21 December 2009

Dear Mr Creese

Traffic Signs consultation

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.

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.

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. Conservation Principles [http://www.english-heritage.org.uk/server/show/nav.9181] sets out the guidelines for engagement with the historic environment which have informed the consultation draft of Planning Policy Statement 15 (PPS15).

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.

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.

I hope that these comments are helpful. We have no further comments on the detailed regulation proposals.

Yours sincerely

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