

Campaigning for a single rational system of measurement

UKMA ADDRESS

DATE

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Roadside Facilities Policy Review – Public Consultation

Dear Miss Burgess,

On behalf of the UK Metric Association, I am writing in response to your general invitation to comment on the above consultation.

UKMA is an independent, non-party political, single issue organisation which advocates the full adoption of the metric system in the United Kingdom as soon as practicable for all official, trade, legal, contractual and other purposes, including adoption of the international norms for road signs, in accordance with the spirit of the Vienna Convention, to which the UK is a signatory. UKMA is financed entirely by membership subscriptions and personal donations.

This response was approved by UKMA's Committee on 19 November 2007.

Summary

Our response to the consultation is restricted solely to issues surrounding the units of measurement used in the Roadside Facilities Policy Review document.

For each issue raised, we cite relevant guidelines, legislation, and DfT traffic signs manuals as appropriate.

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Introduction

We are pleased to see that the use of metric units has been adopted in the new policy document for the expression of floor areas. However, we are disappointed that other recommendations that we made in the earlier Motorway Service Areas consultation have not been taken onboard - in particular, our advice concerning the abbreviation "m" used for "miles" on motorway services approach signs.

In our consultation response, we highlight those points in the draft policy document which do not follow current best practice regarding metric units of measurement as indicated in Government guidelines and regulations regarding the use of metric units. In particular we would draw attention to:

"Guidance Note on the use of Metric Units of Measurement by the Public Sector" http://www.berr.gov.uk/consumers/buying-selling/weights-measures/Metrication/publicsector/index.html

The Units of Measurement Regulations 1986 (SI 1986, No. 1082) as amended, and British Standard BS ISO 1000:1992.

Point 45 – Spacing of Motorway Service Areas

The speed limiters mentioned here should be described as "90 km/h speed limiters" not "56mph speed limiters". Vehicle speed limiters are calibrated in km/h not mph.

See Regulation 36B of The Road Vehicles (Construction and Use) Regulations 1986 as amended by SI 2005 3170 http://www.opsi.gov.uk/si/si2005/uksi_20053170_en.pdf Specifically, article 4(2)(e) of SI 2005 No.3170 states:

"(e) has, or if a speed limiter were not fitted to it would have, a relevant speed exceeding 90km/h;"

Consequently the following text in point 45 ...

"Further, 56mph speed limiters for LGVs limit the distance they can travel in 30 minutes to a maximum of 28 miles. Any new application for an MSA should therefore be considered on the basis of a 28 mile distance, or 30 minutes travelling time, from the previous MSA, whichever is the lesser."

Should be re-worded as ...

"Further, 90 km/h speed limiters for LGVs limit the distance they can travel in 30 minutes to a maximum of 45 km. Any new application for an MSA should therefore be considered on the basis of a 45 km distance, or 30 minutes travelling time, from the previous MSA, whichever is the lesser."

Defining distances in kilometres rather than miles will also be of practical benefit to planning authorities and road contractors who work in metric units.

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Point 47 and 48 - Infill Sites

For consistency of use of units of measurement, we would recommend that "40 miles" be replaced by a distance expressed in kilometres e.g. "65 km".

Point 70 - "kgs"

The symbol for kilogram (kg) should never be written with as "kgs". Please amend "150,000 kgs" to "150,000 kg", and "16,500 kgs" to "16,500 kg".

Points 82, 83, 85, 86 and 99 - The symbol for "square metre" - m²

The correct symbol for "square metre" is "m²", not "m2".

All occurrences of "m2" should be replaced by the correct symbol "m²".

Point 111 - Spacing of Service Areas on All-Purpose Trunk Roads

We do not know how the distance of "14 miles" was decided upon. 14 miles in 30 minutes corresponds to a seemingly arbitrary speed of 28 mph. However, we can see no reason why this distance should not be expressed in kilometres. e.g. "25 km".

Appendix A - The signing of "miles"

We would draw attention to the diagrams given in Appendix A of the draft policy document which use the symbol "m" to denote miles (diagrams 2918, 2917 variant, 2917 single route, 2919.1, 2310.1, NP2918.2, NP2919.3, NP2310.1, NP2310.2, NP2311.3 and NP2311.4, NP2919.2, 2313.1, 2313.3, 2313.5).

The Traffic Signs Regulations and General Directions 2002 (SI 2002/3113) offer three alternatives for the expression of distances in miles on road signs;

- a) the word "mile" or "miles",
- b) as numbers-only, or
- c) the abbreviation "m".

We would strongly discourage the use of "m" as an abbreviation for the word "mile" on any road sign.

We recommend that "mile" or "miles" should be used on road signs expressing distances in miles, or that distances in miles should be shown as numbers only.

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Our reasons for discouraging the use of "m" to denote "miles" are as follows:

The symbol "m" is the standard symbol for "metre". Its use should therefore be reserved solely for that purpose The use of this symbol is defined in:

- i) British Standard BS ISO 1000:1992
- ii) The Units of Measurement Regulations 1986
- iii) The International Bureau of Weights and Measures (BIPM) SI brochure (8th Edition, 2006).
 - http://www.bipm.org/en/si/si_brochure/chapter2/2-1/#2-1-2
- iv) The Units of Measurement Directive (80/181/EEC).

The symbol "m" is already used on UK road signs to mean "metre". See diagrams 629A, 629.2A and 780A of TSRGD 2002.

The Units of Measurement Regulations has no symbol or abbreviation for "mile".

It is not unreasonable to expect that most visitors to the UK would read a legend of, for example, "20 m" on a road sign to mean "20 metres".

As far as we are aware, the UK is the only country in the world that uses the symbol "m" on road signs to mean "miles". e.g. The U.S.A. uses the abbreviation "mi". Throughout the world, the symbol "m" is used to mean "metre". We therefore concur with point 35 of the consultation Explanatory Notes which states, "Inconsistency of signs, road markings and layout can create a safety risk and confuse drivers, particularly visitors to England".

Most UK road signs do not use "m" as an abbreviation for miles. This practice seems to be mostly restricted to motorway services approach signs.

It has not gone unnoticed by us that the diagrams of example motorway services road signs in the TSRGD (which are also reproduced in the policy document) are mostly of the variety where "m" is used to denote "miles". Road contractors and sign makers are likely to follow example diagrams closely, and less likely to follow other options given in "fine print". We therefore strongly recommend that the example diagrams from the TSRGD, that have been reproduced in the policy document, should be replaced by equally legally compliant examples that do not show miles being expressed with the abbreviation "m".



The following images show how the diagrams in the policy document can be amended in accordance with our recommendations:



Diagram 2918



Diagram 2917 variant



Diagram 2917 - single route



Diagram 2919.1





Diagram 2310.1

Rest area 1 mile

diagram NP2918.2



Diagram NP 2919.2



Diagram 2313.3

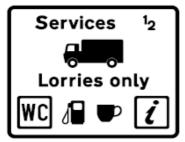


Diagram 2313.5





Diagram 2313.1



Diagram 2313.1 variant



Diagram 2313.5 - no HGVs

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Background: Government policy on metrication

Government policy since 1965 has been to promote the use of the metric system (SI) for an increasing range of purposes. Indeed, as a result of the Units of Measurement Regulations 1986 (SI 1986, No. 1082) as amended, the metric system is now the primary system of units of measurement permitted to be used for most official and legal purposes in the UK (subject to certain derogations contained in Directive 89/617/EEC (as amended) regarding the temporary retention of imperial units for speed and distance on road signage).

The reasons for the Government's policy of promoting the metric system as the primary (and eventually the only) system of weights and measures have been set out repeatedly over many years in official reports and White Papers such as those listed in Appendix B. We will not rehearse these reasons here except to reiterate that a single system of measurement units is essential to clear communication, children's education, and safety on the roads. The continued retention of two incompatible systems of measurement is contrary to the national interest.

Finally

We would like to thank the Highways Agency for being given the opportunity to express our views in this consultation, and look forward to taking part in future consultations.

A copy of this letter has been e-mailed to you for your convenience.

Thank you for your kind attention.

Yours faithfully

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Appendix A: Official reports and White Papers advocating the primary or exclusive use of the metric system in the UK

Select Committee appointed to consider the practicality of adopting a simple and uniform system of weights and measures (1862) *Report* Parliamentary Paper

Select Committee appointed to enquire into whether any and what changes in the present system of weights and measures should be adopted (1895) *Report* Parliamentary Paper

Committee on Weights and Measures Legislation (Hodgson Committee) (1951) Report Cmd 8219 HMSO

Committee on Consumer Protection (1962) Final Report Board of Trade

Standing Joint Committee on Metrication (1968) Change to the metric system in the United Kingdom HMSO

Department of Trade and Industry (DTI) (1972) Metrication Cmnd 4880 HMSO

Department of Prices and Consumer Protection (1977) Metrication HMSO

Department of Trade and Industry (DTI) (1995) Guidance Note on the use of Metric Units of Measurement by the Public Sector DTI

Department of Trade and Industry (DTI) (1999) The adoption of the International System of Units as the primary system of measurement in the United Kingdom DTI

Appendix B: Reports by the UK Metric Association (UKMA)

Metric Signs Ahead (UKMA) (2005) The case for converting road signs to metric units

ISBN: 978-0-9552351-0-8

A Very British Mess (UKMA) (2004) A response to the National Standardisation Strategic Framework

ISBN: 978-0-7503101-4-7