

Living Streets is the national charity that stands up for pedestrians. With our supporters we work to create safe, attractive and enjoyable streets, where people want to walk.

Living Streets' response to consultation on the draft Traffic Signs Regulations and General Directions

Introduction

We are the national charity that stands up for pedestrians. With our supporters we work to create safe, attractive and enjoyable streets, where people want to walk. We work with communities, professionals and politicians to make sure every community can enjoy vibrant streets and public spaces.

We started life in 1929 as the Pedestrians Association and have been the national voice for pedestrians throughout our history. In the early years, our campaigning led to the introduction of the driving test, pedestrian crossings and 30 mph speed limits. We welcome this opportunity to respond to the Government's proposals revise the Traffic Signs Regulations and General Directions (TSRGD).

Summary

Living Streets supports the Government's continued efforts to reduce sign clutter. However, in view of the projected growth in the number of new signs efforts must be stepped up in order to ensure that the clutter does not creep back in. The proposals to remove the need for Traffic Orders to allow changes to yellow line restrictions will help local authorities to respond to local need and reduce the costs involved, but consultation must continue to be part of the process. We support the removal of pelican crossings from the TSRGD and favour the use of pedex crossings with on-crossing detection technology. However, these changes must not be viewed in isolation from the need for appropriate maintenance of crossings or for changes to the assumed walking speed used to determine the clearance time.

Further changes are needed to reduce clutter and improve the function of pedestrian zone, home zone and shared space signage. These should be positively signed, show a recognisable road user hierarchy (placing pedestrians first) and be accompanied by an advisory speed limit.

Question 3: Is there anything more we can do within TSRGD to reduce sign clutter?

Living Streets warmly welcomes the Government's continued commitment to reduce sign clutter. Visual clutter is not only confusing for drivers it also affects the appearance of urban streets and reduces the navigability of the pedestrian environment. However, more will need to be done to offset the projected growth in the number of signs identified in the Impact Assessment. In built-up environments in particular, the introduction of new signs should be accompanied by an audit of the sign location. Best practice identifies the need to assess:

- Whether there is any redundant signage (could the new sign merge functions?),
- Where is the best place to put it (could it be wall mounted?)
- What is the best design, balancing function against visual impact?

Question 4: Do you support the proposals to allow changes to yellow line restrictions to be made without an associated Traffic Order (TO) process?

Living Streets supports the Government's proposals to remove the requirement for yellow line restrictions to have associated traffic order (TO). We would, nevertheless, fully expect local authorities to continue to consult on changes and recommend the Government produce guidance

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Living Streets (The Pedestrians Association) is a Registered Charity No. 1108448 (England and Wales) and SC039808 (Scotland), Company Limited by Guarantee (England & Wales), Company Registration No. 5368409



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on the minimum required. Local authorities will be able to advertise proposed changes much more cheaply through digital media (as opposed to having place notices in local newspapers under a TO). Where there is local opposition, we believe that local authorities should be free to act to protect the most vulnerable road users, for example, near hospitals, care homes and schools.

Question 6: Do you agree that pelican crossings should not be included in TSRGD?

Living Streets supports the proposed removal of pelican crossings from the TSRGD. We believe that pelican crossings create unnecessary confusion for both drivers and pedestrians. The simultaneous flashing amber signal to drivers and flashing green signal to pedestrians can cause pedestrians to feel nervous when crossing the road. Evidence has demonstrated that puffin crossings are safer than pelican crossings¹.

As the TSRGD consultation highlights there are alternatives to the pelican crossing, which provide clearer signals to both pedestrians and drivers and have other benefits.

We welcome steps taken to further accommodate vulnerable pedestrians at pedestrian crossings, including the use of detectors which can give people extra time to cross if needed. However, we are aware that there are some concerns about the near side signal used at puffin crossings and they may not be appropriate in all cases. For instance, if there are many people waiting to cross the road it can be difficult to see when the green man is showing². Efforts have been made to resolve this by introducing a second display, which is located above the first one, to increase visibility of the green man.

Similarly, when near side signals are used at junctions pedestrians can be confused as to which crossing the signal relates to. Some pedestrians indicate that they prefer the far side signals because they are more reassuring. Evidence has shown this to be the case³.

Living Streets is supportive of the use of puffin crossings, but considers that the use of pedex crossings with on-crossing detection technology offers greater benefits in the majority of situations. Pedex crossings enable authorities to retain the far side signals and provide the benefits of puffin crossings. However, some of the older versions of this technology cannot detect people under umbrellas. Therefore, local authorities should upgrade detectors at the earliest opportunity. Effective maintenance programmes are also essential to ensure that if the technology

¹ Puffin pedestrian crossing accident study, Transport Research Laboratory, (2011).

http://www.trl.co.uk/online_store/reports_publications/trl_reports/cat_traffic_engineering/report_puffin_pedestrian_crossing_accident_study.htm

² A TfL(2005) *Puffins and Pelicans Research report* found that 30% of pedestrians surveyed agreed with the statement that "Sometimes I can't see the red and green men because there are people in the way" when talking about puffin crossings: <http://www.tfl.gov.uk/cdn/static/cms/documents/Puffin-Attitude-Study-Final-Report.pdf>

³ When directly asked 33% of pedestrians said they preferred far side signals, 62% had no preference between near and far side signals, and only 5% stated they preferred nearside signals. When directly asked a majority (80%) of pedestrians stated that they preferred the combined arrangement of nearside and far side signals, and only 4% said they would prefer to have nearside signals only.

Trial of far side pedestrian signals at puffin crossing:

http://www.trl.co.uk/online_store/reports_publications/trl_reports/cat_traffic_engineering/report_trials_of_farside_pedestrian_signals_at_a_puffin_crossing.htm

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fails, then problems can be remedied quickly. On-crossing detectors can only help the most vulnerable road users when they are functioning correctly.

Whilst Living Streets approves the recommended use of detectors to protect vulnerable road users, we strongly recommend that the Department for Transport reviews the current assumed walking speed of 1.2m/s. The Government suggests that it could take between 15 and 20 years for pelican crossings to be phased out. Given the time lag for upgrading pelican crossings, we think it would be easier and simpler for authorities to improve the comfort and amenity of pedestrians crossing at signalised facilities by altering the timings.

The adoption of the assumed walking speed of 1.2m/s is thought to date back to the 1950s⁴. It is has not been reviewed for over 60 years, during which time our roads have become unrecognisable. The volume and speed of traffic is now much greater. Recent research by University College London found that over three quarters of older people (over the age of 65) are unable to cross the road in time⁵. Living Streets has commissioned the Transport Research Laboratory to review existing literature and establish the evidence on walking speeds from the UK and abroad. We hope that this will help inform the design and updating of signalised pedestrian crossings and pedestrian facilities at junctions.

Question 13: Do you have any other comments on the draft Schedules?

We look forward to working with the Department for Transport on related pedestrian crossings guidance. As part of the review of guidance we would like to see greater emphasis on encouraging local authorities to include provisions for people or are partially sighted or blind such as rotating cones and audible signals where appropriate.

We welcome the proposed new crossing layout for pedestrians and cyclists (paragraph 5.1) as shown on figure 5.1. This option provides safety and amenity for people wanting to cross the road on foot or by bicycle.

Streamlining pedestrian zone, home zone and shared space signage

Living Streets welcome the proposed cycle streets concept, which would see signs accompanied by an advisory speed limit of 15mph. Besides urging the Department of Transport to consult with Living Streets fully on these proposals (to ensure that pedestrians' needs are considered in the trial), we would like to see the TSRGD go further by streamlining pedestrian zone, home zone and shared space signage.

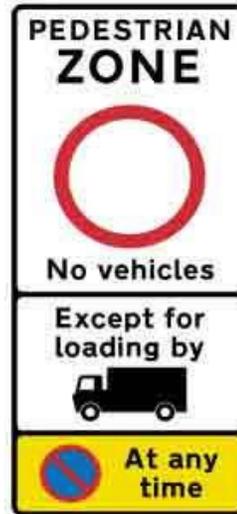
Paragraph 5.7 of the consultation document identifies the need to clarify the difference between "no motor vehicles" and "no vehicles" signs used to denote pedestrian zones. Currently pedestrian zones are indicated either by a red roundel with a blank centre or a red roundel with a car and motorcycle in the centre. Instead, Living Streets would like to see pedestrian zones to be clearly and positively signed with pedestrians in white on a blue background – similar to the shared space sign

⁴ It is thought that the speed of 1.2m/s or 4ft/sec came from research conducted in 1952 by James Exnicios whilst a student Graduate of Yale University.

⁵ Asher et al, *Most older pedestrians are unable to cross the road in time: a cross-sectional study*, University College London, (2012).



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This is clearer than

Signs should follow a recognisable road user hierarchy where the most vulnerable, pedestrians, are prioritised first



Signs should be accompanied by an advisory walking speed limit. The home zone sign is ineffective without enforcement, it could be discontinued in place of a generic pedestrian and/or shared use zone (cycle and or motorised vehicles) with an enforceable speed limit



This is a French example – hierarchy of transport mode is shown by size and a speed limit roundel is inset.

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