



GOVERNMENT OFFICE  
FOR THE SOUTH EAST

Representing Central Government in the South East

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Our ref:

Your ref:

26 October 2010

Dear Sir/Madam

**THE ROAD TRAFFIC REGULATION ACT 1984  
THE A3 TRUNK ROAD (LEA COACH ROAD JUNCTION, NEAR THURSLEY)  
(PROHIBITION OF USE OF GAPS IN THE CENTRAL RESERVATION) ORDER 2010**

1. I am directed by the Secretary of State for Transport ("the Secretary of State") to refer to the above draft Order which was published on the 28 May 2010 by the Highways Agency.
2. The effect of the Order, if made, would be a full and permanent closure of the gaps in the central reservation of the A3 trunk road opposite Lea Coach Road and Warren Mere.
3. The aim of the scheme is to reduce personal injury accidents (PIAs) by ending travel movements which carry most risk in this location. There has been a chronic accident record of eight PIAs over 6 years to December 2009 associated with the use of the Lea Coach Road gap.

**OBJECTIONS AND REPRESENTATIONS**

4. A total of 74 objections and 8 representations to the proposal were received during the objection periods for two sequential gap closure Orders. The most recent Order, being the subject of this letter, supersedes all earlier gap closure Orders and proposes closure of the gaps for all users.



INVESTOR IN PEOPLE



5. The main issues raised in objection were increases in journey time and distance, increased traffic on unsuitable roads, safety of turning movements related to Lea Coach Road and Warren Mere, and inconvenience to non motorised users. A proposal for a new connecting road between the Thursley bridge over the A3 and Lea Coach road was widely supported as an essential element of the gap closure scheme. Other proposals included a footbridge or underpass at the gap site.

6. The Secretary of State has carefully considered the objections and representations made in response to the gap closure Order. He has weighed them against road safety benefits and the deliverability of the scheme and alternatives, and reached a decision on whether a public inquiry would be likely to produce any significant new information relevant to his decision on this Order. That decision is set out in paragraph 10 and takes account of the issues and considerations expressed below.

### **Principal objections and representations**

7. This paragraph summarise the principal objections and representations by subject matter, followed in paragraph 8 by more detailed consideration, commentary and observations of discrete issues of concern.

#### **Convenience**

- a) Traffic on the northbound A3 trunk road prevented from right turning into Lea Coach Rd would divert to leave the A3 at Milford junction and be delayed by congestion at Milford west roundabout and other junctions.
- b) There would be an increase in journey time and or distance for other displaced traffic.
- c) A subway, footbridge or at-grade crossing facility of the A3 should be provided for non motorised users (NMU).

#### **Wider impacts**

- d) There would be increased severance of villages to the north and south of the A3 trunk road, notably Witley and Thursley, as well as to Thursley and Witley Commons.
- e) There would be an increased in traffic through and near Bowlhead Green, on what are generally described as unsuitable roads.
- f) The additional distance travelled by diverted vehicles adds to greenhouse gases and worsens air quality.
- g) Loss of a facility for invalid carriage users exiting Warren Mere.
- h) A new link road should be provided to link the A3 Thursley junction with Lea Coach Road to mitigate the impact of closing the gap at Lea Coach Road.

#### **Safety**

- i) The accident record provides insufficient justification for the proposed scheme.
- j) The closure of the gap providing egress from Warren Mere is unnecessary as no Personal Injury Accidents (PIAs) have been recorded there.
- k) There would be an increased risk for:
  - drivers turning into Warren Mere from the A3 northbound carriageway due to reduced carriageway width resulting from the gap closure.
  - drivers turning right out of Lea Coach Road onto the A3 northbound carriageway.
  - drivers turning left into Lea Coach Road from the A3 southbound carriageway.
  - drivers turning left out of Lea Coach Road onto the A3 southbound carriageway

#### **COMMENTARY AND VIEWS on specific issues raised in correspondence.**

- 8. a) Journey delays and general safety concerns associated with traffic using Milford west roundabout.

The Milford west roundabout is the western roundabout at the A3/A283 Milford junction. Milford junction is the next available junction after Lea Coach Road that displaced traffic could leave the A3 northbound carriageway.

In the morning ( am) peak period, the volume of displaced traffic from Lea Coach Road arriving at Milford west roundabout would be about 38 vehicles per hour. The majority of this displaced traffic would be vehicles that currently turn right off the A3 northbound into Lea Coach Road as an alternative means of accessing Milford and the surrounding area. Milford junction is the designated junction off the A3 trunk road to Milford and the surrounding area and so the proposed gap closures would redirect traffic on the A3 northbound to this junction, which is well signed and of sound design.

The Highways Agency report that the roundabout was observed in 2008 to be flowing freely during the morning and afternoon peak periods on the day visited, though limited instances of queuing and delay at the junction from the A3 northbound exit slip road during the morning peak was noted.

There have been no PIAs recorded at the Milford west roundabout between 1st January 2007 and 31st December 2009, the most recently recorded three year period.

Surrey County Council (SCC), the Highway Authority for the roundabout, report that they do not consider the roundabout to be overloaded at present. In addition, Surrey Police's view is that the displaced traffic will not create a problem at the Milford west roundabout.

The Secretary of State is therefore satisfied that highway safety and congestion at the Milford west roundabout is likely to be no more than marginally affected by the closure of the gaps.

- b) Journey delays and general safety concerns about displaced traffic using other roundabout and traffic signal junctions in Milford.

SCC is the Highway Authority for the following roundabout and traffic signal junctions in Milford:

- A283/A286 Cherry Trees roundabout.
- A286/A3100 Portsmouth Road mini roundabout.
- A283 Guildford & Godalming Bypass Road/A3100 Portsmouth Road traffic signal junction.
- A283 Portsmouth Road/Cherry Tree Road traffic signal junction.

Surrey County Council has confirmed that these junctions experience a degree of peak period congestion at present.

Given the low volume of displaced traffic arising from the proposed gap closure the change to current congestion levels at these junctions would be small. Furthermore, given the presence of an alternative route for displaced traffic via the A3 southbound from Milford junction, it is considered unlikely that all displaced traffic would travel through Milford itself, so further reducing the likely congestion impact.

In addition, as noted above, the majority of displaced traffic would be vehicles that currently turn right off the A3 northbound into Lea Coach Road to access Milford and the surrounding area rather than use the signed and higher standard Milford junction.

The Secretary of State is therefore satisfied that highway safety and congestion at the above junctions is likely to be no more than marginally affected by the closure of the gaps.

c) Increased journey time and or distance.

There will be an increase in journey time and or distance arising from the closure of the gaps. It is anticipated that the majority of the displaced traffic would travel to the Milford junction, where it could either:

- U-turn and proceed south on the A3 to the Lea Coach Road junction; or
- Join the A283 to gain access to Milford and the surrounding area

Should displaced traffic U-turn at the Milford junction, this would represent an additional distance of 7.6km (4.8 miles). Surveys undertaken record this increase in journey time as a maximum of 5.9 minutes in the morning peak.

For those living in Warren Mere or Warren Park who make frequent trips to Milford this represents a significant overall increase in journey time and distance.

A Scoping Level Assessment of the impact on air quality and greenhouse gases resulting from the proposal has been undertaken in accordance with HA 207/07 'Air Quality', published by the Highways Agency (HA) in May 2007, as part of Volume 11 of the Design Manual for Roads and Bridges (DMRB). The Assessment determined that there would be no impact on either local or regional air quality.

The Secretary of State considers that there would be a significant economic impact on the relatively few local people who frequently use the gap to travel to Milford and surrounds, and that this impact must be weighed against road safety benefits. He is satisfied that environmental impacts associated with longer journey times or distances are not significant.

d) The retention of an at-grade crossing facility for NMUs or the provision of a subway or footbridge.



## **General**

The Highways Agency advise that their advice note TA 91/05 'Provision for Non Motorised Users', published in February 2005 and contained in Volume 5 of the Design Manual for Roads and Bridges (DMRB), recommends that informal at-grade rights of way crossings are not normally appropriate on dual carriageways where two-way daily traffic (AADT) is greater than 25,000. The two-way AADT recorded in 2007 for this section of the A3 was 29,470. A range of user groups and other organisations were consulted in the development of TA 91/05.

Traffic Advisory Leaflet 2/03 'Signal Control at junctions on High Speed Roads', published by the Department for Transport (DfT) in March 2003, does not recommend signal controlled junctions where the 85 percentile approach speeds are greater than 65 mph. The 85 percentile wet weather speed for design, calculated in accordance with TA 22/81, is 66 mph and therefore the provision of traffic signals to provide an at-grade NMU crossing would be contrary to DfT recommendations.

The estimated cost of a subway, with the associated ramps, would be in excess of £2 million and consequently could not be justified as value for money against the safety benefits of the scheme and the use that would be made of it. In addition maintenance costs would be substantial due to the need for a pumping facility to prevent a subway at this location from flooding, and there would be environmental impacts on sensitive and protected areas.

A footbridge could similarly not be economically justified from the benefits of the scheme and for the use that would be made of it. The estimated cost of a footbridge, with the associated ramps, would be in the region of £2 million. As with a subway, a footbridge and associated ramps would have some detrimental impact on an environmentally sensitive area.

## **Equestrians**

TA 91/05 states that "informal at-grade equestrian crossings are not recommended on roads with a 120 kph design speed". The design speed of this section of the A3 has been assessed in accordance with design note TD 9/93 'Highway Link Design' (DMRB Volume 6, Section 1, Part 1, June 1993) and has a design speed of 120 kph.

In addition, Traffic Advisory Leaflet 3/03 'Equestrian Crossings', published by the DfT in March 2003, states that equestrian crossings not controlled by traffic signals may be suitable where vehicular flows and 85 percentile speeds are "reasonable". In this case an equestrian crossing is not considered to be appropriate because:

- the 25,000 AADT threshold for informal at-grade crossings recommended in TA 91/05 is exceeded; and
- the recommended 85 percentile speed of 65 mph for signal control is exceeded in dry and wet weather conditions.

There is an extensive network of bridleways in the vicinity which can provide alternative equestrian routes. The Highways Agency intend providing signage for equestrians at appropriate locations off the strategic road network in order to minimise the length of the diversion. The diversion via the Thursley bridge would improve equestrian safety as this



grade separated facility would incorporate horse margins and high parapets with solid infill panels to cater for the safe passage of horses and their riders.

## **Pedestrians**

Pedestrians would need to use an alternative route, with the length of the diversion depending on the origin and destination of the pedestrian. The HA intend providing signage for pedestrians at appropriate locations off the strategic road network in order to minimise the length of the diversion. The diversion via the Thursley bridge would improve pedestrian safety because grade-separation avoids conflict with vehicular traffic.

## **Cyclists**

Cyclists would also need to use an alternative route. The maximum diversion for cyclists on the A3 northbound wishing to enter Lea Coach Road, is to continue on the A3 northbound, U-turn at the Milford interchange and return on the A3 southbound.

The Secretary of State appreciates that non motorised users who would normally use the Lea Coach Road gap to cross the A3 will be inconvenienced by needing to use other *probably* longer routes following the closure of the gap. He is satisfied that the number of movements affected would be very low and bases this view on the content of the objections received, the spatial distribution of dwellings, and trip origins and destinations. An addition factor for consideration is the high risk of injury from contact between a non motorised user and a high speed vehicle. The Secretary of State is satisfied that the provision of a subway or footbridge at this location would not represent value for money for the use that would be made of it, and could have an adverse impact on land of special environmental significance.

### **e) Increased severance.**

The proposed scheme would create severance at this location on the A3. There are no community facilities of note east of the A3 and within easy walking distance of Warren Mere and Warren Park residents. For these residents links to Thursley would be weakened as a result of the additional driving time between the two. Road users from Thursley intending to travel to Witley would chose between travelling north on the A3 to the Milford junction and on to their destination, or using local roads such as French Lane. The proposed scheme would not affect road trips from Witley to Thursley via Lea Coach Road.

The Secretary of State considers that the scheme would create severance which would have a community impact on a small number of local residents. The community links between locations most affected do not appear to be strong and are primarily facilitated by motorised travel.

### **f) Increased traffic through Bowlhead Green.**

A3 northbound traffic no longer able to turn right into Lea Coach Road would tend to chose between two principal diversions routes, either via Milford junction or on local roads through Bowlhead Green via the Thursley junction. Journey time surveys undertaken over these competing alternative routes have identified very similar travel times despite the route via the Milford junction being notably longer than the route via Bowlhead Green. Objection correspondence refers to the unsuitable nature of this route and incidents where vehicles are held up for a significant time. With this in mind, and given the nature of the route via



Bowlhead Green, it would be reasonable to anticipate that few drivers would chose this route in preference to using the A3 and Milford junction.

This is further reinforced by signage, as the Milford junction is the designated junction off the A3 trunk road to Milford and the surrounding area.

The Secretary of State is of the view that few drivers will chose to divert onto local roads through Bowlhead Green as their perception will be of negligible differences in journey time and worse journey time reliability.

g) The provision of a new link road between French Lane and Lea Coach Road.

Three different routes for a new link road connecting French Lane with Lea Coach Road have been suggested as follows:

- a route running parallel and adjacent to the A3;
- a route following the existing bridleway between French Lane and Lea Coach Road; or
- a route following the existing bridleway between Lea Coach Road and Lake Cottages that joins French Lane at the existing 90 degree bend next to the A3 via a curved alignment.

The cost associated with the construction of the least expensive proposal to link French Lane and Lea Coach Road would alter the economic rate of return to the extent that value for money would be insufficient for the scheme to progress.

Protective designations applying to land between French Lane and Lea Coach Road include Special Area of Conservation, Special Protected Area, Sites of Special Scientific Interest, Area of Outstanding Natural Beauty, and Registered Common Land.

The Secretary of State notes the extraordinary environmental sensitivity of the area that would be affected by any practical new route linking Lea Coach Road and Thursley junction. Regardless of the fact Surrey County Council would be the relevant highway authority for such a proposal and that the project cost would render the scheme economically non viable, the Secretary of State is not content to disturb these sensitive environments by promoting a scheme to reduce travel time for diverted traffic.

h) The closure of the gap providing egress from Warren Mere.

No PIAs are associated with movements at this gap, raising the issue of whether safety would be compromised were this gap to remain open for vehicular egress out of Warren Mere onto the A3 southbound.

The following accidents recorded at the Lea Coach Road gap between 1/1/03 & 31/12/09 involved manoeuvres contravening the existing regulatory signing:

- 2 involved a vehicle turning right out of Lea Coach Road
- 1 involved a vehicle turning right into Warren Mere
- 1 involved a vehicle U-turning from the A3 southbound to the A3 northbound.

This demonstrates that regulatory signing of the gap at this location has not prevented the prohibited movements; also, taking the view that such movements are minimal, that the risk



of injury accident associated with each movement is particularly high.

The Warren Mere and Lea Coach Road gaps are in very close proximity to each other. Though regulatory signing preventing turning movements from the A3 could be introduced, the Warren Mere egress gap could not be physically reconfigured to prevent turning manoeuvres by drivers on the A3 determined to use the gap.

A manoeuvre of this type would not have the benefit of a deceleration lane and would not be expected by other drivers, thus creating a situation of particular risk of injury.

In April 2009 Surrey Police stated that they were in no doubt that blocking up the gap would be a major step in reducing casualties.

Based on accident data at the Lea Coach Road gap the Secretary of State is satisfied that, even with regulatory signing, closing Lea Coach Road gap but not Warren Mere gap would result in prohibited movements taking place with a substantial and unacceptably high risk of PIA.

i) Increased risk for drivers turning into Warren Mere from A3 northbound carriageway.

In addition to the gap closure scheme, a separate improvement scheme is programmed to provide a diverge and merge taper into/from Warren Mere off the A3 northbound carriageway. This and the gap closure scheme would result in no reduction in carriageway width on the A3 at the Warren Mere junction

The Secretary of State is therefore satisfied that there will be no noticeable increase in risk for drivers turning into Warren Mere from the A3 northbound carriageway.

j) Increased risk due to drivers turning right out of Lea Coach Road onto the A3 northbound carriageway.

This manoeuvre was banned by the Traffic Regulation Order (TRO) which came into force in October 2003.

The proposal to close the gaps would physically prevent this manoeuvre and consequently the Secretary of State is satisfied that this objection may be discounted.

k) Accidents will occur due to drivers turning left into Lea Coach Road from the A3 southbound carriageway.

There is an existing deceleration taper off the A3 southbound for left turns into Lea Coach Road which complies with current geometric standards. Vehicles carrying out this manoeuvre have been observed to utilise the deceleration taper without adversely affecting the southbound A3 traffic.

Furthermore, the accident record over the most recently recorded 5 year period (01/01/2005 to 31/12/2009) confirms that there have been no PIAs associated with this manoeuvre.

It is recognised that, due to the route of the displaced traffic arising from the proposed scheme, the volume of left-turn manoeuvres into Lea Coach Road could increase. However, given the volume of this increased flow together with the lack of any recorded PIAs, as described above, it is considered that any increase in risk would be negligible.



The Secretary of State is therefore satisfied that the proposed scheme is unlikely to increase accidents involving conflicts between left-turning traffic into Lea Coach Road and A3 southbound traffic.

l) Accidents will occur due to drivers turning left out of Lea Coach Road onto the A3 southbound carriageway.

It has been suggested that accidents will be generated due to conflict between traffic turning left out of Lea Coach Road and southbound traffic on the A3.

There have been no PIAs associated with this manoeuvre over the most recently available 5 year period (01/01/05 to 31/12/09). Furthermore, as the proposed scheme should not generate any additional traffic performing this manoeuvre, there should be no associated change in risk resulting from the scheme.

The Secretary of State is therefore satisfied that the proposed scheme is unlikely to increase accidents involving conflicts between left-turning traffic from Lea Coach Road onto A3 southbound.

m) The loss of a facility for invalid carriage users exiting Warren Mere.

The proposed closure ensures that users of invalid carriages do not carry out the highly dangerous activity of crossing fast moving dual carriageway traffic. Groups representing invalid carriage users have expressed no views on this.

The Secretary of State is satisfied that the proposals do not discriminate against or imperil invalid carriage users.

n) The accident record provides insufficient justification for the proposed scheme.

From data recorded by Surrey Police, there have been 11 recorded PIAs in the most recent 5 year period (01/01/05 to 31/12/09) within a 500m radius of the Lea Coach Road junction. Analysis of this data has identified that 7 PIAs are associated with the gap, including 1 fatal accident in November 2007. It has been predicted that an annual PIA saving of 1.4 would be realised from the implementation of the scheme.

The Secretary of State is satisfied that an accident rate of over one PIA each year represents a serious safety situation which should be addressed. He considers that the accident rate is fairly consistent and is unlikely to drop significantly if at all, particularly in the light of the traffic impacts of opening the Hindhead tunnel. He is also content that the safety benefits more than outweigh the cost of the scheme, whilst accepting that the wider costs to the local community need to be brought into the balance.

## **THE DECISION OF THE SECRETARY OF STATE**

9. The Secretary of State has given careful consideration to whether, in light of the objections received and the material relating to them, he should hold an Inquiry. He considers that whilst there are strong safety arguments for closing the gaps there are also justifiable grounds for objection to the closure of the gaps.

10. The evidence from the Highways Agency on safety, traffic, environmental and other aspects is clear and adequately covers the issues raised. Similarly the objections and representations are clear and provide sufficient information for the Secretary of State to be satisfied that an Inquiry would be unlikely to produce any significant new information relevant to his decision. He has consequently decided not to hold an Inquiry.

11. The decision on whether to make the Order rests primarily on the balance between improved safety and the various impacts on road users and the local community and its environment.

12. The safety case is a very strong one and the closure of the gaps would undoubtedly lead to a sustained reduction in PIAs, with the historic average rate of 1.4 PIAs as an indicator of potential savings. There is no suggestion that future changes in traffic flow or speed will reduce this saving in the long term and, contrary to some assertions, it is not viewed as likely that the cumulative risk associated with diversion traffic will significantly erode the safety savings.

13. There would be inconvenience and additional time and cost penalties for a relatively modest number of people who drive through the gap to access Witley and Milford. The diversion route via the A3 is of high standard, with occasional congestion noted. The maximum length diversion was timed at 5.9 minutes which, though significant, is not viewed as an unacceptable addition to a journey which includes a dual carriageway trunk road. The few residents of Warren Mere and Warren Park who frequently use the gap to travel to Milford and surrounds are more affected and would suffer significant proportional time penalties.

14. A new link road connecting Thursley junction with Lea Coach Road would be of limited value to the Warren Mere and Warren Park residents. In addition, and most pertinently, the land between Thursley junction and Lea Coach Road is of such environmental sensitivity that the disturbance of a new traffic route would be unacceptable, regardless of affordability or of who would promote it.

15. Providing a new footbridge or underpass at the gap site would also have environmental impacts, but the key issue here is whether funding for such infrastructure could be justified. On the basis of minimal usage and related value for money the Secretary of State does not consider that it could.

16. Leaving a gap at Warren Mere would seriously undermine the safety benefits of the scheme and is not an option the Secretary of State would pursue. In consequence and in light of comments above the resulting options come down to either making no physical changes to the arrangements or to physically close both gaps to all traffic without providing a new footbridge, underpass, or Thursley to Lea Coach Road Link Road.

17. The Secretary of State has carefully considered all objections and representations as set out above, and has balanced the nature and weight of these against the safety benefits of the scheme. For the reasons given in paragraphs 8 to 16 the Secretary of State concludes that the safety benefits are sufficient to outweigh the acknowledged inconvenience and other impacts and is consequently satisfied that the proposal should proceed. He has consequently decided that this draft Order should be made as published.



## **NEXT STEPS**

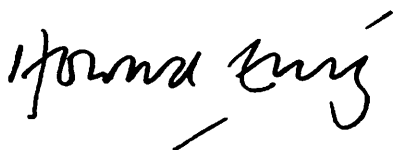
18. The Order will be made shortly and the notice will be published in local newspapers indicating where copies of the Order and associated plans may be inspected.

## **AVAILABILITY OF DOCUMENTS**

19. A copy of this letter has been sent to all those organisations and individuals who submitted written representations on the proposal. Additional copies of this letter are available free on request from the Government Office for the South East, Transport Team, Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4GA (tel. 01483 882355).

20. Copies of this letter and a detailed drawing of the scheme may be inspected during office hours at the offices of the Highways Agency, NODDSE Area 3 Room 3A, Federated House, London Road, Dorking, Surrey, RH4 1SZ. To arrange this, please contact Wayne Moore in writing at the above address or by telephone on 01306 878407.

Yours faithfully



**H A L Ewing**  
**On behalf of the Secretary of State for Transport**  
**Deputy Director**  
**Government Office South East**

The Comprehensive Spending Review 2010 confirmed that the Government Offices for the Regions are being closed. The GO Network will therefore close no later than the end of March 2011.

For more information about our work please visit our website at [www.gos.gov.uk](http://www.gos.gov.uk)