders to request a local authority to make a disabled street parking order on respect of a street parking place convenient to their home. The local authority must decide whether it is possible to identify a suitable parking place and if so, start the procedure to make an order. Many residential roads are quite tight for space and it might be possible to identify a space but not one large enough to meet the current prescribed minimum dimensions. The regulations already permit a kerbside space of normal width to be provided by using diagram 1032 rather than diagram 1028.3. However, note 4 in diagram 1032 still indicates that the minimum length of a parking space reserved for disabled badge holders shall be 6.6 metres. In many cases a shorter space would be perfectly adequate and it would frustrate the intention of the Act if a disabled resident had to be</p>	<p>appropriate working party? What I can say is that if a road has traffic calming introduced in the form of chicanes, it should be possible to provide lay-bys marked with diagram 1010 and parking signs to diagram 801 without the need for a TRO. The parking places would be free and available 24/7 though</p>	
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<p>denied a space as a result of the prescribed minimum length. Likewise, it may not be possible to identify an echelon bay of exactly the 3.6 metres width currently prescribed in diagram 1033. It is, therefore suggested that although 3.6 metres should still be recommended, a range between 2.4 metres and 3.6 metres should be permitted in appropriate circumstances.</p> <p>It is recommended that the fifth sentence of note 4 on diagram 1032 should be amended from “The minimum length of a parking space reserved for disabled badge holders shall be 6600 millimetres” to “The normal minimum length of a parking space reserved for disabled badge holders shall be 6600 millimetres but this may be reduced to a length not less than 4500 millimetres in a case where the space available is insufficient for a larger bay.” It is also recommended that the width dimension for a “DISABLED” echelon bay in diagram 1033 should be amended from “3600” to “3600 recommended, 2400 min”.</p> <p>3. Temporary Marking of an Advisory Parking Bay for Disabled Badge Holders</p> <p>Section 9 of the Disabled Persons’ Parking Places (Scotland) Act 2009 requires local authorities to designate a temporary advisory disabled street parking place whilst going through the procedure to make a traffic order to designate a mandatory blue badge space with convenient access to the address of a qualifying person. The current version of TSRGD does not make provision for the marking of an advisory space. Diagram 661A complies with the requirements of the Vienna Convention on Road Signs and Signals for indicating “a parking space reserved for handicapped persons” and it is suggested that it would be inappropriate to dilute its effect by permitting it to be used for an advisory blue badge space. However, the use of the road marking “DISABLED” in conjunction with a parking bay marked out in accordance with diagram 1028.3, 1032 or 1033 is not covered by the terms of the Vienna Convention. It is, therefore, suggested that it should be permitted to use this marking to indicate a temporary advisory blue badge space. Once the traffic order was in place, a sign to diagram 661A would be added to indicate a mandatory space. If recommendation 1 above were accepted, there would be no further need to change Direction 7 to achieve this. However, it would still be necessary to amend Direction 25(1) to permit the use of the markings without the plates.</p> <p>It is recommended that items 8, 17 and 19 should be deleted from the table in Direction 25(1).</p> <p>4. Provision of a Mandatory Blue Badge Space without a Traffic Order</p> <p>Implementing the requirements of section 5 of the Disabled Persons’ Parking Places (Scotland) Act 2009 will involve local authorities in promoting traffic orders to cover large numbers of isolated blue badge spaces at locations convenient to the addresses of qualifying persons. There will be significant costs involved in the promotion of these orders. These costs could be reduced if the sign to diagram 661A indicating a parking place reserved for disabled badge holders were added to the list of signs to which section 36 of the Road Traffic Act 1988 applies. This would make disobeying the requirements of the sign an offence without the need for a traffic order. It is not suggested that misuse of a blue badge space should be a disqualification offence, so it is proposed that diagram 661A should be added to the list of signs in regulation 10(1) but not to the list in regulation 10(2). It would also be appropriate to add a new regulation in section 3 defining the significance of signs to diagram 661A.</p> <p>It is recommended that signs to diagram 661A and 639.1B when the lower panel is varied to diagram 661A should be added to the list of signs in Regulation 10(1) to which section 36 of the Road Traffic Act 1988 shall apply. It is also recommended that a new regulation should be added to section 3 setting out the significance of signs to diagram 661A or 639.1B when the lower panel is varied to 661A.</p> <p>5. Use of Yellow Road Markings for Parking Bays for Disabled Badge Holders</p> <p>The current regulations specify the use of white lines to mark out the boundary of an on street parking bay for disabled badge holders, either to diagram 1028.3, diagram 1032 or diagram 1033. However, yellow lines are commonly used for off street parking bays for disabled badge holders and are widely recognised by the public as delineating a bay not available for general use. The provisions of the Vienna Convention on Road Signs and Signals would allow each contracting country to choose between yellow, white or blue for this purpose, so a change to yellow would be consistent with our international obligations. The current Regulations prescribe yellow markings to diagram 1028.2 for spaces restricted to taxis, ambulances and police. It is suggested that spaces restricted to disabled badge holders have more in common with these restricted categories of use than with the categories of use for which white markings are prescribed. It is believed that the use of yellow markings could reduce the misuse of blue badge spaces by able-bodied drivers</p>			
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1 1	<p>Diagram 816.1</p> <p>CPZ Signs for cul-de-sacs</p> <p>There is no standard definition of what constitutes an appropriate cul-de-sac. Is it a single road or can it consist of various roads leading off one another? Further clarification is required as a single entry sign for a large number of cul-de-sacs leading off each other could lead to driver confusion.</p> <p>Diagram 1028.3</p> <p>Disabled Bays</p> <p>The requirement for a minimum length of 6.6 metres is too onerous. We would like to put in more formal bays but the current guidance is too restrictive, as it does not allow for shorter bays. We would like to see a recommended (6.6) as well as an absolute (5?) minimum length, as we already do for width.</p> <p>School Keep Clears and Disabled Bays</p> <p>It would be helpful if both of these became a mandatory marking in the same way as a bus stop clearway, in that they would be enforceable without a TRO and in the absence of a time plate, they would be enforceable at any time. The existing guidance on SKC length is also restrictive. Ideally we would be permitted to have them longer and able to go around corners.</p> <p>Diagram 663.2</p> <p>CPZ Entry Plates</p> <p>Does it state categorically that 2 signs are required at each entry/exit point, one on each side of the road? If so, where?</p> <p>CPZ Signs</p> <p>There is still confusion over the interpretation of CPZ (parking signs); these need to be made more understandable. The current parking zone signs have been criticized for being too ambiguous for many drivers to ascertain their meaning, or simply containing too much information for their purpose; court rulings have found in favour of the defendant in these circumstances, stating that the individual cannot be held responsible for a breach of the law if the sign face is ruled to be too confusing to understand.</p> <p>1.1</p>	90	<p>Diagram 1028.3 (and 1027.1) - these are matters for the Traffic Signs Review.</p> <p>Parking zone entry signs (CPZ and RPZ) - direction 8 specifies when one or two signs are required. If CPZs are too confusing then remove them and use conventional signing.</p>	

<div>1.2 Diagrams 530, 531.1, 532.2, 532.3</div> <div>Width and height restrictions</div> <div>The removal of imperial only signs is welcomed, and will contribute to the prevention of bridge strikes nationwide. Though there is some concern this will add to sign clutter, especially in respect of diag 530, 531.1, 532.2 and 532.3. Commented that could go one step further and support metric only signs, and the abolition of imperial signs, now that it's nearly 40 years since decimalisation came in to effect.</div> <div>Diagram 2602.1</div> <div>Cycle journey time signs</div> <div>Use of journey times on pedestrian/cycle signs - assume we'll be provided with guidance for average speed of pedestrian/cyclist so we can state the journey time consistently on signs. Will be useful in promoting healthy and environmentally friendly modes of transport for school zones, central London, etc.</div> <div>Diagram 2919.2</div> <div>Motorway services ahead</div> <div>The motorway services sign diag 2919.2 does not include the wheelchair symbol. Is this because DDA 1995/2005 now supersedes the use of this symbol in that it is a legal requirement to provide facilities for the disabled?</div> <div>Diagram 820A</div> <div>New “Road unsuitable for HGVs sign”</div> <div>This new sign may receive a lot of requests; it is essentially a combination of the old Diagram 820 sign and the standard HGV profile with a red line crossing through it, and therefore may be popular with those choosing to add a graphical message to the existing sign. In practice however, we would undoubtedly follow standard procedure and replace these signs as it becomes necessary owing to wear and tear.</div> <div>1001.2A</div> <div>Broken line entrance into stop line box</div> <div>The broken line allows cyclists to reach stop line and is more in keeping with other similar types of road markings. General opinion was that this was a reasonable idea.</div> <div>3001.1</div> <div>Portable light signals</div> <div>The use of portable pedestrian crossing signal heads on the opposite side from the push button is noteworthy; it seems to go against the puffin design, which we have been working towards for some time now. Also we believe that these unfamiliar, signal-controlled crossings should allow pedestrians on more time to cross, and should use a blackout period instead of the red/green figure.</div> <div>Diagram 610</div> <div>Keep left/right arrows</div> <div>Consider removing the requirement for keep left/right arrows to be illuminated; this would reduce the energy bill as well as saving capital installation costs. Modern reflective materials are more than adequate for nearly all locations.</div> <div>Temporary signs</div> <div>Temporary road works signs need additional guidance notes to exempt the need to display a whole set of them where they would otherwise cause more of a hazard than the works themselves. For example, a utility excavation in a cul-de-sac only really requires barriers if the works are no wider than a parked car. The advance signing is not only unnecessary, but can be hazardous and inconvenient to drivers parking in the street.</div> <div>Diagram 958A/959A</div> <div>Bus clearway signs</div>	<div>Diagrams 530, 531.1, 532.2, 532.3 - too soon to go metric only. It would also affect diagrams 629A and 629.2A etc.</div> <div>Diagram 2602.1 - actual support for journey times, but I think the consensus is that the proposal should not proceed.</div> <div>Diagram 820A - it isn't intended that this sign should replace all existing signs to diagram 820 (HGV versions), but used where there are sat-nav problems. If local authorities what to use the new sign when the existing 620 becomes life-expired, that is up to them.</div> <div>Diagram 610 - any relaxation on illumination is not a matter for the amendment TSRGD, but in this case a self-righting bollard will be appropriate in may situations (but not all).</div>
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	<p>The new Diagram 958 and 959 bus lane signs contain a motorcycle, which does not appear to be optional, and which could cause problems in areas where the TRO's are not in place to allow motorcycles to use bus lanes. However, these signs are designated Diagrams 958A and 959A, thus making them variations on the originals. The rules for the 958 and 959 signs remain the same, with the possible exception of the removal of the word 'local' from the bus symbol [Schedule 19; Paragraph 1, part 1 of the consultation proposals].</p> <p>1.3 Diagram 1043/1044 Yellow box junction markings Yellow box markings no longer require Traffic Regulation Orders to install, according to the most recent amendments. This is a step in the right direction, but there are other markings that could also benefit from not requiring specific authorisation, for example the 'disabled' bay. The 'disabled' bays marked in town centres and commercial areas usually have the backing of a TRO, but unfortunately the process of drawing up a TRO is a lengthy one, making it less helpful for introducing isolated bays in residential cases.</p> <p>The option to introduce of yellow box markings without a TRO is welcomed and their use at narrow points on roads might also be helpful. Removal of the word 'regular' in the diagram text for speed limit repeater signs is helpful as would scope to widen Chapter 8 signs warning of Road Works to e.g. include information regarding local bus routing.</p> <p>TSRGD General issues</p> <p>There followed a discussion on whether regulatory signs or informatory signs received the highest level of attention, and which would be more likely to be ignored. Evidently, blue signs (such as bus lanes) are more likely to be taken as permission by ALL drivers to use the lane in question, rather than being recognised as a sign specifically informing buses. However, it was pointed out that this information was contained in the Highway Code, and therefore drivers would have to know this information in order to pass their test.</p> <p>Also mentioned was the apparent lack of "plain English" used within the TSRGD; it should be clearly worded, but instead the need to continually cross-reference and refer to other sections can lead to confusion.</p>		<p>Diagrams 958A and 959A - this is not the first consultee to think that these might be replacing diagram 958 and 959. I don't understand the comment about local buses. Clear guidance will need to be given. Chapter 3 will eventually be updated to include diagrams 958A and 959A.</p> <p>Yellow box markings - the fact that these are provided without a TRO isn't a new proposal</p> <p>The provision of disabled parking bays without the need for a TRO is a matter for the Traffic Signs Review.</p>	
1 1	<p>Yes but – Diagram 7290</p> <p>Due to the changes in TSM Chapter 8: 2006 this sign is not only redundant it constitutes a net increase in risk. Although specifically discouraged in Chapter 8 several enforcement bodies are incorrectly stating that this signing is needed for the enforceability of speed limits. Given its size and location on the approach zone this sign probably constitutes the single largest avoidable risk to road worker putting out signs at present. Those setting standards and regulations are required to comply with the duties under HSWA 1974. To ensure that these are met there is a requirement to either remove diagram 7290 in these amendment regulations or at least prescribe it only for a speed of 30 mph.</p> <p>Part 1: Paragraph 3 - Width and Height Restrictions</p> <p>The proposed changes include the requirement that both metric and imperial measurements should be displayed on all width and height roundel signs. However, diagrams 7201, 7201.1, 7210, and 7212 are shown in TSRGD with just the diagram 7283 imperial width sign.</p> <p>Other signs which are affected by the proposed changes have been included in the Amendment regulations, so shouldn't the signs 7201, 7201.1, 7210, and 7212 also be included? Otherwise, designers are likely to continue to have these temporary signs made as shown in the current Regulations.</p> <p>The signs should be changed to show the diagram 7283.1 dual unit roundel, and/or, if this is adopted, both imperial and metric versions of diagram 7283 stacked on top of each other. See also response to Q1 above.</p> <p>Part 1: Paragraph 11 – Traffic Officers</p> <p>Historically the ability to maintain the highway (road works and street works) has relied on enforceable signs (e.g. keep right arrow). To undertake works TTM operatives have to pass these signs in a manor which would be an offence e.g. drive to the left of keep right arrow on a section of road which may be coned off but which is not closed by a traffic order. The assumption has been that as TTM operatives have the powers to place,</p>	93	<p>Diagram 7290 - we can't withdraw this sign without consultation. It would affect local authorities, not just the HA. The HA do not have to use it on their roads. However, I have seen it used on motorways etc where the speed limit changes within road works, particularly on the approach to narrow lanes. As a driver, I find it useful as an indicator to move the left hand lane and reduce speed before the actual limit starts. If this sign is to be withdrawn eventually, then I would like to see the speed limit terminal signs mounted on yellow backing boards - to increase the target value when they are other signs, cones. merging traffic etc that attract a driver's attention</p> <p>Diagrams 7201, 7201.1, 7210, and 7212 (and 7235) - I have already suggested that these should be changed to show dual units.</p> <p>Traffic Officers - not for me to comment</p>	<p>No, will not do this.</p> <p>Dealing with this.</p> <p>Do not agree,</p>


<p>maintain and remove signs under section 65 of RTRA 1984 that these powers allow them to pass signs which they would also have the power to remove. The draft changes to accommodate Traffic Officers may imply that the above assumption is incorrect and that additional changes would be required to allow road works to be undertaken in compliance to TSM Chapter 8.</p> <p>Part 1: Paragraph 12 Advance Stop Line</p> <p>The proposed changes to diagram 1001.2 looks to be a method of cheaply making the large number of incorrectly and unlawfully marked ASL (without an approach cycle lane) lawful rather than providing cyclists with a safe method of using the facility.</p> <p>Part 1: Paragraph 22 – Road Works Signs</p> <p>The proposed changes to Diagram 7022 (to extend its use to one way streets) is not consistent with the decision of the TSM Chapter 8 TPB. Given the known problems and accident record with the use of wicket signs on single carriageway roads additional guidance on the correct use of these signs was included in TSM Chapter 8:2006. While the use of wicket signs on one way streets is likely to be acceptable it was identified that specific guidance was needed in Chapter 8 to fully explain the correct usage and to stop their use on bidirectional single carriageways.</p> <p>I would suggest that this amendment be dropped, or delayed, until it is possible to simultaneously revise Chapter 8 to include guidance on the correct use of these signs on single carriageways.</p> <p>Part 1: Paragraph 26 – Amendment of regulation 55 – Road Danger Lamps</p> <p>The proposed change refers to the latest Standard which is BS EN 12352:2006 which calls these lamps “Warning Lights” and not “Road Danger Lamps”.</p> <p>Because of this change in term, the revised version of Chapter 8 of the Traffic Signs Manual published in March this year was amended so that the title of the relevant section (O4.7) was amended to “Warning lights (road danger lamps)” and throughout the document the term “warning lights” has replaced “road danger lamps”.</p> <p>Shouldn’t the amended regulation 55 either use the term “warning lights” instead of “road danger lamps” or at least make reference to both terms? This will minimise confusion amongst practitioners who are being told in Chapter 8 that “warning lights” is now the ‘official’ term to use</p> <p>Part 4: Schedule 6- Lane markings</p> <p>The removal of division by speed limit for the different versions of diagrams 1004, 1005, 1008 should not be accepted. For speed limits less than 40 mph the existing six metre modules gives an increased preview time of over the nine metre modules. If a speed limit is to be reduced to below 40 mph for reasons of safety then highway authorities should be required to provide the better performing markings i.e. those currently required for lower speed limits.</p> <p>In addition the proposed changes are likely to require changes to the marking and stud details in Chapter 8 as well as voiding the HA TTM road stud authorisations. If these proposed changes are to be adopted then the revised road stud versions should be included in the amendment regulations.</p> <p>Amendment to regulation 14: Signs attached to vehicles - Not included</p> <p>An opportunity seems to have been missed to amend regulation 14.</p> <p>The revised version of Chapter 8 published in March this year included a revised section on Single Vehicle Works (Section O8.1) which introduced reference to a small light arrow sign (paragraph O8.1.8). In addition the need to authorise each light arrow sign again to accommodate planned updates due to changes in technology and materials would be avoided by revising Regulation 14.</p> <p>Use of fluorescent yellow for certain signs:</p> <p>The Highways Agency has authorised that signs coloured yellow in Schedule 7 part VIII and Schedule 12 of the regulations may be fluorescent yellow. If this is acceptable on all roads, should the opportunity be taken to</p>	<p>Diagram 1001.2A - most of the existing markings should be lawful because they would have been authorised.</p> <p>Diagram 7202 (not 7022 - typo) - I wouldn’t rush into dropping this amendment. Firstly it brings it into line with diagram 872.1 (permanent lane drop). Also it clarifies to use of the sign on one-way link roads etc. How do you indicate lane closures on a one-way street without this sign. There is already a version for a two-way road (diagram 7206). The problem is that if guidance is produced, say next year, the existing sign could not be authorised for use on a one-way street. Synchronising an update of Chapter 8 and new TSRGD will almost be impossible. It is best to produce guidance in a Circular to start with. We will have to do this for most of the signs in the amendment TSRGD.</p> <p>Diagram 1004 etc - we are not proposing to change the relationship between module size and speed limit. It will become guidance rather than mandatory and will overcome the problems caused when speed limits are changes or temporary limits imposed. The A46 in Nottinghamshire is being upgraded to dual carriageway in a three-year contract. The permanent speed limit is currently 60mph (national limit on a single carriageway road). A large length of the road now has a temporary 40mph limit, but no-one is going to change to marking module are they? In fact, the length of the limit was shortened over the Christmas holiday. “speed limit” in the caption to these markings includes temporary speed limits (regulation 5), so some of the markings on the A46 are currently unlawful.</p> <p>No further comments - [REDACTED] etc can deal with other issues.</p>	<p>Ignore the suggestion.</p> <p>Do not agree with suggestion.</p> <p>[REDACTED] considering road danger lamps separately.</p> <p>Writer has misunderstood removal of diversion by speed limit.</p> <p>Signs attached to vehicles - to note, wrote to Highways Agency who did not supply signs.</p>
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	include this in the Amendment Regulations?			
1 1	<p>Yes - Part 1</p> <p>2. Consideration needs to be given to combining the two signs in diagram 531.1/532.3/818.5 as has been done in diagram 818.3. Signs mounted as shown will considerably increase the overall height and width of the sign assembly leading to visual intrusion. Some bridge owners are reluctant to have lighting units on their structures and providing two lighting units will increase difficulties. Would reflectorised signs be permitted as an alternative to illumination on a bridge?</p> <p>7. We agree in principle about restricting the use of signs on signal poles except for one particular case. That is the use of no entry signs on the back of signal poles. This cuts down on street clutter and the grey colour of the no entry sign (back of the sign) does not distract motorists from the traffic signal display.</p> <p>9. Comments were made previously when the puffin crossing was first introduced that in removing the pedestrian demand display from the opposite side of the road would make it more difficult to be seen. The need to provide a high level repeater signal appears to support the concern expressed at that time.</p> <p>11. We recognise the need to include Highways Agency's Traffic Officers within the list contained in Regulations 26 and 27. While accepting the Traffic Officers operate on the motorway, is it intended to extend their powers to specific sections of local highway authority roads where these markings are provided? Will highway authorities need to include this in their own local traffic orders?</p> <p>12. In diag 1001.2A, why is the 45 degrees so prescriptive? Could greater site flexibility not be achieved with a range from 30 to 60degrees? The proposal of a sign to permit contra flow cycling without an advisory lane marked on the carriageway has received mixed reactions. There are those who, while having no direct evidence, consider this potentially dangerous especially where road widths are restricted. There are also concerns about the safety of road users where cyclists may not confine their riding to one section of the highway, as when delineated by a carriageway marking. It is recognised, however, that this concern runs counter to the relevant TAL 6-98 and is going in the opposite direction to trends in the UK and established practice in more cycle-friendly countries abroad.</p> <p>The proposal in diag. 2602.1 to include times to a destination has, also, received a mixed reaction. Determining times is a subjective assessment depending upon an individual, indicating distance is definitive. It is however recognised that there are increasing requests for times to be shown.</p> <p>13. Comment relates not to the changes being proposed but to the size of signs required for HOV lanes particularly in urban environments. With an increasing move towards HOV lanes these will have a detrimental effect of the urban environment.</p> <p>17. Relaxation of the need for special authorisation for sign 663.3 is welcome. Why in paragraph 17 does this indicate restricting use to 'suitable culs-de-sacs' compared to details under the diagram no. referring to 'entrance to a road or area'? Sign to diag 663.3 should be permitted to be used for a road or an area.</p> <p>24. We agree VMS signs should not scroll or page messages. However we do think that alternating an approved TRSGD symbol with a message should be acceptable.</p> <p>Part 3</p> <p>8. The reasoning behind the changes to the use of repeater signs is accepted. However, the phrase 'as required to inform drivers' requires a subjective assessment to be made which is open to challenge. Could guidance on a minimum and maximum distance be provided?</p> <p>Part 5 Schedule 6</p> <p>Diagram nos. 1004, 1004.1, 1005, 1005.1, 1008, 1008.1, have had references to use with speed limits of 40mph or less and more than 40mph removed. It is considered that these references to speed limits should be reinstated. This will ensure the current uniformity across all highway authorities as to when these markings are used.</p>	95	<p>Diagram 531.1/532.3/818.5 - we have never tried dual metric/imperial triangular signs. It might work but would require a larger triangle (e.g. 750mm instead of 600mm). This is probably something for the Traffic Signs Review.</p> <p>Direction 44A - I don't understand this comment - the new direction includes diagram 616.</p> <p>Puffin crossings - not for me to comment.</p> <p>Traffic Officers - not for me to comment.</p> <p>Diagram 1001.2A - we will look at the design of this.</p> <p>Contra-flow cycling - as I have said before (and acknowledged by Howard), this is not new. We did consult on this in Chapter 3 of course.</p> <p>Journey times on cycle signs - no conclusion here.</p> <p>HOV lane signs - not an issue for the amendment TSRGD, but something we can look at, perhaps as part of the Traffic Signs Review. I presume the large signs referred to are those explaining what a HOV lane is and not the signs used along the lane.</p> <p>Permit parking area - diagram 663.3 is being prescribed to indicate a cul-de-sac or area and guidance on its use will be given</p> <p>VMS - not for me to comment.</p> <p>Repeater signs - guidance is already given in Chapter 3.</p> <p>Diagram 1004 etc - it seems that we did not explain in the consultation why we are making the change. The guidance in Chapter 5 won't change.</p>	
1 1	<p>2. Regarding Amendment of Direction 41, page 83 & 84</p> <p>This amendment creates a state of no distinction between a bollard that is internally illuminated and conforms</p>			

	<p>to BS EN 12899-2:2007 and a bollard that is illuminated by means of retroreflecting material that conforms to British Standard BS 8442:2006.</p> <p>We believe further consideration should be given to this decision. With retroreflective bollards being widely used, their limitations are now becoming known and many of their advantages are now disputed. There is a place for them however, but to create a state of no distinction that makes no reference to the safety benefits of a fully compliant internally illuminated bollard will not, in our opinion, benefit society or the environment. We acknowledge the administrative requirement that may be a burden when specifying retroreflective bollards, however this alternative is a situation that is likely to result in a less safe, and in some cases, more expensive road environment. Further we do not believe that these concerns have been fully taken into account as part of the impact assessment.</p> <p>A further point to note is that the sentence “is illuminated by the use of retroreflecting material extending over the whole surface of the sign....” is ambiguous and is a stipulation that could conflict with BS 8442:2006 or any new standard that supersedes it. It is therefore likely to result a further administrative burden as specifiers try to unravel the meaning of the clause.’</p> <p>Page 83 Amendment to direction 41(3)(b)(i) - reference should be made to the requirement of a 600 mm dia roundel plate with a signlight over when the installation involves an island site or a replacement of an illuminated bollard.</p>			
1 1	<p>Yes but paragraph 12 – Cycle Advance Stop Lines – The proposed marking would be confusing to other road users and is likely to encourage abuse by powered two wheelers. It is also likely to compromise the stop line for vehicles.</p>	97	Diagram 1001.2A - we have been authorising this. Are we aware of any problems?	
1 1	<p>Yes. Width and height restrictions – paragraphs 2-6. We understand the need to have restriction signs in both imperial and metric, however, it would be beneficial if these two measurements could be incorporated into one sign. In situations where the restriction applies to a bridge which is a listed structure, it would not be acceptable to fix more signs on these valued historic buildings.</p> <p>Cycling issues – Paragraph 12. Advanced stop lines with ‘gate’ will be useful in streets where the width of carriageway is limited. Contra flow cycling without an advisory lane will also be useful, but we feel there must be direction and advice on where this can be used safely.</p> <p>We would also like to see the following:</p> <p>1) Cycling in pedestrian zone signs Cycle logo with hours of permitted access</p> <p>This would help to give a more positive signal to cyclists that they are permitted to cycle in pedestrian zones. At present the entry plate signs are not understood by many cyclists and it is often ignored.</p> <p>2) Illumination requirements At present it appears inconsistent that some signs must be illuminated and others are not. It is our view that any sign in a lit urban area which is retroflective is sufficient. The cost and difficulty of achieving electrical supply and the ongoing electricity cost cannot in our view be justified.</p> <p>3) No entry roundels There is considerable ignorance and confusion regarding the no entry sign to all vehicles (red empty circle). In our view the no entry sign should be utilised in all cases in the interest of compliance</p>	99	<p>Diagram 530 - I think it is worth looking into the possibility of designing a dual height single sign. I have previously said that this ought to be a matter for the Traffic Signs Review, but now that three consultees have raised this, I think we should look at it now.</p> <p>Contra-flow cycling - guidance is given in Chapter 3.</p> <p>Pedestrian Zone entry signs - any redesign in respect of cyclists is a matter for the Traffic Signs Review.</p> <p>Illumination - a matter for the Traffic Signs Review.</p> <p>Diagrams 616 and 617 - diagram 616 cannot be used as a substitute for diagram 617. Diagram 617 can have exemption plates and can apply to two-way roads. The future policy on the use of diagram 616 is a matter for the Traffic Signs Review.</p>	
1 1	<p>General Questions / Comments</p> <ul style="list-style-type: none"> How will the review affect existing signage, will there be a requirement to remove/change existing signs Will previous special authorised signs be automatically compliant If new direction taken will existing signs need to be altered in order to remain compliant 	100	<p>NOTE: This is headed Traffic Signs Policy Review so should it be considered as a response to the TRSGD consultation? However, my comments are as follows:</p> <p>General questions/comments - the savings (Regulations and</p>	

<div data-bbox="172 69 765 111"><ul style="list-style-type: none">• Will existing signs become non-compliant</div> <div data-bbox="127 153 368 195"><p>General Requests</p></div> <div data-bbox="172 226 1587 1014"><ul style="list-style-type: none">• Make it possible to create signs more understandable by the public. i.e. operational hours that span midnight.• Allow greater tolerances i.e. don't make dimensions prescribed, so long as the elements are there and they can be seen as what they are they should be enforceable.• Include a statement that allowances can be made for local conditions i.e. a road with numerous short parking bays split by drives, no requirement for a sign in each bay.• Reduce the need for double signs e.g. No Entry signs• Remove the need for signs in well lit built up areas to be illuminated.• minimise or even remove altogether the illumination of signs.• Consider two tiers of prescribed signage. Those that cannot be varied for safety/consistency reasons & those that can be varied to suit local conditions such as parking signs.• Renumber all diagrams in a logical fashion• Reduce the number of elements required for bus lanes.• Review the word Taxi to make it clear to the public that Private Hire vehicles are not taxis when used in signs. Possible suggestion to use Hackney Carriage symbol.• Consider the introduction of a system that ensures TROs remain enforceable following signs being stolen or defaced.• use the minimum number of signs necessary for road safety/ information;• Minimise the number of poles used;• Minimise the size of signs necessary to convey the message effectively and safely• Consider relaxation of the prescribed specifications for the marking out of controlled parking bays ie double end bars. This leads to prosecution problems.</div> <div data-bbox="127 1056 368 1098"><p>Specific Requests</p></div> <div data-bbox="172 1129 1552 1318"><ul style="list-style-type: none">• Introduce new schedule for Taxi Ranks similar to yellow boxes and bus stops• Introduce new schedule for School Keep Clears similar to yellow boxes and bus stops• Consider introduction of new schedule for double yellow lines at junctions similar to yellow boxes and bus stops.• Schedule 16 item 38 - Allow the use of '24hrs' or 'at all times' in addition to 'at any time'.</div> <div data-bbox="127 1371 311 1413"><p>Specific signs</p></div> <div data-bbox="172 1444 1409 1749"><ul style="list-style-type: none">• Diag. 663 – allow other variants of zone type i.e. an area name.• Diag, 670 – Reduce sign sizes for residential roads subject to 20 and 30 mph speed limits.• Diag. 1028.2 – show the thick yellow line in TSRGD• Diag 1028.3 & .4 make one type with all the variants together• Diags 958, 959 etc allow more variants i.e. offside bus lanes.• Diag 974 When the clearway is 24 hours omit the requirement for the sign.• New signs for Resident Parking areas without road markings• New sign for average speed cameras.</div> <div data-bbox="127 1801 290 1843"><p>Other Notes</p></div> <div data-bbox="172 1875 1587 2022"><ul style="list-style-type: none">• In the review document, the last entry in Table 4, to allow the public to challenge the erection of signs is likely create major issues for the enforcement of necessary restrictions.• Promote consistence approach to restrictions. e.g. all peak hour restrictions should have the same operational hours.</div>	<div data-bbox="1721 69 2561 247"><p>General Directions) will make existing signs lawful. We must be certain that the wording of the savings for the Directions are clear (see my comment in respect of direction 44A in respect of the response from [REDACTED] above and [REDACTED] below).</p></div> <div data-bbox="1721 310 2561 384"><p>General requests - all for the Traffic Signs Review (will these be passed on?).</p></div> <div data-bbox="1721 1066 2561 1213"><p>Specific requests - again these are all for the Traffic Signs Review. I do support the term "at all times". This is more appropriate than "at any time" for 24 hour bus lanes. Is this something we could add to Schedule 16, item 38 now?</p></div> <div data-bbox="1721 1413 2561 1486"><p>Diagram 663 - a name can already be added (Schedule 16, item 39).</p></div> <div data-bbox="1721 1518 2561 1591"><p>Diagram 670 - Chapter 3 gives guidance on sign sizes. Terminal signs need to be larger than repeaters.</p></div> <div data-bbox="1721 1623 2561 1759"><p>Diagram 1028.2 - it would complicate matters to illustrate the no stopping version in the TSRGD since it is not strictly an alternative type. It is illustrated in the draft of Chapter 5 (2010 edition).</p></div> <div data-bbox="1721 1791 2561 1864"><p>Diagram 1028.3 and 1028.4 - this is being considered in the Traffic Signs Review.</p></div> <div data-bbox="1721 1896 2561 2001"><p>Diagrams 958 and 959 - too soon to include other variants. These will continue to be authorised and considered as part of the Traffic Signs Review.</p></div>
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			<p>Diagram 974 - a sign is needed to indicate either “except buses” or “except local buses”.</p> <p>Resident parking area - this is included in the amendment TSRGD as a permit parking area.</p> <p>Sign for average speed cameras - already in amendment TSRGD.</p>	
1 1	<p>Yes. The overall proposals in general, are helpful and will provide the necessary updates to signing requirements, facilitate the requirement under the TRA and revise specifications to bring these in line with current British and European Standard.</p> <p>There are however two issues where it is considered additional amendments to the regulations should be included.</p> <p>The provision of contra flow cycle lanes is an important facility in the planning of strategic cycle routes and the provision a sustainable transport infrastructure. Where no segregation for cyclists is provided at the start of a contra flow facility, the only signing available is the “prohibition of motor vehicle” sign (diag. 619). There remains a high level of non-compliance / misunderstanding associated with this sign which leads to a number of safety concerns. It is requested that Supplementary plates “Except buses and cycles” (diag. 954.3) and “Except cycles” (diag. 954.4) should be permitted with the No Entry sign (diag. 616) to improve compliance and safety where contra flow cycle lanes are provided.</p> <p>The TSRAGD 2002 introduced relaxations to the illumination requirements for a number of warning signs erected on non-principle roads within 30mph speed limits. At that time, this was considered a first step towards further relaxations. In view of the improvements made to the reflecting performances of sign face materials and the wider use of micro prismatic materials, there remains an opportunity to include further relaxations to the illumination requirements for other warning and mandatory signs both within and outside 30mph speed limits, where these can be accommodated without adversely affecting road safety. These relaxations should be included within the new regulations and will positively contribute towards the carbon assessment and environmental impact assessments for the revised TSRAGD.</p>	102	<p>Contra-flow cycles - the use of “no entry except cycles” is currently being trialled. It is too soon to be included in the amendment TSRGD and is a matter for the Traffic Signs Review.</p> <p>Illumination - the main purpose of the amendment TSRGD is to introduce portable pedestrian crossings and to reduce the number of authorisations. Major changes such as illumination requirements are a matter for the Traffic Signs Review.</p>	
1 1	<p>Change to the use of diagram 1010 at a road junction</p> <p>It is not clear whether the proposal is for diagram 1010 to cease being used as a junction marking in any situation. If this is the case, it will result in the unnecessary use of full give way markings layout having to be used at inappropriate locations eg. to indicate the priority at a minor junction on roads within a housing scheme. The use of diagram 1003 across the whole width of a side road junction (usually only appropriate for very narrow roads) can cause confusion by giving the impression that the side road is a one way street.</p> <p>New sign to diagram 820A – Unsuitable for HGV’s</p> <p>Care will have to be exercised with this proposal that it is not regarded as a prohibition sign resulting in issues with access to farms etc located along narrow rural roads. A significant publicity campaign should be considered to inform drivers of the meaning of the sign.</p> <p>Disabled Persons’ Parking Places (Scotland) Act 2009</p> <p>The new Disabled Persons’ Parking Places (Scotland) Act 2009 requires Scottish local authorities to promote legally enforceable disabled parking bays by September 2010. To allow councils to fulfil their obligations under the new Act within the required time scale an amendment is required to the Traffic Signs Regulations and General Directions 2002, allowing mandatory disabled parking places to be provided without the need for a Traffic Regulation Order as already exists with the bus stop diagrams 1025.1, 1025.3 &1025.4. It would also help to reduce costs and sign clutter if the requirement for the associated regulatory signing could also be omitted.</p>		<p>Diagram 1010 - it was because of the mis-use of diagram 1010 at a junction in Scotland resulting in an accident that this change has been made. Give way markings should be use at minor junctions in a housing scheme as they are where I live.</p> <p>Diagram 820A - residents and farmers should be able to advise visitors and delivery drivers on how suitable the road is. If a vehicle is too large then it doesn’t matter if the sign is viewed as being informative or regulatory - the vehicle will be unable to negotiate the road.</p> <p>Disabled bays - it’s that Scottish problem again. How is this being dealt with?</p>	

	<p>The Disabled Persons' Parking Places (Scotland)Act also requires councils to make disabled bays in off street car parks legally enforceable such as those serving supermarkets, retail parks, leisure centres etc. The TSRGD 2002 is quite specific about the design, layout and colour of on street disabled parking bays. However, many of the disabled bays marked in car parks are of individual, non standard, colour, design and layout. Guidance is needed on a standard layout for off street car parks to facilitate enforcement.</p> <p>School Keep Clear Markings to diagram 1027.1</p> <p>As the intention of these markings is to keep clear the frontages and entrances of schools, fire stations hospitals etc, consideration should also be given to making the markings enforceable without the need for a Traffic Regulation Order. At present the advisory markings rely on the good will and common sense of drivers to operate and they are unenforceable without a covering TRO. A maximum & minimum permitted length already exists and further safeguards on their use could also be written into an amendment to the Traffic Signs Regulations and General Directions 2002. This would allow their speedy use when situations change and it would also allow the markings to be removal without the need to revoke an Order.</p>		<p>Diagram 1027.1 - I support this suggestion, but I think we would have to consult on this, so it will have to be a matter for the Traffic Signs Review. This does raise the question that before we prepare draft TSRGD and consult, we could invite local authorities etc to put forward suggestions that we could consult on.</p>	
1 1	<p>Response to the consultation on the revision of Traffic Signs and Regulations General Directions 2010 from CTC</p> <p>CTC, the national cyclists' organisation, was founded in 1878. CTC has 70,000 members and supporters, provides a range of information and legal services to cyclists, organises cycling events, and represents the interests of cyclists and cycling on issues of public policy.</p> <p>We welcome the opportunity to respond to this consultation.</p> <p>1 Diagram 960.2 – permitted contraflow with no cycle lane</p> <p>We strongly support the proposal to prescribe the sign for contraflow access without need for cycle lanes. This is a sensible step which reflects existing practice elsewhere in Europe. The need to install cycle lanes can, in some cases, reduce the effectiveness of the proposed contraflow, particularly where space is insufficient to install a contraflow wide enough to meet current guidelines, or where marked lanes are likely to suffer abuse and obstruction.</p> <p>2 Diagram 966 – ‘cyclists dismount’</p> <div></div> <p>The ‘cyclists dismount’ sign is an inappropriate and over-used sign which represents truly incompetent thinking. The sign should never exist, except where the cycle route requires dismounting due to a break cause by steps or low headroom – even in these cases there may be alternative existing signs which are adequate. We support the prescription of a ‘cyclists rejoin carriageway’ sign but feel it should not be a variation of the ‘cyclists dismount’ sign but instead stand as a sign in its own right.</p> <p>The unpopular nature of the ‘Cyclists Dismount’ sign has been clear since <i>Cycle Friendly Infrastructure</i> (IHT/DfT/CTC, 1996):</p> <p><i>‘12.1.7 “Cyclists Dismount” signs</i> <i>A good cycle route will have no “Cyclists Dismount” signs as it will link coherently to other routes without interruptions. These signs have been used in the past by local authorities where they felt obliged to make use of existing Pelican crossings, subways or other facilities where for legal or financial reasons, cycling could not be permitted. Other techniques are now available and, where these can be used, “Cyclists Dismount” signs should be progressively removed. “Give Way” markings should be used in preference to “Cyclists Dismount” signs at junctions and crossings on the cycle track where the cyclists does not have priority. A combination is confusing and contradictory.’</i></p> <p>The more recent LTN 2/08 - <i>Cycle Infrastructure Design</i> (DfT, 2008) suggested that ‘Cyclists Dismount’ was</p>	104	<p>Diagram 960.2 - nothing to comment on</p> <p>Diagram 966 - there are still some situations where CYCLIST DISMOUNT signs are appropriate (e.g. subways and bridges). Guidance is given in Chapter 3.</p>	

<p>'over-used' and 'the least favoured among cyclists – each time it is used it represents a discontinuity in the journey, which is highly disruptive'. The guidance goes on to suggest that where the sign looks like it might be required practitioners should attempt to redesign the scheme to eliminate its use or be prepared to defend their decision if they cannot.</p> <p>We therefore recommend that the sign be removed from TSRGD and its use restricted only on a site by site basis. We believe that this step is the only means of preventing the current flagrant misuse of this sign.</p> <p>3 Diagram 616 (no entry) used in conjunction with 954.4 (except cyclists)</p> <p>We understand that the DfT has permitted several trials of the combination of a sign to diagram 616 used in conjunction with a plate to diagram 954.4, but does not intend to bring this forward until the full Traffic Signs Review is complete.</p> <p>This appears to be a limited step. Clear evidence exists that the approach is obviously sensible – the alternative, the use of the sign to diagram 619 (the 'low flying motorcycle') has, it is suggested, lead to infringement by motor vehicles. There is very poor understanding of what this sign means, lowering transport planners confidence in its use with the possible result that overly complex plug entry gates are erected to enable cycle contraflow, when a simple 'no entry' with an exemption for cyclists would suffice.</p> <p>It would therefore seem fitting to include this measure within the 'quick wins' to be completed by 2010, considering that it has been suggested for many years and operates without problem in every other part of Europe. In 1996 <i>Cycle Friendly Infrastructure</i> reported that: 'A conclusion of the European Greening Urban Transport project, based on the experience on many towns and cities, is that in almost every case it is possible to exempt cyclists from one way street regulations.' (p. 48)</p> <p>4 Advanced Stop Lines</p> <p>Current regulations on Advanced Stop Lines pose a significant problem. Currently the requirement to include a short entry lane leads cyclists to adopt a road position that may not always be appropriate, especially if intending to go straight on or turn right at a junction where a large volume of traffic is turning left. Many ASLs have been installed with the 'stub' or 'gate' entry suggested by the consultation, and many also have been installed with no entry gate or stub whatsoever.</p> <p>We understand that the proposed measure permits the use of 'stub' entry gates. Whilst we prefer ASLs to include feed-in lanes (particularly a minimum of 1.5 metres wide), we can understand the need to allow local authorities the flexibility to install ASLs without lanes where conditions are appropriate.</p> <p>We suggest that a simpler suggestion to the current problem would be to exempt cycle traffic from the traffic direction as it applies to the first stop line, whilst also permitting local authorities to include entry gates associated with continuing cycle lanes wherever appropriate.</p> <p>We suggest that this could be accomplished by amending regulation 43 as follows:</p> <p>(2) Where the road marking shown in diagram 1001.2 has been placed in conjunction with light signals, "stop line" in relation to those light signals means -</p> <p>(a) the first stop line, in the case of a vehicle other than a pedal cycle; or</p> <p>(b) the second stop line, in the case of a pedal cycle.</p> <p>We see no reason to retain the ridiculous anomaly whereby other vehicles are allowed to proceed to the second stop line if they have already passed the first line while the lights are changing.</p> <p>5 Other items not included</p>	<p>104</p>	<p>Diagram 616 - not something to rush into. The trial needs to be concluded first before a decision is taken</p> <p>Diagram 1001.2A - I have previously suggested that we could consider allowing cyclists to legally cross the first stop line. I do appreciate that cyclists turning right from the nearside may be at risk, particularly as the signals change to green. This now has to be a matter for the Traffic Signs Review</p> <p>ues - a matter for the Traffic Signs Review.</p>	
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Although we understand that a full review of traffic signs is currently in progress, we believe that there are many areas where new traffic signs to enable cycle traffic greater access and to provide greater clarity over cyclists' needs are required.

Some road signs which we believe need to be considered are covered below, including 'cycle streets', 'Tiger crossings', a sign giving pedestrians priority in shared use areas.

6 'Cycle streets'

Where priority cycle networks use quite back streets or minor roads it may be appropriate to provide signs indicating that cyclists have priority. This approach has been taken in many other parts of the world – the Netherlands, for instance, have a sign designating 'Fietsstraat' (cycle street):



In Germany a similar concept, the 'Fahrradstraße' also exists, while in the US a concept has been developed called 'Bike Boulevards':



'Bike boulevard' in the US

CTC believes that these treatments need no primary legislation at this stage, and can be achieved simply through the current Traffic Signs Review.

Formalising a 'cycle streets' treatment would give support to transport planners who are already applying similar principles, including using cycle logos (on road signs to diagram 1057) located towards the centre of the lane.

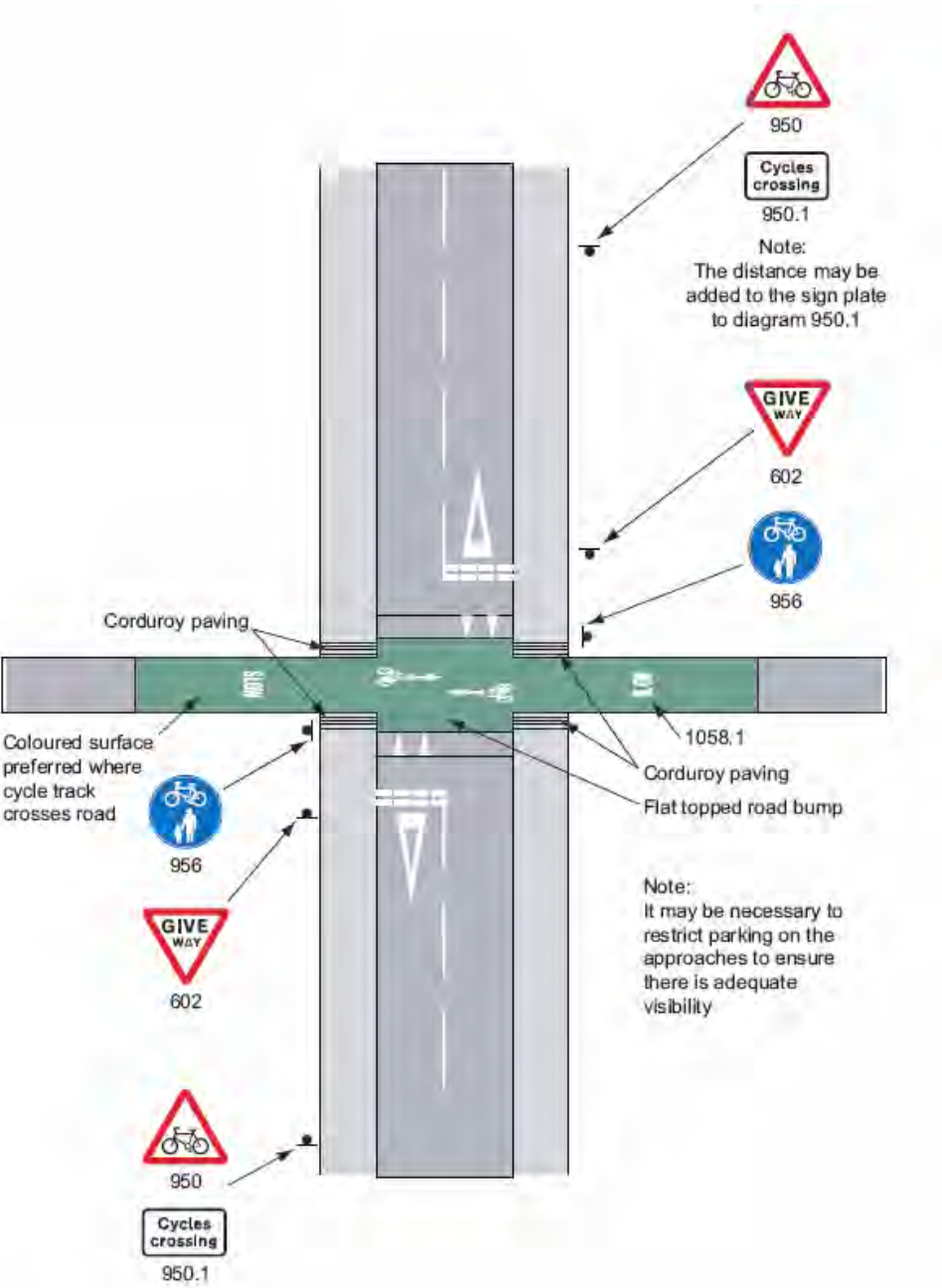
7 'Tiger' crossings – giving cyclist priority over motor traffic

'Tiger' crossings are often mentioned as a variant on zebras to give priority to cyclists over motor traffic. They would be especially useful for the junctions of cycle tracks with roads. Providing continuity for cyclists is critical to ensuring an effective cycle network. It has been estimated that the energy lost braking to a halt is the equivalent to 100 metres of forward travel. Forcing cyclists to yield 10 times on an average 4 km journey increases energy expenditure by a quarter.

In addition some cyclists, keen not to waste energy expenditure, may be tempted to ignore give way markings, especially where cycle tracks cross side-roads. These situations place the cyclists at risk of turning traffic.

Although separate secondary legislation exists for pedestrian crossings, crossings for cyclists is covered under TSRGD. Priority crossings for cyclists are allowed in certain circumstances and suggested layout is included in *Cycle Infrastructure Design* (LTN 2/08) p. 63 – see below. However, this proposed design is seldom used and there is nothing (other than the give-way sign) to firmly indicate that cyclists have priority on the crossing point.

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Cycle track priority over road - hardly ever used in the UK

We therefore believe that a new sign giving clear priority to cyclists for side-road cycle tracks is required. This should be clear, giving cyclists the confidence to use the facility without risk and drivers a firm understanding that they need to give way

8 Shared/use sign giving pedestrians priority over cyclists

The current sign (956) designating areas as shared use for pedestrians and cyclists fails to clarify which user has priority. We believe that a sign should be provided which gives pedestrians clear priority yet allows cycles access. This is important in circumstances such as vehicle restricted areas which remains important parts of the cycle network.

9 Pedestrian crossings – marking of cycle lanes through crossing zone (TSRGD 15.15)

The TSRGD does not currently prescribe a layout where a cycle lane continues through a pedestrian crossing. This has lead to local authorities adopting a variety of arrangements. Some of these may compromise enforcement of parking restrictions in the crossing zone, by omitting kerbside markings. Other arrangements confuse cyclists by creating a narrow, zig-zagging lane that is impossible to follow.

We recommend clarifying the arrangement in the TSRGD. We recommend an arrangement that omits the kerbside markings in the presence of a cycle lane, and positions the inter-lane markings so that they lie entirely outside the width of the cycle lane, to avoid cramping cyclists using the lane.

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Non-compliant
Mixing cycle lane and crossing markings



No thanks
A common, but not very practical or user friendly, interpretation of the TSRGD arrangement



Yes Please
No kerb markings.
Inter-lane markings outside cycle lane width

10Parallel crossings – cycle turning ban across pedestrian section



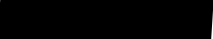
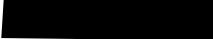
Parallel toucan crossings work better than crossings in busy locations because the interaction between pedestrians and cyclists is reduced. They do however have one major drawback. There is no prescribed layout, however most authorities arrange the pedestrian and cycle phases to work together, but ban cyclists from turning across the pedestrian part of the crossing. This severely limits the usefulness of the crossing as it prevents people from joining the road, as they would at a normal major / minor road junction.



Parallel crossings work better than crossings in busy locations because the interaction between pedestrians and cyclists is reduced. They do however have one major drawback. There is no prescribed layout, however most authorities arrange the pedestrian and cycle phases to work together, but ban cyclists from turning across the pedestrian part of the crossing. This severely limits the usefulness of the crossing as it prevents people from joining the road, as they would at a normal major / minor road junction.

	<p>There are two possible solutions:</p> <ol style="list-style-type: none"> 1. Treat the crossing as a 4 arm junction and separate the pedestrian and cycle phases. Setting the cycle phase to go before the pedestrian phase will avoid the temptation for cyclists to go early (people do not suffer the same abuse and hostility if they cross early on foot). This arrangement would of course extend the cycle time, making the crossing less satisfactory for all users. We therefore recommend: 2. Acknowledge that cyclists already frequently use shared toucan crossings to leave and join the carriageway, crossing paths with people crossing on foot, without mishap. There is little, if any difference between toucan and parallel crossings in this respect, the latter simply reduces the amount of interaction between people going straight across. <p>We therefore recommend that turning bans are explicitly NOT required on parallel crossings, as they restrict cycle access without bringing any genuine benefits to others. (See Gonville Place reports)</p>	104		
1 1	<p>Yes. Para 10. We agree with the use of toucan push-button with pedal cycle-only traffic signals.</p> <p>Para 11. This refers to the Highway Agency's traffic officers in uniform. This should also include, "in a marked vehicle and displaying appropriate warning lights".</p> <p>Para 12. We agree with ASL 'gate' option. The wording should be "not practicable" throughout, as opposed to "not possible" (as used in Section 6). However, it should not be compulsory to access the ASL via the 'gate' or lead-in lane. The journey time option to cycle direction signs is welcomed. A prescribed sign for contra-flow cycling (without a mandatory lane) is welcome. Can a 25mm x-height be included for the stack and other cycle direction signs? Can the 40 and 50mm x-heights be removed on both options of Diag 966 Cyclists Dismount and Cyclists Rejoin Carriageway, as 30mm is adequate for cyclist's speeds? Can the wording to Diag 966 be changed from "at the end of break in cycle lane track or route" to 'where it is not appropriate to authorise continued cycling off-carriageway'? The proposed Diags 958A and 959A should have Item 4 changed to allow the omission of the solo motorcycle symbol as exclusion of P2Ws may be desirable for some bus lanes.</p> <p>In relation to Regulation 4, Interpretation, should include definitions of road, building and engineering works, particularly in terms of durations (as stated previously).</p> <p>Again, in relation to Regulation 4, Interpretation, as line-markings for pedestrians are not a requirement, consideration should be given to durations of these events when such markings are not necessary (as stated previously).</p> <p>In relation to Regulation 43, it is suggested that the proposed use of new Diagram 7011.2 be reconsidered. It is suggested that in the first instance this Diagram may not be as effective as the existing Diagram 7011.1 – "WHEN RED LIGHT SHOWS WAIT HERE", and perhaps this may cause the new Diagram to be perceived as less important, in a not dissimilar manner as Wig-Wag signals are perceived as not being as well understood or effective as RAG signals.</p> <p>In the second instance, it is agreed that the use of Diagram 7011.2 may be understood at a stand-alone pedestrian facility layout, there are junction layouts that may often require the pedestrian facility to be offset considerably from the vehicle stop-line or equivalent (drawings can be provided to demonstrate this), in this instance the new Diagram may not be as clear, as for motorists the pedestrian crossing facility may not be clearly visible.</p> <p>In relation to proposed Diagram 1001.2A, it is suggested that the explanatory text be reconsidered. Firstly, it references Diagram 1001, when it may be preferred to reference Diagram 1001.2. Secondly, the text suggests that there is a cycle stop-line and a vehicle line, when the Regulation pertaining to this marking does not</p>	105	<p>Cycle signs - an x-height of 25mm is not appropriate. This size is not even prescribed for pedestrian signs (except diagrams 2610 and 2610.1). With regard to diagram 966, traffic authorities can choose the appropriate x-height for a particular location.</p> <p>Regulation 4 - this covers definitions that are not included in other legislation or where the interpretation is different. There will already be a definition of "road" elsewhere.</p> <p>Diagram 7011.2 - we need to consider whether the sign design should be changed from "GREEN LIGHT" to "RED LIGHT". The former is used in diagram 7011.1 because the red signal is likely to show for a long time. In the case of diagram 7011.2, it might be better to follow the design of diagram 7011.</p> <p>Diagrams 1001.2 and 1001.2A - we should perhaps consider amending both captions. The caption to diagram 1001.2 doesn't mention other vehicles - should it or would this conflict with regulation 43? Perhaps the solution is to separate out diagrams 1001.2 and 1001.2A in regulation 43 (paras (2) and a new para (2A)) and refer to these regulations, as appropriate, in the captions. Regulation 43 needs to be amended anyway because diagram 1001.2A does not have cycle lane.</p> <p>General Directions Schedule 2 - is it not intended to provide multi-lane approaches and should this be made clear? Also, the way in which Schedule 2 is drafted implies that staggered crossings and central refuges should not be used, but this isn't clear.</p> <p>Pedestrian signs at portable signal facilities - probably not necessary as the signals for pedestrians are the same as those at permanent crossings</p>	

	<p>indicate as much, indeed this is a common misconception. However consideration may be required to ensure that motorcycle access to the reservoir can be achieved in the future, if necessary.</p> <p>In relation to Schedule 2, Table, which dictates the minimum-number and placement of portable vehicular signals, consideration could be given to multi-lane approaches. Whilst we recognise that this may be something that is later covered in any accompanying Traffic Advisory Leaflets, or indeed that you suggest Traffic Authorities themselves consider creating their own local guidance, it is something that you may consider capturing in legislation. Clearly this was not a significant issue prior to the inclusion of portable pedestrian facilities, it is suggested that this is now a greater issue that is worthy of consideration. Again drawings can be supplied to illustrate the multi-lane scenario, but in essence the suggestion is that additional vehicular signal heads may be preferred for multi-lane approaches where vehicular occlusion has significance to visibility of pedestrians.</p> <p>In relation to Schedule 12 and Regulation 43, it is suggested that consideration be given to requiring pedestrian signage be placed with portable pedestrian signals. It seems that if an allowance has been made for vehicles when no stop-line (or other road markings) are present, then the same consideration should be made for pedestrians (when line markings are absent particularly – again highlighting the consideration for duration to be covered). Even if such signage is already considered to be in TSRGD, then it is suggested that these signs should be legislated in terms of their use in certain instances.</p> <p>The amendments to Direction 41 will give discretion to traffic authorities to directly illuminate the signs mounted in bollards or use retro-reflective alternatives, this change is to be welcomed</p>			
1 1	<p>Yes. Part 4 : Details of the Proposed New Diagrams</p> <p><i>Schedule 6: Road Markings</i></p> <p>Diagram nos. 1004, 1004.1, 1005, 1005.1, 1008 & 1008.1 – removing the references to appropriate speed limits will undoubtedly increase the incorrect use of these road markings, which is already apparent. I have found that many inexperienced engineers and road marking specifiers use TSRGD as a reference rather than TSM, indeed they often do not know that TSM exists. This often leads to incorrect assumptions about which size of sign or road marking to use. The speed limit reference is a useful guard against the widespread misuse of centre line markings.</p> <p>Although an S.I. is not the ideal place for this, can a clear advisory reference to the traffic signs manual be included in the TSRGD?</p> <p><i>Schedule 12: Signs for Road Works</i></p> <p>Diagram Nos. 7301 & 7302 – these signs can be specified for use with a junction warning sign to diagram no. 506.1. Can dimension variants be permitted for the signs to be sized to match the warning sign dimensions and therefore facilitate mounting on a single backing board? Para 25: I assume that this will allow 300mm diameter non-illuminated signs to be used on islands, etc. without the need for a larger post mounted illuminated sign. Comment from colleagues, suggests that clarification is needed.</p> <p>2 Regulations 18, 19 & 20 (Schedule 17) Illumination requirements</p> <p>Given the advances in reflective sign material - particularly prismatic material technology (BS 8408), can consideration be given to further relaxations in the types of sign plates which no longer need to be illuminated by means of internal or external light units</p> <p>No doubt an overall simplification of illumination requirements will be considered as part of the overall Traffic Signs Policy Review, however further interim relaxations would provide substantial savings to local authorities in terms of both energy use and installation costs. These further relaxations could be tied to the use of an appropriate grade of retro-reflective material.</p>	106	<p>Diagram 1004 etc. - lack of awareness of the Traffic Signs Manual is not a reason not to change the captions to these signs. It is the professional responsibility of local authorities, consultants etc that they ensure their staff are fully aware of relevant guidance, especially where road safety and traffic regulation is concerned. There is a good reason why we are making these changes. We can't refer to the TSM in the TSRGD, but we can mention it in any Circular that accompanies the amendment Regulations. The DfT website is another source of information of course.</p> <p>Diagrams 7301 and 7302 - this is something that we have not considered before. I'm not sure how we would deal with this as the fixed size (as currently prescribed) would be required for a free-standing sign, and a variable size required when used as a supplementary plate. Is this something to be considered as the part of the Traffic Signs Review? It isn't something that we could deal with in the amendment TSRGD.</p> <p>Signs on bollards - advice regarding additional signs is given in Chapter 3. This is likely to be up-dated in respect of self-righting bollards</p>	

1 1	<p>Yes. TSRGD, Direction 9 (4) and 10(8) – suggest amending requirements for terminal signing at locations with a dividing island to nearside and central island only.</p> <p>TSRGD, Direction 9(5)(b) – suggest amending the 100 metre rule to apply to repeater signs in the permitted directions of travel only ie no requirement to the right when entering a dual carriageway or gyratory system.</p> <p>TSRGD, Direction 11(4)(a) – suggest clarification of no repeaters requirement in rural street lit 30mph areas when lamps cannot be seen clearly in daylight ie when attached to telegraph poles.</p> <p>These issues have also been raised by the Hampshire and Isle of Wight Safer Roads Partnership.</p> <p>TSRGD Amendments – new sign to diagram 820A particularly welcome as inappropriate routing of HGVs by Sat Nav is an issue in Hampshire.</p> <p>Requested TSRGD Amendment – request inclusion of a ‘20’ carriageway roundel for use in 20mph speed limits and zones, with and without upright repeater signs. The roundel should be of an appropriate size for a low speed environment and preferably small enough to fit inside the wheel tracks of an average family car to minimise wear and tear.</p>	107	<p>Direction 9 - see my own comment (26). I support both suggestions, especially the change to direction 9(5)(b). I would like to think that we can take on board the change to 9(5)(b). I did suggest this before we went out to consultation. With regard to central refuges, that might have to be an issue for the Traffic Signs Review.</p> <p>Direction 11 - lamps attached to telegraph poles, buildings etc - we can't deal with this in the amendment TSRGD, but is perhaps something that can be looked at in the Traffic Signs Review.</p> <p>Diagram 1065 - this, perhaps, is something to consider in the light of the new guidance from RUS on 20mph zones and 20mph speed limits to be published later this year. The 20mph roundel is already prescribed. We could amend the Directions to allow the 20 roundel to be used without an upright sign. I'm not sure about a reduced size roundel. This should perhaps be trialled first.</p>	
1 1	<p>Yes. Highland Council wish to suggest an additional change to the TSRGD, which will facilitate the implementation of the Disabled Persons Parking Places (Scotland) Act 2009 and will considerably reduce the cost of implementing this Act. The change would be equally beneficial in England.</p> <p>The change would be to make Regulation 29 and Schedule 19 apply to road markings to diagrams 1028.3, 1032 and 1033 with permitted variation “Disabled”. This could create an enforceable waiting restriction at disabled person's parking spaces, except for vehicles displaying a “blue badge” and obviate the need to create numerous traffic regulation orders to give effect to the new Act.</p> <p>In schedule 4 sign diagram 820A, Highland Council would like to suggest that a bus symbol with a red bar should be permitted instead of, or in addition to, the lorry symbol. “Buses” is already a permitted alternative in diagram 820, on which 820A is based. There is as much of a problem in the Highlands with tour bus drivers unfamiliar with the area using unsuitable roads, as there is with goods vehicles.</p>	108	<p>Disabled parking bays - the Scottish issue again.</p>	
1 1	<p>Yes. Part 1, Paragraph 6: Whilst we support the introduction of a sign identifying routes unsuitable for HGVs, we question whether the sign is sufficiently explicit to be effective.</p> <p>Part 1, Paragraph 12: Further promotion of cycling within urban areas is welcomed. We would like to see the introduction of an ‘except for cycles’ plate to be authorised for use in conjunction with a ‘no entry’ sign.</p> <p>Part 2, Paragraph 7 (Amendment of Regulation 19): In general terms, we feel more needs to be done to address the issues around illuminated signs, in the interests of reducing energy costs and the effect on the environment. Advances in retro-reflective materials should lead to lesser reliance on mains powered signs, and it is felt that more power should be given to local authorities to decide on the necessity of illumination at each individual site, following assessment of the factors at that site.</p> <p>Part 2: Paragraph 11 (Amendment of Regulation 27): “It is an offence under Section 25(5) of the Road Traffic Regulation Act 1984 of contravening regulation 18 or 20 of the Zebra, Pelican and Puffin Pedestrian Crossings Regulations and General Directions 1997 9S.I. 1997/2400) (prohibition on stopping vehicle on or near pedestrian crossings”) – What is the definition of near the crossing? – How do we prevent vehicles parking on the footpath behind zig-zags?</p>	109	<p>Diagram 820A (as  - the use of the sign is optional.</p> <p>Diagram 616 (as  - the “Except cycle” plate is under trial. It will be considered as part of the Traffic Signs Review.</p> <p>Vehicle parking on footway behind zig-zags at pedestrian crossings - not one for me to comment on.</p>	

<p>Part 3: Paragraphs 15 and 16 (amendments to Directions 24 and 25): With reference to the omission of markings within a permit parking area tabled in direction 25 (paragraph 2, column 2) and direction 24, paragraph (3), it is felt that clarification of a 'permit parking area' is required (i.e. "as defined by entry signs 663.3" or similar definition). For consistency and to avoid confusion, particularly in terms of enforcement, clarification is required as to whether markings and traffic signs need also to be removed from existing parking areas.</p> <p>Part 5: Schedule 6: We welcome the change in the warning lines schedule such that they do not need to be related to speed limit. (1004, 1004.1, 1005 etc)</p> <p>Regulation 26 (Not covered in consultation document) In respect of Schedule 6, diagram 1013.1, it would be useful if it were prescribed that road studs, when used in pairs, could be fitted just inside the white line markings rather than within the width (Traffic Signs Manual, Chapter 5, Para 5.12). Placing studs within the line leads to much higher maintenance costs (having to remove studs prior to re-lining) and also giving the appearance of a broken line, leading to the Police sometimes being reluctant to enforce the regulation.</p> <p>Schedule 2, Diagram 670 (Not covered in the consultation document): We do not understand the relevance of the reference to Direction 42(7) in this diagram, nor to the reference to Direction 55A, which does not appear to exist.</p> <p>Restricted Zone Signage (Not covered in consultation document): We would welcome simplification on restricted zone signage for town centre and pedestrian areas, whilst still maintaining clarity. Signage must be clear and understandable, but still be able to deal with all the varied restrictions on cycle and vehicular access, waiting restrictions and shared space issues.</p> <p>'Bay hopping' (Not covered in consultation document): We would be interested to know if any work has been or will be carried out into modifications to parking restriction signing within zones to stop motorists moving every time their allocated free parking time expires from one part of a zone to another (or even from one side of a street to the other). This is a particular problem in areas where waiting is limited to 2 hours no return within 2 hours. Although the underlying TROs are written to prevent this happening, any challenge to the enforcement is normally upheld by the parking adjudicators.</p> <p>Technical inaccuracies (Not covered in the consultation document): Increasing numbers of Parking Appeals are succeeding based on technical inaccuracies of the lines and signs for parking restrictions. Whilst an Authority has responsibility for ensuring all lines and signs are correct, there are times when inaccuracies do creep in, or portions of line become worn or damaged. In these cases it is clear overall that a parking restriction is in place, but any small inaccuracy or inconsistency is used to lodge appeals. The Zebra, Pelican and Puffin Pedestrian Crossings Regulations and General Directions 1997 contain a clause stating "<i>Where, as respects a crossing or controlled area, the requirements of this Section of these Regulations as to the placing of traffic signs and road markings to indicate the crossing or controlled area have not been complied with in every respect, the crossing or, as the case may be, the controlled area shall nevertheless be treated as complying with these Regulations if the non-compliance .. is not such as materially to affect the general appearance of the crossing or the controlled area</i>" Can a clause similar to this be incorporated into the TSRGD in relation to parking bays?</p> <p>Disabled Bays (Not covered in the consultation document): It would save Authorities a significant amount of money if we were able to introduce a mandatory disabled bay without the need for an order, in the same way as for a bus stop clearway. As it is, the provision of a mandatory bay is so expensive that their introduction may be resisted on finance grounds rather than traffic management grounds, effectively leading to discrimination.</p> <p>Alternatively, it would be good to be able to provide a non regulatory disabled bay marking for blue badge</p>	<p>Permit parking area (as [REDACTED] - this is defined in direction 3 (may need to be moved to regulation 4). Guidance will be given in an update to Chapter 3.</p> <p>Diagram 1013.1 and road studs - this requires an amendment to regulation 31 and should be considered as part of the Traffic Signs Review.</p> <p>Diagram 670 - another local authority not familiar with previous amendment TSRGD.</p> <p>Restricted parking zones (as [REDACTED] - the current guidance in Chapter 3 will be updated now that the signs are to be prescribed.</p> <p>Various parking issues (as [REDACTED] - a matter for the Traffic Signs Review.</p>	
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	<p>holders in residential areas. This would be welcomed by many disabled people as it provides them with a chance of parking near their homes. Generally a blue badge holder will apply to the local HA for the marking, and subject to meeting certain conditions the marking is placed on the highway outside their home. This provides authorities with a good value solution and defends the argument in relation to the provision of costly formal disabled bays backed by a traffic regulation order. The markings would not be appropriate where any other restrictions were present. Suggest using similar to diag 1028.3 without the associated signing, regulations and directions.</p> <p>Diag 2709, 2710 Emergency Route signing (Not covered in the consultation) There is a need to include the desired destination of the emergency vehicles on these signs. This situation arises where there is more than one destination requiring emergency services routes in the area – i.e. Donington Park race track and East Midlands Airport – both on A453 within 1-2 mile of each other and both requiring emergency vehicle route signing</p> <p>Double yellow lines – diag 1018.1 Many requests are received for ‘junction protection’ and this Authority spends a considerable amount on the provision of double yellow lines to stop drivers obstructing junctions on main and local distributors. It would be far more efficient if local HAs could provide double yellow lines at junctions to support the requirement of the highway code that drivers do not park within 10 metres of a junction, without the need to create a traffic regulation order. This could be achieved by using similar to diag 1018.1 with a regulation and associated schedule making it an offence to park on these waiting restrictions as if there were a traffic regulation order – similar to bus stop markings.</p>		<p>Diagram 2709 and 2710 - something for the Traffic Signs Review?</p> <p>Diagram 1018.1 - this is for the Traffic Signs Review.</p>	
1 1	<p>Yes. Comments on Part 1</p> <p>Para. 12: Provision of a direction sign to direct motorists to the access points for recognised cycle routes so that they may park, where parking is provided and use their bicycle for the remainder of the journey</p> <p>Comments on Part 5</p> <p>2509.1 There does not seem to be provision for matrix type signs</p> <p>2511.1 What are the origins of the Park Mark Scheme, how is it funded, how long will it be in operation for and who is responsible for funding the replacement signs.</p> <p>Comments on Annex A</p> <p>2711.1 Metric units should be included on this sign.</p> <p>2919.2 A three-digit fuel price indicator should be prescribed. Is there the opportunity to vary the Petrol legend to Diesel? In addition, clarification would be useful on the maximum number of service provider logos that can be displayed on the header board. MSA operators are becoming increasingly creative with company names in order to maximise the advertising potential of this medium.</p> <p>Should allowed variant “MUST USE SOS PHONE” not also apply to 783</p> <p>878 Is there an opportunity to prescribe the variant “VARIABLE SPEED LIMIT” as per HA drawing MCX0732</p> <p>Additional comments</p> <p>Symbols for use on Tourism signs:</p> <p>T401 – Tourist attraction recognised by Wales Tourist Board. The Wales Tourist Board is now known as Visit Wales and the dragon symbol has changed. It is requested that the revised symbol and new organisation name is included in the amended regulations.</p> <p>T403 – Property in the care of CADW has been updated and is used with authorisation in Wales. It is</p>	111	<p>Park and cycle - it is not clear whether these are ordinary car parks or those reserved for cyclists. It might be possible to use existing signs to diagram 2505 etc. However, the comment implies that the cycling element of the journey is pre-planned, in which case either the car park is known to the driver or there is appropriate publicity given.</p> <p>Diagram 2509.1 - I presume [REDACTED] is referring to a complete VMS. Diagram 2509.1 is a sign that incorporates VMS. The colours (as described for diagram 2505) include black background, which suggest a possible matrix element.</p> <p>Diagram 2511.1 - Park Mark isn't that new. It is an ACPO/BPA scheme. There are several Park Mark accredited car parks in Cardiff:</p> <p>http://www.parkmark.co.uk/results/index.php?cpsearch=Cardiff&x=52&y=19</p> <p>2711.1 - we haven't gone metric in distance yet. Is there a European requirement that this sign should use metres and not yards?</p> <p>2919.2 - with regard to petrol price I don't think we need a permitted variant to allow three characters. The price is what it is and regulation 13 (7) allows any style of character In any case, prices are usually quoted to a tenth of a penny and there were three numerals before the price exceeded £1. I don't think we should complicate the issue with “diesel” (even though I drive a diesel car). [REDACTED] should comment on the header board.</p> <p>Diagram 784.1 - [REDACTED] should know if SOS also applies to</p>	

	<p>requested that the revised symbol is included in the amended regulations.</p> <p>Sports Centre – It is requested that a sports centre symbol specific to Wales may be added to the amended regulations.</p> <p>All the above symbols are available from mcbride@wales.gsi.gov.uk</p>		<p>diagram 783. Diagram 878 - we have had a request for “Variable speed limit ends” from (HA), perhaps we also need to prescribe “Variable speed limit”.</p> <p>Tourist symbol T401 - the new design should become AT401.1 and put on the DfT website. It won’t require authorisation and will be included in the next consolidated TSRGD.</p> <p>Tourist symbol T403 - there is already a revised symbol AT403.1 on our website. If this is the same symbol as that referred to by then it does not require authorisation. Tourist symbol “sports centre in Wales” - I think this is the outline discus thrower which we didn’t like as a symbol, but if WAG want to continue to use it then it should become an approved symbol, i.e. given an AT drawing number and put on the DfT website.</p>	
1 1	<p>Paras 2,3 and 4</p> <p>Metric signs are of benefit to foreign commercial drivers and this, together with better advance signing, may assist in reducing bridge strike or on inappropriate routes.</p> <p>Para 9</p> <p>High level repeater signs on puffin crossings are welcome as pedestrians like assurance. Whilst the question of repeaters on the far side of the road is still controversial amongst some road safety practitioners, the repeaters on the near side will be welcomed by many.</p> <p>Para 12</p> <p>The ‘gate’ leading to advance cycle stop lines is a useful addition. This recognises that roads authorities often have the problem of trying to encourage cycling although the available road space is extremely limited.</p> <p>Para 13</p> <p>The designated lanes allow some flexibility in encouraging sustainable transport, which is useful</p> <p>Para 14</p> <p>Yellow box markings are frequently abused and probably misunderstood by many road users. Clarification is therefore useful.</p> <p>Para 15</p> <p>The growth of average speed cameras and their general acceptance by the public mean that the proposed simplification is beneficial.</p> <p>Para 16</p> <p>Simplification of procedures in terms of parking signing is welcomed. The harmonisation of signing nationwide is very important and changes that reduce authorisation requests should benefit all.</p> <p>Para 25</p> <p>The use of self-righting bollards has, indeed, become commonplace and needs to be addressed. The maintenance of bollards, in particular the electrical illuminating facility, has long been an issue with roads authorities and so regularisation of the use of self-righting bollards is welcomed.</p> <p>Disabled parking</p> <p>There has been a Private Members’ Bill enacted by the Scottish Parliament that has major implications for Scottish Roads authorities. To assist in implementation and operating of this Act, we would like to see the following issues considered as amendments to the TSRGD:</p> <p>1. Provision of a mandatory Blue Badge Scheme without the need for a Traffic Order</p>	112	<p>All other comments from are supportive of the proposed amendment TSRGD.</p> <p>Disabled parking bays - the Scottish issue again.</p>	

	<p>2. Withdrawal of the requirement for bays to be marked with a sign</p> <p>3. Alterations to the minimum dimensions of parking bays for disabled badge holders</p> <p>4. Use of yellow road markings for parking bays for disabled drivers</p> <p>I understand that a comprehensive representation has been made from the Society of Chief Officers of Transportation (SCOTS) on this matter and would commend it to your consideration.</p>			
1 1	<p><u>Width and Height Restrictions</u></p> <p>The requirement to display both metric and imperial warning signs will impose a significant additional cost to local authorities (contrary to the ethos of providing savings to signing provision); the requirement for new advance will increase sign clutter, will potentially result in incidences where there is difficulty in establishing sufficient space to mount the additional signs, will result in an increased size of pole or an increased number of poles.</p> <p>The requirement to complete the upgrade within 4 years is very onerous.</p> <p>On a positive note, it will help to remove any dubiety for drivers.</p> <p><u>Pedestrian, cycle and equestrian crossings</u></p> <p>We agree with both the high-level repeater signals as well as the use of the Toucan push-button with the pedal cycle-only traffic signals.</p> <p><u>Cycling Issues</u></p> <p>We agree with the variant of the cycle advanced stop line.</p> <p>The proposal to allow journey times to be shown on cycle-route signs would probably only be suitable for leisure routes, though the signs should ideally show both the time and the distance. However, the requirement to also show pedestrian journey times when the pedestrian symbol will result in very large signs, with potentially increase pole heights/ thickness, therefore it would not be a preferred option in most cases.</p> <p><u>Designated Lanes</u></p> <p>We are in agreement with these proposals.</p> <p><u>Yellow Box Markings</u></p> <p>We agree with the proposal to permit their use at sites such as fire stations.</p> <p><u>Enforcement Cameras</u></p> <p>We agree with the concept, however, we believe the wording is incorrect. The use of ‘average speed check’ suggests that speeds are just being monitored; the sign should replicate Diagram 878 and state ‘Average speed camera’ underneath the camera symbol.</p> <p><u>Parking Signs</u></p> <p>We agree with these proposals.</p> <p><u>Road Markings</u></p> <p>We agree with clarifying the use of the carriageway edge marking as not being a substitute for give way lines at a priority junction.</p> <p><u>Road Works Signs</u></p> <p>Para 22 (d) – It is not obvious what the intended changes are – this item requires clarification.</p> <p>Para 23 – If the two signs are to be used together, why not combine as one sign. However, erecting any sign indicating a maximum speed, particularly when there is no variant, puts too much liability on to local authorities. It would be better to have no ‘maximum speed limit’ and just have a sign warning drivers to drive at a speed suitable for the conditions.</p> <p><u>Variable Message Signs</u></p> <p>Para 24 - There are pros and cons to this argument, the need to get over a certain amount of useful information</p>	113	<p>Height and width signs - too many local authorities seem to be putting perceived “sign clutter” before road safety. Chapter 3 already recommends dual signing. We should, however look at a dual triangular height restriction sign. This will be particularly helpful on directional signs that include warning triangles.</p> <p>Journey times on cycle signs -showing times for cyclist only on a sign that includes the walking figure will confuse pedestrians. I agree that the signs are very large and that is one reason why I am against this proposal.</p> <p>Enforcement cameras - average speed check was agreed in 2005 by ourselves, RUS and the HA (initially for motorway road works). I seem to recall that we looked at various options. This sign is now in general use having been authorised.</p> <p>Diagram, 1010 - here’s one Scottish local authority that agrees that this marking should not be used as a substitute for give way lines (now where in Scotland was that problem junction that started all this?).</p> <p>Consultation document para 22(d) - what happened to paras 22(a), 22(b) and 22(c)? I presume that 22(d) is referring to diagram 7005 where there is more flexibility in the way that the date may be shown,</p> <p>Diagram 7009.1 - as far as I know, the design using two signs (generally mounted on a grey backing board) had been previously agreed. It is shown in the RSDA/CCS Code of Practice for Signing at Surface Dressing Sites.</p> <p>VMS - not for me to comment.</p>	

	<p>set against the need to minimise the time that drivers' attention is distracted from the road. Overall, we feel it is better to let local authorities to have flexibility to decide of which is appropriate for individual locations, as it will be dependent upon the type of sign as well as the form of message to be displayed.</p> <p><u>Miscellaneous Issues</u></p> <p>Para 25 – We agree with this. However, because microprismatic and similar retroreflective materials are now so much better, it would be preferable to permit wider use of retroreflective bollards on splitter islands, and the like (require an amendment to Direction 41 (3)(b)).</p> <p>It should also be clarified whether or not post-mounted lit Dia. 610 signs are required in instances where retroreflective self-righting bollards are used on splitter islands</p> <p>In addition, the option to use retro reflective signing materials, of a specified grade, instead of the requirement to have external illumination should also be extended to include various signs, including some directional signs. This would reduce power supply costs as well as negate the time often taken to obtain a supply, would reduce annual energy revenue costs (particularly significant in view of recent reductions in local authority budgets), and reduce greenhouse gas emissions (which could contribute to local authority Carbon Reduction Commitment (CRC) requirements).</p> <p>Para 30 – Same comments as per Para 25 comments above.</p> <p>Para 32 – We agree with the extended usage of yellow box junctions outside fire stations, and the like, but do not agree with their usage at a road narrowing or width restriction, as it will doubtless lead to a proliferation of requests for their installation at many unsuitable locations.</p> <p><u>Schedule 6: Road Markings</u></p> <p>The removal of the direct linkage between road marking type and actual conditions potentially may lead to some confusion. Although the TSRGD determines what signs and marking may be used, the Traffic Signs Manual directs how they should be used. Regardless, some clarification is required within the TSRGD as to when and where individual markings should be used. This applies to Diagram Nos 1004, 1004.1, 1005, 1005.1, 1008, and 1008.1.</p> <p><u>Schedule 7: Directional Signs</u></p> <p>Diagram 2602.1 – The permitted variants shown in item 4 should be amended to include the option to substitute 'distance' instead of 'journey times'. This should be at the local authority's discretion, as it is not always suitable to indicate only 'journey time' as that may not always be a constant factor in some instances.</p> <p><u>Disabled Person Parking Places (Scotland) Act 2009</u></p> <p>In terms of the requirements of the above Act, all existing on-street parking places need to be marked in accordance with the TSRGD Diag.1028.3 and signed to Diag. 661.A and covered by a TRO. NLC would seek that disabled parking bays are identified by lining only without the need for a TRO, similar to the requirement for a Bus Stop Clearway, and also seek removal of the requirement for an individual sign at each bay. In this regard and in an effort to try and alleviate high initial costs a special blanket interim authorisation will be sought from the Scottish Government to allow the continued use on non-standard existing disabled bay markings until such time as they are required to be replaced through wear or as a result of changed circumstances.</p>		<p>Self-righting bollards - not sure what is being suggested here in respect of wider use. Is [REDACTED] talking about different signs on a self-righting bollard or the use of a reflective-only non-self-righting bollard? Use of additional signs (supplementing bollards) is for guidance in Chapter 3.</p> <p>Illumination (general) - the amendment TSRGD are not intended to introduce a relaxation of the current illumination requirements.</p> <p>Yellow box junctions - the consultation document is misleading (para 32 in Part 2). The current TSRGD allows box markings to be used at road narrowings (in conjunction with diagram 615 etc), We are not changing this.</p>	
1 1	<p>1. The main aspect of the TSRGD 2010 that affects permanent signals is the inclusion of direct approval for high level repeater signals for puffin, toucan and equestrian crossings (Regulations 47, 49 and 48 respectively). The purpose is to aid visibility of the indicators at busy crossings where a normally located indicator may be obscured by waiting pedestrians/cyclists. These units are indicators only and do not contain a push button unit.</p> <p>2. The diagram referred to in the draft statutory instrument (diag 4003.1A) allows the minimum size of the red/green man to be smaller than the normally located indicator (70 mm min rather than 100mm min). A standardised view on the size of the indicators would be welcomed. Where smaller variants have been assessed by client officers previously they were rejected in favour of indicators of the same dimensions as the normal indicator/push button unit.</p> <p>3. The local highway authorities/GMADE will need to come to a view about whether such high level repeaters are to be installed as standard or, as I would recommend, evaluated on a site by site basis. In the</p>	114	<p>Pedestrian crossing repeater signals - for [REDACTED] to comment on.</p>	

	<p>case of junctions not all crossing points are equally busy and may not warrant the use of repeaters on all crossings. The installation of repeaters does of course have a cost implication, in the order of something like an additional £1500 per individual crossing. At complex junctions this could mean an increase in costs of well over £10,000 in addition to the ongoing maintenance/asset management implications.</p> <p>4. A new direction, 44A, is welcomed as it clarifies that only a very small number of closely regulated signs may be attached to a signal pole.</p> <p>GM Traffic Manager Comments</p> <ul style="list-style-type: none"> education in the illumination requirements offset against high quality reflective sign material. Tolerance on makings in terms of enforcement opportunities. i.e. spread of materials, condition etc. DfT should consider relaxing the need to illuminate all signs (Regulatory, Warning and Informatory) signs within street lit areas (maybe 30mph and less) provided diamond grade signs are used. The cost of installation and maintenance of illuminated signs can no longer justified when compared with the superior quality obtained from modern reflective materials. Relaxation of the tight spec for the marking out of controlled parking bays ie double end bars. This leads to prosecution problems. Relaxation for the requirement that all bus stop clearways should have to have the sign diagram number 974. When the clearway is 24 hours then there should be no need to add a sign. Currently we are experiencing thief of signs thus rendering the clearway unenforceable. <p>Stockport's Response</p> <ul style="list-style-type: none"> We should certainly support the need to relax the requirement to illuminate signs down to signs may be lit. This allows us to assess the surrounding light levels and to provide illumination only if needed. No strong views on the tolerances, but anything that removes doubt over a prosecution must help. Would support this (Bus Stop Clearways) – Double Yellow Lines mean No Waiting At Any Time and no plates are required so why not the same for Bus Stop Clearway Orders that operate At Any Time? Theft of plates is also an issue to bear in mind, although I have no details for SMBC. Site Authorisations, rather single site authorisation way not give more Authority wide authorisations? i.e. "Permit holders parking only past this point" <p>DfT to be more responsive to requests for previously authorised signs – see previous example – days rather than months as it is all done electronic now!</p>		<p>Illumination requirements - for Traffic Signs Review.</p> <p>Parking bays - for Traffic Signs Review.</p> <p>Bus stop clearways - a sign is needed to differentiate between "except buses" and "except local buses", unless the former is the default and a sign is required only for the latter. However, the no stopping message would be lost and there might be enforcement problems, particularly if advisory bus stops are introduced (see my comments on the response from [REDACTED] above). This is a matter for the Traffic Signs Review.</p>	
1 1	<p>No. Transport Scotland is responsible for the Motorway and Trunk Road Network in Scotland. It is the long standing and established practice in Scotland to sign the start of motorway speed limits with Diag 670 Maximum Speed Limit signs using a 70mph roundel. Transport Scotland requires this practice to be accommodated within the proposed amendment regulations.</p>	115	<p>National speed limit signs on motorways in Scotland - this is tricky. Using diagram 670 showing 70 is not what we want and have never liked its use in Scotland. National speed limits should not be shown on diagram 670. The sign to diagram 2901 means that the national speed limit applies. The amended caption to diagram 670 specifies that the sign must not be used for national speed limits. It is questionable whether the existing signs in Scotland are lawful, but assuming that they are, only existing signs will be "saved". It will not be possible to replace them when they become life expired or to use them at new sites. I don't know how Scotland will respond to this. One possibility is to take up the suggestion made by [REDACTED] that we prescribe only the numerals that we want to use (i.e. 20, 30, 40. 50 and on dual carriageways and motorways 60). This should then make it possible for Scotland to authorise a 70</p>	

			roundel, and hopefully this wouldn't have any effect on the legality of the speed limit. However, the purpose of the TSRGD is to provide consistent signing throughout England, Wales and Scotland. We need to think carefully about this and try not to upset Scotland too much	
1 1	<p>Yes. Para 9 – Masking of the push buttons at pedestrian crossings by people waiting to cross is potentially an issue. SCOTS suggest this revision of the TSRGD is an opportunity to introduce far side pedestrian aspects on Puffin Crossings. This would remove the need for repeater signals as suggested.</p> <p>Para 25 – Clarification is required as to whether the use of retro-reflective self righting bollards also require post mounted lit signs to Diag 610.</p> <p>Additional comments, suggestions and other items requiring clarification are noted separately at the end of this document</p>	116	<p>Pedestrian repeater signals - is it feasible or desirable to introduce far side signals. As a pedestrian, I personally prefer far side signals. However, this is more of a matter for the Traffic Signs Review. How would it affect the ZPPPCRGD?</p> <p>Self-righting bollards - advice regarding additional signs is given in Chapter 3. This is likely to be up-dated in respect of self-righting bollards.</p>	
1 1	<p>Additional Comments</p> <p>1) Disabled Person's Parking Places (Scotland) Act 2009.</p> <p>Background</p> <p>A Private Member's Bill to make all on and off street disabled parking spaces enforceable was introduced by Jackie Baillie MSP to the Scottish Parliament. It required local authorities, amongst other things, to promote Traffic Regulation Orders for all disabled bays which were not legally enforceable. The Bill obtained Royal Assent on the 1st April 2009.</p> <p>The Society of Chief Officers of Transportation in Scotland (SCOTS) was heavily involved in discussion between Ms. Baillie, the Minister for Transport, Infrastructure and Climate Change, Scottish Government Officials and COSLA, prior to the Stage 3 debate in Parliament on the 26th February 2009, principally around the issue of costs arising to Local Authorities from the proposals contained in the Bill.</p> <p>The Minister, during the Stage 3 debate, stated that his officials "will ask the Society of Chief Officers of Transportation in Scotland to address the issue of how to take account of economies of scale and best value as the implementation programme is progressed". In response to a letter from the SCOTS Chair, Ian Bruce dated 28th August 2009 the Minister replied on 17th September 2009 confirming his support to change the legislation to ease the burden on Local Authorities and simplify the process for future requests (See attached)</p> <p>Following Royal Assent a Working Group was set up, chaired by Bill Brash from the Scottish Transport Directorate, who invited SCOTS and COSLA to provide representatives onto the group. A number of other organisations including Edinburgh City Council, South Lanarkshire Council, STUC, VOSA and ACPOS are also represented.</p> <p>The Disabled Persons' Parking Places (Scotland) Act 2009 has introduced a right for qualifying disabled badge holders to request a local authority to make a disabled street parking order in respect of a street parking place convenient to their home. Under current legislation the local authority must decide whether it is possible to identify a suitable parking place and if so, start the procedure to make an order on each and every occasion that a request is made. For all non-statutory bays the local authority must convert these to enforceable bays i.e. marked and signed in accordance with TSRGD. A quick survey carried out by SCOTS members revealed that there are almost 13,000 on-street spaces which need to be re-marked and provided with a sign and TRO in order to comply, with over 7,000 additional spaces which are correctly marked but have no sign or TRO. The cost and timescales for achieving the requirements of the Act in the current economic climate without any changes to the legislation is proving extremely difficult for local authorities.</p> <p>Points for Consideration</p> <p>SCOTS would like to see the following issues considered as amendments to the TSRGD:</p> <ol style="list-style-type: none"> 1. Provision of a mandatory Blue Badge Scheme without the need for a Traffic Order 2. Withdrawal of the requirement for bays to be marked with a sign 3. Alterations to the minimum dimensions of parking bays for disabled badge holders 4. Use of yellow road markings for parking bays for disabled drivers 	116	<p>Disabled parking bays etc - this is the Scottish issue and can't really be dealt with under the amendment TSRGD. The design and size of bays is a matter for the Traffic Signs Review. The reduction in the length of a disabled parking bay would be appropriate only where the bay is also designated for use by a specific permit holder. Bays available to any disabled badge holder need to accommodate vehicles of all sizes.</p>	

<p>Dealing with each point in turn</p> <p>Provision of a mandatory Blue Badge Scheme without a Traffic Order Implementing the requirements of section 5 of the Disabled Persons’ Parking Places (Scotland) Act 2009 will involve local authorities in promoting traffic orders to cover large numbers of isolated blue badge spaces at locations which are convenient to the addresses of qualifying persons. There will be significant costs involved in the promotion of these orders and in the conversion to the markings etc to ensure compliance with the current legislation. If disabled spaces were treated in a similar way to bus stop clearways which, under Schedule 19 / Regulation 29 do not require an order, then costs could be significantly reduced. The need for local consultation is recognised and Councils could undertake this at a local level as they currently do for many other functions. Eliminating the need for an order would streamline the consultation and objection procedures and allow the bay to be made available for the disabled badge holder immediately. It also removes the need to promote a revocation order when a mandatory bay is no longer required. Although the Disabled Persons’ Parking Places (Scotland) Act 2009 does not apply south of the border it this suggested amendment would also benefit English Authorities</p> <p>It is recommended that the regulations be changed to allow the introduction of disabled parking bays without the need for a Traffic Regulation Order</p> <p>Requirement for bays to be marked with a sign To comply with the TSRGD the requirement to erect signs for all non-statutory bays is resulting in substantial additional costs and can cause delays in implementing the bays. The provision of disabled parking spaces can sometimes be for relatively short periods where the person moves or no longer qualifies. Removal of the signs adds further costs to that of burning off the redundant markings.</p> <p>As a bay marked in accordance with diagram 1028.3 etc already has the word “DISABLED” to convey the prohibition is there a need to also provide a sign?</p> <p>The “Manual for Streets” and the Scottish equivalent “Designing Streets” both encourage roads authorities to address street clutter by removing as many signs as possible. Eliminating the requirement for a sign to 661A would help address the policy direction in these documents.</p> <p>It is recommended that the regulations be changed to allow the introduction of disabled parking bays without the need for a separate sign</p> <p>Alterations to the minimum dimensions of parking bays for disabled badge holders Many residential roads are tight for space and it is sometimes possible to identify a space but not one large enough to meet the current prescribed minimum dimensions. Hence a number of non statutory bays have been installed over the years. Regulations already permit a kerbside space of normal width to be provided by using diagram 1032 rather than diagram 1028.3. However, note 4 in diagram 1032 still indicates that the minimum length of a parking space reserved for disabled badge holders shall be 6.6 metres. In many cases a shorter space would be perfectly adequate and it would frustrate the intention of the Act if a disabled resident had to be denied a space as a result of the prescribed minimum length. Likewise, it may not be possible to identify an echelon bay of exactly the 3.6 metres width currently prescribed in diagram 1033. It is, therefore suggested that although 3.6 metres should still be recommended, a range between 2.4 metres and 3.6 metres should be permitted in appropriate circumstances.</p> <p>It is recommended that the fifth sentence of note 4 on diagram 1032 should be amended from “The minimum length of a parking space reserved for disabled badge holders shall be 6600 millimetres” to “The normal minimum length of a parking space reserved for disabled badge holders shall be 6600 millimetres but this may be reduced to a length not less than 4500 millimetres in a case where the space available is insufficient for a larger bay.” It is also recommended that the width dimension for a “DISABLED” echelon bay in diagram 1033 should be amended from “3600” to “3600 recommended 2400 min”.</p> <p>Use of yellow road markings for parking bays for disabled drivers The current regulations specify the use of white lines to mark out the boundary of an on street parking bay for</p>			
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<p>disabled badge holders, either to diagram 1028.3, diagram 1032 or diagram 1033. However, yellow lines are commonly used for off street parking bays for disabled badge holders, particularly in shopping centres and are widely recognised by the public as delineating a bay not available for general use. The provisions of the Vienna Convention on Road Signs and Signals would allow each contracting country to choose between yellow, white or blue for this purpose, so a change to yellow would be consistent with our international obligations. The current Regulations prescribe yellow markings to diagram 1028.2 for spaces restricted to taxis, ambulances and police. It is suggested that spaces restricted to disabled badge holders have more in common with these restricted categories of use than with the categories of use for which white markings are prescribed. It is believed that the use of yellow markings could reduce the misuse of blue badge spaces by able-bodied drivers.</p> <p>It is recommended that item 4 in Diagram 1028.2 should be amended to include the word “DISABLED” as a permitted variant. A note should be added giving the recommended dimensions for a bay reserved for disabled badge holders. The Word “DISABLED” should be removed as a permitted variant for diagrams 1028.3, 1032 and 1033. A new diagram 1033.1 should be introduced showing an echelon bay in yellow with permitted variants of “DISABLED”, “AMBULANCES” and “POLICE”. As is normal when the regulations are changed, there should be a transitional provision in regulation 3 allowing markings complying with the previous edition of the regulations to continue for a specified period. We would recommend ten years as an appropriate timescale.</p> <p><u>2) Keep Clear markings to Diagram 1027.1</u> Currently this marking requires a Traffic Regulation Order (TRO). Can consideration be given to allowing this marking to be used in a similar manner to Diagram 1025.1, 3 & 4 wherein the marking is immediately enforceable without a TRO providing it is used in conjunction with the appropriate sign plate?</p> <p><u>3) Illumination requirements (General)</u> Given the advances in reflective sign material - particularly prismatic material - technology, can consideration be given to further relaxations in the types of sign plates which no longer need to be illuminated by means of internal or external light units (Schedule 17.1)?</p> <p>No doubt an overall simplification of illumination requirements will be considered as part of the overall Traffic Signs Policy Review, however further interim relaxations would provide substantial savings to local authorities in terms of both energy use and installation costs. These further relaxations could be tied to the use of an appropriate grade of retro-reflective material.</p> <p><u>4) Illumination requirements (Bollards)</u> Can consideration be given to allowing the use of retro-reflective bollards in place of internally illuminated items for the same reasons noted in Item 3 above, without the need for site specific authorisation?</p> <p><u>5) Additional Variant of Diagram 563</u> Many authorities are using a variation on the supplementary plate to Diagram 563 which reads “Red squirrels”. Can consideration be given to making this a variant of Diagram 563 and allowing this plate to be used without site specific authorisation?</p> <p><u>6) Simplification of the Patch/Panel colouring system used on Directional and Informatory signs</u> Local experience has shown the members of the public neither understand nor are interested in the current system of destination and route patches and panels currently employed in the design on the above signs and their meaning. It would appear that the motorist simply wishes to know where they are going and on what road.</p> <p>To this end, can consideration be given to simplifying the system currently used to allow the use of simple route patches only as appropriate? We understand that this is more a Traffic Signs Manual (TSM) issue, rather than TSR&GD issue, however we would ask for your comment on this meantime.</p> <p><u>7) Use of Diagram 610 (Arrow) on the Rear of Service Vehicles</u> Currently this is limited to roads with 30mph limit or less. To overcome this TSR&GD constraint, the authors of Chapter 8 (TRL) set out options for mobile works which include a light arrow. If the TSR&GD could be changed to allow Diagram 610 to be used on higher speed roads, this would allow Chapter 8 to have a more pragmatic solution of using Diagram 610 for mobile works such as grass cutting on minor routes. Such an approach would</p>	<p>Diagram 1027.1 - I support this suggestion, but I think we would have to consult on this, so it will have to be a matter for the Traffic Signs Review.</p> <p>Illumination requirements (general) - not appropriate for amendment TSRGD, except for my suggestion regarding terminal signs to diagrams 955, 956 and 957.</p> <p>Illumination requirements (bollards) - not sure whether this is about self-righting bollards or the use of a reflective-only non-self-righting bollards? Not really for me to comment.</p> <p>Diagram 563 - this is a policy decision and probably not appropriate for the amendment TSRGD. The use of this sign is primarily for the protection of red squirrels and not for road safety. We have argued in the past that the toad sign is a road safety sign because of the risk of skidding.</p> <p>Colour coding on directional signs - this is a matter for the Traffic Signs Review.</p> <p>Diagram 610 on rear of vehicles - not for me to comment</p> <p>Diagram 7009.1 - guidance will need to be given on sign sizes. The larger sizes are for signs placed in advance of the treated road where traffic might be travelling at say 60mph. the signs cannot be split as suggested.</p>	
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<p>require a site risk assessment as per Chapter 8. Current use of the 610 arrow on roads over 30mph is common place and is the practical approach to mobile works.</p> <p>8) <u>Additional Signs at Surface Dressing Works</u> Chapter 8 of the TSM refers to the Road Surface Dressing Association/ County Surveyor Society (RSDA/CSS) document “Code of Practice for Traffic Safety and Control of Surface Dressing Operations” for the signing of surface dressing works, however the signing proposed by in this document is not in accordance with TSR&GD. We note that there is a proposed amendment to Direction 21 of the TSR&GD which we trust will clarify this anomoloy.</p> <p>In addition to this, when implementing the proposals from the RSDA/CSS document there are some issues in regard to the use of two plates/X-Heights with should be clarified at the same time. We assume that for a 600mm high warning sign to Diagram 7009, the appropriate X-Heights would be 50mm/200mm on the supplementary plates to Diagram 7009.1? Presumably these X-Heights will increase by the steps noted with the overall size of the warning sign? The issue with this pattern is that it will present problems with accomodating the signs on rural road verges due to their overall size.</p> <p>Can consideration be given to allowing the smaller sizes of supplementary plates to be used with larger triangles? Can more flexibility be allowed in using smaller X-Heights for the supplementary plates or can the signs be split up into two separate assemblies (I.e. warning sign first, followed by a separate sign board carrying the supplementary plates)?</p> <p>9) <u>Time to adapt Diagram 818.5</u> SCOTS agree with the comments in relation to Diag 818.5, to allow additional information in the form of metric measurement for bridge signing, however, in the current financial climate a maximum of 4 years till the old signs are withdrawn is insufficient time and SCOTS would prefer to see a 10 year implementation period.</p> <p>10) <u>Schedule 6 road markings</u> How will diagram 1004, 1004.1, 1005, 1005.1, 1008 & 1008.1 use be determined if the speed limit is not used. There is no indication how 6m and 9m modules will be determined - will there be another new Chapter 5?</p> <p>11) <u>Cycle Signing</u> An advisory contraflow cycle lane (where a one way order is present, but it does not relate to cyclists) requires a sign similar to Diag 960.1, but with a dashed line between the flows rather than a solid one (like the dashed line in Diag 868 or similar in Schedule 4).</p> <p>12) <u>Schedule 4 Miscellaneous informatory signs</u> Sign diagram 820A. Suggest that a bus symbol with a red bar be permitted instead of, or in addition to, the lorry symbol. “Buses” is already a permitted alternative in diagram 820, on which 820A is based. A number of largely rural areas experience difficulties with coaches during the summer, whose drivers are often unfamiliar with area and often use unsuitable roads. This revision would assist.</p> <p>13) <u>Use of paths by equestrians</u> A recent change in legislation within Scotland has meant open access to multi-user paths for walkers, cyclists and equestrians. At present however, only signs 956/957 are available for use and these do not depict equestrian use which can lead to disputes arising on whether or not equestrians can use the path. Is there any intention of changing these signs to include use of the paths by equestrians?</p> <p>14) <u>Safety Cameras</u> Change references to “Speed cameras” e.g. diagram 880 to “Safety Cameras”.</p>	<p>Diagram 818.5 - this comment seems to be about the time period required to change diagram 530 (imperial-only) to metric/imperial signing, but it does raise the issue that diagram 818.5 might not suitable for bridges that show imperial-only heights. However, new directional signs incorporating diagram 530 will have to show metric heights even if the bridge has not been re-signed, so using 818.5 prior to adding metric signs to the actual bridge may not be a problem. I presume that signs to diagram 818.3 and 818.4, and directional signs incorporating imperial-only height and width signs are saved without time limit.</p> <p>Diagram 1004 etc - yes there will be a new Chapter 5, but the existing Chapter 5 states when to use which module in accordance with the speed limit without saying it is a mandatory requirement of the TSRGD, i.e. longitudinal lines are treated like any other road marking where the size depends on the speed limit but is not a mandatory requirement (e.g. arrow length, diagram 1040.2 etc).</p> <p>Cycle signing - this comment seems to be suggesting that if an advisory contra-flow cycle lane has a boundary line to diagram 1004 (rather than no line at all) then a variation of diagram 960.2 showing a broken line should be used rather than diagram 960.2. This idea has crossed my mind before, but the problem is (a) an authorised version of 960.2 has been in use for sometime, and (b), the contra-flow facility might be a mixture of diagram 1004 and no line. We would have to consult on any new sign.</p> <p>Diagram 820A - adding the bus symbol with a red bar is a logical extension of this sign. It is something I have previously thought about myself. It would be similar to diagram 832.7 where both or either of the two symbols are permitted. Eventually we could restrict existing diagram 820 to those vehicles that do not have a symbol that could be shown on diagram 820A. I have actually been on a tour bus (many, many years ago before sat nav) that got stuck in a narrow lane near Leek in Staffordshire. Do we want to include the bus symbol now, even if we haven’t had a request for authorisation? It is possible that by prescribing diagram 820A it draws attention to the use of symbols on “unsuitable for” signs and requests for bus symbols etc might start coming in. I don’t think we would need to consult on this change because we would be using a currently prescribed symbol (except that the bus is white and</p>	
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			<p>not black).</p> <p>Multi-user paths - this has to be a matter for the Traffic Signs Review.</p> <p>Safety cameras - a change to from “speed cameras” to “safety cameras” is a matter for RUS, but as I recall, we don’t refer to them as such</p>	
1 1	<p>Cycling issues</p> <p>12. – Permitted variant of 1001.2A should allow use of the gate in other lanes. As it stands, it encourages cyclists to ride up the inside of left turning lorries, one of the most dangerous things a cyclist can do. Or the law should be changed to allow cyclists to cross the first stopline where there’s an ASL. Then they could choose the most appropriate place to cross themselves and we wouldn’t need gates, which in practice are ignored anyway.</p> <p>Diagram 1057 (cycle symbol) should be able to be used without a sign to reduce clutter.</p> <p>Red arrows should be permitted for traffic signals, as is the norm in almost every other country in the world.</p> <p>An offside bus lane sign should be in the TSRGD</p> <p>Inset parking bays by zig zags should be allowed</p>	118	<p>Diagram 1001.2A - I agree with these comments. When I previously suggested that the cycle entry could be applied to all lanes, I was told that it was appropriate for the left hand lane only. This is probably a matter for the Traffic Signs Review and we could consider other variations for site specific authorisation. However, I am not sure whether we could authorise a layout where there is no cycle entry (i.e. permitting cyclists to cross the first stop line) because the meaning of the stop line would change. I have seen this arrangement, but I doubt that we authorised it.</p> <p>Diagram 1057 - we do consider that it is lawful to use more road marking repeater than the upright sign. We could amend direction 11 and/or direction 18 to clarify this. For any cycle facility (other than an ASL) there must be at least one upright sign in accordance with direction 18. We shouldn’t change this, but could issue a special direction for a site specific case.</p> <p>Red arrows on traffic signals - not for me to comment.</p> <p>Off side bus lanes - too soon to prescribe these. These will continue to be authorised and considered as part of the Traffic Signs Review.</p> <p>Inset parking bays by zig-zags - the purpose of zig-zags is to ensure clear visibility of the crossing. In any case, this is a matter for the Traffic Signs Review.</p>	
1 1	<p>Yes. <u>Part 1</u></p> <p>29 - Schedule 16 item 38 - Allow the use of ‘24hrs’ or ‘at all times’ in addition to ‘at any time’.</p> <p>30 - We support the need to relax the requirement <i>to illuminate</i> signs down to signs <i>may be lit</i>. This allows us to assess the surrounding light levels and to provide illumination only if needed. Modern reflective materials provide better quality and reduce installation / maintenance costs, as per the GM Traffic Manager’s comments, and also help towards the Council’s carbon reduction goals.</p> <p>34 (and other specific sign requests) -</p> <ul style="list-style-type: none"> • Diag. 663 – allow other variants of zone type i.e. an area name. • Diag, 670 – Reduce sign sizes for residential roads subject to 20 and 30 mph speed limits. • Diag. 1028.2 – in the book show the thick yellow line. • Diag 1028.3 & .4 make one type with all the variants together. • Diags 958, 959 etc allow more variants i.e. offside bus lanes. • Diag 974 When the clearway is 24 hours omit the requirement for the sign. • New signs for Resident Parking areas without road markings. • New sign for average speed cameras. 	119	<p>Schedule 16, item 38 - I support “at all times” as it is more appropriate than “at any time” on bus lane signs. It could be done now. In any case, changes to item 38 are also a matter for the Traffic Signs Review.</p> <p>Illumination - a matter for the Traffic Signs Review, except I have suggested that we relax the requirements for terminal signs to diagram 955, 956 and 957 which we could do now</p> <p>Specific sign requests - the following are my comments on the response from [REDACTED] (for AGMA) above:</p> <p>Diagram 663 - a name can already be added (Schedule 16, item 39).</p> <p>Diagram 670 - Chapter 3 gives guidance on sign sizes. Terminal signs need to be larger than repeaters.</p> <p>Diagram 1028.2 - it would complicate matters to illustrate</p>	

	<p>We also have a number of comments specifically related to cycling:</p> <p>Part 4</p> <p>960.2 - Would be further strengthened if one-way streets were made additionally cycle-permeable through the addition of ‘except cycles’ to ‘No Entry’ signs.</p> <p>1001.2A - There should be a clearer definition [as used in the London Cycling Design standards] of the circumstances under which the inclusion of an approach cycle lane ‘is not practicable’. Such clarification would include the minimum width for an adjacent traffic lane for a variety of road types / traffic densities, mindful that an advisory cycle lane, when not being used by cycles, is available to all traffic.</p> <p>Part 5</p> <p>966 - Rejoining of the carriageway should only be signed when kerb and lane configurations have been adjusted to make it safe for cyclists to make this manoeuvre.</p> <p>2601.1 - Agree with principle of giving cycling times as well as /instead of distances.</p> <p>4003.6 - It should be emphasised that induction loops / other means of automatic detection remain preferable, as they enable a shorter response time and are more convenient to use.</p> <p>General comments – Rather than single site authorisations, consider more Authority wide authorisations such as “Permit holders parking only past this point”? Also, will such requests for previously authorised signs receive a quicker response now that they all done electronically?</p> <p>The review raises a number of issues regarding the affect on existing signage, such as whether previous special authorized signs will be automatically compliant and whether existing signs become non-compliant, therefore need altering.</p> <p>Also, allowing the public to challenge the erection of signs is likely to create major issues for the enforcement of necessary restrictions.</p> <p>General Requests</p> <ul style="list-style-type: none"> • Make it possible to create signs more understandable by the public, e.g. operational hours that span midnight. • Allow greater tolerances on markings to facilitate enforcement / prosecution, as per the GM Traffic Manager’s comments. E.g. Relaxing specifications such as parking bay double end bars or not prescribing dimensions. • Include a statement that allowances can be made for local conditions e.g. where numerous short parking bays are split by dives, no requirement for a sign per bay. • Reduce the need for double signs e.g. No Entry signs. • Consider two tiers of prescribed signage: <ul style="list-style-type: none"> - cannot be varied for safety/consistency reasons, & - can be varied to suit local conditions such as parking signs. • Renumber all diagrams in a logical fashion. • Reduce the number of elements required for bus lanes. • Review the word Taxi to make it clear to the public that Private Hire vehicles are not taxis when used in signs. Possible use Hackney Carriage symbol? • Consider the introduction of a system that ensures TROs remain enforceable following signs being stolen or defaced. • Minimise the number and size of signs (i.e. only what is necessary for road safety/ information), and the number of poles used. • Introduce new schedules, similar to yellow boxes and bus stops, for Taxi Ranks, School Keep Clears and, possibly, double yellow lines at junctions. <p>Promote consistence approach to restrictions, e.g. all peak hour restrictions should have the same operational hours.</p>		<p>the no stopping version in the TSRGD since it is not strictly an alternative type. It is illustrated in the draft of Chapter 5 (2010 edition).</p> <p>Diagram 1028.3 and 1028.4 - this is being considered in the Traffic Signs Review.</p> <p>Diagrams 958 and 959 - too soon to include other variants. These will continue to be authorised and considered as part of the Traffic Signs Review.</p> <p>Diagram 974 - a sign is needed to indicate either “except buses” or “except local buses”.</p> <p>Resident parking area - this is included in the amendment TSRGD as a permit parking area.</p> <p>Sign for average speed cameras - already in amendment TSRGD.</p> <p>Diagram 960.2 - “no entry except cycles” is being trialled. Not appropriate to include in the amendment TSRGD.</p> <p>Diagram 1001.2A - use of the marking will be given as guidance in the new Chapter 5. We are going to reconsider the design of the marking and could show a minimum lane width, but that might be too restrictive.</p> <p>Diagram 966 - we can give further guidance in Chapter 3.</p> <p>Journey times on cycle signs - this shows support for the proposal, but there is also opposition from other consultees and I have previously suggested that we do not proceed with this.</p> <p>Diagram 4003.6 (cycle signals) - for [REDACTED] to comment on.</p> <p>General comments/requests - for Traffic Signs Review.</p>	
1 1	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.	120		

	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.			
1 1	Amendment of direction 11 – Repeater Signs, Bullet Point 2, Point of Clarification, the text states that “ <i>Repeater signs for national speed limits (diagram 671) need not be placed along defined short lengths of carriageway</i> ”. 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.	120	Direction 11 - the revision to this direction should be made clear when we reconsider it. There is no question of using national speed limit repeater signs on unlit roads. The proposal for short lengths of road is to remove signs and hence reduce sign clutter. The main problem for national parks will be the speed limit review which might result in 50mph speed limits on some unlit rural roads, thus requiring the provision of repeater signs.	
1 1	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.	120	Diagram 784.1 - the sign is what it is. Any change would have to be agreed with the Safety Directorate of the ORR.	
1 1	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. 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.	120	Diagram 818.5 - see diagram 530 above. Diagram 820A - the legend may be omitted when an arrow is shown on the sign. To omit the legend when there is no arrow would result in the just the lorry symbol. The sign without an arrow would be erected at the entrance to the road where it is important that the sign is understood and has good target value; hence the need for the legend. In future we might be able to omit the legend when the use of the symbol becomes familiar - it might be necessary to increase the size of the sign.	
1 1	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. 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.	120	Diagrams 960.1 and 960.2 - these are designs based on diagram 960. I don’t see the need to make any changes. Increasing the arrow size would make the signs taller.	
1 1	The following comments relate to the Consultation document and Annex A. <ul style="list-style-type: none"> Regulation 53 – temporary signs. The Council welcomes the inclusions of temporary signs for civil emergencies, and the definition of the ‘civil emergencies. Other emergencies are dealt with separately in the Street Works Regulations as ‘immediate activities’ and there is a separate definition for these. Direction 11 – at the moment our Car Club Bays and electric vehicle charging bays are relatively short, but should there be a requirement in the future to extend the lengths of the bays the need not to put repeaters in short lengths of roads is welcome. Car clubs – Schedule 16. It is unlikely that we would include the name of the authority (item 39A) though an example in the Directions (660.8) would be useful. Likewise an example of an arrowed sign under item 11 (the sign number that would apply is unclear) would be useful. Electric vehicle charging points – Consideration should be given to include a time period on the prohibition, including ‘At any time’. In order to also avoid confusion amongst drivers who may park in different boroughs that if all the signs throughout London are the same this may prevent appealed tickets at a latter date issued against drivers in Camden even through we have special authorisation for signs which state ‘At any time’. Car club and electric vehicle charging point bays – Consideration should be given to adding the road markings ‘CAR CLUB ONLY’ and ‘ELECTRIC VEHICLES ONLY’. These provisions have been authorised by the DfT in relation to these bays in Camden. Satellite navigation - Schedule 16, item 11 – sign 829A. This sign is welcome, but the Council wants to see 	121	Diagram 660.8 - the working drawing will show appropriate permitted variants. Diagram 660.9 - the proposed permitted variants already include the addition of a time period (Schedule 16, item 38). “At any time” is not appropriate. If we were to agree to anything it would be “at all times”. However, the convention is that a parking sign that does not display any time period operates 24 hours. If we have authorised “at any time”, why did we? And if we had, that is no reason to continue with the practice. Parking bays for car club and electric vehicles - we are, of course, going to prescribe appropriate legends. This was an oversight. Diagram 820A (829A typo) - another request for the bus symbol. I am quite happy to include this in the amendment TSRGD. With regard to pedestrian areas, if these close the road to all motor vehicles, then the no through road sign should clearly be displayed.	

<p>the coach/bus logo added, possibly as a variation, with suitable wording (e.g. ‘Unsuitable for HGVs and coaches’). In-vehicle satellite navigation systems are causing no end of problems across the borough. This not only relates to road narrowing but also locations that are blocked by pedestrian areas not shown on sat nav. The resulting reversing has caused damaged to parked motor vehicles and damage to street furniture as well as considerable traffic congestion and disruption depending on the location.</p> <ul style="list-style-type: none"> • ‘Permit holders parking only pass this point’, new sign 663.3. This is welcome. We have special authorisation for equivalent signs but with different formats, and these are erected at the entrance to some of our most attractive mews areas, often cobbled, for which individually marked out bays would involve inappropriate street clutter. The need to alert drivers that they are entering such areas is understandable, however we should be given the option to tone down the size of the signs. The Council has serious concerns about the size of the x-height set for this sign and the dimensions of the ‘P’. The size of the sign is dictated by the x-height and at 40mm for the minimum is excessive, if an option of 20mm was allowed this would enable us to lessen the visual impact at the entrances to such areas without drivers missing the signs. For the existing signs (other than Lithos Road which was set by the DfT at 40mm), the average height is 30mm which Camden considers to be far too large to meet our requirements. We ask that you consider allowing the use of a minimum height of 20mm to a maximum of 40mm. A set height of 40mm produces a huge sign which is not appropriate for the areas that we would use the sign. The signs, due to their size have to be erected on 4m posts that are ugly in this context and always result in complaints. The ability to use the street name on the signs will be very useful in the future to avoid confusion but only if the x-height can be reduced. • Yellow boxes – the amendment to Part II of Schedule 9 is welcome to cover road narrowing. However, example diagrams should be included, as they should be for T-junctions (adjudicators have ruled that these can be marked at crossroads in conformity to the two diagrams in the TSRGD) and roundabouts. • Signs for cyclists and pedestrians – the ability to add cycling and pedestrian times to signs 2601.1 and 2601.2 are welcome. An example of a sign showing times for both would be useful. • Bus lanes – although the Council does not currently allow motorcycles in bus lanes (this policy may change in future), the inclusion of motorcycles within new bus lanes signs is welcome. • Bus lanes – similar to the point above, the DfT could also consider including cycle freight vehicles (electrically assisted cycles with a body attached) in the sign. These vehicles have started operating within the Clear Zones area (this is an area located around Holborn, Covent Garden Fitzrovia and Bloomsbury, as a partnership between Camden, and the Cities of Westminster and London). The DfT has recently considered whether these vehicles should be registered; the conclusion being that they should have number plates and be treated as a powered two-wheeler. This is a complex issue due to its interactions with the dimensions of bus lanes and is a subject that might be best considered in the Traffic Signs Policy Review. • Double kerb blips on corners - Statutory Instrument 2009 No. 1116 sets out that signs are no longer required to enforce the prohibition of parking on dropped kerbs (crossover and corners). In this context signs include road markings, in the sense of Section 64 of the <i>Road Traffic Regulation Act 1984</i>. The intention of SI 1116 is to assist with street decluttering. Currently regulations require that double kerb blips (designating no loading at any time) must also be accompanied by a sign. To assist with decluttering could the DfT considering removing the obligation to have a street sign for this purpose on corners? • Inclusion of other categories could consideration be given to prescribing signs for types of bays other than the generic diagram 660. Examples include bays dedicated to market traders vehicles and bays dedicated to severely disabled people (in Camden these are normally located as close as possible to their houses). A number of local authorities operate similar schemes. • Inclusion of other categories - could consideration also be given to permitting a variant to the accompanying road marking to diagram 1028.4 “PERMIT HOLDERS ONLY” so as to include the permit identifier e.g. “PERMIT HOLDER xxx ONLY” (xxx being the permit identifier). The intention would be to use this marking where the bay is restricted to the use of a single person. The opinion has been expressed that this road marking serves to emphasise the restriction. • Inclusion of other categories – the signs and bay markings have recently been changed to comply with the current TSR&GD regulations and are wholly accepted by the DfT. Westminster City Council, the City of London and Royal Borough of Kensington & Chelsea, who have their own schemes with different coloured badges and the word ‘Disabled’, have experienced PCN appeals on the grounds that the signs and bay markings are non-prescribed. Such a reference confuses “ordinary” Blue Badge holders. It is Camden’s view 	<p>Diagram 663.3 - using a smaller x-height would make the sign look like a parking bay time-plate and could lead to enforcement problems. I would suggest no change, but authorise smaller signs on a site specific basis (if appropriate). If the width of the road is such that two entry signs are required, then small signs might look out of place. On narrower roads where only one sign is required, it might not be noticed if it is too small. These signs have a similar function to CPZ and restricted zone entry signs. If smaller sizes were prescribe other traffic authorities might use an inappropriate size as a cost cutting exercise.</p> <p>Yellow box markings - road narrowings are already covered by the TSRGD 2002; the consultation document is misleading. I have said before that we might need to amend the diagram illustrations to cover the extended use.</p> <p>Journey times on cycle signs -  might support this, but if he saw an illustration of journey times for both cyclists and pedestrians he might change his mind, particular if he is trying to fit them into a Camden street. Also in a busy urban area with many traffic signals, how do you estimate pedestrian times if it takes all day to cross the road (waiting for the green walking figure that never seems to appear). I still consider that this proposal should not be proceeded with.</p> <p>Bus lanes (cycle freight vehicles) - the use of bus lane by such vehicles should be a matter for sign authorisation and the Traffic Signs Review.</p> <p>Double kerb marks - we have resisted a move to dispense with diagram 638 on the grounds that diagram 1020.1 is not as emphatic as diagram 1018.1. Also, a loading ban prohibits disabled badge holder parking and we should consider their needs before dispensing with the sign. I can’t see how we could effectively give a direction that the sign isn’t required at corner but is elsewhere. How would you define a corner or a distance from a junction as it would depend on the individual junction layout.</p> <p>Diagram 660 - market traders and disabled badge holders can be given permits that apply to one or two particular bays. It doesn’t have to say “market trader permit holder” etc on the sign, the current diagram 660 with a permit identifier is sufficient, although the sign will say “permit holders”, not “permit holder”.</p> <p>Permit holder bay markings - I agree that the current prescribed legend PERMIT HOLDERS ONLY might not be appropriate where a single permit is given. However, the legend is optional, and in any case there will be single vehicle bays in a street where they can be used by more that one permit holder (i.e “HOLDERS” is still appropriate). The upright sign at present cannot be varied to the singular (see diagram 660 above). I think individual bays should be provided under signing and marking currently available and that any change to “PERMIT</p>	
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	<p>that the compliant signs should not be altered. The Council treats Green Badge Holder bays as a regular permit holder’s bay “Permit holders GRN-B only”, however there should be an option to distinguish these bays with the carriageway legend as described above as “Permit Holder GRN-B only”.</p> <ul style="list-style-type: none">• Illumination of signage – it is Camden’s view that for some time the DfT should be asked to consider amending the requirements relating to the need for signs to be illuminated (both internally and externally). The reasons for this are as follows:<ol style="list-style-type: none">1. The need for illumination in urban / well lit environments – Current street lighting levels when conforming to current European and British Standards render the need for additional illumination of signs unnecessary as they are clearly visible without this.2. Modern reflective materials – Recent advances in the reflectivity of materials used for signage again renders the need for additional illumination unnecessary when lighting levels are to modern standards and when it is a legal requirement that vehicles have their headlights on during the hours of darkness.3. Reduction in carbon production / energy saving – Current government and international directives in relation to the need to conserve energy, as well as our moral obligation to the environment, would demand that we investigate all possibilities of reducing our energy consumption. There is a huge opportunity here, by the removal of unnecessary illumination, to make significant reductions in energy consumption and consequently to substantially reduce costs to local authorities. <p>Evidence and trials – There are many examples of trials being carried out all over the country with a DfT dispensation where street furniture, signage and road markings previously thought essential have been removed. These trials are showing positive results in terms of safety, appearance and the way the street is being used by both pedestrians and vehicles. Are there any examples of trials that have been or are being carried out to ascertain whether the removal of traffic sign illumination has had any significant detrimental impact on road safety?</p>		<p>HOLDER plus identifier” on the carriageway, and “Permit holder” (singular) on the upright signs should be a matter for the Traffic Signs Review.</p> <p>Green badge holder etc - for the Traffic Signs Review.</p> <p>Illumination of signs - for the Traffic Signs Review, although I have suggested that we could remove the requirement to directly light terminal signs to diagrams 955, 956 and 957.</p> <p>Authorised signs - where these are different to the new prescribed signs, as long as the authorisation is not withdrawn these signs will remain lawful. A good example is the “end of restricted zone” sign. There is no need to change this to diagram 664.</p>	
1 1	<p>PARAGRAPH 18 – CAR CLUB PARKING</p> <p>Although I see that draft Direction 24 proposes the use of the legend “CAR CLUB ONLY”, I would have thought it would be in the spirit of the presentation of the SI that this legend be added as a permitted variant to Item 4 in the table which accompanies the road marking diagrams in Schedule 6 (Diags 1028.3, 1032, 1033). So far as Diag 1033 is concerned, the permitted variant could be “CAR CLUB” if the width of the marking is too narrow for the longer version.</p> <p>I consider that the Diag 660.8 should be allowed to include the legend “at any time”. Very often a designated parking place is discontinued to allow a car club bay to be introduced in its stead. Since the designated bay may have operated during specified hours (e.g. Mon-Fri, 8.30am – 5pm) the car club bay will be in force at all times. It will not be surprising if the general public fails to understand this difference.</p> <p>The same will apply to Electric Vehicle Charging Points.</p> <p>As a general point, I consider the Department should change its policy on this aspect f signing, and allow text such as “Monday – Sunday” to indicate 7 days a week and similar variants to make the information conveyed by the sign as clear and as unambiguous as possible.</p> <p>One final point Will the Department be making available a comprehensive, single document, which includes all the amendments into TSRGD 2002 as published? The thought of having to make one’s own annotations in a hard copy is too awful to contemplate.</p>	122	<p>Car club parking bays - at last someone has spotted the “deliberate “ error and appreciates the problem of adding the legend to some road markings. It is all in hand.</p> <p>Diagram 660.8 - the legend would be “Car club permit holders only at all times”. However, I don’t want to prescribe this. There might be a problem in CPZs where parking bays that operate at the same time as the CPZ (e.g. 8am to 6pm) do not show times. But as Chapter 3 points out, where no time period is indicated then the bay operates at all times. However, we shouldn’t be prescribing something just because some local authorities are not following the rules. Also it would make the signs larger and more costly. We can’t allow a system to continue where a sign with no time period shown means (a) 24/7 in a particular CPZ that does not operate 24/7 and (b) the same as the CPZ times of operation in another non-24/7 CPZ.</p> <p>Diagram 660.9 - unlike diagram 660.8, this sign can show a time period except when it applies 24/7. My comments on diagram 660.8 above also apply to this sign.</p> <p>Monday to Sunday - absolutely not (I don’t think this will even be proposed by the Traffic Signs Review). It makes the sign larger and gets drivers wondering on which day the restrictions do not apply. Why would drivers think certain days are exempt if “Monday to Sunday” is not shown on the sign?</p> <p>Consolidated TSRGD - I said this would lead to problems. Already some consultees are not aware of previous amendment TSRGD (reference to direction 55A). How many sign designers will overlook the new amendment TSRGD 2010?</p>	

1 1	<p>1.) Keep Clear markings to Diagram 1027.1 Currently this marking requires a Traffic Regulation Order (TRO). Can consideration be given to allowing this marking to be used in a similar manner to Diagram 1025.1, 3 &4 wherein the marking is immediately enforceable without a TRO providing it is used in conjunction with the appropriate sign plate?</p> <p>2.) Illumination requirements (General) Given the advances in reflective sign material - particularly prismatic material - technology, can consideration be given to further relaxations in the types of sign plates which no longer need to be illuminated by means of internal or external light units (Schedule 17.1)? No doubt an overall simplification of illumination requirements will be considered as part of the overall Traffic Signs Policy Review, however further interim relaxations would provide substantial savings to local authorities in terms of both energy use and installation costs. These further relaxations could be tied to the use of an appropriate grade of retro-reflective material.</p> <p>3.) Illumination requirements (Bollards) Can consideration be given to allowing the use of retro-reflective bollards in place of internally illuminated items for the same reasons noted in Item 2 above, without the need for site specific authorisation?</p> <p>4.) Disabled Parking Bay (Diagram 1028.3) In a similar issue to Item 1 above, can consideration be given to allowing this marking to be placed on the road without the need for a TRO, either with or without the associated sign plate to Diagram 661A? As an additional point relating to this issue, the Society of Chief Officers of Transportation in Scotland (SCOTS) have written to the Scottish Minister for Transport Infrastructure & Climate Change re- the Disabled Persons Parking Places (Scotland) Act 2009 regarding the requirements of this Act and, in particular, the need to comply with Traffic Signs Regulations & General Directions (TSR&GD) where each disabled parking place must be accompanied with the (currently) required sign. SCOTS have suggested a pragmatic approach to the Act, suggesting that if the TSR&GD can be amended to enable the bay marking alone to be sufficient for enforcement purposes then the TSR&GD could be amended such that the sign could be omitted. We would support this point to minimise the sign clutter adjacent to bays used by disabled persons, and reduce the expense incurred by councils in providing this new statutory duty.</p> <p>5.) Additional Variant of Diagram 563 Many authorities are using a variation on the supplementary plate to Diagram 563 which reads "Red squirrels", Can consideration be given to making this a variant of Diagram 563 and allowing this plate to be used without site specific authorisation?</p> <p>6.) Simplification of the Patch/Panel colouring system used on Directional and Informatory signs Local experience has shown the members of the public neither understand nor are interested in the current system of destination and route patches and panels currently employed in the design on the above signs and their meaning, It would appear that the motorist simply wishes to know where they are going and on what road. To this end, can consideration be given to simplifying the system currently used to allow the use of simple route patches only as appropriate? We understand that this is more a Traffic Signs Manual (TSM) issue, rather than TSR&GD issue, however we would ask for your comment on this meantime,</p> <p>7.) Use of Diagram 610 (Arrow) on the Rear of Service Vehicles</p>	123	<p>Diagram 1027.1 (as [REDACTED] above) - I support this suggestion, but I think we would have to consult on this, so it will have to be a matter for the Traffic Signs Review.</p> <p>Illumination requirements (general) (as [REDACTED] above) - not appropriate for amendment TSRGD, except for my suggestion regarding terminal signs to diagrams 955, 956 and 957.</p> <p>Illumination requirements (bollards) (as [REDACTED] above) - not sure whether this is about self-righting bollards or the use of a reflective-only non-self-righting bollards? Not really for me to comment.</p> <p>Disabled parking bay - the Scottish issue again and a matter for the Traffic Signs Review.</p> <p>Diagram 563 (as [REDACTED] above) - this is a policy decision and probably not appropriate for the amendment TSRGD. The use of this sign is primarily for the protection of red squirrels and not for road safety. We have argued in the past the toad sign is a road safety sign because of the risk of skidding.</p> <p>Colour coding on directional signs (as [REDACTED] above) - this is a matter for the Traffic Signs Review.</p> <p>Diagram 610 on rear of vehicles (as [REDACTED] above) - not for me to comment.</p> <p>Diagram 7009.1 (as [REDACTED] above) - guidance will need to be given on sign sizes. The larger sizes are for signs placed in advance of the treated road where traffic might be travelling at say 60mph. the signs cannot be split as suggested.</p> <p>Diagram 570 - this is an interesting question. In many cases the start of the hazard will be indeterminate (e.g. animal signs), therefore the distance should be measured from the sign. With a series of bends I would still measure the distance from the sign even where the bend is some distance ahead (at 51-60mph 85th percentile speed, the sign should be about 185 to 240 metres from the first bend). The distance shown will be longer than distance over which the hazard extends but is "failsafe". Perhaps we should clarify this in Chapter 4 when updating to include changes resulting from the amendment Regulations.</p>	
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	<p>Currently this limited to roads with 30mph limit or less, To overcome this TSR&GD constraint the authors of Chapter 8 (TRL) set out options for mobile works which include a light arrow, If the TSR&GD could be changed to allow Diagram 610 to be used on higher speed roads, this would allow Chapter 8 to have a more pragmatic solution of using Diagram 610 for mobile works such as grass cutting on minor routes, Such an approach would require a site risk assessment as per Chapter 8, Current use of the 610 arrow on roads over 30mph is common place and is the practical approach to mobile works,</p> <p>8.) Additional Signs at Surface Dressing Works</p> <p>Chapter 8 of the TSM refers to the Road Surface Dressing Association/ County Surveyor Society (RSDA/CSS) document "Code of Practice for Traffic Safety and Control of Surface Dressing Operations" for the signing of surface dressing works, however the signing proposed by in this document is not in accordance with TSR&GD, We note that there is a proposed amendment to Direction 21 of the TSR&GD which we trust will clarify this anomaly,</p> <p>In addition to this, when implementing the proposals from the RSDA/CSS document there are some issues in regard to the use of two plates/X-Heights with should be clarified at the same time, We assume that for a 600mm high warning sign to Diagram 7009, the appropriate X-Heights would be 50mm/200mm on the supplementary plates to Diagram 7009,1? Presumably these X-Heights will increase by the steps noted with the overall size of the warning sign? The issue with this pattern is that it will present problems with accommodating the signs on rural road verges due to their overall size, Can consideration be given to allowing the smaller sizes of supplementary plates be used with larger triangles? Can more flexibility be allowed in using smaller X-Heights for the supplementary plates or can the signs be split up into two separate assemblies (I.e. warning sign first, followed by a separate sign board carrying the supplementary plates)?</p> <p>9.) Supplementary plate to Diagram 570 (TSM Chapter 4) Whilst not a TSR&GD issue, clarification is sought with regard to whether the distance on the supplementary plate should allow for the distance that sign plate is mounted in advance of the hazard or should the distance noted on the plate simply be that over which the hazard extends. TSM, Chapter 4 is not clearly worded on this matter and your comments would be appreciated.</p>		
1 1	<p>Diagram 637.2A</p> <ul style="list-style-type: none"> • The use of a repeater sign read "Restricted Parking Zone" to reflect the nature of the zone to which it signifies entry and to match the entry signs already used and authorised by the Scottish Government in Glasgow. <p>Diagram 663.2</p> <ul style="list-style-type: none"> • The legend on this sign should read "Restricted Parking Zone" to reflect the nature of the zone to which it signifies entry and to match the signs already used in Glasgow. I have little doubt that the inclusion of the word 'parking' contributed positively to motorists' understanding of its meaning. 	124	<p>Diagram 663.2 - I agree that the legend “Restricted Parking Zone” is much clearer than “Restricted Zone”. The regime in Glasgow (that [REDACTED] and I saw in 2006) also differs in that repeater signs to diagram 637.2A are not used (I note that Robert implies that they are now using repeater signs - perhaps where the prohibition is not 24/7). The restriction that [REDACTED] and I saw was that parking/loading was permitted only in signed bays. The zone entry sign was simple. No times were shown . The legend in the lower panel is “Park only in signed bays”. I have a photograph of the sign. This simplicity would not be suitable for all zones, but I would consider amending diagram 663.2 to include the word “Parking” even if this is not what we have previously authorised. We are no longer continuing with the authorised “end of restricted zone” sign, so there is no reason why we cannot prescribe an entry sign that is different to those that have been authorised. “Restricted zone” could imply restricted access. There is, of course, one problem with “zone” entry signs in that sometimes the zone has yellow lines and sometimes it doesn’t. A Restricted Zone could have pay and display parking bays but no yellow lines; a Pay and Display Zone has pay and display bays and yellow lines. Even so, I still strongly support restricted zones.</p>

1 1	<p>Notwithstanding the above, you will be aware that the Disabled Persons' Parking Places (Scotland) Act 2009 (DPPPA) came into force on 1 October this year. The Act has, unfortunately, placed an unusually high level of administrative and financial burden at a local level, something that your proposed amendments sets out to remove. The Act places a duty on Scottish Local Authorities to make all on-road and off-road advisory disabled parking places mandatory. To ease this burden, I would propose that the requirement for an Order to be promoted when using Diagrams 661A, 1028.3, 1032 and 1033 is removed. I would also propose that the requirement to place a sign to diagram 661A in addition to diagrams 1028.3, 1032 and 1033 is removed. To facilitate the foregoing, I would propose the following additional amendments:</p> <p>Diagram 661A</p> <ul style="list-style-type: none"> • Item Direction 25 should be deleted. This will reduce both the financial and administrative burden on Scottish Roads Authorities when fulfilling its duties under the DPPPA <p>Diagrams 1028.3, 1032 and 1033</p> <ul style="list-style-type: none"> • Direction 7 para (2)(a) should be amended to exclude the above diagrams. This will reduce both the financial and administrative burden on Scottish Roads Authorities when fulfilling its duties under the DPPPA <p>Diagram 1032</p> <ul style="list-style-type: none"> • The fifth sentence of note 4 should be amended to allow a reduced minimum length of 4500mm. <p>Diagram 1033</p> <ul style="list-style-type: none"> • The width dimension should be amended to allow a reduced minimum of 2000mm. <p>Although the requirements of the Act only relate to Scotland, the above proposals will provide additional benefit on a UK basis and I understand that the Scottish Minister has recently written to your Minister in this regard.</p>	124	<p>Disabled parking bays - we can't remove the requirement to need a TRO as it would affect other uses of the bay such as loading, unless we specifically mentioned the version with the legend DISABLED. We do need to discuss how we are going to deal with the Scottish problem, but it can't be solved by the amendment TSRGD.. Separate amendment TSRGD applying to Scotland only might be required, but I'm not happy that disabled parking bays in Scotland are different to those in England and Wales. This needs to be considered as part of the Traffic Signs Review. A copy of the Scottish Act can be found at:</p> <p>http://www.opsi.gov.uk/legislation/scotland/acts2009/pdf/asp_20090003_en.pdf</p>	
1 1	<p>For the future, I would like to see the number of signs that require illumination further rationalised in view of the advancement of retro-reflectivity products. This would not only provide considerable cost savings when providing new assets but would reduce the environmental affects of the apparatus.</p>	124	<p>Sign illumination - a matter for the Traffic Signs Review.</p>	
1 1	<p>1. Good luck to the practitioners who will have to grapple not only with a set of Regulations that most already seem to find incomprehensible, but at the same time with a complex and very wide-ranging set of amendments. You don't need me to tell you that it would have been vastly preferable to have issued a consolidated Instrument. Presumably a Legal resources issue. I hope the Joint Committee on Statutory Instruments doesn't have a fit.</p> <p>2. From time immemorial (or certainly since 1957) SI's have adopted the convention that references to the Regulations or the General Directions always use an initial capital; viz "these Directions" or "the General Directions" or the "the Regulations". The initial letter remains uncapitalised if the reference is to a specific regulation, e.g. "regulation 3" or "direction 26". Similarly references to the Statutory Instrument or "this Instrument" have always used initial capitals, as have references to Schedules.</p> <p>These Amendment Regulations have generally (but not consistently) ignored this convention, resulting in an inconsistent hotch-potch. Was that intended? I can send you a list if you like but you'll probably find it quicker</p>	126	<p>1. Consolidated TSRGD - well, I expected this. We know it isn't what we wanted. This issue was also raised by [REDACTED] above. Some consultees are not aware of previous amendment TSRGD and are confused by amendments to those included in the current draft. This will lead to confusion. In view at the fact we are unlikely to meet the April "coming into force" date, do you think we ought ask our lawyers what the time and resource implications would be if we consolidate the TSRGD 2002 and all the amendments?</p> <p>2. Reference to Regulations etc - take note.</p>	<p>Agreed – mark up for continuity.</p>

<p>for Legal to do find and replace (unless this really was intentional, which I find hard to believe).</p> <p>3. Have you considered allowing the use of microprismatic sheeting for yellow road works signs as an alternative to direct lighting? HA have been trialling this for more than ten years. The performance would have to be specified against BS8408, and it might be necessary to require signs to be mounted upright. It's time fluorescent yellow (but not yellow-green) was also permitted, as it is for diagram 528.1.</p> <p>Cycling issues para 12: the new diagram 2602.1 expresses better than any words could convey the sheer fatuousness of replacing distances with journey times. Presumably the times are based on an assumption that a cyclist travels at 8mph, or something in that region. So here I am; on my way to Wells (perhaps intending to collect the Holy Grail as I pass Glastonbury). 1hr 15 mins (should that be “min”, by the way?). Er ... so how long will that take me? I know I can do about 6mph, but I don't know what the clever clogs at DfT assumed when they calculated the journey time. If only they'd said something useful, like “12 miles”, I'd be able to work it out for myself. Ruddy bureaucrats, sitting at their desks drinking tea all day. Where was I? Oh yes, how long will it take me to get to Wells? Have I time for a cream tea before I continue? No way of knowing... The problem is even worse for pedestrians, where the time differences (and the effort) might be even greater. This is the daftest idea ever to appear in TSRGD, but I suppose there's no way of stopping it now.</p> <p>Miscellaneous issues para 25: see my separate email. This doesn't reduce clutter, because it simple replaces an internally-illuminated bollard with a reflective one. The potential reduction would come from no longer insisting that a directly-lit supplementary sign be added, if there wasn't one already (often there is). There are potentially serious consequences that aren't even mentioned here.</p> <p>Miscellaneous issues para 27: you might as well make it January to December for all the notice that local authorities are going to take</p> <p>Amendment of Schedule 16</p> <p>Item 1: this is a golden opportunity to limit the freedom to change the numerals on diagram 670 to 20, 30 or 50 only, except on dual carriageway roads where it may additionally be amended to 60. That should stop nonsenses like 19, and other imaginative plays.</p> <p>Item 3: diagram 2602.1 needs to be added, not as the consultation document says to show time, but to enable journey time to be replaced by distance. But, unless it's intended to permit both, it would be better to deal with this in the table below diagram 2602.1, and not refer to Schedule 16 at all.</p> <p>Item 28: diagram 2502 has not been added.</p> <p>Item 38: still includes diagram 962.2, which relates to a 24-hour lane and can't have time added.</p> <p>Amendment of Schedule 19 Part II: see answer to Q5 above; the proposal goes far too wide.</p> <p>Savings</p> <p>Amendment regulation 35</p> <p>(2)(a): surely 554.3, 620, 954 and 954.2 shouldn't be listed; what are they supposed to be replaced with?! 629 must be replaced within four years, but why must the supplementary plate be replaced within two, when it will still be required with the replacement regulatory sign? Someone's in a muddle here: I hope it's not me!</p> <p>(2)(b): again, what do you want diagrams 530, 530.2, 531.1, 532.2 and 532.3 replaced with within four years? If the existing sign were the imperial and metric pair, it would have to be another identical sign. This doesn't seem the way to achieve the desired effect. I think the saving will need to be qualified to make clear that it refers to places where the imperial sign has been used alone.</p> <p>(2)(c): why should MSA operators get ten years to replace these (often already clapped-out) signs, when traffic authorities get only two to replace 2310.1?</p> <p>Diagram 660.8: is the new symbol to be prescribed, or is for local determination? If prescribed, can it be the standard shade of blue – and if it can't how will it be identified?</p> <p>Diagram 660.9: what provision is there to enforce the use of these parking places for charging electric vehicles? It seems that in practice they might be able to just park there without re-charging. Is it intended that</p>	<p>3. Illumination of temporary yellow signs - not for me to comment.</p> <p>Journey times on cycle signs - quote “This is the daftest idea ever to appear in TSRGD, but I suppose there's no way of stopping it now.” Oh yes, there is - we have had sufficient objections (including mine) to this proposal to abandon it for now. explanation as to why it is a “daft idea” couldn't be better.</p> <p>Self-righting bollards - do the current authorisations allow for no additional illuminated signs? The reflective bollards I have seen (usually at signalled junctions) are not supplemented by directly lit signs to diagram 610.</p> <p>Migratory toad crossing - point taken, but we'll keep to the proposed amendment.</p> <p>Diagram 670 - I would support specifying the numerals, but put them in item 4 of the table below the diagram, in a similar manner to diagram 1065.</p> <p>Diagram 2602.1 - as the draft TSRGD adds this sign to item 3 of Schedule 16, is obviously referring to the error in the consultation document. Anyway, if we are going back to the existing diagram (yes we are) then this sign won't be added to Schedule 16, item 3.</p> <p>Diagram 2502 - this has been added to item 28 of Schedule 16. Again, is referring to the consultation document?</p> <p>Diagram 962.2 - Schedule 16, item 38 has been removed from the table below the diagram, but diagram 962.2 hasn't been</p>	<p>Misc issues para 25 – dealing with this.</p> <p>Misc issue para 27 – do not agree.</p> <p>Item 1 for review</p> <p>Item 3 don't agree</p> <p>Item 38 – take off diagram from schedule</p> <p>2(a) (b) (c) for later</p> <p>Blue – dealt with</p> <p>Charging – dealt with</p>
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<p>this be dealt with in the TRO?</p> <p>Diagram 786: not clear why “AND” and “&” are both prescribed. If “&” saves a line, don’t prescribe “AND”, and if it doesn’t, don’t prescribe “&”.</p> <p>Diagram 820A: hard to see what advantage this has over diagram 820, unless the thinking is that non-English speakers might be more likely to work out its meaning. But the explanation on p25 doesn’t mention overseas drivers.</p> <p>Diagram 878 item 4: “be” omitted in fifth line.</p> <p>Diagram 959A: this is in the wrong place; 959A must obviously follow 959 and precede 959.1.</p> <p>Diagram 960.2 item 3: 1004.1 needs to be added to correspond to direction 17(14A), alarming as the idea of contra-flow cycling on high-speed roads might be.</p> <p>Diagram 964 item 3: double space before “None”.</p> <p>Diagram 1001.2A: there seems to be a glitch in the drawing where the transverse and diagonal lines intersect (unless it’s the low resolution making it look like a glitch). Presumably they should intersect cleanly at the north-west corner, and the lower edge of the transverse line projected to meet the diagonal line.</p> <p>Diagrams 1004/1004.1, 1005/1005.1, 1008/1008.1: I know why you’ve done it, but omission of the reference to speed limits will leave a lot of people wondering why there are two versions of each marking.</p> <p>Diagram 1050: 18(3) has not been changed to 18(1), as asserted on p33, and 1050 isn’t mentioned in the amended 18(1) either.</p> <p>Diagram 2402.1 item 4: I wonder if you could allow the item of geographical or historical interest to be added above <i>or below</i> the place name where appropriate – you’ll remember the example of “Nutfield/ A Domesday village 1086”, which looks a bit odd in the prescribed order. This might save you being asked for a special authorisation!</p> <p>Diagram 2502 item 4: Schedule 16 item 28 has been added here, but 2502 has not been added to Schedule 16 item 28.</p> <p>Diagram 2505: the explanation on p33 says that the number of spaces may be displayed, inter alia, in red or green characters. This would be a bad idea, but fortunately item 4 in the table does not in fact permit this.</p> <p>Diagram 2602.1 item 4: item 5 should be removed, as distances are no longer shown on the diagram. Substitution of distances for times should be dealt with in the table.</p> <p>Diagram 4003.1: line between items 3 and 4 hasn’t printed in my version; I can’t check the website because the link is broken (hopefully only temporarily), but you might like to check there isn’t a glitch.</p> <p>Diagrams 7009/7009.1: you might take the opportunity in the circular that accompanies the published SI to ask LAs to ensure that contractors in their error don’t cheat by using non-reflectorised versions of these signs; unreflectorised Correx seems to be in universal use, in defiance of the Regulations (but it does increase profits).</p> <p>Amendment of direction 7(2)(a): (f); 959A should precede 959.1, not follow it.</p> <p>Amendment of direction 9(4): despite the claim in the consultation document that this amends the reference to dual-carriageway roads in line with direction 10, the wording is in fact quite different from direction 10(4).</p> <p>Amendment of direction 11: para (8) is to be inserted after para (7), but in my copy of TSRGD 2002 there is no para (7) in direction 11 (or para (6), so the previous insertion seems to be incorrectly numbered also).</p> <p>Amendment of direction 17: items 9A and 11A are being inserted in the wrong places. 958A should follow 958, not 958.1, and 959A should follow 959, not 959.1.</p> <p>Page 80 footnote (b); don’t overlook the omission of initial capitals in “general directions”.</p> <p>Amendment of direction 21 (1): (c); these are in the wrong order, should be “958, 958A, 958.1, 959, 959A or 959.1”.</p>	<p>removed from item 38 of Schedule 16. This needs to be done.</p> <p>Savings - █████ has raised the same points I have previous made (my comment 22). With regard to imperial-only versions of diagram 530 etc. I think the savings is just about OK since it refers to signs prescribed by the 2002 TSRGD which are no longer prescribed by the amendment TSRGD 2010. I take it that permitted variants that cease to be permitted variants are covered by this without having specifically refer to them . This would apply also to imperial-only warning signs, roundels and “secured” parking panels incorporated on directional signs.</p> <p>Diagram 660.8 - I and other consultees agree that the standard blue should be used for the symbol. The new symbol is prescribed as shown in the diagram and cannot be varied.</p> <p>Diagram 660.9 - do we need to amend the legend on the signs or is it clear. The problem with the word “charging” is that it could also mean payment. I think the sign is OK as it is. The conditions relating to a permit should make it clear that vehicles may be parked only for the purpose of charging the battery. For non-permit bays, we could add an additional legend at the bottom of the sign - “No parking” or “No parking by any vehicle”, but is this necessary?</p> <p>Diagram 786 - does the use of “AND” or “&” depend on whether “AT CROSSING” is omitted? If it does, we can either be more specific in the permitted variants (stating which SOS variant is used when AT CROSSING is shown and when it is omitted) or just rely on the working drawing to show the recommended layouts (and use of “AND” or “&”).</p> <p>Diagram 820A - no comment.</p> <p>Diagram 878 - oops. Table to be corrected.</p> <p>Diagram 959A - quite right (see my comment 20).</p> <p>Diagram 960.2 - no, direction 17 needs to be amended (see my comment 32).</p> <p>Diagram 964 - oops again. Remove extra space in item 3 of the table.</p> <p>Diagram 1001.2A - the drawing is fine (exactly how █████ says it should be) - that’s low res jpegs for you. We must sort out the final printing arrangements, otherwise we will end up with the image quality in the TSM far superior to that in a Statutory Instrument!</p> <p>Diagrams 1004 etc - well I did suggest that we should show alternative types rather than two separate diagrams for each marking. I suppose we took the easy way out.</p> <p>Diagram 1050 - we know we have to put this one right. If you recall, I produced the correct artwork, but it was changed to</p>	<p>786 – done</p> <p>820A – disagree</p> <p>878 – corrected</p> <p>959A – we know 960.2 – disagree, we are altering direction</p> <p>964 – we know</p> <p>1001.2A – need top take note</p> <p>1004 etc – leaving as it is</p> <p>2402 – leaving</p>
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<p>Amendment of direction 24 (1): In item 6A, 1017 has been omitted. 639.1B will always have a yellow line with it.</p> <p>Amendment of direction 25(1): (a); surely the insertion must be “660.9 or”.</p> <p>Items 12A, 15A, 15B, 18A, 18B and 20A seem to allow electric vehicles to use these bays whether or not they are actually charging. I suppose it’s too difficult to prove someone is just parking and not charging, or that charging has finished and the vehicle wasn’t instantly removed! Or is it intended that the TRO will deal with this?</p> <p>Amendment of direction 32: it’s not obvious why this amendment is necessary. None of the other variants are mentioned.</p> <p>Amendment of direction 37: (1A); is something missing in the phrase in parentheses? It doesn’t seem to mean anything.</p> <p>Amendment of direction 41: see separately emailed comments; this seems to fling the baby out with the bathwater.</p> <p>New direction 44A(3): the qualification seems odd; have people been mounting the plates to face in some other direction?</p> <p>44A(4): would read less lumpily as “does not prohibit mounting on the post the signs shown …”.</p> <p>Amendment of <u>S</u>chedule to the <u>G</u>eneral <u>D</u>irections (as it should be styled):</p> <p>Amendment direction 33(4)(c): punctuation is incorrect; the full stop at the end of (b) needs to be replaced with a semi-colon.</p> <p>Amendment direction 36: is it necessary to have a saving for portable temporary signs such as 832.1A and 832.2A, which are not permanently placed? Savings usually apply to signs <i>placed</i> before coming into force of the Instrument, certainly not to those that were in a yard somewhere at the time, and only placed <i>afterwards</i>.</p> <p>Same comments as above on the vast discrepancy in the savings period for 2310.1 and 2919.1.</p> <p>EXPLANATORY NOTE: don’t overlook “<i>instrument</i>” for “<i>Instrument</i>” in “<i>This note is not...</i>”</p>	<p>match the draft General Directions (which I had said were incorrect).</p> <p>Diagram 2402.1 - I agree and have the drawing to prove it.</p> <p>Diagram 2502 - [REDACTED] is mistaken, this diagram has been added to Schedule 16, item 28.</p> <p>Diagram 2602.1 - no, the table is correct - this is the standard way of doing things. Anyway, the sign is going to revert back to the existing, isn't it?</p> <p>Diagram 4003.1 - the line is there in the artwork - it is the awful jpeg image that’s caused the problem.</p> <p>Diagrams 7009 and 7009.1 - not for me to comment.</p> <p>Direction 7(2)(a) - agreed (see my comment 25).</p> <p>Direction 9(4) - I agree with [REDACTED] that this needs to be re-written. At present it doesn’t say whether the 20 metres is measured along the relevant road or the other road. It should be the relevant road of course. I would suggest that the form of words should be based on directions 10(7) and 10(8) (it is the same situation but where the speed limit on the other road is a national limit) as follows:</p> <p style="padding-left: 40px;">(4) Where paragraph (2) applies, for the purpose of indicating the speed limit in force on the other road to traffic entering that road from the relevant road, the sign shown in diagram 670, 674 or 675 shall (subject to paragraph (5)) be placed in accordance with paragraph (4A) on the relevant road not further than 20 metres from the junction.</p> <p style="padding-left: 40px;">(4A) [as direction 10(8)]</p> <p>Direction 11 - Paragraphs (6) and (7) were introduced by the amendment TSRGD 2008 (speed limit signs). [REDACTED] should have known that, but it does show that where previous amendments exist it is going to cause confusion.</p> <p>Direction 17 - agreed (see my comment 31).</p> <p>Direction 21(1) - agreed (see my comment 35).</p> <p>Direction 25(1) - I have produced a new table. The point about parking and not charging in an electric vehicle bay is referred to above under diagram 660.9.</p> <p>Direction 32 - than you [REDACTED] I’ve been saying this all along. We shouldn’t be overcomplicating the TSRGD when it isn’t necessary. This amendment is not needed (see my comment 38).</p> <p>Direction 37(1A) - no, nothing is missing in the phrase in</p>	<p>Agreed, delete amendment 32.</p>
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			<p>parentheses. It is providing interpretation of the expressions used in paragraphs (1B) and (1C). It could possibly be phrased different by setting out the two definitions in a separate paragraph and using only the expression (and not full definition) in paragraph (1A) (which would become paragraph (1B) as paragraph (1A) would be the two definitions).</p> <p>Direction 41 - no comment.</p> <p>Direction 44A(3) - I take [REDACTED] point, but it is consistent with direction 44A(2).</p> <p>Direction 44A(4) - lawyers should advise on this. Don't forget the point I raised about pedestrian signals and signs (demand units) prescribed by the ZPPPCRGD.</p> <p>Amendment direction 33(4)(c) - agreed. It should read:</p> <p style="padding-left: 40px;">(c) in sub-paragraph (b), for "crossing." substitute "crossing;"; and</p> <p style="padding-left: 40px;">(d) [as current 33(4)(c)]</p> <p style="padding-left: 40px;">[Also "and" needs to be removed from the end of 33(4)(b)]</p> <p>Amendment direction 36 (savings) - see my comment 42. With regard to temporary signs, there is a general problem in that you can't expect contractors to change them overnight while they are "in the yard". There ought to be a saving that allows temporary signs to be continued to be placed temporarily for a particular time period. This will require a change to amendment regulation 35(1)(a)(ii) in respect of temporary signs. I don't think we have considered this problem before.</p>	
1 1	<p>The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all. Thank you for inviting us to participate in this consultation.</p> <p>The Institute has no specific points to raise with regard to the proposed amendments to the regulations in general use but would like to make a few observations about the applicability of the Regulations in areas of visual sensitivity. Whilst many of the proposals are intended to regularize common practice, there is a general tendency for the Regulations to allow, and, therefore implicitly encourage, traffic signs which are bigger, brighter, higher off the ground and illuminated in an increasingly wide range of circumstances.</p> <p>We acknowledge that in some circumstances safety demands that more prominent signs are appropriate. However, we endorse the approach for sensitive areas, such as conservation areas and the setting of listed buildings, set out in Local Transport Note 01/08 <i>Traffic Management and Streetscape</i> which we consider to contain valuable advice. You may be aware that the CLG is intending to replace PPG15 <i>Planning and the Historic Environment</i> and it is intended not to include the issues contained in Chapter 5 <i>Transport and Traffic Management</i> in its replacement. We feel it is all the more important that highway authorities are advised of the need for sensitivity in historic environments by DfT advice. We believe this approach is supported by DfT as the Minister (Tony McNulty MP) endorsed the English Heritage series of manuals <i>Streets for All</i> Registered Office: 3 Stafford Rise, Tunbridge Wells, Kent, TN2 4QZ Registered as a Charity: No. 1061593 Company Limited by Guarantee; Reg. in England No. 3333780</p>	127	Nothing for me to comment on.	


	Accordingly, we should be grateful if references to LTN01/08 and <i>Streets for All</i> and for the general need for signage that is sensitive to the visual demands of historic areas could be made in the Circular or letter to accompany the new Regulations when published.			
1 1	<p>Proposals are generally helpful but do not go far enough in terms if issues such as-</p> <ul style="list-style-type: none"> ❑ Reducing number of signs required to remove street clutter (e.g. one way streets, 20mph zones ❑ Removing need for illumination in as many signs as possible in light of the new sign face materials available. This would bring further benefits in the form of power and carbon savings. <p>I strongly recommend these issues be considered in the forthcoming review mentioned in the document.</p>	128	Nothing for me to comment on.	
1 1	Brent would like to see further amended to Sign diag 616 (No Entry) to allow the use of supplementary plate sign diag 954.4 (Except Cycles). This will avoid confusion generated by sign diag 619, when allowing cycle access without a splitter island.	129	Diagram 616 - it is not appropriate to allow an “Except cycle” plate until the current trial has been assessed. This is a matter for the Traffic Signs Review.	
1 1	<p>18 – regulation 46 this appears to conflict with the use of the matrix sign on M25 & M1 where they are used for variable speed limits not just “advised maximum speed”. Suggest this text is added rather than substituted.</p> <p>26 – regulation 55 (c) (i) this appears to rule out the use of LED powered lamps that would have multiple LEDs.</p> <p>23 – direction 41 the optional use of non illuminated bollards most welcome.</p> <p>Also from TSRGD 2002 direction 41 (page 434) item 7, “An identification code for maintenance purposes...not exceeding 25mm in height” this is totally in adequate for night patrols for sign illumination. I suggest the size is omitted. All illuminated signs on unmetered supplies are required to have an ID numbered under the UMSUG agreement, this would generally be at least 50mm high. I suspect that most illuminated signs in the UK do not comply with this paragraph and could possibly be unenforceable.</p>	130	not seen?	
1 1	<p>Advanced Stop Lines for cycles</p> <p>We have concerns about the proposal for Advanced Stop Lines (ASLs) with gate entries. The proposal for a gate entry is described as being for ‘sites where it is not possible to provide a lead-in lane owing to constraints on road space’. If this was the case then this would only be for sites where there is a single lane in each direction. We would support such a proposal.</p> <p>The proposed new diagram, however, shows a layout where there are two lanes for general traffic. In such cases, it is clear that there is sufficient road space for it to be physically possible to provide a lead-in lane. There may be limited capacity at the junction, such that the highway authority decides it is not prepared to remove a general traffic lane.</p> <p>Research by Transport for London (TfL) on the A23 has shown that ASLs with gate layouts have no safety benefits to junctions with no ASLs at all. Because the gate is the only point where a cycle can cross the stop line lawfully when the signals are at red, it encourages people to cycle where they are most likely to be caught by left-turning vehicles. This is a particular safety risk as left-hook collisions are frequently fatal. Some authorities, including TfL, have provided off-side gates, which we understand the DfT does not authorise.</p> <p>We would therefore like to see diagram 1001.2A modified so that it shows a layout with a gate entry and only one general traffic lane. We would like to see a further variant either of 1001.2A or 1001.2 showing an off-side cycle lane, i.e. on the right hand side of a single general traffic lane. This is useful where most motor traffic is required to turn left but cycles can proceed straight ahead.</p> <p>Further changes to ASLs should be considered as part of the Traffic Signs Policy Review, in particular changing the meaning of the first stop line so that contraventions of it could be decriminalised in relation to motor vehicles to allow more effective enforcement. There could also be consideration of permitting pedal cycles to cross any part of the first stop line into the ASL to facilitate safe positioning in accordance with Bikeability standards.</p> <p>Cycle route signage</p> <p>Particularly in rural areas, there can be a difficult balance to strike between ensuring that cycle routes are easy to follow but that their signage does not clutter up ‘lanescape’. Much of the existing signage just shows cycle route numbers, which is not helpful for those who are trying to get their bearings or only use part of a cycle route</p>	131	Diagram 1001.2A - some good points raised here, including allowing cyclists to lawfully cross any part of the first stop line; something I have previously suggested. I also support cycle entry points in off-side lanes, but was told that this is not recommended. We will be looking at the design of diagram 1001.2A. I wasn’t aware of the view that there should be only one traffic lane.	

<p>rather than ride along all of it.</p> <p>We very much support the proposed new stack type advance direction sign that includes destinations. Permitted variants should allow the omission of national or regional cycle route numbers, for example where a minor road is advised reaching a destination by cycling but not by driving as part of a rural traffic management scheme.</p> <p>Cycling speeds vary more than any other mode of transport as there is a wide range of different design types of cycle user: see para. 1.3.8 of Cycle Infrastructure Design (LTN 2/08). Journey times will differ greatly between different people on different cycles.</p> <p>While we appriate that this proposal is designed to make cycling seem more of an option to non-cyclists, we are therefore strongly opposed to cycle route signs that show journey times instead of distance. These times are likely to be inaccurate for most people and they make comparison of the effort needed to travel on different routes harder, particularly if they involve gradients. The specimen sign in the draft statutory instrument shows Wells being 1 hour 15 minutes away, yet it might in fact be 40 minutes for a competitive cyclist on a road bike or 2 hours 30 minutes for someone who needs to push up hills. This sort of information is best kept to maps and heads-up on-street displays such as Legible London, where it can be shown through isochrones.</p> <p>Contraflow cycling</p> <p>1. We support making it easier to enable contraflow cycling with minimal expense and clutter. Although the consultation purports to prescribe contraflow cycling signs ‘with or without an advisory lane marked on the carriageway’, the draft amendments to direction 17 require the placing of 1004 or 1004.1 (an advisory lane) with 960.2. This should be deleted completely so that authorities are given discretion to use cycle markings or an advisory lane.</p> <p>2. While not part of this consultation, although it was announced the same day, the trialling of the ‘no entry’ and ‘except cycles’ (not ‘except cyclists’ as stated in the press release) is very much welcomed. The ‘no motor vehicles’ sign is often misunderstood, which is not surprising as there are normally motor vehicles on the other side of it, albeit facing one.</p> <p>3. The DfT’s research report entitled <i>Increasing Understanding of Traffic Signs</i> (2004) showed that only a quarter of drivers understood the contraflow cycle lane sign. Understanding of the proposed sign, which is hardly intuitive, is likely to be lower. Authorities should be encouraged to trial the use of ‘one way’ and ‘except cycles’ together, a combination which is the norm in most continental countries. Not only would this be cheaper to roll out, requiring a small additional plate as opposed to a whole new sign, it could also be more accurate. Contraflow cycling schemes often include a mix of kerb segregation of a contraflow (where the one-way sign should be used as if it were a dual carriageway), mandatory contraflow lane and advisory or no lane. Current signing rules require a confusing mix of signage in such circumstances, which is rarely adhered to in practice.</p> <p>Cycle lanes</p> <p>4. On the continent the boundary marking for cycle lanes is the same width as that for bus lanes. Continental standard cycle lanes as wide as 2.5m are now being implemented in the UK, so it is important that these are as conspicuous as bus lanes. The unnecessarily complicated limitation that the boundary marking (diagram 1049) of a cycle lane must be 150mm wide should be ended by removing this requirement from the table in direction 17 and amending table 2 in direction 18.</p> <p>5. The note to diagram 959 (with-flow bus lane) states that any vehicle may enter the bus lane to stop and load unless specifically prohibited. Unlike bus lanes, motor vehicles are not permitted to enter mandatory cycle lanes during their hours of operation. Therefore notes should be added to this effect to diagrams 959.1 and 960.1.</p> <p>Bus and designated lanes</p> <p>6. Given the increased use of High Occupancy Vehicle and other priority lanes, the prescription of ‘designated lanes’ makes sense. The Traffic Signs Review should consider the scope for simplifying the TSRGD further by</p>	<p>Diagram 2601.1 - Schedule 16, item 20 already allows cycle route numbers to be omitted (or varied).</p> <p>Journey times on cycle signs - more support for not proceeding with this proposal at this time.</p> <p>Contra-flow cycling - linking diagrams 1004 and 1004.1 to contra-flow cycle lanes is an error in the draft TSRGD as it is not in accordance with published guidance, including Chapter 3. Ralph will be pleased to learn that cycle lanes do not have to be marked if certain conditions are met.</p> <p>Diagram 960.2 - I haven't come across the idea of using 652 with diagram 954.4 before. It might look odd. I would prefer to keep to our design which is based on diagram 960.1 (which in turn is based on diagram 960). In any case this would be a matter for the Traffic Signs Review</p>	
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	<p>merging the signage and rules for bus lanes, bus lanes with motorcycle access and designated lanes, so that they are all permitted variants of a priority with-flow lane.</p> <p>7. There should be greater flexibility for except plates: while ‘except buses & taxis’ is authorised, ‘except taxis & cycles’ is not, the absence of which from the TSRGD is causing problems outside St Pancras station. There also needs to be greater flexibility in the permitted variants for 1035 (markings for appropriate traffic lanes) and regulation 30(2) to facilitate if not enable cycles to proceed straight ahead in a left turn lane between two sections of bus lane. Similar considerations are likely to apply to any vehicle permitted to be in a priority lane that changes into a left-turn only lane before a junction.</p> <p>8. On the other hand there should be less flexibility for timings by introducing a requirement to remove unnecessary information. New bus lane signs on red routes in London now state that they operate ‘Mon-Sun, At any time’. Besides being completely unnecessary for enforcement purposes, this unnecessarily increases the information overload on drivers as well as the clutter overload on London’s streets. Although diagram 663 (controlled zone) includes the text that ‘The lower panel shall be omitted where the restriction operates at all times’, there is no such requirement for bus and designated lanes. Such a restriction should be introduced to diagram 961 while schedule 16 item 38(1) should be amended so that ‘Mon-Sun’ is not permitted.</p> <p>Enforcement Cameras</p> <p>9. We believe that enforcement camera signs should only be used where there is particular justification, such as where new cameras have been installed. With the roll out of decriminalised enforcement of moving traffic contraventions enabled by the Traffic Management Act 2004, it makes sense to include further permitted variants to this sign including: ‘traffic sign’, ‘cycle lane’ and ‘designated lane’.</p> <p>Parking Signs</p> <p>10. We very much welcome the proposal to prescribe the signs for restricted zones. This will make it easier to remove the need for yellow lines to enforce parking restrictions. We also support the prescription of the signs for car club and electric car bays, which should make it easier to increase use of car clubs and electric vehicles.</p> <p>11. Yellow boxes can be very visually intrusive but they can be very useful in keeping traffic flowing. We support the extension of their application beyond signalled junctions to pinch points etc. We would like to see the regulations made more flexible so that their edges can be set back to allow cycle lanes to be marked through junctions, as is permitted in Ireland.</p>		<p>Cycle lanes - using a wider line for safety reasons etc should be a matter for cycling policy. It’s not something to consider for the Amendment TSRGD. There is also a cost implication, so we would need to consult. I don’t see the point of adding a note below diagrams 959.1 and 960.1. Guidance on waiting and loading prohibitions is given in Chapter 3. KYTS states that vehicles must not enter a mandatory with-flow cycle lane except to pick up or set down passengers.</p> <p>Designated lanes - most of the comments here are for the Traffic Signs Review. 24-hour bus lanes do not have to an “At any time” plate. These plates are recommended only where there is an adjacent non-24-hour lane. I like the idea of prohibiting Mon-Sun in Schedule 16, item 38. Can we do it without further consultation(please)?</p> <p>Diagram 878 - RUS have provided the guidance on the placing of camera signs. The existing permitted variant “Traffic enforcement cameras” covers civil enforcement of moving traffic contraventions.</p> <p>Yellow box junctions - cycle lanes - something for the Traffic Signs Review. It sounds an interesting idea. We would have to ensure that it is safe. However, the current system allows cyclist to cross the box where the lane is on both side of the junction because the exit would be clear (I can’t imagine a long queue of cyclists blocking the lane back to the junction).</p>	
1 1	<p>The proposed sign advising HGV drivers not to follow their satnavs down unsuitable routes is an innovation that will be welcomed by many rural communities. It does however pose the questions of whether it will become a “must have accessory” for many villages at a time when we are trying to avoid sign clutter and how “appropriateness” of a route will be defined. Perhaps the department could set out in the guidance notes which will accompany information about the changes how highway authorities should use these signs i.e. they are not a panacea to properly implemented width, weight or length restrictions and should be used sparingly where clear problems have been evidenced.</p> <p>There is no doubt that bridge height and width signs need to be in metric measures, especially given the concerns about drivers from abroad. Our experience is that going for metric measures alone creates considerable public complaint, meaning that dual signing, and the use of larger signs is unavoidable.</p> <p>Turning to cycle “gates”, we would hope that some method is found to make it clear whether drivers are meant to leave room on their inside for cyclists to move to the gate and up to the advanced stop line or whether they should treat it as a normal light controlled junction. There is a risk that different interpretations of how to use</p>	132	<p>Diagram 820A - “Unsuitable for HGVs” is already available as diagram 820. Will the addition of a symbol really mean that there will be a flood of requests for this signs? Traffic authorities will need consider each request on its merits and provide signs where there is a known problem. Guidance on the use of this sign will need to be given.</p> <p>No comment from </p>	

	<p>this facility could create friction between drivers and cyclists. It could also make more cyclists try to move up the “inside” of waiting lorries and leave themselves in a very vulnerable position if the lorry is turning left. The existence of the “gate” may also not be apparent to drivers in any queue for the junction. Again the guidance needs to make clear context within which the cycle gates can be used.</p>		<p>Diagram 1001.2A - with regard to the concern expressed by the AA, are there any known problems where this marking has already been authorised?. We could specify a minimum traffic lane width (this would be less than that which could accommodate an advisory cycle lane where diagram 1001.2 would be used). Another possibility is to permit the cycle marking to diagram 1057 to be used adjacent to the kerb on the approach to diagram 1001.2A to indicate the route to be taken by pedal cycles and to indicate to drivers the possible presence of cycles. We have approved a similar arrangement indicating a route for pedal cycles through a junction that is also used by trams (in Nottingham). If this is agreed, diagram 1001.2A needs to be added to direction 18, table 1, item 11 (it might need to be specified as being on the approach to diagram 1001.2A to avoid confusion with the cycle symbol that forms part of diagram 1001.2A). Alternatively, the symbol could be shown in the diagram itself (perhaps at least two symbols) with a permitted variant saying that the number of symbols may be varied, or that the symbol may be omitted.</p>	
1 1	<p>Para 16 & 17 and to some variants of Diag. 660 of TSRGD 2002.</p> <p>Diags. 660 & 660.3 when days of the week and times of the day are indicated, drivers’ confusion is removed while parking and would save a lot of time to parking enforcement authorities in the PCN representation/ appeal process.</p>	133	<p>Diagrams 660 and 660.3 - not clear what this comment is a about. If it means showing the days of the week and times of operation within a CPZ when the operational period of the parking bay is the same as that for the CPZ, then this is what should be done. If it means showing “Monday to Sunday” and “At any time” in any situation (CPZ or not), then this is no clearer than not showing a time period at all - no time period means at all times (a driver isn’t going to guess when parking is permitted or not).</p>	
1 1	<p>Part 1 overview – designated lanes – item 13.</p> <p>The ‘end of bus lane’ markings need to be supplemented by clear signage and lane markings.</p> <p>Schedule 6 Road Markings</p> <p>Re: 1004, 1004.1, 1005, 1005. 1008, 1008.1. ‘Caption to be amended so that the marking no longer relates to the speed limit.’</p> <p>Further guidance required to differentiate between the uses of these markings. Currently clear as related to speed limit. Does this affect the minimum number of marks e.g. in length on each approach currently defined by the speed limit? If speed limits alter would existing markings then remain unchanged? Are any issues created with enforcement? If hatched markings (diagram.1040, 1040.2) are still defined by the speed limit is this not potentially inconsistent?</p> <p>9 - Repeater puffin pedestrian signals higher up the pole are welcomed as a very good idea and work well in other areas. This is a far safer approach than putting the boxes on both posts which defeats the object of trying to make pedestrians look at least partially in the direction of oncoming traffic.</p> <p>12 - The Advanced Cyclist Stop Line without a lead in lane is a useful addition, although how useful cyclists will find it in practice remains to be seen.</p> <p>14 - Yellow Box Junctions for Fire Station accesses as oppose to just junctions are a good idea.</p>	134	<p>End of bus lane - unfortunately the consultation document was not clear on this in Part 1, para 13. The change is to allow the arrow to diagram 1050 to be used without the upright sign to diagram 964 at intermediate junctions. The guidance in Chapter 3 is that the upright sign is used at the end of the bus lane.</p> <p>Diagram 1004 etc - the guidance on appropriate module size won’t change in Chapter 5. However, this guidance ought to be extended to include changes to the speed limit and explain why the markings in the TSRGD are no longer associated to speed limits. Hatch markings are not linked to speed limits in the TSRGD, only in Chapter 5. Some consultees seem to think that because we are removing the speed limit link in the TSRGD, we are doing the same in Chapter 5, which is not the case.</p>	
1 1	<p>Matthew,</p> <p>Thanks for copying me in on the response to the consultation that you submitted on behalf of yourself, [REDACTED] and I.</p> <p>Following the draft response that I sent you and [REDACTED] I see that you have added a paragraph in response to Q.11 which expresses your view in relation to the diagram 7290 sign. It is unfortunate that it wasn’t made clear that what you wrote was a minority view and not one shared by me, or I think, [REDACTED]</p> <p>What concerns me is that since there was no reference to diagram 7290 in the consultation documentation there has been no opportunity for views on the use of this sign to be heard, in particular from practitioners ‘at the sharp end’. As you can see from the attached email sent to the Chapter 8 email address, some</p>	135	<p>Diagram 7290 - I support [REDACTED] and [REDACTED] on this one. Here is what I said in response to [REDACTED] ([REDACTED] Comments on Consultation Responses (5).doc):</p> <p>“We can’t withdraw this sign without consultation. It would affect local authorities, not just the HA. The HA do not have to use it on their roads. However, I have seen it used on motorways etc where the speed limit changes within road works, particularly on the approach to narrow lanes. As a driver, I find it useful as an</p>	

<p>practitioners feel strongly that there is a safety benefit in using the sign, despite Chapter 8 saying that its use is “no longer recommended”. To me, it seems unjust to prohibit the use of the sign under any circumstances without any consultation.</p> <p>With the exercise to revise the Regulations underway, if, as part of this process, DfT should decide that removing the sign is in the public interest then this will be included in the consultation exercise documentation and the likes of ██████████ will have the opportunity to put his case.</p> <p>Regards. ██████████</p> <p>Response referred to above as follows</p> <p>:</p> <p>Diagram 7290</p> <p>Due to the changes in TSM Chapter 8: 2006 this sign is not only redundant it constitutes a net increase in risk. Although specifically discouraged in Chapter 8 several enforcement bodies are incorrectly stating that this signing is needed for the enforceability of speed limits. Given its size and location on the approach zone this sign probably constitutes the single largest avoidable risk to road worker putting out signs at present. Those setting standards and regulations are required to comply with the duties under HSWA 1974. To ensure that these are met there is a requirement to either remove diagram 7290 in these amendment regulations or at least prescribe it only for a speed of 30 mph.</p> <p>Part 1: Paragraph 3 - Width and Height Restrictions</p> <p>The proposed changes include the requirement that both metric and imperial measurements should be displayed on all width and height roundel signs. However, diagrams 7201, 7201.1, 7210, and 7212 are shown in TSRGD with just the diagram imperial width sign.</p> <p>Other signs which are affected by the proposed changes have been included in the Amendment regulations, so shouldn't the signs 7201, 7201.1, 7210, and 7212 also be included? Otherwise, designers are likely to continue to have these temporary signs made as shown in the current Regulations.</p> <p>The signs should be changed to show the diagram 7283.1 dual unit roundel, and/or, if this is adopted, both imperial and metric versions of diagram 7283 stacked on top of each other. See also response to Q1 above.</p> <p>Part 1: Paragraph 11 – Traffic Officers</p> <p>Historically the ability to maintain the highway (road works and street works) has relied on enforceable signs (e.g. keep right arrow). To undertake works TTM operatives have to pass these signs in a manor which would be an offence e.g. drive to the left of keep right arrow on a section of road which may be coned off but which is not closed by a traffic order. The assumption has been that as TTM operatives have the powers to place, maintain and remove signs under section 65 of RTRA 1984 that these powers allow them to pass signs which they would also have the power to remove. The draft changes to accommodate Traffic Officers may imply that the above assumption is incorrect and that additional changes would be required to allow road works to be undertaken in compliance to TSM Chapter 8.</p> <p>Part 1: Paragraph 12 Advance Stop Line</p> <p>The proposed changes to diagram 1001.2 looks to be a method of cheaply making the large number of incorrectly and unlawfully marked ASL (without an approach cycle lane) lawful rather than providing cyclists with a safe method of using the facility.</p> <p>Part 1: Paragraph 22 – Road Works Signs</p> <p>The proposed changes to Diagram 7022 (to extend its use to one way streets) is not consistent with the decision of the TSM Chapter 8 TPB. Given the known problems and accident record with the use of wicket signs on single carriageway roads additional guidance on the correct use of these signs was included in TSM Chapter 8:2006. While the use of wicket signs on one way streets is likely to be acceptable it was identified that</p>	<p>indicator to move the left hand lane and reduce speed before the actual limit starts. If this sign is to be withdrawn eventually, then I would like to see the speed limit terminal signs mounted on yellow backing boards - to increase the target value where there are other signs, cones. merging traffic etc that attract a driver's attention.”</p>	
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	<p>specific guidance was needed in Chapter 8 to fully explain the correct usage and to stop their use on bidirectional single carriageways.</p> <p>I would suggest that this amendment be dropped, or delayed, until it is possible to simultaneously revise Chapter 8 to include guidance on the correct use of these signs on single carriageways.</p> <p>Part 1: Paragraph 26 – Amendment of regulation 55 – Road Danger Lamps</p> <p>The proposed change refers to the latest Standard which is BS EN 12352:2006 which calls these lamps “Warning Lights” and not “Road Danger Lamps”.</p> <p>Because of this change in term, the revised version of Chapter 8 of the Traffic Signs Manual published in March this year was amended so that the title of the relevant section (O4.7) was amended to “Warning lights (road danger lamps)” and throughout the document the term “warning lights” has replaced “road danger lamps”.</p> <p>Shouldn’t the amended regulation 55 either use the term “warning lights” instead of “road danger lamps” or at least make reference to both terms? This will minimise confusion amongst practitioners who are being told in Chapter 8 that “warning lights” is now the ‘official’ term to use.</p> <p>Part 4: Schedule 6- Lane markings</p> <p>The removal of division by speed limit for the different versions of diagrams 1004, 1005, 1008 should not be accepted. For speed limits less than 40 mph the existing six metre modules gives an increased preview time of over the nine metre modules. If a speed limit is to be reduced to below 40 mph for reasons of safety then highway authorities should be required to provide the better performing markings i.e. those currently required for lower speed limits.</p> <p>In addition the proposed changes are likely to require changes to the marking and stud details in Chapter 8 as well as voiding the HA TTM road stud authorisations. If these proposed changes are to be adopted then the revised road stud versions should be included in the amendment regulations.</p> <p>Amendment to regulation 14: Signs attached to vehicles - Not included</p> <p>An opportunity seems to have been missed to amend regulation 14.</p> <p>The revised version of Chapter 8 published in March this year included a revised section on Single Vehicle Works (Section O8.1) which introduced reference to a small light arrow sign (paragraph O8.1.8). In addition the need to authorise each light arrow sign again to accommodate planned updates due to changes in technology and materials would be avoided by revising Regulation 14.</p> <p>Use of fluorescent yellow for certain signs:</p> <p>The Highways Agency has authorised that signs coloured yellow in Schedule 7 part VIII and Schedule 12 of the regulations may be fluorescent yellow. If this is acceptable on all roads, should the opportunity be taken to include this in the Amendment Regulations?</p>			
1 2	<p>We are making changes to require both metric and imperial triangular warning signs to be displayed to give warnings of restricted headroom, with the upgrade being complete in four years’ time. Using the imperial sign on its own will no longer be permitted Consider cost implication to local authorities. The resulting advance signs will be wider/ taller, requiring larger foundation, posts (perhaps passively safe if above 89x3.2mm gauge), larger lights and re-cabling. Will these new wider signs fit in all situations due to limited verge widths/footways? Existing signs mounted on bridges will need to be changed - to do this road closures will be required, notices to be made, diversions, Traffic Management etc. - many necessary to comply with CDM 2007. With current contracts it is reasonable to expect the cost per site to be in the region of £2500- 5000 per location, rather than a few hundred pounds.</p> <p>Suggest reconsideration of costs. Assuming any replacement applies to both side of a bridge, it appears the maximum sign face cost per bridge has been assumed to be £300. A more realistic figure will be significantly higher due to the need for H&S considerations for example, road closure, notices, new post and foundation, cabling, new light units, traffic management plus future maintenance costs. We would envisage the cost per bridge to be nearer £5000 allowing for these various requirements and consideration of CDM Regs</p>	73	<p>Metric/imperial signs on bridges - with regard to cost, the issues are (1) exactly how many bridges are affected (many will already have dual signing), and (b) what cost of an accident because a bridge doesn’t have dual signing? With regard to signs on approach, the dual roundel should already be used for non-arch bridges. Triangular warning signs will increase in height (one above the other) not width. Is the post size really an issue?</p> <p>No comment from </p>	

1 2	The financial impact of using retro reflective bollards in lieu of directly illuminated alternatives can be significant. The cost and environmental impact of providing an electrical supply to the centre of a carriageway, maintaining the electrical equipment over time, periodic electrical testing and the safety implications for operatives working in live traffic conditions in the centre of the road are not covered. The increased reliability of retroreflective materials against directly illuminated alternatives has not been identified and is again significant. TRL research and typical costs can be provided by CSS members if this would support the case.	6	No comments	
1 2	Adding metric signs at locations where there is currently imperial only or replacing an imperial only sign with a dual system sign implies an increased current cost in the future since either two signs, or a sign containing an increased amount of graphics, would require to be maintained/replaced. This future cost would be reduced if the current imperial signage was replaced by metric only. In the case of width and height restrictions any argument for the need to display imperial dimensions is simply countered by amending Regulation 10 of The Road Vehicles (Construction and Use) Regulations 1986, as amended by SI 1997/530 to require any vehicle height that exceeds 3 m to have the maximum height of the vehicle in metres displayed inside the cab so that it is clearly visible to the driver. Adoption of the above proposals provides a double win-win situation: 1. Lower future maintenance costs (to the taxpayer). This benefit needs to be taken into account in the impact assessment, preferably comparing the proposals as made with the all metric option. 2. Greater safety for UK goods vehicle drivers when driving elsewhere in Europe and further afield through their familiarity of their vehicle's dimensions in a universally recognised system of measurement.	18	No comment from [REDACTED]	
1 2	The financial impact of using retro reflective bollards in lieu of directly illuminated alternatives can be significant. The cost and environmental impact of providing an electrical supply to the centre of a carriageway, maintaining the electrical equipment over time, periodic electrical testing and the safety implications for operatives working in live traffic conditions in the centre of the road are not covered. The increased reliability of retroreflective materials against directly illuminated alternatives has not been identified and is again significant. TRL research and typical costs can be provided by UK Lighting Board members if this would support the case.	29	No comment from [REDACTED]	
1 2	There is a failure to mention the benefits of reducing the likelihood of bridge strikes by British drivers on non-UK bridges. If UK drivers are familiar with seeing metric dimensions signs at home, then they are less likely to cause an incident overseas due to unfamiliarity. Bridge strikes overseas have costs for the foreign nation and also have real costs for the British driver and his/her employer.	32	See above.	
1 2	See answer to Q9 – the additional requirement for written approval of simple shuttle section portable signals will increase costs for both utilities / contractors and local authorities – whilst only small on an individual basis, the cumulative costs could be considerable. However, more importantly, the potential delays to the delivery of utility services could have significant cost implications for both utilities that are required to provide connections within certain prescribed timescales, and indeed to businesses waiting for their utility services.	35	No comment added by [REDACTED]	
1 2	It is impossible to verify your figures, the main impact on councils will apply if they are forced to change sign plates ahead of normal maintenance replacement regimes and in the economic climate are unlikely to receive priority attention. This should be reflected by a more realistic approach to changeover		No comment added by [REDACTED]	
1 2	We do not agree that there is an average of 2 signs per bridge when your estimating cost . We believe the average to be 4 but would add caution to your assumptions on average cost etc. Most rural bridges have advanced signs at junction some distance from the bridge itself and these can be on large ADS type signs. If we have to change parts of these signs we have to look at the cost of using Lattice post etc this can make a large ADS cost nearer £5K to £10K. Do not understand why we cannot use metric only signs instead of both metric and imperial? Estimates don't appear to cover signage fixed to bridge structures. Traffic management costs for changing these signs usually requires a road closure (currently £1200, say £1500 incl. diversion signage).	47	No comment by [REDACTED]	
1 2	The proposals make reference to savings, but there isn't any counter balanced costs heading. As stated previously there are considerable costs associated with weight/height restriction signs replacement	49	No comment by [REDACTED]	
1 2	£150 / sign as stated in the draft impact assessment sounds reasonable. The benefits are also stated and I agree with what has been written there. Presumably the draft impact assessment will refer to signs on the bridge. I don't believe that traffic management is needed for changing all signs, especially signs that warn of a height restriction a certain distance ahead, and are not on a bridge. However, I would say that money spent on	63	No comment from [REDACTED]	

	metric signs is money well spent.			
1 2	<p>The author has identified a number of instances under Q3 where the EU directive 80/181/EEC has not been followed due to incorrect symbols being used. If this was successfully challenged in court by, for example, an HGV driver who stood to lose his licence for not complying with such signs, the DfT could be ordered under Francovich vs Italy judgement (European Court of Justice) to fund the replacement of non-compliant signs with compliant signs.</p> <p>It is recommended therefore that a contingency be put aside to fund such an eventuality. It is furthermore recommended that the DfT take steps to ensure that all signs are replaced with compliant signs.</p>	64	No comment from [REDACTED]	
1 2	No. No account has been taken regarding the cost of removing existing signs such as waiting restriction time plates from traffic signal poles and replacing them on new posts or of the future cost of having to provide additional posts for this purpose.	82		
1 2	No. Costs will not necessarily fall to Central Government who are promoting this	85		
1 2	<p>No. The draft impact assessment does not attempt to quantify all the costs and benefits but makes some reasonable albeit highly uncertain assumptions about the few that can be quantified.</p> <p>There would appear to be an error in the statement relating to sustainable development. It is difficult to see how the amendments could be viewed as being non-compliant with sustainable development principles. If, as intended, they result in a reduction in bridge strikes then this will be supportive of sustainable development principles by reducing the unnecessary waste of resources associated with repairing bridges that have been damaged</p>	89		
1 2	No. Adding new signs, where illuminated, may require new poles and floodlights with disconnections and reconnections, thus increasing costs.	90		
1 2	<p>No. The draft impact assessment for local authorities to accelerate the replacement of traffic signs to display both imperial and metric measurement by 2014 assumes the useful life for all signs to be 10 years, and that a replacement programme is in place within that time scale. Modern micro prismatic sign face materials have warranties up to 12 years and in most cases will maintain required performance for well in excess of the guarantee period.</p> <p>The draft impact assessment has also based cost on 2 signs @ £150 per bridge. In reality the design and management costs, sign manufacture and erection costs, traffic management of the site and the Basic Asset Protection Agreement with Network Rail will result in cost well exceeding that cost even for a simple 2 sign installation. In most cases signing replacement works will involve advance signing and in some cases alternative route signing. It is estimated that costs per bridge would be between £5000 and £20,000 and require a budget of £100,000 to £150,000 p.a. over 4 years to complete all resigning works associated with height and width restrictions.</p>	102		
1 2	No. Costs will not necessarily fall to Central Government who are promoting the changes.	116		
1 2	It's perhaps a trivial point, but the replacement signs for diagrams 629 and 629.2 should be one step larger than the signs they replace in order to preserve the same legibility (e.g. there is no prescribed 600mm size, although some LAs think there is). I don't know if this would make any material difference to the costings, which perhaps weren't so precise that such differences could be accounted for anyway.	126	No comment from [REDACTED]	
1 2	<p>Diagram 530 – a single 600mm illuminated sign is often mounted on a lighting column. Increasing this to 2 no 600mm signs will in most cases exceed the design loading for the column necessitating a separate post. For existing free standing posts a new post and electrical connection will be required.</p> <p>The alternative is to use dia 629.2A on all bridges and dia 818.3 as advance warning, which does not need to be illuminated. This then begs the question, is dia 530 needed at all except in existing locations where metric and imperial measurements are used.</p>	130		