

**A3 Hindhead Public Inquiry**

**September 2004**

**Proof of Evidence**

**Sue Hall**

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## **(1) Introduction**

### **Personal Details**

My name is Sue Hall. I have an interest in the environment (including landscape and wildlife) and in issues concerning sustainability and transport. I choose not to drive a car and make almost all of my journeys by 'sustainable transport' modes including by rail, bus, cycle and on foot.

My main means of transport is my bike and my interest in cycling led me to work for the CTC (Cyclists' Touring Club) in Godalming for 14 years. The CTC is Britain's national cycling organisation and represents the interests of transport and leisure cyclists. (A separate organisation represents sporting cyclists).

I ran the CTC's transport and tourism information service for ten years, working with bodies such as the British Tourist Authority, and transport providers. I subsequently worked as the CTC's public transport campaign officer, in the context of the Government's Integrated Transport White Paper, with bodies such as the Department for Transport and National Cycle Forum.

I recently opted for a change of direction and now work as a landscape and garden designer.

I have a BA degree in Geography and a BSc in Landscape & Garden Design.

## My Proof of Evidence

- I am not objecting to the scheme as a whole. My principle objection is to the closure of the A3 across Hindhead Common. I would like to see this narrowed and retained for non-motorised users, as was the original Highways Agency plan.
- The Published Scheme removes an existing cycling facility (the A3) that caters for everyday transport journeys. It diverts cyclists on to an existing track: BOAT 500, which it modifies in an attempt to be 'all things to all people'. But even when modified, this facility will be far inferior in quality to the existing provision and potentially dangerous.
- I support the continued use of BOAT 500 for cyclists and other non-motorised users as an alternative to a retained A3 route. I am keen to see further improvements to routes severed by the A3.
- The Published Scheme appears to ignore Government objectives concerning trunk roads and sustainable integrated transport.
- It has misunderstood cycling issues and as a result the value of cycling to the Hindhead scheme has not been realised.
- Cycling is highly compatible with the other scheme objectives. Cycling is part of the solution to environmental problems.
- In the context of the UK Sustainability Strategy and concerns about climate change we need to take a long-term view of transport and the environment and start planning for a sustainable transport future today.
- Instead, the Hindhead Scheme offers a high quality transport solution to *motor* vehicles and a compromised, inferior solution to sustainable transport.
- High quality cycling provision would translate as a net benefit in the Scheme's Appraisal Summary Table and make the Scheme more attractive to Ministers.

*This Proof uses blue/grey shading and italics to highlight document quotes*

## **(2) The Published Scheme Fails To Implement Government Policy With Regard To Integrated Transport, Sustainable Development And Cycling.**

### **2.1 New Appraisal and Investment Criteria for Trunk Road Schemes**

2.1.1 The Government's Integrated Transport Policy (extract below) and its 'Daughter Document': A New Deal for Trunk Roads requires the Highways Agency to consider integrated transport corridors rather than just the trunk roads themselves. This represents an important historical change. There is no evidence that the Hindhead Scheme has complied with this policy.

2.1.2 Government policy also seeks to make use of existing infrastructure – such as the existing A3 over Hindhead Common – before building new routes. Once again the Hindhead Scheme fails to do this.

#### ***“Integration***

*This White Paper sets a new course for roads policy. The days of 'predict and provide' are over - we will give top priority to improving the maintenance and management of existing roads before building new ones*

#### ***Investment strategy***

*We will look at trunk roads in their wider context, and at the part they play in those transport corridors which include road and rail routes. Our priorities for trunk roads will complement improvements to inter-urban travel, by rail in particular, so that they form part of an integrated approach.*

ctd overleaf...

*We have set new objectives for the Highways Agency.*

*Overall, the Agency's strategic aim will be to contribute to sustainable development by maintaining, improving and operating the trunk road network in support of our integrated transport and land use planning policies.*

*The Agency's main purpose in future will be as a network operator rather than as a road builder. It will include the following key objectives: -*

- to give priority to the maintenance of trunk roads and bridges with the broad objective of minimising whole life costs;*
- to develop its role as network operator by implementing traffic management, network control and other measures aimed at making best use of the existing infrastructure and facilitating integration with other transport modes;*

### ***Investment criteria***

*Decisions on when and where to invest in network improvements, including measures to manage traffic, will be taken in the light of the new approach to appraisal based on the criteria: -*

- Integration - ensuring that all decisions are taken in the context of our integrated transport policy;*
- Safety - to improve safety for all road users;*
- Economy - supporting sustainable economic activity in appropriate locations and getting good value for money;*
- Environmental impact - protecting the built and natural environment;*
- Accessibility - improving access to everyday facilities for those without a car and reducing community severance.*

## **2.2 Integration, Accessibility and Environment**

2.2.1 These are key aims of Government transport policy, and key criteria for assessing trunk road schemes in the Appraisal Summary Table (see 2.1). The Highways Agency Appraisal Summary Table (OVE-E) fails to record any benefits of the Published Scheme for transport interchange under **Integration** or for access to transport system under the heading **Accessibility**. These are important omissions. Further, the provision of sustainable integrated transport would also provide benefit to the **Environment** if it encouraged people to switch from car use, as sought by Government policy.

2.2.2 The Published Scheme could promote public transport use and cycle use along the A3 corridor for both everyday transport and recreational/tourism. But the Highways Agency provides no evidence that it has carried out proper cycle counts or a full assessment of existing and potential public transport services.

2.2.3 Good cycle routes and public transport services are key to improving access to everyday facilities for those without a car. (See DfT 'National Cycling Strategy'; IHT 'Cycle Audit and Review' and ODPM 'PPG13').

2.2.4 The proposed new South Downs National Park and the proposed removal of motor vehicles from the A3 at Hindhead is likely to attract increased levels of tourism to the area. (Waverley Borough Council, 2003) In the absence of sustainable tourism options this will be car-based. This would increase pressure for car parking space at Hindhead, contribute to local congestion and have a potentially detrimental effect on the local landscape, amenity and environment. The Published Scheme needs to address this issue.

2.2.5 Indeed, it is curious that after commissioning an A3 Hindhead Recreation Survey (by Atkins, 2002), the Highways Agency Proofs of Evidence do not demonstrate any application of those findings to integrated transport proposals.

2.2.6 The A3 Hindhead Recreation Survey (Atkins, 2002) found that 64% of visitors to Hindhead had travelled from Guildford and that 65% of those surveyed had travelled by car. A frequent rail service operates between Guildford and Haslemere and with a bus link from the train station car users could be offered the option of travel by public transport to Hindhead.

2.2.7 It would be a logical next-step to also investigate the potential for a cycle route from Haslemere Railway Station to Hindhead Common e.g. to the National Trust Car Park. Bikes can be carried on trains that would enable visitors from other parts of the country to access Hindhead by rail and cycle, instead of by car and cycle. In addition a bus link from Haslemere could be designed to carry cycles. Schemes elsewhere in the country demonstrate the practicality and popularity of these sustainable and integrated transport options.

2.2.8 The Cyclists' Touring Club (CTC) and National Cycle Forum (NCF) have undertaken research into Inter-modality issues and good practice. The findings are readily accessible to the Highways Agency (See bibliography: NCF: Issues for Transport Planners and Bikes on Buses and CTC: Bikes on Trains)

2.2.9 Cycle Tourism has proven economic benefits to the rural economy, helping to support village shops and farm and village accommodation *without* the impact of motor traffic. (See Sustrans leaflet on Cycle Tourism).

## 2.3 Economy

2.3.0 'Best value' is an underlying Government theme and is highlighted in 2.1 (above) with reference to trunk road investment.

Why then does the Published Scheme seek for its cycling provision to dispense with a perfectly good road and instead to build another?: -

2.3.1 A narrowed-down version of the existing A3 would be perfect for cycling because the A3 is: -

- Well-designed
- Constructed to a high quality specification
- Fit for the purpose of conveying non-motorised users across the Common
- Far more acceptable to non-motorised users as the 'A3 alternative' to the road tunnel
- A road in which considerable investment has been made over the years
- A road which has many years of life left in it, especially when not subjected to wear and tear by motor vehicles
- Relatively easy to maintain.

2.3.2 Yet, the Published Scheme proposes that this high quality, acceptable route is literally **buried beneath heathland**.

2.3.3 Worse still, the Published Scheme proposes that **a new replacement route for cyclists is constructed on a nearby track** (BOAT 500). This route is already used by cyclists and others.

This proposed new cycle path: -

- For part of its course is in a sunken track, running close to and beneath trees with a meandering line that has poorer sightlines than the existing A3
- Has a far inferior construction specification compared to the existing A3
- Has the potential to be damaged by tree roots.

- Will require more sophisticated maintenance due to the differing surface materials to be used for the bridleway, verge and cycle way. (Sweeping, leaf collection, strimming / mowing?)
- Is likely to have significant ongoing maintenance costs
- Is likely to have a far shorter life span than the existing A3
- Is not acceptable to the transport users for whom it is being built
- Is less direct and less convenient than the existing A3

Overall it is not fit for the purpose of acting as the alternative A3 cycle route for the Road Tunnel.

2.3.4 And, as if this were not enough: -

The proposed new route along BOAT 500 will be steeper and therefore less attractive to cyclists.

2.3.5 To be fair, the Highways Agency has acknowledged objections made about this by cyclists. But instead of agreeing that cyclists can use the a narrowed-down version of the existing and more gently-graded A3 (which is what cyclists want and which is what the Highways Agency *originally agreed to*) the Highways Agency now proposes to invest further resources and money into reducing the gradient along part of the BOAT 500 route. This will involve costly earthworks.

2.3.6 All of the above is a questionable use of public money when a perfectly good route already exists and when government guidance is to make use of existing infrastructure before building new.

2.3.7 The real costs of this proposal need to be disclosed by the Highways Agency. These costs need to be assessed in terms of the Economic dis-benefits of the Published Scheme in the Appraisal Summary Table.

2.3.8 'Best value' for money is surely represented by the retention of a narrowed-down A3 for cycling.

2.3.9 And since this is a Public Inquiry at which all aspects of the Published Scheme come under scrutiny all of the above raises a further issue: - the links between the Highways Agency Road Scheme and the National Trust's Restoration Plans for Hindhead Common.

2.3.10 This Inquiry is considering a Road Scheme and this should surely be distinct and distinguishable from the National Trust's Restoration Plans for Hindhead Common. This is important so that the Inquiry can clearly and properly assess the:

- Public cost of the road scheme as distinct from the (private) cost of the National Trust Restoration Plan
- Merits of the road scheme based on the Proofs of Evidence and cross-examination of witnesses

2.3.11 Yet throughout the Proofs of Evidence the road scheme and restoration scheme are so closely intertwined that one wonders to what extent one is subsidising the other.

2.3.12 That they are so clearly intertwined also raises the question: to what extent **are** the National Trust's Restoration Plans determining the Highways Agency's Road Scheme and to what extent **should** this happen?

2.3.13 If this Inquiry believes that the two schemes **should** to some extent be considered together then surely the National Trust's Restoration Plans and more importantly the *rationale* for these Plans ought to be provided in a detailed Proof of Evidence by the Highways Agency so that they can be scrutinised in public and assessed as an integral part of the scheme.

2.3.14 Since the rationale for the National Trust's Restoration Plans is not provided in any of the Proofs of Evidence are we to conclude that: -  
The Restoration Plans are not the direct concern of this Inquiry and therefore they *cannot* be used by the Highways Agency or others as a basis for arguing for the removal of the existing A3 across Hindhead Common.

2.3.15 This Inquiry has to work either one way or another. It has to see and discuss the rationale for the National Trust Restoration Plans or it has to disregard the Restoration Plans as permissible evidence. I would suggest the latter.

2.3.16 In terms of the above and the issue of Economy there is a further fundamental difference that we need to recognise between: -

- The proposed landscaping for the Road Tunnel e.g. screening of the tunnel portals and screening along the line of the road where it runs above ground. This needs to be paid for by the Highways Agency from public funds and
- The landscape works which are not essential to the road scheme, but which are in fact part of the National Trust's Restoration plan. These need to be paid for by the National Trust from private funds.

2.3.17 All of the above suggests that the retention of a narrowed-down version of the existing A3 for non-motorised users is the best option for 'Economy' since there is: -

- Best use of investment into the A3 as part of it will continue to be used
- No need to construct a new surface along BOAT 500
- No need to restore spurs to the head of the valley
- No need to move such large amounts of soil, vegetation and any other landscaping materials on to the Heath in order to bury the A3

2.3.18 A further Economic benefit of retaining the narrowed-down A3 for cyclists is that this represents the shortest and fastest route alternative to the tunnel. Journey times for motorists are discussed in detail in the Highways Agency Proof of Evidence but journey times and inconvenience for cyclists do not merit a mention. Journey times for cyclists are important as noted in the Highways Agency's Design Manual for Roads and Bridges. The retention of a narrowed-down A3 will not affect the Economy of the scheme for cyclists and this ought to be part of the Appraisal Summary Table assessment.

2.3.19 Conversely, if BOAT 500 were to be used instead of the A3 as the only cycle route alternative to the road tunnel then this would extend journey times and inconvenience to those people who use their cycles for everyday transport journeys. This would represent a dis-benefit for cyclists in terms of Economy.

2.3.20 The Published Scheme could get better value from existing infrastructure investment by using a narrowed-down version of the existing A3 as a route for cyclists and other non-motorised users. This accords with *all five* of the government's criteria for trunk roads set out in 2.1.2. (above).

### **(3) The Published Scheme Fails To Provide An Alternative ‘Cyclists A3’ At Hindhead. It Removes An Existing Transport Facility And Offers An Inferior, Inappropriate And Dangerous Replacement**

#### **3.1. The DMRB Guidance for Assessing Cyclists’ Needs**

The Highways Agency’s Design Manual for Roads and Bridges (DMRB) (Vol. 11.3.8) requires an assessment of a scheme's impact on the journeys made by pedestrians (including ramblers), cyclists and equestrians. It asks for a report to be made outlining how the scheme affects journey times or distance; the amenity value of a journey, journey safety and an assessment of whether some people would be deterred from making journeys that they currently make. It asks for the report to be accompanied by a map showing existing routes and / or route corridors and origin – destination surveys where necessary: -

*“Care should be taken in choosing the days on which counts are made to ensure that samples are representative (for example, recreational routes should be assessed at weekends and routes to work during the week)”.*

*“Counts should generally take place over two days, preferably spread out over a number of months, to avoid variations caused by the weather or local factors. Spring or autumn are likely to be the most appropriate times of year. In residential areas, counts taken on a weekday during school term time are likely to be most typical. In shopping areas, counts conducted on a Wednesday (if not early closing day) and a Saturday may be most representative. In holiday or recreational areas, counts during the summer months will probably be required. All journeys between 8am and 6pm should be counted and their direction indicated (in exceptional circumstances, longer hours may be needed to reflect local factors)”.*

## 3.2 How the Highways Agency Assessed Cyclists' Needs for the Hindhead A3 Scheme

3.2.1 The Highways Agency's Environmental Statement does not contain all of the data referred to above. Nor is this data fully included in any Highways Agency Proof of Evidence. Whilst the Proofs of Evidence record data concerning motor vehicle movements, proper counts and surveys of cycle movements do not appear to have been carried out; particularly along the A3. Major roads *are* used as cycle routes. (See CTC: 'Cyclists and Major Roads')

3.2.2 The Recreation Proof of Evidence is the only Proof of Evidence in which cycling is discussed in any detail. It seems that an assumption has been made that cycling is purely a recreational activity, whereas clearly this is not true.

3.2.3 The Recreation Proof of Evidence records that recreational users (walkers, cyclists and equestrians) were surveyed and counted on the August Bank Holiday Weekends in the year 2002. In 2003 this exercise was repeated on a Sunday and Wednesday in April and June with further unspecified dates in July: -

Extracts from the Recreation Proof of Evidence:-

*"It was not intended that the questionnaire survey and visitor counts in 2002 or 2003 should provide any more than a 'snapshot' of usage of recreational sites around the Hindhead area" (Para. 3.5.2).*

*"Surveys are not able to determine the level of suppressed demand to use recreational routes that are currently subject to severance by the existing A3 alignment" (Para 3.5.5)*

*"The consultations with recreational user groups undertaken in parallel with the surveys provided an indication of the potential level of suppressed demand" (Para 3.5.5)".*

3.2.4 The above clearly shows the limitations of the Recreational Survey.

3.2.5 having acknowledged these limitations it is reasonable to expect that the Highways Agency would carry out further research. However, this appears not to have happened.

3.2.6 One would also expect to find cycling covered in more depth in one or more of the other Proofs of Evidence: perhaps even a Proof of Evidence on Integrated Transport.

### **3.3 What the Highways Agency failed to do**

3.3.1 Cycling is usually considered in terms of journey purpose: -

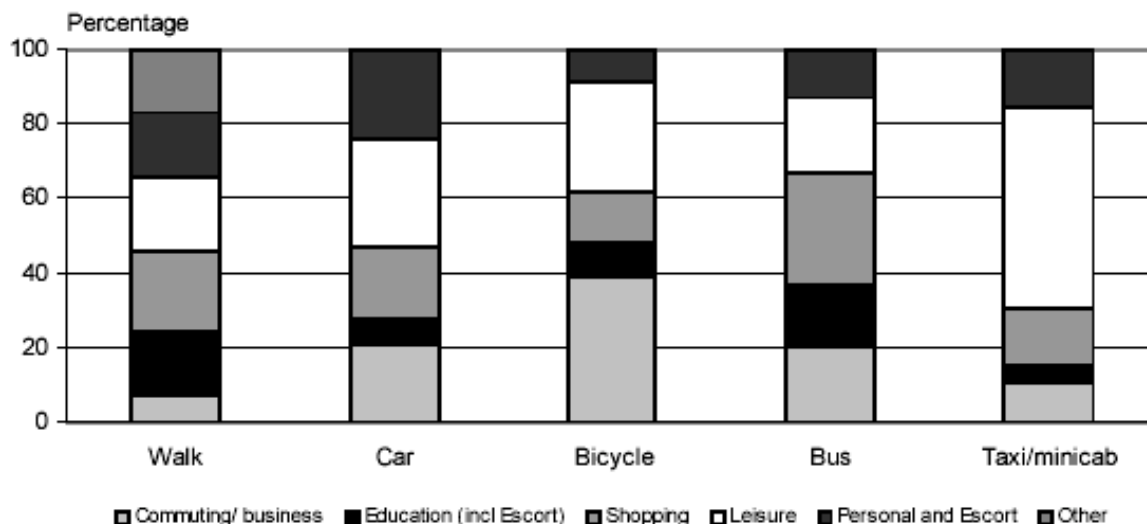
1. Utility (transport cycling),
2. Leisure or recreational cycling
3. Competitive/sports cycling

3.3.2 From the Proofs of Evidence it appears that the Highways Agency counted only **one of the three above groups: recreational cycling**.

3.3.3 Incredibly, for a road scheme of strategic national, regional and local importance being drawn up by a national Government Agency, those cyclists who cycle for transport or for competitive / sporting purposes were omitted in the Highways Agency survey of cycling at Hindhead.

3.3.4 The Department for Transport National Travel Survey statistics 2002 show that listed by journey purpose recreational cyclists are a minority:-

**Chart 8.1: Trips made by selected main mode and purpose: 2002**  
Revised July 2004



3.3.5 The above table suggests that 70% of journeys by cycle are made for everyday transport purposes such as going to school or shopping; whilst only 30% of trips by bicycle are made for leisure/recreation.

3.3.6 This means that the Highways Agency **has failed to consider the majority of cyclists in its Published Scheme.**

3.3.7 **This failure is so significant that it calls into question the validity of the whole proposal for cycling at Hindhead.**

### **3.4 Misunderstanding of Cycling by the Highways Agency**

The Recreation Proof of Evidence demonstrates that cycling has been misunderstood. The introduction identifies the scope of the evidence to include public rights of way and permissive routes; it does not mention the A3 road carriageway where cycling also takes place. Paragraph 4.5.5 confuses the three types of journey purpose with the types of people who ride bikes and contains worrying factual inaccuracies such as “Mountain bikers do not require firm surfaced routes”. I suggest that this Inquiry disregards the definitions of cycling in the Recreational Proof of Evidence.

3.4.1 The result of this misunderstanding is that the Highways Agency has compared the Hindhead A3 Scheme with a cycle route in Sussex known as the Cuckoo Trail. This comparison is invalid and misleading for the reasons below:

3.4.2 The Hindhead Scheme: -

- The Scheme needs to find a direct, high quality route for cyclists banned from the A3 Road Tunnel to use.
- Cyclists approaching the tunnel in both directions will be diverted on to this default route
- The current A3 route has a relatively shallow gradient compared to adjacent routes and this makes it attractive to cyclists.
- It is well surfaced
- The current A3 is a fast, busy road and it is likely that cyclists who use it will be looking for a quick, convenient route around the tunnel in order to complete their journey.
- For cyclists who prefer a quieter, slower and less direct route then they already have the option of using BOAT 500 – an un-surfaced track - which runs nearby. This is open to walkers, cyclists, equestrians, carriage drivers and motor vehicles.
- It is important to note that currently there is choice for cyclists of using either the A3 or BOAT 500.
- The Published Scheme squeezes all cyclists on to a 2metre wide cycle path to be constructed along BOAT 500. It offers no alternative route.

3.4.3 The Cuckoo Trail is: -

- A shared route in Sussex constructed by Sustrans that is open to walkers and cyclists with some, but not all sections open also to equestrians
- The Trail runs along the course of a disused railway line and is virtually flat
- It has a compacted but not absolutely smooth surface.
- Cyclists looking for a faster, tarmac route use quiet roads that run parallel to the Cuckoo Trail.

3.4.4 As described above there are important differences between the Cuckoo Trail and the current A3. Therefore the Cuckoo Trail is most definitely **not** a route upon which to model an A3 route for cyclists. A better way of approaching the design of an A3 cycle route is provided below.

### **3.5 A more accurate understanding of cycling for cycle route design purposes**

3.5.1 Department for Transport Local Transport Note (LTN) 1/04 Planning, Policy and Design for Walking & Cycling is a document that is in the final stages of approval by DfT. It is freely available from DfT including from their website.

3.5.2 LTN 1/04 establishes five core principles common to both pedestrian and cycle routes. Selected extracts appear below: -

- 1. Accessible: Pedestrian and cycling routes should form a network linking trip origins and key destinations including public transport access points. The routes should be continuous and as direct as possible in terms of distance and journey time (type and colour of surfacing can be used to stress route continuity as appropriate). There should be proper provision for crossing busy roads and other barriers in urban and rural areas, and in some areas there should be a positive advantage over private motorised traffic. As far as is practicable, all parts of each route (including crossing points) should be situated on desire lines.*
- 2. Convenient: Networks should allow people to go where they want, and new facilities should usually offer an advantage in terms of directness and/or reduced delay compared with existing provision*
- 3. Comfortable: Infrastructure should meet design standards for width, gradient, and surface quality etc, and cater for all types of user, including children and disabled people as appropriate. Pedestrians and cyclists benefit from even, well-maintained and regularly swept surfaces with gentle gradients. Comfort is enhanced when users are free from the fear of crime.*

4. *Safe: Not only must infrastructure be safe, but for the well being of users, it must be perceived to be safe. The potential for conflict between pedestrians and cyclists should be minimised. Maintenance plays an important part with regard to safe operation, and surface defects should not be allowed to develop to the extent that they become a hazard. Similarly, vegetation should be regularly cut back to preserve available width and sight lines. The latter is particularly relevant with regard to crime and the fear of crime. Apart from long sight lines, the risk of crime can be reduced through the removal of hiding places along the route, ... and the presence of passive surveillance from ... other users. In rural areas, the needs of pedestrians, cyclists and equestrians should be considered where their routes cross busy roads, and where a satellite village or district is separated from a town or city by a major ring road or bypass.*
5. *Attractive: Aesthetics, noise reduction and integration with surrounding areas are important. The walking and cycling environment should be attractive, interesting and free from litter, dog mess and broken glass. If possible, routes should cater for users wishing to stop, chat and rest. The ability for people to walk or cycle two abreast, converse or stop to look at a view makes for a more pleasant environment. Issues of .... personal security should be considered in rural and semi-rural routes.*

3.4.2 To develop these principles further LTN 1/4 uses the concept of a 'design cyclist'. This is intended to help route designers to distinguish between differing priorities when designing cycle routes (for example, safety versus directness). Infrastructure needs to take account of the anticipated type of user. The various needs of different "design cyclists" are identified by LTN 1/4 and these need to be considered in the A3 Hindhead Scheme: -

- *“Fast commuter - confident in most on-road situations, and will use a route with significant traffic volumes if it is more direct than a quieter route;*
- *Other utility cyclist - may seek some segregation at busy junctions and on links carrying high-speed traffic;*
- *Inexperienced utility, commuter and leisure cyclist - may be willing to sacrifice directness in terms of both distance and time, for a route with less traffic and more places to stop and rest. May travel more slowly than regular cyclists;*
- *Child - may require segregated, direct routes from residential areas to schools, even where an on-road solution is available. Design needs to take account of personal security issues. Child cyclists should be anticipated in all residential areas and on most leisure cycling routes;*
- *Users of specialised equipment - includes disabled people using hand-cranked machines and users of trailers, trailer-cycles, tandems and tricycles. This group requires wide facilities free of sharp bends and an absence of pinch-points or any other features which force cyclists to dismount. Cycle tracks and lanes where adult cyclists frequently accompany young children should be sufficiently wide to allow for cycling two abreast. This enables the adult to ride on the offside of the child when necessary. “*

3.4.3 It would be appropriate for the scheme at Hindhead to: -

- Retain a narrowed-down version of the existing A3 as the default route for the A3 Road Tunnel – this would cater well for ‘fast commuter’ and ‘other utility’ cyclists – see previous definitions. This route due to its high quality surface may also be popular with other cyclists especially those with disabilities who use hand-cranked tricycles or wheelchair cycles and with cyclists towing trailers.
- To continue to offer BOAT 500 as an alternative route but to downgrade its status to one that allows access only to non-motorised users (walkers, cyclists, equestrians and carriage drivers).

3.4.4 The Government’s Integrated Transport Policy seeks to offer transport choice. Cyclists can currently chose between a faster A3 route and a slower BOAT 500 route and it would be helpful if the Published Scheme retained this choice.

### **3.5 Why the Published Scheme’s cycle route is misconceived**

3.5.1 As explained above the cycle route in the Published Scheme is derived from a complete miscalculation and misunderstanding of cycle needs at Hindhead.

3.5.2 The Published Scheme removes an existing facility (the A3) that caters for everyday transport journeys. It then uses a further existing facility: BOAT 500, which it modifies in an attempt to be ‘all things to all people’. But even when modified this facility will be far inferior in quality to the existing provision.

3.5.3 This is analogous to telling motorists that they can no longer use the A3 but that they can use the newly added lane of a nearby ‘B’ class road instead; a route popular with agricultural vehicles, learner drivers and caravans. I expect that motorists would be far from happy with this situation.

3.5.3 Fundamentally the Highways Agency has omitted to cater for the 70% of everyday cycle transport journeys that need quick, convenient, direct and well-surfaced routes.

## **3.6 An assessment of the benefits: The retention of the existing A3 for cyclists compared to the Published Scheme:**

### **3.6.1 Economy**

3.6.1.1 Section 2.3.1 of this Proof of Evidence compared the design and construction specifications and maintenance implications of the two routes. It found that the A3 would be the more robust and durable of the two routes and the most economic of the two options in both the long and short term.

3.6.1.3 The use of BOAT 500 and removal of the existing A3 would be a false economy for the Highways Agency. It 'rationalises' the cycling corridor into one route; but what happens when the surface condition of the cycle path deteriorates and the path has to be completely re-laid?

3.6.1.4 The Surrey Cycle Facilities Design Guide (Surrey County Council) recommends that cycle routes are machine-laid rather than hand laid for better surface quality and durability. So would this mean the closure of the entire route whilst this was in progress?

3.6.1.5 If the Highways Agency Scheme has only one route for cycle users, equestrians, walkers and carriage drivers – how would those using this important transport route get from A to B if it were closed?

3.6.1.6 I note that these questions have been raised with regard to the use of the tunnel for motorists and that alternative plans have been made for motorists. I don't recall seeing this principle being applied to the route/s for non-motorised users. The Highways Agency Proofs of Evidence convey an underlying assumption that non-motorised users are less important than motorists.

3.6.1.7 By contrast, the DMRB makes it clear that cyclists have *equal* rights to other trunk road users and the more up to date LTN 1/04 seeks not only to retain existing cycling facilities but to *enhance* them.

3.6.1.8 Further, Policy Planning Guidance 13 (PPG13) on 'Transport' (ODPM 2004) has three key overall objectives all of which promote cycling. To quote: -

*"The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to:*

- 1. Promote more sustainable transport choices for both people and for moving freight;*
- 2. Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and*
- 3. Reduce the need to travel, especially by car".*

3.6.1.9 We need to plan for a future that is likely to see increased levels of cycling. For example I understand that Sustrans would like to include the retained, existing A3 as part of the National Cycle Network (NCN). This is likely to attract increased volumes of non-motorised users to the area - see Sustrans figures below: -

Sustrans National Cycle Network Route Usage Monitoring Programme  
To December 2002

### COMPARISON WITH GOVERNMENT CYCLING STATISTICS

Year-on-year growth in cycling

	1999-2000	2000-2001	2001-2002
All roads (aggregate mileage) Source: Traffic in Great Britain, DfT	-2.0%	-4.0%	+4.6%
All roads (number of trips) Source: Sustrans	-2%	-3%	+5%
NCN traffic free routes (number of trips) Source: Sustrans	+3%	+4%	+18%
NCN on-road routes (number of trips) Source: Sustrans	-1%	+1%	+6%

3.6.1.10 Higher numbers of cyclists may also visit the area if it is promoted alongside the proposed South Downs National Park. The Highways Agency Scheme must take a long-term view of the needs of cycling in the area.

3.6.1.11 The retained (narrowed) A3 plus the option of BOAT 500 will be far better able to cope with the potential for increased volumes of cyclists than BOAT 500 on its own. There is a real opportunity with the Hindhead Scheme to not just 'do the minimum', but instead to embrace and promote cycling as an environmentally sustainable form of transport and leisure.

### **3.6.2 Safety**

3.6.2.1 The existing A3 is a very fast road and its high traffic speeds and noise is intimidating to cyclists. Many cyclists feel unsafe when they cycle along it and there is suppressed demand for cycling. Proving an alternative route could improve perceptions of safety.

3.6.2.2 However, some cyclists feel equally or more unsafe on shared-use paths where the design of the path does not adequately accommodate the needs of all users. The proposed scheme using BOAT 500 is a case in point.

3.6.2.3 Cycle Friendly Infrastructure guidelines (Institute of Highways & Transportation and others) recommends a width of at least 3m for two-way cycle routes. There must also be adequate width to meet British Horse Society recommendations for equestrians and enough space for wheelchair users and others with disabilities, plus pedestrians including those with baby buggies and those walking dogs. We also need to accommodate carriage drivers.

3.6.2.4 There needs to be enough space for cyclists to pass equestrians, dog walkers, those with baby buggies etc in a safe and convenient way. Horses and dogs can be easily startled and chaos can ensue and people can get hurt. The construction details for BOAT 500 (REC-9) show path widths which are narrower than ideal and a verge separating the cycle path and horse route which varies between 0-500mm width. 0mm is clearly inadequate.

3.6.2.5 The construction details for BOAT 500 (REC-9) show a cross-fall across the path. It suggests that if the verge between the bridleway and the cycle path is 0mm then debris from the bridleway would be washed on to the cycle path after rain. This could be a safety hazard.

3.6.2.6 It is important to reiterate that the comparison with safety on the Cuckoo Trail is inappropriate. This comparison was based solely on the research carried out for the recreational use of the A3 at Hindhead. It omits the remaining 70% of cycle journeys; some of which could be at speeds of up to 35 miles per hour (Atkins, 2002).

3.6.2.7 Journey speeds are important to transport cyclists. Competitive cyclists out on a 'training run' will also seek a route that offers them the chance to travel quickly; which of course they can do on the current A3. I doubt that the design speed of the BOAT is 35mph. Yet this is a valid design speed for a replacement A3 cycle route as outlined in the Atkins 2002 Report on Cycling and the A3. To deny this would be to remove an existing facility. Government policy seeks not only to retain, but also to *enhance* existing facilities for cyclists (LTN 1/04).

3.6.2.8 Further, the Design Manual Roads & Bridges guidance TA 67/95 'Providing for Cyclists' clarifies that cyclists have the same rights as other trunk road users: -

*"The policy with regard to cyclists is to take their needs into account from the outset when planning and designing new all purpose trunk roads or making improvements to existing ones.*

*It must be remembered that cyclists have the same rights as other traffic to use all purpose trunk roads...."*

3.6.2.8 For the above reasons I have concerns about the safety of putting all of the non-motorised users together on the proposed BOAT. I think this will lead to conflict.

3.6.2.9 A more positive approach would be to offer a choice of two routes: the existing retained (narrowed) A3 and a downgraded BOAT 500. This would distribute non-motorised users between two routes. Signposting the retained A3 as the 'direct' or 'faster' cycle route would help to direct people accordingly, it would also promote awareness of who would be using the route and help to prevent conflict.

3.6.2.10 Personal security is also an issue. On a personal level if I was cycling alone at night – which I do, as my bicycle is my main means of transport - I might feel a little uneasy about cycling along BOAT 500. This route is for part of its course tucked away in a hollow beneath trees and feels claustrophobic. It has poorer sightlines and mixed surfaces compared to the existing A3. Even the brightest cycle lights do not always illuminate surface detail, debris and obstacles as well as one might wish. From this point of view the retained A3 would be my preferred route.

### **3.6.3 Accessibility**

3.6.3.1 The Published Scheme will make access by cycle to, from and through Hindhead less direct and convenient for those who use the road as an everyday transport route or as a 'training run' as already discussed.

3.6.3.2 The option to use the existing A3 would retain current (good) levels of accessibility for transport and sports cycling purposes.

### **3.6.4 Integration**

3.6.4.1 The Highways Agency document 'The Case for Closing the Old A3 Across Hindhead Common' is an assessment of the original Highways Agency plan to retain a narrowed version of the A3 for non-motorised users. The Appraisal Summary Table for this scheme assesses it as 'beneficial' to land-use policies.

3.6.4.2 Cycling is actively supported and promoted in all Land-Use Policy documents including:- the Integrated Transport Policy (DfT); PPG13 (ODPM); Regional Transport Strategy for the South East (GOSE); County Structure Plans (County Highway Authorities); Local Transport Plans (County Highway Authorities) and Local Development Plans (District Authorities).

3.6.4.3 As already discussed in this Proof of Evidence cycling can also be combined with public transport services in the A3 corridor to provide door-to-door journeys as an alternative to car use.

### **3.6.5 Environment**

3.6.5.1 The retained A3 would represent the retention of a historic route across the Common. This route was constructed in 1829 over a pre-existing track and is of cultural heritage significance. Karen Roberts in the Landscape Proof of Evidence indicates that this route was first surveyed in 1675. To remove the route would be to remove an important part of our cultural history.

3.6.5.2 Unlike motor vehicles cycles generate no surface water pollution from oil run-off, and no air, noise or visual pollution from traffic queues or headlight beams. Further, cycling does not contribute to greenhouse gas emissions. (See CTC: Bikes Not Fumes').

3.6.5.3 Cycling does not represent a danger to wildlife and biodiversity. Sustrans note in their Ways for Wildlife information booklet: -

*"The National Cycle Network now passes through a wide range of different wildlife sites without any apparent problems".*

3.6.5.4 A reduced width A3 would enhance existing wildlife habitats by reducing or eliminating fragmentation and danger. It would also improve the visual unity of the Common, which could be further enhanced by appropriate landscaping.

3.6.5.5 By comparison, it appears from the construction details (REC-9) that the widening of BOAT 500 to accommodate a cycle path, drainage and utility cables would involve the complete excavation of the route and land-take from the banks on one or both sides of the route. This would cause loss of habitat. It would also represent the destruction of the historic character of this route – the original Portsmouth Road - and the possible loss of archaeological remains.

3.6.5.6 If the Highways Agency had any concerns about the compatibility of cycling with wildlife conservation or landscape issues along the route of the A3, these would have been highlighted in their document ‘the Case for Closing the Old A3 Across Hindhead Common’. No concerns were raised and this document supported the retention of the A3 for cycling.

3.6.5.7 The national wildlife and conservation bodies, including the National Trust, Countryside Agency and English Heritage, support cycling. (See Bibliography). Waverley Borough Council (2003) note the English Nature 1994 Report for Punch Bowl SPA which stated that: -

*“the main threat to the nationally important species is posed by habitat deterioration through lack of appropriate management. The National Trust has been carrying out comprehensive management in the Punch Bowl over the last decade, to enhance the heathland”.*

3.6.5.8 A cycle route exists across Dunwich Heath (SPA) in Suffolk and across Studland Heath (National Nature Reserve), Dorset, without any problems. I understand that these high quality habitats are home to many of the same species found on Hindhead Common such as the Nightjar and Dartford Warbler. (English Nature and Suffolk Coasts and Heaths websites)

3.6.5.9 Another environmental benefit is that cycling is excellent for personal health and fitness especially when undertaken regularly. The A3 scheme could accommodate increased cycle use more readily than BOAT 500, thus offering the potential for more people to enjoy these health benefits. This would accord with the objectives of the new national Walking and Cycling Action Plan recently published by the Department for Transport.

## **(4) The Published Scheme is not based on proper consultation and communication with cycling organisations**

### **4.1 The Importance of Consultation**

4.1.1 Guidance note TA 67/95 'Providing for Cyclists' contained in the Design Manual Roads & Bridges states:

*"Consultation should be seen as an important stage in identifying the need for cycling provision, and should be carried out with local cycling organisations as well as local authorities".*

### **4.2 Consultation for the Atkins, A3 Facilities Report 2002.**

4.2.1 The Highways Agency *did* consult with cycling organisations in the compilation of the Hindhead A3 Report on Pedestrian, Equestrian and Cyclist Facilities' (Atkins October 2002).

4.2.2 This report is important because it records the detailed concerns of the various groups involved and it includes the detailed route specifications sought in order for the three user groups to safely share a retained A3 route.

4.2.3 The Summary and Conclusions of the Atkins October 2002 Report state that

*"The idea of a motorised-traffic-free route along the course of the current A3 around the Devil's Punchbowl was particularly welcomed."*

4.2.4. The Report's Conclusions recommend the use of the established Cycle Audit & Review procedures to further develop the scheme along with the continued consultation of the non-motorised user groups concerned.

### 4.3 Communication that a narrowed A3 was to be retained for cyclists

4.3.1 The 'Case for Closing the Old A3 Across Hindhead Common' Highways Agency (February 2003) confirms that: -

*"If the old A3 is closed as proposed, then the existing road around the Punch Bowl can be considerably reduced in width to a narrow track just sufficient for road cyclists, vehicles wishing to gain access to the Youth Hostel and BT vehicles wishing to service cables in the old A3. It would also provide easy access for wheelchairs. The earth bunding and tree screen could then be removed to open up views across the Punch Bowl".*

4.3.2 The Appraisal Summary Table in this document clarifies that this scheme will have an '**immediate positive**' impact on Biodiversity, a '**slightly beneficial**' impact on Landscape and that one of the two Land-use policies that would be **affected most positively** are 'to conserve and enhance biodiversity'.

4.3.3 Significantly, the Appraisal Summary Table does not record any negative impacts from the proposed non-motorised user route along the retained A3.

#### **4.4 The benefits of a narrowed, retained A3 route are shown in the Environmental Statement**

4.4.1 The Hindhead A3 Environmental Statement Volume 1 assesses the alternative access options across Hindhead Common. (Table 4.3). The option to retain the existing A3 for cycle use is listed as *Option 2*. Of the four options listed this is the only one that is supported by: -

*“all recreational users and road cyclists”*

4.4.2 The Environmental Statement records that the route has no environmental or ecological impacts. For example:-

*“Intrusion of cycle track mitigated by careful choice of surfacing”*

*“ it was decided to adopt Option 2 as it was the most supported and it would be the least disruptive to the existing Rights of Way network. This alternative was incorporated in the scheme layout shown at the pre orders exhibition held in July 2003.”*

#### **4.5. So why a complete ‘U-Turn’?**

4.5.1 In autumn 2003 cycling organisations discovered to their horror that the Highways Agency had decided *not* to retain the old A3 across Hindhead Common as a cycle route.

4.5.2 As far as I am aware cycling organisations were not consulted about this, nor was the decision communicated to them formally with an explanation of the reasons for this ‘U-Turn’.

4.5.3 The decision was made behind closed doors and no-one is sure why it was made.

4.5.4 The Design Manual Roads & Bridges Volume 11 Section 4 Part 4:

Environmental Impact Tables for Trunk Road Schemes states: -

*“The level of detail will increase as the project develops. It is important that alternatives are considered to the same degree of detail at each stage and where alternatives are not taken forward then there should be a clear record at that stage of the reasons for such decision”.*

4.5.5 According to the recently published Environmental Statement Volume 1;

*“8.68 Following the pre orders exhibition, it became clear that there was no need for BT to have access to the cable route adjacent to the existing A3. This then provided an opportunity to reconsider the options”.*

4.5.6 At this point it would seem reasonable for the Highways Agency to have contacted non-motorised users and explained that an opportunity had arisen and that they wished to reconsider the options at a meeting. But it appears that the Highways Agency failed to do this.

4.5.7 According to the Environmental Statement Volume 1: -

*“After further discussion with the stakeholders, a modified Option 4 was favoured”.*

4.5.8 Which stakeholders were involved with this decision? I have asked the Highways Agency to clarify and am awaiting their reply.

4.5.9 According to the Environmental Statement Volume 1: -

*“.. a modified Option 4 was favoured, as it would give the opportunity to completely remove the effects of the Existing A3 around the Devil’s Punch Bowl and to concentrate the right of way on the line of BOAT 500”.*

4.5.10 This appears to represent a change in the objectives of the Road Scheme. ‘Moving the Goal Posts’ at such a late stage in the consultation process is a highly questionable action.

4.5.11 Instead of supporting a scheme that meets the needs of all of the non-motorised users who will be banned from the Road Tunnel, the Highways Agency appear to now be supporting a scheme which is best for the National Trust's Hindhead Restoration aspirations.

4.5.12 As discussed in Section 2 of this Proof of Evidence the National Trust's Restoration Plans are not open to public scrutiny as part of this Inquiry; therefore an argument based on achieving elements of the Heathland Restoration ought not to hold weight.

4.5.13 The fact that the Highways Agency has done a last minute 'U-Turn' on its support for retaining the A3 and the fact that this decision was made behind closed doors without proper consultation or communication with cycling organisations goes against all of the principles and policies of 'open government' It also wastes the voluntary time and effort which cycling organisations and others have applied to the scheme.

## **(5) The Published Scheme Could Better Meet The Full Range Of Government Objectives If It Provided A Route For Cyclists Along The Existing A3**

5.1 Not only can we challenge the failure of the Highways Agency to use the correct procedures in making its 'U-Turn' on cycling; but we can also challenge the resulting decision both on this basis and also judged on the merits of the scheme itself.

5.2 Quite simply, the Highways Agency has not made a case for this 'U-Turn' under the Appraisal Summary Table criteria.

5.3 In fact the Highways Agency has already made an excellent case under Appraisal Summary Table criteria in support of retaining the A3 as a route for cyclists and other non-motorised users.

5.4 The Highways Agency document: The 'Case for Closing the Old A3 Across Hindhead Common' (February 2003) includes the plan to retain part of the existing A3 for non-motorised users. This was assessed by the Highways Agency in the Appraisal Summary Table to have 'positive impacts overall'.

5.5 Since the U-Turn by the Highways Agency on the A3 route there has - to the best of my knowledge - been no new evidence put forward by the Highways Agency to indicate any detrimental impacts of the A3 cycle route. All of the Highways Agency Proofs of Evidence assess the closure of the A3 on the basis of the environmental impact of motor vehicle use, not cycle use.

5.6 However, reading between the lines, the Proofs of Evidence suggest that there may be three concerns underlying this U Turn:

1. The wish to prevent motor vehicle access to the route
2. Concerns about landscape aesthetics
3. The use of the route closure as mitigation and compensation for the adverse impacts of the scheme overall

## **5.6. 1 The wish to prevent motor vehicle access to the route**

5.6.1.1 The Sustrans National Cycle Network incorporates barriers and design features. These have proved to be successful in preventing motor vehicle access to routes designed for non-motorised users. The technical details are available in the Sustrans leaflet: 'Removing Barriers from the National Cycle Network'.

5.6.1.2 The Highways Agency-commissioned Atkins Report on A3 Cycle Facilities also provided advice and recommendations for enabling non-motorised user access and preventing motor vehicle access.

5.6.1.3 If current 'best practice' is used to design the retained A3 route there is no reason why motor vehicles should cause problems.

## **5.6.2 Concerns about landscape aesthetics**

5.6.2.1 The Highways Agency document Case for Closing the Old A3 Across Hindhead Common promotes a cycle route across the Common and does not highlight any incompatibility between this and landscape concerns.

5.6.2.2 The above document also states:

*"The sense of a remote wilderness has long been the hallmark of Hindhead Common, as painted by Turner"*

5.6.2.3 The Proof of Evidence on Landscape and Visual Impact includes an image of this Turner painting along with other historic images that capture the essence of the heathland of Hindhead Common (LAN 20 page 52):

5.6.2.4 These images are fantastic in conveying a sense of place, of beauty and also in attracting the interest of the viewer.

5.6.2.5 It is important to note that all four of these images depict people in the landscape. It is the presence of a person or of a man-made feature which enables the viewer to relate directly to the landscape experience. In the absence of a cultural symbol a landscape holds little or no meaning.

5.6.2.6 Plate 2 of LAN 20 is a particularly apt image of Hindhead depicting two travellers using the route across the heath. It is this image of the heath that I have when I consider how a route for non-motorised users may be designed to fit into this landscape. The route would be designed so as to not jar with the landscape and due to the profile of the hillside would not even be evident from most aspects.

5.6.2.7 It is important to remember that Lowland Heath such as that found at Hindhead is a man-made landscape. Prior to the Saxon period it is likely that the area was wooded. Expanding populations with their increasing demands for timber, wood and grazing led to the emergence of a heath landscape. This was maintained through the Commoners exercising their rights to grazing and collecting wood.

5.6.2.8 The natural tendency for this landscape is for it to be colonised by plants and trees such as birch. The natural process of 'succession' means that left to its own devices the landscape will evolve over time into woodland. Evidence of invading and colonising vegetation can be seen on the heath today.

5.6.2.9 As the National Trust website page for Hindhead explains: -

*"Grazing of the heathland by commoners ceased around the mid-1900s, which allowed the spread of birch, pine and bracken over the heather. However, this encroachment is now being reversed by a programme of active reclamation. Exmoor ponies and Highland cattle are now helping to restore and maintain these areas. Until the 1930s, the Punch Bowl was inhabited by 'broom squires', who made brooms from the surrounding birch trees".*

5.6.2.10 So whilst the romantic images of Hindhead convey "the sense of a remote wilderness" the heathland landscape is very much a working landscape characterised by grazing, wood and timber management processes. To manage heathland requires access to all parts of the area and the historic network of routes across the heath is testament to this.

5.6.2.11 Thomas Hardy can perhaps be credited for capturing the real essence of Heathland. In his book: 'The Return of the Native' he describes the fictitious Egdon Heath based on his knowledge of several local Dorset heaths. He devotes pages of evocative description to the heath itself. In particular he examines the impact that the heath has on the people who live there and the impact that they in turn have on the heath. He does not pretend that the heath is anything but a working landscape and highlights the intrinsic importance of the routes across the heath both to its landscape beauty and cultural value.

5.6.2.12 The retention of a route across the heath for non-motorised users would be an entirely appropriate heathland feature. To remove all trace of human activity would be to deny the integrity of the heath landscape and would create a wholly misleading picture. The Postcard of the Punch Bowl & Sailors Stone in the Landscape Proof of Evidence (Plate 2 - Figure LAN 20 page 52) depicts what appears to be a route width appropriate to the needs of non-motorised users across Hindhead Common today. A similar width of route can be seen curving around the valley sides in the Turner painting (Plate 3 Figure LAN 20 page 52) to the bottom left hand side of the painting.

5.6.2.13 In educational terms it is also important for people to understand what heathland is and how it is conserved. What better means to do this than from a historic communication route – the A3 – retained and restored to the kind of width it would have been historically.

5.6.2.14 One final thought on the subject of landscape: it was the writers and artists of the Victorian era who really put Hindhead Common on the map as an attractive landscape and who themselves built the townscape with its prominent Victorian properties. Landscape aesthetics is very subjective but it could be argued that the Hindhead area as a whole (landscape and townscape) developed its broad character in the Victorian era and this is the era to which any restoration plans could best relate. Coincidentally, this is when the world's first bicycle came into being and would undoubtedly have been an important fashion accessory and means of transport across the Common!

5.6.2.15 The Hindhead pages of the National Trust website attribute another relevant piece of cultural history to the Victorians:

*“Sir Robert Hunter, co-founder of the National Trust, lived in Haslemere about 100 years ago. Shortly after forming the Trust in 1895, he organised a public subscription to purchase much of Hindhead Commons, one of the Trust's earliest acquisitions. Sir Robert's far-sightedness has meant that a century later we can still enjoy the landscape he worked to save”.*

5.6.2.16 Whatever period of history we choose, historic (ancient) communication routes across Hindhead Common ought not to be buried and forgotten. They tell an important story about the social, economic and landscape history of the heath.

### **5.6.3 The use of the route closure as mitigation and compensation for the adverse impacts of the scheme overall**

5.6.3.1 From the Highways Agency Proofs of Evidence it is clear that the Published Scheme as a whole will have adverse impacts in key government areas such as the Environment. It seems that the Highways Agency needs to make the Appraisal Summary Table look more favourable if the overall scheme is to win Ministerial approval. The Highways Agency has chosen to use mitigation and compensation measures to do this.

5.6.3.2 The complete removal of the existing A3 from the Common appears to be an easy way for the scheme to score extra points and ‘balance’ the Appraisal Summary Table.

5.6.3.3 But the point about this particular use of mitigation and compensation is that it doesn't have to penalise or dis-benefit cycling.

5.6.3.4 The whole of the Highways Agency case is based on the damage done by motor vehicles with no evidence of any problems connected to cycling.

5.6.3.5 This surely means that mitigation to the same level of benefit would still apply if a cycle route was taken over Hindhead Common. The point is that we can win for both cyclists and the environment on this; there is no need to trade one off against the other.

5.6.3.6 Cycling has huge benefits in its own right that could be exploited without affecting the existing benefits of the scheme. The net result would be to boost the attractiveness of the overall scheme to Ministers.

5.6.3.7 The Highways Agency can add increased value to the Appraisal Summary Table by actively promoting cycling through really high quality and well thought out cycling provision; which doesn't impact adversely on the landscape or environment.

5.6.3.8 The Highways Agency is fortunate to have high-level interest by Sustrans, the CTC and others in the existing A3 route. It has the cycling reports, which it has already commissioned and it is aware of the technical specifications sought.

5.6.3.9 I really hope that the Highways Agency will re-evaluate cycling in view of the evidence presented to this Inquiry and support both a narrowed, retained A3 route and downgraded BOAT 500 for non motorised users. After all, why not?

1. There is no evidence that cycling and a cycle route across the Common using the existing A3 would be detrimental to wildlife.
2. There is no evidence that this cycle route could not be landscaped to fit in with the heathland landscape or historic character of the area
3. There is no evidence that a properly designed route with appropriate barriers to prevent motor vehicle access would not work.

5.6.3.10 Cycling has so many excellent selling points, as described elsewhere in this Proof of Evidence and so far the Highways Agency has understated these.

5.6.3.11 In addition the Highways Agency could work with the National Trust to:

- Promote the A3 cycle route as an added benefit for the National Trust because of its educational value and cultural heritage value.
- Work with Sustrans to develop the A3 as a National Cycle Network Route.
- Make links with public transport interchanges and services.
- Make links with leisure cycling routes such as the Surrey Cycleway so that the area becomes a centre for sustainable recreation and tourism.

5.6.3.12 The Highways Agency can create a win: win situation for all AND get the scheme approved by Ministers.

## **(5) The Published Scheme Could Be Further Improved For Non Motorised Users Whose Routes Are Severed By The A3**

5.1 As the Highways Agency point out, the severance of routes by the A3 is also a key issue. It is important that existing public crossing points of the A3 are retained and made safe for non-motorised users. In addition I support the representations being made by Waverley Cycling Forum, East Hampshire Cyclists' Forum and Hampshire Cycling for an extra A3 crossing by Knockhundred Lane.

5.2 I am concerned that some of the Highways Agency's proposed routes, subways and junctions – particularly the roundabouts will be dangerous for cyclists. Careful, detailed design must address the needs of all types of cyclist to enable them to use these routes safely and conveniently.

5.3 I am also very worried at the proposal for such narrow segregation between the A3 (above ground) and proposed adjacent cycle paths. Traffic speeds, drag and noise can be terrifying and dangerous to cyclists at close quarters – nevermind to horses/equestrians. Wide verges are needed – preferably *much* more than 1metre wide; there must also be proper safety barriers. The central reservation for A3 motor vehicles includes safety barriers and wide verges on either side. This principle ought to be extended to what will in effect be a 'central reservation' between motorists and two-way cyclists.

5.6. Since these are two-way cycle routes which are being proposed and they will be used at night, it is essential that car headlights are screened from cyclists and that cycle lights are screened from motorists. Dense screening that is effective all year round is necessary. For example a hawthorn hedge won't be enough in the winter and of course there is also the incompatibility of thorny hedge clippings and bicycle tyres. I hope that the Highways Agency can provide a good solution here.

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