

Annex E – Consultation Questions

Response sheet

Information about you

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Company Name or Organisation (if applicable)	UK Metric Association (UKMA) www.ukma.org.uk
Please delete as appropriate from the list below that best describes you/your company or organisation.	
No	Small to Medium Enterprise (up to 50 employees)
No	Large Company
No	Representative Organisation
No	Trade Union
No	Interest Group
No	Local Government
No	Central Government
No	Police
No	Member of the public
Yes	Other (please describe): The UK Metric Association (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.
<p>If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:</p> <p>We have about 80 subscribing members and a large number of supporters.</p> <p>This response was approved on 7 December 2009 by the Committee of the UK Metric Association after having consulted members via our private internet forum.</p>	

Consultation Questions

Please let us have your views on the specific issues listed below. Please also let us have any other comments.

Q1: Do you have any comments on the additional proposals contained in Annex C?	
Yes/No – please indicate as appropriate:	Yes
If you selected yes, please explain in detail below:	
<p>Since diagrams 629 and 629.2 are to be withdrawn, the road works variants of these signs (including diagrams 7283 and 7284) should also be withdrawn.</p> <p>Reason:</p> <p>It would be inconsistent to allow roundel diagrams that are being withdrawn from use on other road signs to still remain in use for road works signs. This is particularly important in motorway contra-flow situations, where foreign lorries travelling in narrow lanes are potentially a major hazard.</p> <p>The suggestion of vertically stacking restriction roundel diagrams on road works signs would add at least 600 mm to the height of the sign. This would make such signs less stable and more likely to be blown down in high winds.</p> <p>The benefit of a reduction of 150 mm on sign width, by not using dual unit roundels, could still be achieved if the regulations were amended to permit the use of clear metric-only roundels.</p>	

Q2: Do you have any comments on proposals to allow portable pedestrian facilities?	
Yes/No – please indicate as appropriate:	No
If you selected yes, please explain in detail below:	

Q3: Have all superseded British and European Standards been captured?	
Yes/No – please indicate as appropriate:	No
If not, which have been missed? Please explain below:	
<p>The 1968 Vienna Convention on Road Signs and Signals no longer permits imperial units to be used on width, height, or length restriction signs.</p> <p>The proposed replacement of imperial-only restriction signs with dual unit signs means that, even after being amended, restriction signs will still fail to comply with the Vienna Convention.</p> <p>All restriction signs should be replaced with metric-only signs, as required by the Convention. (See Annex I (Road Signs), Part C. Prohibitions or restrictions, II Descriptions, 1. Prohibition of entry, paragraph (e), Diagrams C5, C6 and C9 on pp. 39/40 of the consolidated text).</p>	

Q4: Do the proposed savings for signs that have been withdrawn allow sufficient time to comply? (note: a 'saving' is the time period given in which to replace signs that have been withdrawn.)	
Yes/No – please indicate as appropriate:	See comments
If you selected no, please explain the difficulties this would create below:	
<p>This is a safety-related upgrade, and should be carried out without unnecessary delay. We would therefore urge that a compliance period of 12 months - and certainly no longer than 2 years should be adopted, rather than the proposed 4 years.</p> <p>It does not seem unreasonable that 12 months should be sufficient time to achieve this upgrade of what is actually a relatively small number of signs (3800 spread over more than 200 Highway Authorities).</p>	

Q5: Do you agree with the proposed changes to Schedule 19 in respect of bus stop clearways, as detailed in paragraph 21 of part 1 of the consultation proposals?	
Yes/No – please indicate as appropriate:	No comment
If you selected no, please explain the difficulties the changes would create below:	

Q6: Do you agree with the proposed changes contained in the draft Traffic Signs (Temporary Obstructions) (Amendment) Regulations 2010?	
Yes/No – please indicate as appropriate:	No comment
If you selected no, please explain the difficulties the changes would create below:	

Q7: Do you have any comments on the proposed variation to allow the mounting height for permanent traffic signal heads to be increased where visibility of the signal heads is an issue?	
Yes/No – please indicate as appropriate:	No comment
If you selected yes, please explain in detail below:	

Q8: Are there signs other than those listed in the draft direction 44A that should be permitted to be affixed to traffic signals or mounted on signal posts?	
Yes/No – please indicate as appropriate:	No comment
If you selected yes, please explain in detail below:	

Q9: Do you have any comments on the proposed revision of direction 53 (placing of portable light signals prescribed by regulation 35)?

Yes/No – please indicate as appropriate:

No comment

Please provide your comments below:

Q10: Do you have any comments on the proposal to amend direction 46 to require portable signals to be mounted on posts coloured yellow or in a non-reflective metallic finish?

Yes/No – please indicate as appropriate:

No comment

Please provide your comments below:

Q11: Are the proposed changes helpful?

Yes/No – please indicate as appropriate:

Yes

Do you have any specific comments? It would help us if you could indicate which proposals you are commenting on by using the relevant paragraph number in Part 1 of the consultation proposals.

We believe that signs that can only be readily understood in a single country represent a significant safety issue for today's international traffic. We therefore commend the decision to withdraw imperial-only restriction signs as an important first step in the process of their replacement with internationally-understood metric signs, in accordance with the Vienna Convention.

IN-CAB HEIGHT INDICATIONS

The withdrawal of imperial-only restriction signs will be an opportune time for a further safety improvement regarding the regulations concerning the in-cab display in vehicles with an overall travelling height exceeding 3 m, [SI 1997 No.530](#). As soon as all height restriction signs show metric units, it will become more useful for in-cab displays to show vehicle height in metric rather than imperial. This will enable in-cab displays to also be used when driving outside the UK. Currently the in-cab display is only of use when driving in the UK.

The following changes should be made to TSRGD 2002 for reasons of consistency with the withdrawal of diagrams 629 and 629.2:

Schedule 1

ARCH BRIDGE WARNING SIGNS

[diagram 530](#) item 4 - replace the words

"Metric sign may **be omitted or** placed to the right of the imperial sign", with

"The metric sign may be placed to the right of the imperial sign"

[diagram 531.1](#) item 4 - omit the words "**Metric sign may be omitted**".

[diagram 532.2](#) item 4 - omit the words "**Metric sign may be omitted**".

[diagram 532.3](#) item 4 - omit the words "**Metric signs may be omitted**".

Schedule 2

LENGTH RESTRICTIONS

[diagram 629.1](#) –. Changes should be made to require both metric and imperial roundel signs to be used to indicate a length restriction. The metric variant diagram (629.1 sheet 2), which exists in the working drawing at <http://www.dft.gov.uk/pgr/roads/tss/workingdrawings/regulatoryp600series/1vehiclelengthlimitimper4375.pdf> , should be added to the TSRGD (currently only the imperial diagram is shown in the TSRGD).

Schedule 3

OVERHEAD CABLES

[diagram 780A](#) item 4 - omit the words "**The indication of height in metric units may be omitted**"

[diagram 780.1A](#) item 4 - omit the words "**The indication of height in metric units may be omitted**"

Schedule 4

DEPTH OF WATER AT A FORD

[diagram 826](#) should be omitted (this variant shows depth of water in feet only). Depth indications should use the same units as height restrictions.

Schedule 7

DIRECTIONAL SIGN WITH HEIGHT RESTRICTION

[diagram 2027](#) should include metric warning triangle as well as imperial.

Schedule 12

LANE CLOSURES AND CONTRA-FLOW

diagrams [7201](#), [7201.1](#), [7210](#), [7212](#), [7235](#) should all be replaced with diagrams that include width restrictions in metric units (as per diagram [7211.1](#))

diagram [7283](#) should be omitted

diagram [7283.1](#) – wording should be updated so as to no longer reference diagram 7283

diagram [7284](#) should be omitted

diagram [7284.1](#) – wording should be updated so as to no longer reference diagram 7284

CYCLE ROUTE SIGNS

Our opinion of the proposed new cycle route sign (new variant of diagram 2602.1), which shows distances using estimated journey times in “hrs” and “mins”, is that it has been poorly thought out, and will lead to an incoherent mix of miles and minutes across the National Cycle Network as a whole. It also makes unstated assumptions about average walking or cycling speeds, whereas these will obviously vary according to the preferences and physical fitness of the individual pedestrian or cyclist, as well as prevailing weather conditions.

The use of imprecise journey times is not what people expect to see on directional signage, which should use exclusively objective measures.

Please see our blog article at:

<http://metricviews.org.uk/2009/10/chaos-comes-to-national-cycle-network-signs/>

It seems also that little consideration has been give to how cumbersome this sign will be when in its bilingual form:



Distances shown using journey times : cycle and pedestrian (bilingual)

Please see our blog article at: <http://metricviews.org.uk/2009/11/signs-review-disregards-welsh-road-users/>

The Units of Measurement Regulations 1986 assigns symbols (h and min) for hours and minutes. These language-independent symbols should always be used on road signs to signify hours and minutes, rather than improvised language-specific abbreviations.

BRIDGE HEADROOM REDUCED

The proposed new sign (diagram 7014.1) indicating a temporary or permanent reduction in bridge headroom is a good illustration of what is wrong with many road signs. It relies on the use of text, instead of making use of standard symbols and pictograms. A driver unfamiliar with English could not be expected to know that the metric value in brackets (the key information of the sign) refers to a height restriction. Also, the sign uses symbols (' and ") which have an entirely different

meaning outside the UK. To a non-British driver, the sign literally means "12 minutes 9 seconds".

We have designed an improved version of the sign, keeping all the elements of the original design:



UKMA
design

Arguably, the sign would be clearer still by removing all text from outside the warning triangles, and by using only the metric warning triangle.

For maximum understanding, the amount of language-specific text on signs should be kept to a minimum. There are many other current signs, e.g. the "NEW ROUNDABOUT AHEAD" sign (diagram 7014), that could be similarly improved by using standard warning triangles or roundels.

In keeping with the principle that symbols should be used where possible instead of text, we would recommend that the words "Except buses" on diagrams 954 and 954.5 should be replaced with the word "Except" and a bus symbol. Similarly for diagrams 954.6 and 954.7

For further examples of signs that could be improved by replacing text with standard symbols see: <http://ukma.org.uk/transport/RoadSignGallery.aspx>

PEDESTRIAN EMERGENCY EXIT

For safety reasons, the pedestrian emergency exit sign on diagram 2711.1 should use the symbol 'm', as per the diagram in the Vienna Convention, rather than the word 'yards'.

DRIVER LOCATION SIGNS

Driver location signs, as described at <http://www.highways.gov.uk/knowledge/17088.aspx>, are installed on many motorways, and some A roads.



The Traffic Signs (Amendment) Regulations and General Directions 2010 presents an opportunity to add the specifications for these new signs to the TSRGD.

Q12: Does the draft impact assessment cover all the costs and benefits arising from the proposals?

Yes/No – please indicate as appropriate:

No

If not please provide supporting evidence below:

See covering letter for comment on the cost-effectiveness of the proposals. We believe that the impact assessment excludes important benefits.