

Draft TSRGD Revision 2015

Sustrans submission to DfT consultation into TSRGD revision

June 2014

Introduction

Sustrans is a leading UK charity enabling people to travel by foot, bike or public transport for more of the journeys we make every day. We work with families, communities, policy-makers and partner organisations so that people are able to choose healthier, cleaner and cheaper journeys, with better places and spaces to move through and live in.

Responses to Consultation Questions

Question 1

If you are responding as a traffic signs practitioner, from the draft you have seen in this consultation, do you believe the new structure and provisions of TSRGD will give you the flexibility to design and use the signs you need to help manage traffic?

Yes, subject to comments in subsequent responses.

Question 2

2A) We would like your views on extending deregulation of sign lighting. The proposal is that any signs within 20 mph limits and zones would no longer need to be lit. This is on the basis that at slower speeds there is more time available to drivers to read the signs.

Do you agree that all signs within a 20 mph limit/zone, particularly safety critical signing such as "no entry" signing, should be subject to local authority judgement only?

Strongly Agree – energy saving issues aside, removing the need to light signs might encourage more appropriate positioning of signs as they will not be constrained by the need to be close to power supplies. This may also encourage wider roll out of 20mph limits and zones. The local authority will retain its responsibility to ensure that signs can be adequately seen in all conditions and therefore may need to provide lit signs in some circumstances, which they will be able to do.

2B) Do you agree that the requirement to light 'two-way traffic ahead' signs is safety-critical, and should remain, or should be removed in line with other warning signs?

Disagree - the road layout should indicate that the road is now two-way. There may be instances where this is not the case, but again it would be down to the local authority to ensure that their design performed adequately in all conditions, and if required they would need to provide lighting.

2C) To help inform our final Impact Assessment please can you provide us with estimates within your local authority on: i) The number of illuminated traffic signs you have placed in 20 mph zones?

Not applicable

Question 3

3A) Is there anything more we can do within TSRGD to reduce sign clutter?

The key will be to ensure that the guidance (Traffic Signs Manual) highlights the importance and benefits of minimising the number of signs provided. However, we recommend less prescriptive signing of cycle lanes and removal of the Cyclists Dismount option for sign 966.

3B) If you are responding as a traffic signs practitioner, will you take advantage of the greater flexibility within the new TSRGD to reduce sign clutter?

Yes

Question 4

Do you support the proposals to allow changes to yellow line restrictions to be made without an associated Traffic Order (TO) process?

Yes – subject to the fact that with no statutory consultation period the public would not be able to challenge the restrictions at an indeterminate point in the future not being an issue.

As a local authority, would you ensure that effective consultation would be undertaken if the requirement for a TO is removed?

Not applicable

Question 5

To inform our final Impact Assessment please can you provide us with estimates within your local authority on the number of cycle schemes you have introduced over the last 10 years using the following signs?

5A) 'Except cycles' plate when it is placed directly beneath the following signs that already have an associated Traffic Order:

Not applicable

5B) Width-flow cycle lane and one way traffic with contra-flow cycle lane sign, along with the white lane marking:

Not applicable

Question 6

6A) Do you agree that pelican crossings should not be included in TSRGD?

Yes, subject to 'Pedex' crossings being adequately defined as the use of farside pedestrian signals, including countdown timers, is appropriate in certain locations. Crossing times for those without on crossing detection should be reviewed and lower walking speeds used.

6B) *If No, should they be allowed for:*

i) *Multi-lane approaches?*

ii) *for any site?*

Question 7

If you are responding on behalf of a local authority, are you likely to make use of the flexibility within the new TSRGD to put up:

7A) *Signs indicating the present county boundaries?*

7B) *Signs indicating historic county boundaries?*

7C) *Signs indicating designated geographical areas?*

7D) *Photographic boundary signs?*

Not applicable

Question 8

Do you support the proposal to include new definition of tourist destination for England within TSRGD?

No view

Question 9

Do you support the proposal to remove the Guildford rules from sign design?

Our preference would be to keep the Guildford rules as they give clarity to direction signs. However, if removal of the rules enables slightly smaller signs to be provided then we would not oppose that, provided the signing of cycle routes on general direction signs is not adversely affected.

Question 10

Do you support the proposal to expand the use of exceptions to 'no entry' signs?

No (on the assumption that 'except cycles' is retained). Allowing 'car-like' vehicles in the form of taxis to be exempt from no-entry restrictions would significantly change the environment of a one-way street and could adversely affect with-flow cycling along a one-way street. It would also be far harder to enforce as there is less distinction between a taxi and a car.

Question 11

In your view, would a sub-plate on these signs be helpful in understanding these prohibitions?

Yes, as an option, in situations where there appears to be misunderstanding of their meaning.

Question 12

In your view, are revised signs indicating the presence of enforcement cameras necessary, or is the proposal to deal with this through the existing planning regime sufficient?

No view

Question 13

Do you have any other comments on the draft Schedules?

General Comments

Whilst we welcome inclusion of a new cycle zebra we want to emphasise that there is a need for consistency between the proposed cycle zebra design and separate cycle priority crossings; at present they use quite different design elements and we would expect there to be value in their being more consistent. This design should integrate with that for other types of cycle priority crossing, with common building blocks, and should form the basis of parallel cycle / pedestrian provision at stand-alone crossings, at crossings near side roads and at crossings that form part of a circumferential cycle track at a roundabout (as is common in the Netherlands)

We welcome the reduced need for Traffic Regulation Orders and the greater flexibility in implementing 20mph zones/limits.

Make it clear where these regulations apply on cycling and walking routes and what sort of routes are not covered (including different rights of way legislation in Scotland)

Regulations should provide greater flexibility to trial and approve additional signs, for example if a sign is not included for a Cycle Street, it should be possible for DfT to issue a blanket authorisation (or similar) for use of a sign that is subsequently agreed for this purpose.

Further TALs need to be prepared to support the revisions, in particular for:

- Contraflow cycling
- Branding of cycle routes
- Use of surface markings on cycle routes

Omissions

Provide clear guidance on the signing of one-way cycle tracks (including both 'hybrid' tracks and tracks at carriageway level segregated by a kerb) including markings at side roads and details at zebra crossings. We would like to see them signed in a similar way to cycle lanes. Signing guidance contained in LTN1/12 for 'hybrid' cycle tracks needs to be clarified.

Include guidance on the signing of car parking adjacent to cycle lanes reinforced by 'light segregation' such as armadillos.

Include markings and use of cycle signals to allow two stage right turn at signals, as per Southampton CSF scheme, and drawing on current TfL trials, as is common in The Netherlands and Denmark.

With the smaller cycle signals the regulations should permit trials of a wider range of signal phasing, including:

- All-green stage for cyclists (cycle scramble) as is common in The Netherlands
- Left turn on red for cycles, possibly with 'intelligent amber'

Include the agreed standard signing for EuroVelo cycle routes; these are used in many other European countries, with the signs having been incorporated into their national signing standards. The signing for the EuroVelo routes has been approved by UNECE WP.1 (United Nations Economic and Social Council, Working party on road safety and signalisation).

Include use of pictograms on cycle route signing within the regulations

Detailed Points

Table	Item	Comments
3	2,3	Permit smaller size for use on cycle routes
4	1	Permit smaller size for use on cycle routes
6	11	Clarify wording in col 2 such that it is clear that a bicycle (as a mechanically propelled vehicle) may legally be pushed by a pedestrian here. Omit ref to Table 7 Item 10 (inappropriate exemptions for play street)
	12	Permit 'play street' plate with 619 (item 7 in table 7) where cycle access is permitted
	21	Permit smaller sign sizes (150mm) on cycle routes
	31	956: include alternative design with pedestrian symbol above cycle symbol for use where greater emphasis on pedestrian use is appropriate
		Include shared use route courtesy sign, such as 'Cyclists please give way to pedestrians' or 'share with care'
	32	956.1: route shared with horse riders: include alternative version where horse rider route is segregated from cyclists / pedestrians (957 variant)
28	1	618.3C: welcome this variant for 'pedestrians and cycle zone'
34	5,6	960.1/960.2: clarify which to be used with advisory cycle lane (which may be intermittent)
	11	2602.3 number patch: welcome permission to use other colours for local routes.
35	3	TSRGD should include clear diagrams of the design options for cycle priority crossings, in a similar way to the diagram of a cycle zebra. The design of both types of crossing must adopt a consistent approach, using common design elements as building blocks.
	11	Include use of this marking for wide cycle lanes (2m or more?)

Table	Item	Comments
36	7	Unclear why this refers to Table 26 Item 2.
41		<p>Cycle Streets: We welcome the recognition of Cycle Streets, but it is unclear what will be included in TSRGD. TSRGD should include a specific Cycle Street sign to inform users of what to expect, which we recommend be based on those used in other European countries. Such a sign would be for information, in a similar way to the Home Zone or Shared Space signs. The design of the street and level of cycle use should be the main drivers behind behaviour change required on Cycle Streets.</p> <p>We attach a guidance note we have produced on Cycle Streets.</p>
	37	2602.2: other colours to be allowed for local routes as per 2602.3 patch
	43	965 End of cycle route: either remove this sign or only permit use of 'lane' or 'track' NOT 'route'
	44	966: Cyclists Dismount option should be deleted from TSRGD
42	2,6	Permit half with markings for use on cycle tracks (50mm)
	28	1057: we welcome that this marking can be used without an upright sign. We recommend a smaller size for use as repeaters on cycle tracks
		Include option of using a surface pedestrian symbol where that would add clarity for users
	32	Arrow markings should be permitted for use when signing on highway cycle routes in conjunction with 1057 symbols and number patches – or else include a separate chevron marking for this purpose
45	8,9	<p>Include options for signs that include both cycle and pedestrian symbols, as well as horse riders</p> <p>Clarification on the use of these as thermoplastic markings on a path surface; that can be useful in areas subject to vandalism.</p> <p>Include variant of cycle signage for diversion routes / alternative routes at roadworks that differ from those for motor traffic, permitting cycle symbols on yellow on black and white on red signs.</p>
	9	No reference included to the need for a pedestrian symbol on this sign.
61	22,23	Map type direction signs should be prescribed to assist cyclists travelling through complex junctions. I think one or other of these might cover that but it is not clear; if so, I suggest that at least one of the diagrams shown illustrates a more bespoke map type sign.
69	4	We welcome these low level traffic signals for cyclists, subject to inclusion of the following:

Table	Item	Comments
		<ul style="list-style-type: none"> • Use of these to indicate cycle staging that may differ from that of general traffic • Use of cycle-specific filter arrows on these <p>If these options are not formally included now, there should be the flexibility to add these in the future.</p>
	46	<p>ASLs with lead in lane:</p> <ul style="list-style-type: none"> • Include provision for more than one cycle lane feeding the ASL • Max reservoir depth to be 7.5m • Welcome use at crossings • Part width option to be included • Option where cycle lane protrudes beyond first stop line but no transverse cycle reservoir to be included • Use at pedestrian crossings to be included • Provision for 'split' ASLs that identify separate movements to be included
	47	<p>ASLs without lead in lane:</p> <ul style="list-style-type: none"> • Welcome that cyclists can cross stop line anywhere
	48	<p>ASLs with gate entry:</p> <ul style="list-style-type: none"> • Omit this option as superseded by Item 47
	49	<p>The 2m spacing of zig zag markings from the kerb needs to be stated explicitly here and shown on diagram. Suggest wording refers to aligning the zig zag markings with cycle lane markings.</p> <p>Permit use of 1057 within zig zags</p>
	50	<p>Zebra crossings: include simplified option of a crossing of a cycle track that omits zig zags and belisha beacons</p>
	51	<p>Cycle Zebras</p> <ul style="list-style-type: none"> • We welcome this provision in principle; however we have a number of comments to make on the design. • This design should integrate with that for other types of cycle priority crossing, with common building blocks, and should form the basis of parallel cycle / pedestrian provision at stand-alone crossings, at crossings near side roads and at crossings that form part of a circumferential cycle track at a roundabout (as is common in the Netherlands) • Clearer give way markings should be provided for traffic approaching on the cycle crossing side; suggest use of

Table	Item	Comments
		<p>continental style 'sharks teeth' markings here.</p> <ul style="list-style-type: none"> • Width for cyclists should consider width within the markings; if limits of crossing width is specified this will be up to 800mm wider than the actual crossing width. • Min width proposed between limits of crossing of 1500mm (700mm crossing width) is inadequate; LTN2/08 shows that a min of 2500mm should be provided for two cyclists to pass each other, so we propose this as the minimum (i.e. 3300 between limits of crossing). • On busy routes we recommend up to 4000mm crossing width (4800mm between limits of crossing) • Set back of give way marking from cycle crossing should be at least as great as the set back from the zebra crossing • Where will belisha beacons be positioned? If it is at the extremities of the crossing will this affect navigation by visually impaired users? <p>Also need to allow for the option of an unsegregated version for situations where approach paths are not segregated or where a shared path approaches on one side of the crossing and continues on the diagonally opposite side; this would also be consistent with the approach adopted for Toucan crossings, which are unsegregated. This should use markings that are distinct from those of a standard zebra, maybe using colour or a variant in the white markings.</p>
	55	<p>Elephants Footprints:</p> <ul style="list-style-type: none"> • Width for cyclists should consider width within the markings; if limits of crossing width is specified this will be up to 800mm wider than the actual crossing width. • Min width proposed between limits of crossing of 1500mm (700mm crossing width) is inadequate; LTN2/08 shows that a min of 2500mm should be provided for two cyclists to pass each other, so we propose this as the minimum (i.e. 3300 between limits of crossing). • On busy routes we recommend up to 4000mm crossing width (4800mm between limits of crossing) • Clarify whether these are used to recommend a route, or something stronger • 55b: Will this be solely for use at a zebra crossing or can it be used elsewhere? We are keen to see this marking used more widely to mark cycle crossings other than at signalled junctions, in particular at cycle priority crossings.. • Permit use of 1057 within this marking

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