

### UK metric association

Campaigning for a single rational system of measurement

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17 December 2009

Richard Creese
Department for Transport
Traffic Signs Policy Branch
2/08 Great Minster House
76 Marsham Street
London
SW1P 4DR

Dear Mr Creese

### Consultation on the Traffic Signs (Amendment) Regulations and General Directions (TSRGD) 2010

I am writing to give the response of the UK Metric Association (UKMA) to the above consultation.

UKMA is an independent, non-party political, single issue organisation which advocates the full adoption of the international metric system ("Système International" - SI) for all official, trade, legal, contractual and other purposes in the United Kingdom as soon as practicable. UKMA is financed entirely by membership subscriptions and personal donations.

Our response is based on consultation with our members through a private internet forum and was approved by our Committee on 7 December 2009.

As requested, we have completed the questionnaire (Annex E) attached to the consultation document, and this is enclosed herewith. In general, we welcome the proposed amendments regarding height and width restriction signs – as far as they go - as sensible, practical and inexpensive measures that will improve road safety and reduce bridge strikes. However, we should like to make the following additional comments.

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### Government policy on completing metrication

While we appreciate that this consultation is limited to the proposed amendments to the TSRGD, we feel that it needs to be seen in the context of Government policy on measurement units generally.

Government policy since 1965 has been that the UK should - in stages - adopt metric units for an increasing range of functions, leading eventually to full metrication. I enclose copies of letters from the former Prime Minister, Tony Blair, and from the Minister for Science, Lord Drayson, setting out this policy. We would therefore have expected that the current proposal to withdraw imperial-only height and width restriction signs would be part of an overall plan to convert the UK's road signs to display metric units.

However, from comments in the media attributed to a DfT spokesperson, it appears that the DfT still believes that it can continue indefinitely to stand aside from Government policy and maintain road signs as a "stand alone" system separate from the rest of society. In doing so it is of course increasing the eventual cost of conversion. We would strongly urge the DfT in the national interest to reconsider its position on metrication and to fall in line with Government policy.

### Legality of DfT policy

Moreover we believe that the DfT's policy is also of doubtful legality as it is in conflict with the Units of Measurement Regulations 1995, which authorises the use of imperial units only for "road traffic signs, distance and speed measurement", whereas the TSRGD purports to authorise imperial units for width, height and length restrictions. Similarly, the Vienna Convention on Road Signs and Signals (as amended) does not authorise the use of imperial units on width, height and length restriction signs.

### Costs and benefits of the current proposal

The cost calculations given in the "Summary: analysis and evidence" appear speculative and uncertain and we have no specific comments.

However, we would point out that the proposal to replace imperial-only restriction signs with dual-unit signs is not the most cost-effective solution. It fails to take into account the fact that the dual unit signs themselves will eventually be replaced with metric-only signs that comply with the Vienna Convention on Road Signs and Signals.

We would therefore propose that in addition to withdrawing all imperial-only signs, changes should be made to the TSRGD to permit their replacement with metric-only signs as an alternative to dual-unit signs. This is particularly relevant in the case of directional signs that incorporate warning triangles (such as the sign illustrated below).

Patrons: The Rt Hon the Lord Howe of Aberavon, Kt, CH, QC; Ian Taylor MP; The Lord Taverne, QC; Dr Nick Palmer MP

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The withdrawal of imperial-only restriction signs will also bring benefits other than the purely monetary ones discussed in the consultation document. These include:

 Drivers will no longer be required to know the dimensions of their vehicle in two different measurement systems. Currently many car parks, garage forecourts, private roads, etc use metric-only restrictions (see pictures below), yet public roads still use imperial-only.







As most

vehicle owner's manuals give vehicle dimensions in metric-only units (see examples on our website at the following URL <a href="http://www.ukma.org.uk/Practical/motoring/default.aspx">http://www.ukma.org.uk/Practical/motoring/default.aspx</a>), knowing these dimensions will be all that is required when relating to restriction signs in the future.

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Above all the analysis ignores the benefits that would eventually accrue to society as a whole if the UK could enjoy the advantages of a single system of measurement understood and used by everybody for all purposes. The refusal of the DfT to consider benefits outside its narrow remit has been and continues to be a major obstacle to the achievement of a single, rational system of weights and measures in the UK.

### Length and depth warnings and restrictions

We would point out that the DfT's proposals only refer to height and width restrictions. However, the same considerations also apply to length restrictions (there are documented examples of long foreign lorries failing to negotiate tight bends and becoming stuck), depth warnings for fords, and warning signs of headroom beneath electricity cables. We cite the relevant sign references in our response to Question 11.

#### Conclusion

I hope these comments, which are being submitted by post and e-mail, are helpful. I should appreciate a copy of the Department's response in due course.

Yours sincerely

Derek Pollard Secretary

#### **Enclosures:**

Completed questionnaire
Copy letter from Rt Hon Tony Blair MP to Lord Howe of Aberavon, 15
September 2004
Copy letter from Lord Drayson, Minister for Science, to Mr Robin Paice,
Chairman of UKMA, 7 December 2008

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#### References:

UK Metric Association (UKMA) (2004) *A very British mess* UKMA UK Metric Association (UKMA) (2006, revised 2009) *Metric signs ahead* UKMA UK Metric Association (UKMA) (2009) *Road signs* [online] available at <a href="http://www.ukma.org.uk/Campaign/policy/transport.aspx">http://www.ukma.org.uk/Campaign/policy/transport.aspx</a>

Paice, R.B. (2005) *Ireland shows the way with Metric speed limits* in *UKMA News*, Vol 3. Issue 1 UKMA

United Nations, Economic Commission for Europe (1968) *Convention on Road Signs and Signals* UN

Department for Transport (DfT) (various dates to 2009) *Traffic Signs Manual* The Stationery Office

Department for Transport (DfT), Driving Standards Agency (2007) *The Official Highway Code 2007 Edition*. The Stationery Office



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