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Consultation on the draft Traffic Signs Regulations and General Directions 2015

English Heritage response, 12/06/2014

Please find below the English Heritage response to the DfT 'Consultation on the draft Traffic Signs Regulations and General Directions 2015'.

English Heritage is the Government's statutory adviser on all matters relating to the historic environment in England. We are a Non-Departmental Public Body established under the National Heritage Act 1983 to help protect England's historic environment and promote awareness, understanding and enjoyment of it.

We have agreed Memoranda of Understanding with the Highways Agency, Environment Agency and Natural England, and as a statutory consultee we are currently working with the DfT on the 'Route Based Strategies' that are being developed by the Highways Agency.

For many years English Heritage has been concerned over the proliferation of traffic signs and other street furniture, and the detrimental impact this has on our streetscapes.

- We have sought to address this through our 'Streets for All Campaign'.
- We have been providing national and regional guidance together with accompanying training events to local authorities and highways engineers to reduce clutter whilst reinforcing local character.

English Heritage was also part of the DfT 'Traffic Signs Policy Review Steering Group' and Chaired the 'Environment Working Group'. However, we do not feel the current review goes far enough and the final proposals fail to embrace the best practice or innovative approaches that were advocated by the 'Environment Working Group' after extensive discussion with all interested parties.

These issues are explained further in our response to question 13.

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?

Although we are not responding as a traffic signs practitioner the proposal to offer great flexibility to local authorities has the potential to exacerbate rather than redress the national problem of street clutter.



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Question 2

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?

We strongly agree.

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?

We are not traffic signs practitioner and have no comment.

2C) To help inform our final Impact Assessment please can you provide us with estimates within your local authority on:

- i) The number of illuminated traffic signs you have placed in 20 mph zones?
- ii) The number of traffic signs you have placed on retroreflective self-righting bollards?
- iii) On average what is your estimated yearly energy cost of lighting a single traffic sign?

We are not a local authority and have no comment.

Question 3

3A) Is there anything more we can do within TSRGD to reduce sign clutter?

Yes – for example, the removal of requirements for zig-zag lines at pedestrian crossings and their replacement, if necessary, by double yellow lines.

- **We also feel there should be greater promotion of exemplar schemes to encourage good practice. The Department commends Northamptonshire County Council’s ‘one up / two down’ approach and advocates the need to adopt similar policies elsewhere which we strongly endorse. This could perhaps be further encouraged by the implementation and promotion of a number of demonstrator projects.**
- **Consideration could also be given in the funding agreement and through financial incentives with highways authorities to setting a target for sign reduction as a specific element of Local Transport Plans and to encourage them to only install the minimum signage needed.**



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- **As part of the Government's localism agenda, the DfT should be encouraging highways authorities to talk to civic and amenity societies, and local groups about reducing signage and addressing street clutter. This would encourage them to participate in the active management of their neighbourhoods.**

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?

We are not traffic signs practitioner and have no comment.

Question 4

Do you support the proposals to allow changes to yellow line restrictions to be made without an associated Traffic Order (TO) process?

Yes

We believe such an approach would allow common sense changes to yellow lines to be more easily carried out. English Heritage would also like to see the revival of Historic Core Zones after the pilots developed by the DfT and Historic Towns Forum which were subject to a Traffic Advisory Leaflet, as they do away with most yellow lines.

As a local authority, would you ensure that effective consultation would be undertaken if the requirement for a TO is removed?

We are not a local authority and have no comment.

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 introduced over the last 10 years using the following signs?

We are not a local authority and have no comment except to say that signage for cyclists should be kept to a minimum that allows cyclists to safely share the carriageway/pathways with other vehicles/pedestrians. Cycle signage should be placed on existing street furniture or on posts/bollards of an appropriate scale.

Question 6

6A) Do you agree that pelican crossings should not be included in TSRGD?

No

As some remain in place and may well be refurbished by those carrying out works to the carriageway, it is necessary that details on setting out



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pelican crossings are available. We are keen to see the 1997 Regulations for Zebra, Pelicans and Penguin Crossings reviewed, to reduce the number of traffic signals, signage and markings.

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:-

Although we are not a local authority, English Heritage owns a number of historic properties and may have influence over other areas including World Heritage Sites.

We believe that on a strictly limited basis, where the signs are of national interest to the public, there may be cases for their use, for example, World Heritage Sites.

Question 8

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

Yes

We agree with the definition of tourist attraction, though might suggest it should be a major visitor attraction as recognised by the Tourist Board. However, we remain concerned about the use of brown signs for sites/venues that are or may be temporal in nature, and where the sign is not removed once the activity ceases.

Question 9

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

Yes

We agree that this will simplify and improve the clarity of direction signage.

Question 10

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

Yes

We support the thoughtful use of exception signage as this would reduce clutter.



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Question 11

In your view, would a sub-plate on these signs be helpful in understanding these prohibitions?

Yes

We feel this would be helpful provided it could be done with a limited amount of text to reduce the size of the sign needed.

Question 12

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

No

We see no benefit in identifying the operator of enforcement cameras and question the use of such signs to highlight their possible existence to drivers who may be breaking national speed limits.

Question 13

Do you have any other comments on the draft Schedules?

Yes

As drafted the consultation implies that only relatively minor changes are required to the current regulatory framework, but we feel this is not the case. DfT's own research has shown a doubling in the number of traffic signs over the past 20 years and although you state this is unsustainable the 'Impact Assessment' suggests their number is expected to continue to grow at the same rate. However, independent studies by English Heritage, CABE, CPRE and other bodies have demonstrated repeatedly that 70% of street furniture is unnecessary, duplicated or redundant.

Clear leadership is required from the DfT (in conjunction with DCLG) supported by a Ministerial Champion, setting out best practice and guidance to local authorities together with more streamlined Regulations. A more logical structured relationship between the planning system and highways regulations could help to reduce street clutter for example through the application of Minor Development Certificates and Control of Advertisements consent.

The existing Regulations, Directions, manuals and guidance relating to traffic signs have evolved over many years and are extremely lengthy, complex and not easily understood. It might be helpful if these were subject to a review similar to the Taylor Review of Planning Practice Guidance which reduced planning policy to the National Planning Policy Framework and guidance to the Planning Practice Guidance.



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Furthermore, the resulting National Planning Policy Framework and accompanying Planning Practice Guidance have been developed as easily accessible web-based documents, and the TSRGD with its accompanying tables could perhaps benefit from a similar approach.

If you require an alternative accessible version of this document (for instance in audio, Braille or large print) please contact our Customer

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