



**RESPONSE TO  
DEPARTMENT FOR TRANSPORT CONSULTATION PAPER  
TRAFFIC SIGNS REGULATIONS AND GENERAL DIRECTIONS 2015**

**12 June 2014**

## **Consultation on the Traffic Signs Regulations and General Directions 2015**

This is RoSPA's response to the Department for Transport's consultation on the Traffic Signs Regulations and General Directions 2015. We thank the Department for the opportunity to comment on the proposals. As RoSPA is not a local authority or a traffic signs practitioner, we have not answered every question.

### **Question 1**

If you are responding as a traffic signs practitioner, from the draft you have seen in this consultation, do you believe the new structure and provisions of TSRGD will give you the flexibility to design and use the signs you need to help manage traffic?

### **RoSPA Response**

Although RoSPA is not a traffic signs practitioner, we agree that the new structure of the TSRGD should provide more flexibility in the design and use of traffic signs.

### **Question 2A**

We would like your views on extending deregulation of sign lighting. The proposal is that any signs within 20 mph limits and zones would no longer need to be lit. This is on the basis that at slower speeds there is more time available to drivers to read the signs.

Do you agree that all signs within a 20 mph limit/zone, particularly safety critical signing such as "no entry" signing, should be subject to local authority judgement only?

### **RoSPA Response**

RoSPA agrees that given the lower speeds in 20 mph areas, it is not necessary to light signs, unless they are safety critical.

We believe that safety critical signs, such as two-way signs, must be lit, and agree that local traffic signs practitioners are best placed to judge which signs are safety critical in each location. They should also have the ability to light other signs if they feel they need lighting because of the specific circumstances where they are sited.

We recommend that the reasons for the decisions to light or not to light signs should be recorded.

### **Question 2B**

Do you agree that the requirement to light 'two-way traffic ahead' signs is safety-critical, and should remain, or should be removed in line with other warning signs?

### **RoSPA Response**

RoSPA strongly agrees that two-way traffic ahead signs are safety critical.

**Question 2C**

To help inform our final Impact Assessment please can you provide us with estimates within your local authority on the number of illuminated traffic signs you have placed in 20 mph zones, the number of traffic signs you have placed on retro-reflective self-righting bollards, and on average what is your estimated yearly energy cost of lighting a single traffic sign?

**RoSPA Response**

As RoSPA is not a local authority, we are unable to provide figures.

**Question 3A**

Is there anything more we can do within TSRGD to reduce sign clutter?

**RoSPA Response**

RoSPA has no further suggestions.

**Question 3B**

If you are responding as a traffic signs practitioner, will you take advantage of the greater flexibility within the new TSRGD to reduce sign clutter?

**RoSPA Response**

RoSPA is not a traffic signs practitioner.

**Question 4**

Do you support the proposals to allow changes to yellow line restrictions to be made without an associated Traffic Order (TO) process? As a local authority, would you ensure that effective consultation would be undertaken if the requirement for a TO is removed?

**RoSPA Response**

RoSPA supports this proposal, but we recommend that there should be a requirement to conduct a local consultation to ensure that any local issues are identified. There should also be a requirement to keep records of any changes and to ensure that any road mapping (GIS) systems are updated.

**Question 5**

To inform our final Impact Assessment please can you provide us with estimates within your local authority on the number of cycle schemes you have introduced over the last 10 years using the following signs?

- 'Except cycles' plate when it is placed directly beneath the following signs that already have an associated Traffic Order:
- Width-flow cycle lane and one way traffic with contra-flow cycle lane sign, along with the white lane marking
- One way traffic with contra-flow cycling

**RoSPA Response**

As RoSPA is not a traffic signs practitioner, we are unable to provide figures.

**Question 6A**

Do you agree that pelican crossings should not be included in TSRGD?

**RoSPA Response**

RoSPA believes that pelican crossings should be included in TSRGD. Although new Pelican Crossings may no longer be used, many existing ones will remain in place for many years to come. Therefore, we believe that the signs, markings and directions for Pelican Crossings should be included in TSRGD.

**Question 6B**

If No, should they be allowed for:

- i) Multi-lane approaches?
- ii) for any site?

**RoSPA Response**

Given that existing Pelican crossings will remain on many types of roads, not just multi-lane approaches, RoSPA believes they should be allowed for any site.

**Question 7**

If you are responding on behalf of a local authority, are you likely to make use of the flexibility within the new TSRGD to put up:

- 7A) Signs indicating the present county boundaries?
- 7B) Signs indicating historic county boundaries?
- 7C) Signs indicating designated geographical areas?
- 7D) Photographic boundary signs?

**RoSPA Response**

RoSPA is not responding on behalf of a local authority.

**Question 8**

Do you support the proposal to include a new definition of tourist destination for England within TSRGD?

**RoSPA Response**

RoSPA supports the proposal to include a new definition of tourist destination for England within TSRGD because this will help to reduce and prevent sign clutter by ensuring that commercial businesses are not able to use brown tourist signs by claiming that they are a tourist attraction.

**Question 9**

Do you support the proposal to remove the Guildford rules from sign design?

**RoSPA Response**

RoSPA supports the proposal to remove the Guildford rules from sign design in order to simplify the design. This should make direction signs easier to read and smaller, reducing sign clutter.

**Question 10**

Do you support the proposal to expand the use of exceptions to 'no entry' signs?

**RoSPA Response**

Given that these additional exceptions are already in use in some situations, RoSPA supports the proposal to include them in the TSRGD. However, we are not convinced that this would make it necessary to require Local Authorities to go to the time and expense of replacing all their blue signs for bus gates and bus only streets.

**Question 11**

In your view, would a sub-plate on these [no pedestrians and no cyclists] signs be helpful in understanding these prohibitions?

**RoSPA Response**

RoSPA believes that sub-plates stating "No Pedestrians" or "No Cyclists" would help to emphasise the meaning of these safety-critical signs

**Question 12**

In your view, are revised signs indicating the operator of enforcement cameras necessary.

**RoSPA Response**

RoSPA does not believe that revised signs indicating the operator of enforcement cameras are necessary. The essential information for drivers and motorcyclists is that enforcement cameras are in use; the name of the body responsible for the cameras is not essential information, and can be obtained elsewhere. Therefore, in RoSPA's view it does not need to be included on the sign. In some cases, the name of the camera operator will be very long, requiring a large sign to fit it on.

**Question 13**

Do you have any other comments on the draft Schedules?

**RoSPA Response**

While RoSPA supports the aim of these proposal to revise the TSRGD to make the requirements simpler, easier to use, more flexible, and more cost-effective, we believe that national consistency in traffic signs and road markings is also important, and should not be lost.

RoSPA also supports the reduction in the requirement to light signs, however, we believe that the recommendation to make decisions on a case by case basis, and based on a full risk assessment, should be a requirement, not just a recommendation.

When deciding whether or not to light traffic signs, local authorities should also consider any local plans to reduce or dim street lights near traffic signs, as this may affect the decision to light the signs.

The reasons for decisions to light or not to light signs, and the risk assessments on which the decisions are based, should be recorded, and the records should be kept available for future reference.

The Royal Society for the Prevention of Accidents  
Response to Department for Transport Consultation Paper  
Traffic Signs Regulations and General Directions 2015  
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RoSPA thanks the Department for Transport for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.

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