

Consultation on the Draft Traffic Signs Regulations and General Directions 2015

Response on behalf of National Parks England

June 2014



## Summary

National Parks England welcomes the opportunity to comment on the “*Consultation on the Draft Traffic Signs Regulations and General Directions 2015*”. National Parks England collectively represents the views of the nine English National Park Authorities and the Broads Authority.

Our ambition is:

*For road signs and other traffic management measures within National Parks to be minimal and sympathetic to their settings.*

We believe that this ambition could be furthered by the following high level actions: -

- We would welcome a declaration from the Government within the final document that road signage within National Parks should reflect the sensitivity of such landscapes and their national importance.
- We would welcome an approach where the regulations related to signage, particularly with regard to size and placing could be made more flexible within National Parks. This approach would also allow traffic engineers to work with National Park Authorities to design signage schemes that blend into the environment more, without compromising their effectiveness.
- We would welcome an approach where Highway Authorities delivering Traffic Orders independent of National Park Authorities, are required to consult National Park Authorities in accordance with the Duty of Statutory Undertakers under Section 62 of the Environment Act (1995).
- We would welcome a recommendation that permanent warning signs should be to the minimum appropriate size; otherwise, the reduction in prescription may lead to risk averse traffic engineers installing signs that are larger than necessary to reduce risk of litigation in the event of a collision.
- We would welcome an approach whereby highway authorities are directed that any new boundary signs within National Parks should be in keeping with the landscape and should not be visually intrusive.
- We would welcome the opportunity for area wide speed limits in National Parks, with the requirement for terminal signs only.

## Background

National Parks England welcomes the opportunity to be able to comment on the “*Consultation on the Draft Traffic Signs Regulations and General Directions 2015*”. National Parks England collectively represents the views of the nine English National Park Authorities and the Broads Authority. Signage has an important role to play for visitors to, and residents of, National Parks, enabling them to undertake journeys in a safe and expeditious manner. However, the over-proliferation of road signs over the last 20 years, referred to within the Draft Circular has had a negative visual impact on the landscape of many of the English National Parks. Due to this impact on protected landscapes, the English National Park Authorities Association (now known as National Parks England) and the National Association for Areas of Outstanding Natural Beauty were represented on the Signs and the Environment Working Group of the DfT Traffic Signs Policy Review. The resulting policy steer towards decluttering has been welcomed by National Parks England and its constituent National Park Authorities.

In responding to this consultation, National Parks England will focus on those areas that are particularly pertinent to National Parks and National Park Authorities, or those areas where we are best able to provide an input.

## General Comments

National Parks England welcomes the Government's commitment to reducing sign clutter as expressed within Chapter 3 of the Consultation document. We also welcome the recognition that the over-provision of signs can have a detrimental impact on the environment, as well as dilute the effectiveness of the message. In those cases where new signage is required, we support an approach of review and consolidation to enable the most efficient use of street furniture, and to minimise the amount of new infrastructure.

We recognise that road safety and the ability for drivers to understand signage, will and should be the prime concern when traffic engineers design road schemes. We also recognise that the approach detailed within the review will go a long way to reducing clutter, particularly in urban areas. However, we remain concerned that within rural areas and particularly those with high landscape designation, such as National Parks and AONBs, that the overabundance of signing will continue to have a negative visual impact. Therefore, we would welcome a declaration from the Government within the final document that road signage within these areas should reflect the sensitivity of such landscapes and their national importance. Such a declaration would be in accordance with the Duty of Statutory Undertakers as defined within Section 62 of the Environment Act (1995).

In conjunction with the suggestion above, we would welcome an approach where the regulations (relating to the size and placing of signage) could be made more flexible within National Parks. This approach would also allow traffic engineers to work with National Park Authorities to design signage schemes that blend into the environment more, without compromising their effectiveness. In some cases, allowing flexibility of placement, that may be as little as a few metres, could enable a sign to have a backdrop of foliage rather than it standing out against the skyline. This approach would enable schemes to be undertaken based on local knowledge and understanding of the landscape, whilst ensuring that they were still fit for purpose.

## Specific Comments

### Chapter 3 – General Changes in TSRGD 2015

Sign Illumination – the approach of removing the lighting requirements from a number of sign categories is welcomed and will have the following benefits: -

- a) This approach will enable Highway Authorities to make budgetary savings on both the direct cost of lighting and also on maintenance, freeing up funding for other areas of work.
- b) The removal of sign lighting will be a positive approach to reducing light pollution. Some National Parks suffer significant impacts from the light pollution from neighbouring urban areas. This approach should help in reducing this impact.
- c) Any efforts to reduce the number of lit signs are positive with regard to reducing the nation's collective carbon footprint.

Traffic Orders – the removal of the requirement for a Traffic Order to enable certain restrictions to be introduced is cautiously welcomed. This approach will reduce the bureaucracy involved in introducing such restrictions. However, it is vital that a requirement to advertise and / or consult is written into such an approach. Whilst this does entail a level of bureaucracy, it may be preferable to the bad publicity that could arise if restrictions are introduced without the public being offered the opportunity to comment. The experience of some National Park Authorities working in conjunction with Highway Authorities to deliver parking restrictions etc suggests that without a full consultation process, residents and visitors will be unsupportive of such measures. This approach is particularly important in National Parks where the catchment area for particular schemes is in effect national rather than local.

Similarly, because of the importance of the National Park landscape and cultural heritage, it is vital that where Highway Authorities are delivering such schemes independent of National Park Authorities, that there is a full consultation process in accordance with the Section 62 Duty.

## Chapter 4 – Permanent Warning Signs

Paragraph 4.4 – This paragraph refers to the removal of prescription of size for warning signs; but then goes on to state that “*This reduction in prescription should not be seen as an opportunity to place smaller signs for environmental or economic reasons*”. This approach is the correct one, in that road safety and driver assimilation should determine the appropriate size of road sign. However, we would welcome a recommendation that signs should be to the minimum appropriate size; otherwise, the reduction in prescription may lead to risk averse traffic engineers installing signs that are larger than necessary to reduce risk of litigation in the event of a collision.

We would also welcome the ability to attach additional signs to permanent ones to alert motorists to seasonal changes. For example this could be related to young livestock on the road such as lambs, calves or foals; or related to seasonal wildlife crossing.

## Chapter 5 – Regulatory Roundels

The introduction of a new roundel for “*pedal cyclists, walkers and horse riders only*” is welcomed and will prove useful to National Park Authorities signing non-motorised multi-user routes. Other measures to improve cycling facilities are also welcomed.

## Chapter 6 – Waiting, loading & stopping restrictions and parking places

On the whole the removal of the requirement for upright signs to accompany parking bays etc is a positive approach and should lead to less signage and / or road markings. This approach has the potential to benefit National Parks, AONBs, Conservation Areas and locations of a high cultural heritage value. However, in order to prove effective it is vital that any scheme is easily understood by the user, particularly if enforcement is to be effective and not subject to challenge.

## Chapter 7 – Speed Limit Signs

The proposed approach to make the introduction of 20mph limits, where appropriate, less constrictive is welcomed. The reduction in the requirement for associated signage and traffic calming measures is a positive one and is likely to lessen the visual impact of such schemes on the urban streetscape. This is particularly important for residential areas and locations of a high cultural heritage value.

We also welcome the removal of the requirement to place at least one repeater sign along a speed limit. However, the review of rural speed limits on A & B Class roads has led to a signage anomaly within rural areas. The A & B Class roads in many National Parks now have 50mph limits as the norm, and this is a positive approach in terms of road safety and reducing carbon emissions. However, this approach has resulted in a proliferation of road signs with the requirement for repeater signs. By contrast, the majority of C Class and Unclassified roads retain the National Speed limit, with no requirement for any signs other than terminal signs. We would welcome the opportunity for area wide speed limits in National Parks, with the requirement for terminal signs only. In order to ensure that the speed limits were fully understood, the terminal signs would act as gateways, and would need to be larger than at present to ensure that the road user was aware of the appropriate limit. However, this would be acceptable in many cases as a balance against the current impact of repeater signs. Where necessary and appropriate, the use of roundels on the road surface could be used to act as a reminder and an aid to enforcement.

## Chapter 8 – Advisory Signs and Markings

The introduction of a sign for ‘Quiet Lanes’ is welcomed; the introduction of Quiet Lanes, particularly in National Parks can have a positive effect, making all road users aware of the likelihood of meeting vulnerable users. The provision of this sign should streamline the process of designating Quiet Lanes. Similarly, the introduction of signs for shared space should assist with normalising the use of road space by non-motorised users such as cyclists alongside motor vehicles.

## Chapter 9 – Direction Signs

The removal of the Guildford Rules for TSRGD 2015 is welcomed. This approach should lead to a reduction in size of directional signs without compromising their readability.

The inclusion of cycle route branding on directional signs is welcomed, and may prove useful to some National Parks promoting new and existing cycle routes.

## Chapter 11 – Pedestrian crossings and light signals for the control of traffic

Facilities for cyclists – this approach is welcomed, but as with other aspects of signage, it is important that the measures introduced are appropriate to the location, as well as serving their primary purpose of improving safety and conveying easily understood information to road users.

## Consultation Document

### Chapter 7 – Other Issues

New forms of boundary signing – we welcome the new flexible approach to the design of boundary signs and feel that this will help to provide visitors to an area with a sense of identity of a location. We also welcome the opportunity for National Parks and AONBs to be included within this approach.

However, we do offer a word of caution, as with other signage it is important that any new signs are in keeping with the landscape and are not visually intrusive. This is particularly important for National Parks. For example the Peak District National Park crosses several boundaries, including three shire counties and three metropolitan counties. In most cases the county boundaries are located in open countryside where there is already a significant amount of other signage. Similarly, there are approximately 40 locations where the Peak District National boundary is crossed by an A road; 13 locations where it is crossed by a B road and 207 where it is crossed by a C or Unclassified road. Therefore, as with other signage, we would recommend an approach based upon enhancing rather than negatively impacting on the landscape. This is best achieved through engagement with the respective National Park Authorities.

In summary, National Parks England welcomes the current Government approach to reducing signage, whilst ensuring that those signs that are installed are fit for purpose and enhance the safety and understanding of road users. We hope that the comments provided are useful in taking the Draft Circular through to its final version and would be happy to discuss our submission further with officials if that would be helpful.

National Parks England

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