Bexhill to Hastings Link Road, CPOs and Side Roads Order

Public Local Inquiry, November 2009

Proof of Evidence on regeneration issues

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on behalf of Hastings Alliance

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Bexhill to Hastings Link Road PLI
Proof of Evidence on regeneration issues – Contents

Summary of the evidence submitted by Alan Wenban-Smith

Qualifications and experience

1. I am a chartered Town Planner, with 20+ years of senior experience as a local government officer responsible for transport and land-use and economic development policy at local, subregional and regional levels. As a consultant over the last 10+ years I have played a significant role in the evolution of national thinking on the relationships between spatial and transport policy and action.
2. In the course of the last two years I have played a major role in several studies that are relevant to the transport, land-use, climate change, housing and regeneration issues raised by the present case.

Commission

3. I was commissioned by the Hastings Alliance to present evidence on the regeneration case being made by East Sussex County Council for the Bexhill-Hastings Link Road. This follows on from previous commissions in 2004 and last year to review this road proposal.

Summary of evidence

Process

4. The case for the BHLR is fails to meet appraisal guidelines because alternatives to the BHLR for meeting the regeneration objectives have not been properly considered. A careful analysis by Denvil Coombe of the process adopted observed that the County Council have failed to separate the traffic issues on the A259 from the development issues in north Bexhill. The result, in his words, is "Anything other than the Link Road will not meet with favour because it would not be the Link Road. That the Link Road is the solution is embedded in the objectives … and in the reasons why non-road-based solutions will not work. These arguments are self-fulfilling". I agree with this conclusion.
5. Further process objections concern the failure to report objections properly to the Planning Committee when making their decision.
6. The promoters have also failed to consider the strategic and regeneration impacts of the A21 Baldslow link, even though this seems regarded by DfT and the County Council as inseparable for BHLR.
7. In addition, Keith Buchan demonstrates that the failure to decrease CO2 emissions (a 'show-stopper' in draft guidance) should have led to a reappraisal of the whole option generation process.

Value for money – economic appraisal

8. Although the objectives of BHLR are stated as being overwhelmingly about economic regeneration. However, the appraisal methodology is overwhelmingly about reductions in congestion, as measured by user time-savings. Only about 20% of the quantified benefits identified in the Regeneration Report are in the form of employment, and these overlap to an unknown extent with the economic value attributed to congestion benefits.
9. In a very local scheme like BHLR the time-savings are small (averaging some 15 seconds per trip). Most will therefore be below the threshold of perception. Economic benefit requires time-savings to convert into improved efficiency, competitiveness and productivity. While such small time-savings may be a legitimate measure of congestion-reduction, it is inconceivable that they could deliver economic benefits through such a chain of reasoning (information on the proportion of assessed benefit that should be disregarded on this basis is awaited).
10. A further objection concerns the erosion of such congestion benefits as there might be by dispersion of activity. The modelling procedures used do not permit this to be investigated but it is an inevitable consequence of increased accessibility, and means that any long-term savings will be over-stated.

11. Official appraisal guidance is in a state of flux, but it is clear that such objections to the conventional approach adopted by the promoters are gaining ground and that the Secretary of State will require advice from the Inspector on their application to the BHLR.

Value for money – regeneration and development

12. The North East Bexhill Business Park (NEBBP) is the most significant piece of economic regeneration enabled by BHLR. However, although this development would become permissable, this is not the major impediment to its regeneration value. If it is to contribute to attraction of inward investment (as originally intended) it is not accessibility within Hastings-Bexhill that matters, but accessibility within the greater South East (which the BHLR does not affect).

13. It is recognised by ESCC that the NEBBP will in fact depend primarily (90%) on attracting local business expansions and start-ups. The corollary is that the net economic benefit will be that much less. It is not clear that the NEBBP is to be preferred to other ways of meeting local businesses space needs: the supply of medium-sized sites and premises in the area is considerable and is continually added to through recycling and churn. At the very least the value for money of BHLR as an industrial access seems to be challenged.

14. Similarly local access may help deliver housing requirements, but in the context infrastructure needs for housing across the region BHLR does not look like good value for money.

Integration and climate change

15. Road improvements like BHLR, while initially offering reduced travel times, in the longer term cause of longer journeys and greater car-dependency – and these have been the two largest elements in the growth of surface transport CO2 emissions over the last 30 years.

16. Traffic growth makes living and working in central locations less attractive, while the operation of businesses is inhibited by the resulting congestion. The County Council's response to this problem is to build more roads and to develop more peripheral sites for housing and business. Even if successful in terms of delivering new development, by compromising the much larger volume of locational choice represented by the churn of existing stock, this approach to regeneration contains the seeds of its own continuing failure, as well as making the achievement of CO2 targets impossible.

17. I demonstrate that there is an alternative trajectory, which could lead to a more compact pattern of settlement, activity and movement, and lower CO2 emissions. This does not necessarily involve less growth or development, but gives more prominence to increasing the attractiveness of the existing stock of buildings to household and businesses. Since the existing stock forms 90% of the market there is great potential to achieve change.

18. Such an approach is entirely in keeping with the clear vision informing the original Five Year Plan, with its emphasis on a growth trajectory that recognised and reinforced the area's Unique Selling Points. The NEBBP and BHLR, in contrast, would make Hastings-Bexhill more like every other small town.

19. There is a new situation arising in which the increasing CO2 load will not be tolerated, and the provision of a £100m road to facilitate a medium-sized Business Park and a few hundred houses cannot be afforded. There is a need to fundamentally review the contribution that transport can make to the regeneration of Hastings-Bexhill. I believe that with a greater emphasis on radical improvements in public transport, more emphasis on tackling the environmental impacts of excessive traffic growth, and a sensitive approach to demand management, transport could make a greater contribution at less overall cost.

20. The over-riding message of this evidence is the need for and benefits of an integrated approach. There are ways of reconciling the regeneration and climate change imperatives with the limited likely resources. The urgent need is for radical thinking about making better use of existing assets, and not being distracted by 'big ticket' schemes like NEBBP and BHLR.

Proof of evidence – Alan Wenban-Smith

1 Introduction

Qualifications

1.1 My name is Alan Wenban-Smith. I hold the degrees of MA (Cambridge), MSc (Toronto) and DipTP (Newcastle) and am sole proprietor of the Urban & Regional Policy consultancy. I am a member of the Royal Town Planning Institute (MRTPI), and currently a member of the RTPI General Assembly and its Policy & Practice Committee. I am Visiting Professor of Planning at Birmingham City University.

1.2 I have held senior local authority planning posts in the North East and Birmingham, including lead responsibilities for transport, planning, urban regeneration, economic development and regional policy in both areas. As Chairman of the West Midlands Chief Engineers and Planning Officers Group I led metropolitan planning and transport consortia in the West Midlands, producing the first (national) integrated transport 'Package' bids (forerunners of LTPs) for the conurbation, and devised and oversaw the shared funding process. As Chairman of the West Midlands Regional Officers Support Group I also led the first Regional Planning Guidance and the first Regional Transport Strategy. I was an external adviser on transport research to DoT and DETR from 1995-98.

1.3 As a consultant I have worked with Cambridge-based economic development consultants SQW (formerly as a Director and now as an associate), transport consultants MVA (where I have acted as Planning Adviser since 1996), and in my own name as Urban & Regional Policy. I have spoken and written extensively on linking transport policy to other aspects of urban and regional policy. I was special Adviser to the Commons Select Committee on the South East Growth Areas in 2002/3 and principal author and main researcher of a report to DfT on *'Integration of RTSs with spatial planning policies'* (MVA, 2004).

1.4 More recent projects relevant to the transport, land-use, climate change, housing and regeneration issues raised by the present case include the following:

a) 2009: invited contributor to DfT NATA Expert Group workshop on problems of transport appraisal;

b) 2009: invited contributor to Committee on Climate Change expert workshop on land-use aspects of transport's contribution to climate change;

c) 2009: advised and represented NW Transport Alliance on regeneration issues associated with the Mersey Gateway Bridge;

d) 2009: Reported to High Speed Rail public interest consortium on complementary measures necessary to facilitate regional economic benefit;

e) 2007/9: advised West Midlands Regional Assembly on housing provision and regeneration risk, and represented Assembly at Public Examination;

f) 2008: Chaired the Peer Group Review of London Land Use Transport Integration model for TfL, including its potential use in the regeneration case for the Thames Gateway Bridge;

g) 2008: contributor to study of land for affordable housing by Chartered Institute of Housing for Homes and Communities Agency.

Scope and perspective

1.5 My evidence is given from the standpoint of spatial policy (in the broad sense defined in PPS1, Delivering Sustainable Development, para 30: *"Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they can function."*).

1.6 Urban regeneration in this context includes not just the nature and amount of new development, but the broader impacts on the local economy, social strucures and environment, working through the whole stock of buildings. Similar considerations apply to the way in which transport interventions, such as the Bexhill-Hastings Link Road (BHLR) affect not just where new development may take place, but also the whole pattern of distribution of residence, activity and movement.

Commission

1.7 I have been commissioned by the Hastings Alliance to review the regeneration case being made by East Sussex County Council (ESCC) for the Bexhill-Hastings Link Road (BHLR). The principal focus of this critique is the Regeneration Report (RR – Ref 47) produced by East Sussex County Council (ESCC). Although much of the RR is based on material available earlier, there has been extensive updating in important areas, and crucial information was still not available at the deadline for submissions.

Structure

1.8 My evidence is structured around what appear to me to be the most important objections to the case for the BHLR. These fall under the main headings of Process, Regeneration and Integration, as follows

a) ***Process:*** procedural failures:
- There has been a failure to properly consider alternatives to BHLR (including non-transport measures), as required by Government policy guidance;
- The relationship with the A21 Baldslow Link is such that the BHLR cannot properly be considered in isolation from it;

b) ***Regeneration:*** failure to demonstrate relevance of BHLR:
- 'Regeneration' is presented as the main purpose of BHLR, but congestion savings provide the overwhelming bulk of the benefits;
- The economic relevance of the congestion benefits claimed are overstated, since they consist mainly of small time-savings which are of little or no economic value, indicative only of congestion impacts, and eroded by induced changes in location and travel;
- The regeneration value of North Bexhill Business Park (NBBP) depends on better *regional* access to attract inward investment, while BHLR only enhances *local* access. Other means of meeting the expansion needs of local businesses are likely to be more cost-effective;
- Local access *may* be relevant to serving housing developments, but (as with local business needs) BHLR is a very expensive way of providing this and not demonstrated to be cost-effective;

c) ***Integration:*** lack of a strategic spatial perspective to address both regeneration and climate change:
- The focus on BHLR has led to loss of the broad strategic perspective informing the original regeneration plans in which the crucial transport elements for local regeneration were rail links within and beyond the locality;
- The baseline for appraisal of CO_2 impact is inappropriate: the small difference 'with' and 'without' scheme ignores large difference of both from the appropriate local share of the CO_2 trajectory that is now a national commitment;
- A more integrated approach is essential to reconciling regeneration and climate change imperatives, and could be feasible within the resource envelope.

1.9 In each area I will review the evidence in the context of the relevant current policies of the Government.

2 Process

Context and evolution of the BHLR scheme

Regeneration and the A259

2.1 Throughout the development of BHLR the case for it has consistently been made in terms of regeneration of the Hastings-Bexhill area. However, a side-effect is relief of congestion on the A259, and the two issues have become entangled. The situation is further complicated by the status of parts of the A259 as a Trunk Road, making the possible impacts on the wider roles of this route unavoidably part of the context.

2.2 From the national perspective, the DfT's *'Categorisation of core trunk roads in England'* (2005) states that no part of the Trunk Road route along the south coast (A27/A259/A2070) is regarded as being 'a route of Strategic National Importance'. Further down the scale, although in Bexhill the A259 is classified as a Trunk Road, through Hastings it is not. DfT commented:

> *"The M27/A27/A259 provides the only east-west route for long distance traffic south of the M25, though its primary use is in connecting the South Coast towns and communities with the M25 radials and each other. Much long distance east-west traffic, even along the south coast uses the M25 as the quickest reliable route - though not the most direct."*

2.3 From a local perspective it should be noted that only 5% of the peak traffic on the A259 crossing the Glyne Gap between Bexhill and Hastings is *not* local (ie has either origin or destination outside the two towns). Thus regardless of its Trunk designation in Bexhill, the A259 is primarily 'a local road for local people', and in making the case for the BHLR, ESCC has not proposed a change in the function of the East-West transport corridor *within* Hastings and Bexhill.

2.4 This picture is complicated by the fact that the predecessor to BHLR, the proposed Bexhill and Hastings Bypass, would have carried the trunk route right around both towns. The Secretary of State decided against the by-pass scheme essentially because he considered the economic benefit to be outweighed by the environmental damage, and asked the local authorities to explore less damaging ways of delivering the regeneration benefit (CD 9.16). The BHLR proposal was the local response to this decision. Although not presented as a through route, it will inevitably function as such, particularly when taken with the A21 Baldslow Link, proposed by the Highways Agency and essentially inseparable (as discussed below paras 2.14-2.16).

Local chronology

2.5 The relationships between the evolution of transport and regeneration plans for the area are complex, but are an essential background to understanding the issues. Appendix 1 summarises the chronology of key events, while Appendix 2 provides a more detailed bibliography with cross-references to the current PLI Core Documents. Where documents are on the Core Documents list this reference will be used, otherwise the sequence number in Appendix 2 (NB many documents understood to be destined for the Core Documents list were not posted on the Inquiry website at the deadline).

Failure to consider alternatives

The role of 'alternatives' in the appraisal framework

2.6 Project appraisal in the public sector is required to conform to the Treasury 'Green Book' (CD 9/23). This presents appraisal as part of a process that starts with a clear statement of the rationale for public intervention and the outcomes sought, puts forward practical options for achieving these outcomes, appraises these in terms of value for money, and finally monitors and evaluates the actual results.

2.7 DfT enjoys a degree of autonomy from Treasury oversight when applying its own Transport Appraisal Guidance system – WebTAG (CD.9.22) – by virtue of its continual efforts to ensure compliance with Green Book principles. WebTAG is an extensive, sophisticated, elaborate and

evolving system, currently comprising over 100 distinct modules, over 20 of which are currently the subject of consultation (including a number particularly relevant to this Inquiry: eg WebTAG 2.8C and the related 'expert' paper WebTAG 3.5.14C posted in April 2009, and WebTAG 2.1C posted in September).

2.8 The fundamental Green Book guidance has always been clear that 'alternatives' to be considered must relate to the fundamental economic, social and environmental outcomes sought, and not simply be variants on a single solution. Recent WebTAG developments underline this point.. In the case of Hastings-Bexhill, the fundamental local objectives concern regeneration of the area, and there are increasingly important national objectives concerning climate change. ESCC's response to this issue appears to be (see Appendix 3) that all relevant alternative options were considered in the course of the South Coast Multi-Modal Study (SoCOMMS – CD 7.16). As Keith Buchan's evidence discusses in more detail this is not compliant with appraisal guidance.

2.9 The assertion that SoCOMMS was investigated by Denvil Coombe, a highly respected transport planning and appraisal expert. His report (Ref 47) can be summarised as follows:

a) He notes that there are in fact *two* distinct sets of problems: (i) congestion on the A259 between Hastings and Bexhill and (ii) access to development land in North Bexhill;

b) SoCOMMS provides justification for a strategy for the South Coast corridor as a whole, but its recommendation regarding BHLR (i) includes other *complementary* measures and (ii) is not justified in any depth;

c) The subsequent Strategy Development Report (Ref 10 – an input to CD 7/10) adds little, and provides no evidence that a full range of alternatives was considered. It does however confirm that it is not the intention to promote 'end-to-end' infrastructure provision (rail or road) but rather to deal with 'bottlenecks';

d) The Hastings Strategy Development Plan (2002) muddies the water by treating action like public transport improvements and 'soft measures', hitherto regarded as *complementary* to BHLR as instead being less satisfactory *alternatives* to it. This approach was carried through into the 2004 Major Scheme Bid (CD 9/28).

2.10 Dr Coombe summarised the position as follows:

a) *"The needs of the development in north Bexhill are being used as a reason why non-road-based options, or options other than the Link Road, will not address the problems in the A259 corridor between Bexhill and Hastings. While the Link Road may conveniently address the problems in the A259 corridor and also unlock the development potential in north Bexhill, the two sets of problems seem to me to be separate. The argument being put forward, however, says that because non-road-based options, or options other than the Link Road, cannot solve the development problem in north Bexhill, they cannot be used to address the problems in the A259 corridor.*

b) *"Anything other than the Link Road will not meet with favour because it would not be the Link Road. That the Link Road is the solution is embedded in the objectives in Table E-1 and in the reasons why non-road-based solutions will not work. These arguments are self-fulfilling."*

2.11 Subsequent reformulations of the case for the BHLR have not altered the force of this analysis. It has been a fundamental difficulty throughout that, while regeneration is the stated main objective of the BHLR, the operation of the A259 as a Trunk Road has been the determining factor in the consideration of alternative means of meeting that objective. This is compounded by the fact that the methodology for appraising the economic case for the BHLR is overwhelmingly dominated by user time-savings – the same criterion as applies to the operation of the A259 as a Trunk Road.

ESCC responses to objections

2.12 The report to ESCC Planning Committee in December 2008 (CD 9/3) includes a lengthy appendix summarising objections to the BHLR and offering the County Council's responses. Given their appearance is from page 130 onwards in the Committee Report, and that the presentation is garbled so that lines from objection and response columns are interleaved, there seems little likelihood that serious consideration was given by the County Council to objections in arriving at their decision.

2.13 Appendix 3 sets out (with corrected formatting) the references to our earlier report (Ref 37). . From this it can be seen that the responses are fragmented, partial and formulaic. This continues a general pattern, observable from the outset, in which the County Council's determination to build the BHLR is immune to consideration of reasoned argument, evidence or alternatives. As Keith Buchan's evidence demonstrates, it is also non-compliant with Government guidance on scheme development and appraisal .

Relationship to A21 Baldslow link

2.14 A complicating factor, compounding the confusion noted by Dr Coombe concerning the purpose of the BHLR is the relationship to the A21 Baldslow link (linked to the BHLR by the B2092 Queensway). The DfT has indicated its intention to start work on this Trunk Road improvement consecutively with the completion of the BHLR.

2.15 It is clear that in DfT's view the schemes are inseparable, and indeed the effect on traffic on the Queensway would seem to make this an unavoidable consequence of BHLR. However, taken together with Queensway the two schemes provide the kind of end-to-end capability that it was the purpose the rejected by-passes to have offered. The traffic forecasts support this by showing large increases in traffic compared with BHLR alone on Queensway (+3,300-4,300, 14-18%) and B2092 Crowhurst Road (+1,300-1,900, 6-9%). This is in addition to the substantial increase from BHLR alone (ESCC evidence on this point is still awaited).

2.16 The strategic implications for regeneration of implementation of both schemes are not necessarily positive: increased congestion on Queensway, which serves much existing industry, and an increased traffic impact on the environment of Hastings-Bexhill. In essence the combined scheme amounts to a 'through by-pass' for the A259. I conclude that the implication for the present Inquiry is that a decision in respect of BHLR cannot properly be made without considering it in conjunction with the A21 Baldslow link.

3 Regeneration and value for money

Scheme justification

3.1 The BHLR scheme itself is not significantly different from that considered in my previous reports, neither has the County Council's case for the scheme shifted in any significant way since 2004 (except for stronger support for additional housing development). In essence the case is based primarily upon economic development, with new housing and reduction of congestion on the A259 as subsidiary benefits, as illustrated by the following excerpts:

a) *"The driving force of the scheme is to enable essential economic regeneration for Bexhill and Hastings, which is currently compromised by the poor accessibility within and between the two towns. … the Bexhill Hastings Link Road would make a major contribution to meeting the need to improve access between the towns and linking Trunk Roads which serve the area".* (Design & Access Statement 2007, 2.1.1);

b) *"One purpose of the Scheme is to facilitate both the release of development land at north east Bexhill and elsewhere, and the regeneration of Hastings and Bexhill for the public benefit. … to avoid the potential prospect of housing development being allowed on appeal within other parts of Rother District which is overwhelmingly designated as an Area of Outstanding Natural Beauty. … Furthermore, the Scheme will achieve reductions in traffic along the existing A259 between Bexhill and Hastings, on rural roads to the north of the two towns and through Crowhurst and Battle. Journey times will be improved, bus services are expected to be more reliable and accidents involving motor vehicles are forecast to reduce. Air quality along the A259 will improve as a result of reduced traffic and less congested conditions."* (ESCC Statement of Reasons, Jan 2009)

3.2 As in 2004 and 2008, the focus of the regeneration case is still the development of the 48,000 sq m North East Bexhill Business Park (NEBBP). The intention is to create a high quality development that would attract new types of business to the area through inward investment. When fully occupied this is estimated to create some 1500 net additional jobs in the area. However, this development could not be permitted without new means of access to the main road system – particularly the A259. The Highways Agency stated (CD9/35):

> *".. the Highways Agency would almost certainly want the Link Road in place before any of these sites could be considered for development. The Agency would remain concerned over these sites even with the Link Road in place if no other new road is provided to distribute the traffic … I confirm that the only point at which the Agency would sanction planning permission being granted for North Bexhill is when a contract for the BHLR has been let with occupation permitted only once the link road is open to traffic."*

3.3 The relationship of the BHLR to the NEBBP was described in the following terms in the 2007 Regeneration Statement (Ref 30, para 1.3.3):

> *"At the Bexhill end, the Scheme will connect into the A259 Belle Hill signal junction replacing the existing London Road approach to the junction. A second traffic signal controlled junction just north of this junction will facilitate access to and from the existing A269 London Road to North Bexhill. After passing through the built up area of Bexhill, a new signal junction will be constructed which will form the main access to the proposed North Bexhill development".*

3.4 This part of the BHLR was one of the road schemes tested by the original MMS (Ref 2), where it was referred to as the 'Bexhill North Approach Road' (BNAR), and this (complete with its junction with the then proposed Western By-Pass) was costed at £4m. This would provide a good quality direct access from the NEBBP to the A259 where it becomes a Trunk Road. The Highways agency objection seems to be due to a combination of housing development since 2000 together with concerns about the knock-on effects on the Bexhill Trunk section of the A259 from additional traffic attracted to the non-Trunk Hastings section.

3.5 The major part of the cost of BHLR thus appears to be for the section from the NEBBP to Queensway in Hastings. While this part of the road would improve accessibility to the development for Hastings residents, its main effect is to provide relief to congestion on the A259 in the Glyne Gap (though at the price of increased congestion on Queensway itself and other local roads, especially The Ridge).

3.6 The major part of the cost of the BHLR thus appears to be associated with the subsidiary objective for its construction (general relief of congestion on the A259). This is consistent with the balance of benefits identified figures in successive scheme appraisals (as discussed in the next section), but not with the primary objective of regeneration (as discussed subsequently).

Value for money appraisals

3.7 Although the current BHLR scheme is broadly similar to that which received Provisional Acceptance in 2004, both costs and benefits seems to have changed very markedly from those stated in the original Major Scheme Bid, as summarised in Figure 3.1 (since the figures are being revised yet again, the last column has been left blank for the convenience of the reader):

Figure 3.1: Costs and benefits, 2004, 2008 and 2009 (NPV £m)

Benefit or Cost	2004 Bid[2]	2008 PA[3]	2009 (May)[4]	2009 (Oct)[6]
Business user time-savings (NPV, £m)	63.8	75.3	99.5	
Other user time savings (NPV, £m)		136.0	87.0	
Accident savings (NPV, £m)	9.9	28.5	31.1	
All Transport Benefits (NPV, £m)	96.8	226.2	204.0	
Costs[1,5] (NPV, £m)	40.7	61.8	71.8	
Transport Benefit:Cost Ratio	2.4:1	3.7:1	2.8:1	
Regeneration benefits (NPV, £m)	23.1	22.2	22.2	
Regeneration benefits (jobs)	1800	2000	2000	

Notes: 1. the costs and benefits reported here have all been discounted to net present values (NPV) at 2002, so are not the same as the crude 'headline' costs; 2. price base of 2004 bid not stated; 3. 2008 scheme was costed at 2006 prices (Ref 33, 2.2.1); 4. 2009 scheme costed at 2002 prices. 5. 2008 and 2009 *include* risk and optimism bias (~£23m gross) but *exclude* the link to NEBBP (~£18m gross). 6. further revisions are believed to be in preparation

3.8 It can be seen that there are some very large differences in both costs and benefits, with costs increasing by some 50% while transport benefits more than doubled between 2004 and 2008. Benefits decline again by about 15% between 2008 and 2009 appraisals – but are split entirely differently between business and private users (from 35:65 to 55:45). Without much more detail about the changes in the modelling process and assumptions it is difficult to comment on why this should be, but at the very least such large discrepancies cast substantial doubts on the reliability of the figures as a basis for decision-making. A supplementary statement may be necessary if further information becomes available.

3.9 However, the most striking feature of the appraisal is not the variations over time (surprising as these seem), but the relative scale of the transport benefits (accident savings, and user time-savings from reduced congestion) on the one hand and regeneration benefits (measured in terms of the value of employment created) on the other. The transport benefits (£204m) are nearly 10 times as large as the employment benefit (£22m) – though these benefits cannot be added as they overlap (– see paras 3.10-3.11, below).

User time-savings and economic benefit

Evolution of thinking

3.10 Until the 1999 SACTRA Report *'Transport and the Economy'* (Ref 49) the overwhelming bulk of economic benefits of transport were considered to comprise direct benefits to users – primarily user time-savings from reduced congestion. Though these time savings could (and usually would) be transmuted into changed patterns of activity (and congestion benefits lost in

the process), in a perfect market the benefits of the changed pattern of activity would be equivalent to the original user benefits, however long and tortuous the route between.

3.11 User time-savings can be forecast from the same transport models used to design roads, and on average accounted for around 80% of the monetised benefits of road schemes (with accident savings – also modelled – accounting for most of the rest). This was the basis of the traditional practice, followed for almost 50 years and still the dominant mode, of treating economic benefits and user time-savings as essentially synonymous. However, as SACTRA pointed out, within this paradigm *"… in general, the value of direct transport benefits must decline if indirect economic benefits are to grow"*.

3.12 SACTRA also pointed out that in imperfect markets (such as generally exist in the real world) the equation of user time-savings with economic benefits need not hold. For several decades up to this point, the treatment of time-savings of transport users as direct benefits to the local economy was standard practice in transport appraisal, but since SACTRA increasing attention has been given to the important effects of imperfect markets – particularly (following the Eddington Report) in quantifying the economic impact of transport where wider economic benefits (WEBs) such as agglomeration economies, increased competition in imperfect markets, and improvements in labour supply. These considerations are now feeding through into major revisions of appraisal guidance.

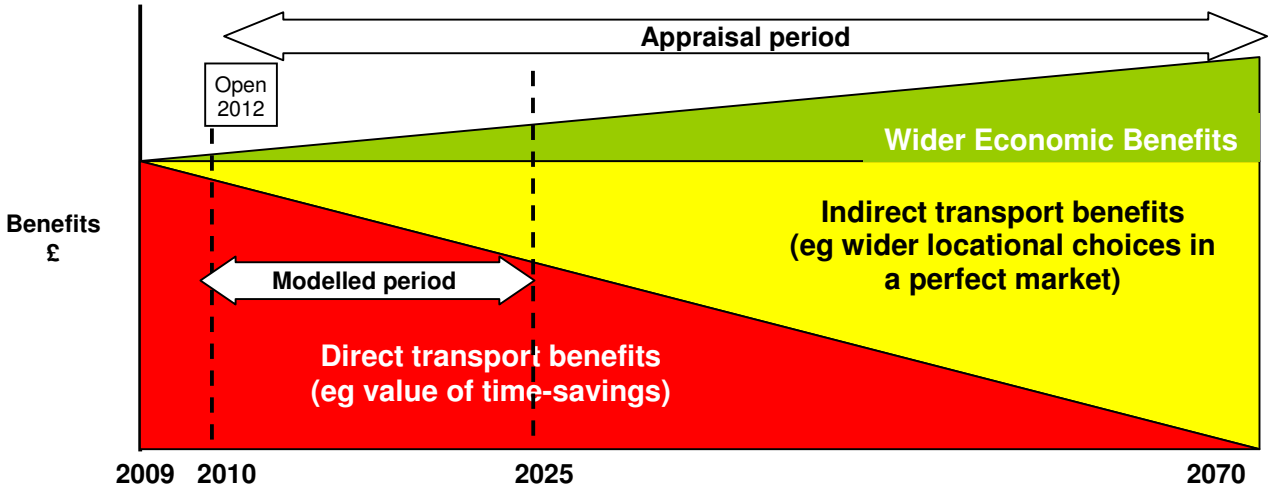
Changing appraisal guidance

3.13 Another technical change with major wider implications was imported into transport appraisal when the 2003 Green Book (CD 9/23) replaced its predecessor. Previous to this, the period over which costs and benefits needed to be considered was 30 years from opening, and the discount rate (the annual reduction in the present value of costs incurred or benefits won in the future) was reduced from 6% to 3-3.5%. This greatly increases the significance of future incomings and outgoings (the present value of £1 in 30 years' time is 41p at 3%, but only 17p at 6% (at 60 years the equivalent figures are 17p and 3p).

3.14 While this makes longer term implications more influential in present decisions, it adds enormously to the weight that is placed upon the numbers used in long term forecasts. The significance of this problem is shown by a review of forecast traffic against actual outcomes (CD 9.22: WebTAG 2.7.1, para 1.8.6). After about five years 'induced traffic' becomes more significant and there is a systematic underestimation of traffic. This is a symptom of the changed patterns of location and travel that resulting from new or improved roads, and is discussed further below (para 3.17 onwards).

3.15 The relationship between time-savings benefits, conventional COBA and WEBs components over the longer-term appraisal periods now in force is shown graphically in Figure 3.2

Figure 3.2: Components of economic benefit over appraisal period



3.16 The transitory nature of user time savings is a major issue to be considered in reviewing the economic impact of BHLR Two questions arise:

a) How much reliance can be placed upon traffic forecasts (and related time savings) as a measure of direct benefit beyond the short-term (5 years)?

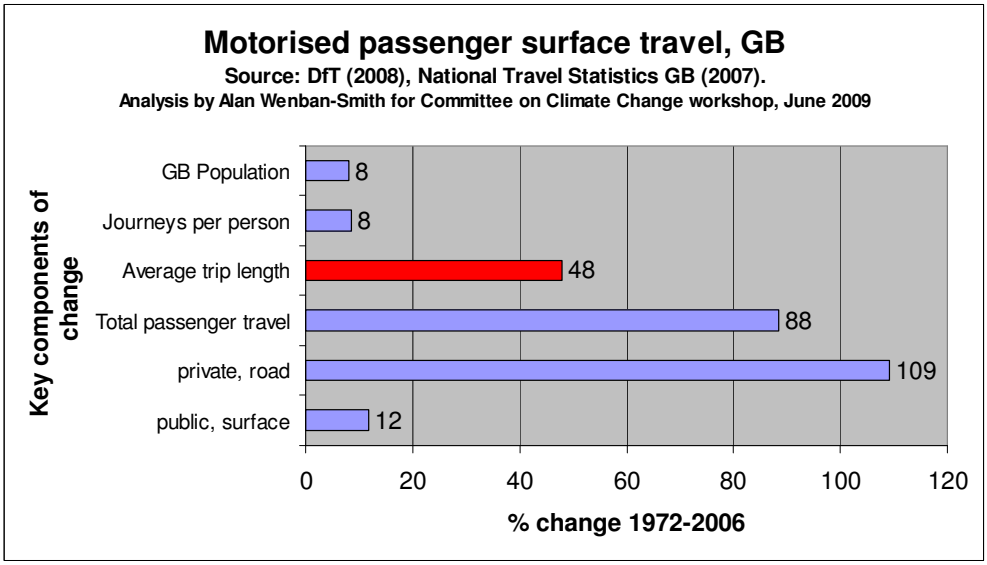
b) While the conversion of time-savings to new patterns of activity and travel may be assumed to benefit the individual traveller, how far does this further the wider economic, social and environmental aims referred to by the Green Book, including regeneration?

Changes in patterns of activity

3.17 The basis of the appraisal reported in the BHLR Business Case is that reductions in road congestion will lead to time savings for business users, which will lower costs, leading to increased efficiency and competitiveness, and thus to economic growth. However, while improved accessibility may lower business costs, it also tends to increase the amount of travel that is undertaken as businesses and households enjoy wider ranges of choice – in market areas businesses can serve, suppliers, labour markets, housing, shopping, schools, services, etc. Under this pressure, the pattern and scale of travel demand have changed dramatically since WW2.

3.18 In particular, while the number of *trips* has changed very little, around 2/3rds of the increase in personal travel is the result of *longer trips*. This phenomenon is mainly the result of the increasing dominance of road travel, particularly by car (Figure 3.3 below).

Figure 3.3: Components of growth of motorised surface travel, 1972-2006



3.19 The effects described above are a consequence of a more dispersed *pattern of activity*, driven by economic and social pressures and enabled by transport improvements. In any one year, around 90% of this change in patterns of activity and location takes place through the turnover ('churn') of the existing stock of buildings, which offers about 10 times the volume of choice of new build (and a much wider range of locations). This is important to consideration of alternative strategies, since actions which make more compact patterns of settlement, activity and movement attractive can also operate on the whole stock, and have the potential for much greater effectiveness than policies for new infrastructure or development (this is discussed further in paras 4.10- 4.14).

The economic relevance of user time savings

3.20 From the brief discussion above of the changing basis of transport appraisal, it can be seen that the conventional reliance on user benefits converting to an equal amount of economic benefit through perfect market operations is no longer generally tenable. The difficulty we all face is

that at this stage there is no fully worked out alternative to the conventional approach, enshrined in earlier (but still current) versions of WebTAG.

3.21 In this situation we must look at the particularities of the case, and consider whether the conventional approach is more or less likely to be misleading. Two considerations suggest that conventional methods are likely to overstate the conversion of user time-savings to economic benefit in the case of the BHLR:

a) Because of the very local nature of the trips using BHLR, and the short length of the road itself, the bulk of the time savings will be very short. The value of time savings in Year 1 are worth some £4.5m (ESCC data), but this is distributed over a large number of trips. With a workforce of some 80,000 there will be some 18m commuting trips pa in the area, almost all by road (car or bus); nationally commuting comprises some 18% of total motorised road travel, implying some 100m road trips pa in Hastings-Bexhill. Thus the saving per trip is of the order of 4.5p per trip – or at (say) £10/hour around 15 seconds each[1]. Of course the savings will tend to be concentrated on some routes (and there will be extra delays on others). However, it is entirely likely that many of the time-savings will be too brief to be perceptible[2]. Such savings may be a useful indication of reduced congestion, but it is impossible in logic to argue that *any* quantifiable economic benefit could follow.

b) Locational choice: as has already been noted (3.20-21), the effect of improved access tends to be taken up by wider locational choices. While some of this may be economically beneficial in terms of widening markets, increasing competition, etc, much of it is likely to be neutral or even negative in these terms (eg more leisure/commuting clogging arterial routes); all of it will erode the initial congestion benefits from new roads. A standard 4-stage transport model (even with VDM), such as has been used for BHLR cannot compensate for such effects. The result is that it will tend increasingly to overestimate time savings. It was noted earlier (para 3.14) that such models are decreasingly reliable after about 5 years, so this is a major draw-back when appraisal periods have extended to 60 years. The assumption of static benefits after 30 years looks particularly unsafe. While a LUTI model might help address this issue, the elaboration and expense would not be justified at this scale.

Regeneration benefits

Relationship to time-savings

3.22 Formal current DfT guidance on estimating regeneration benefits is contained in WebTAG Unit 3.5.8 (2003) (CD 9/22) and does not include the potential for *overall* economic changes that WEBs represent. However, it does require an Economic Impact Report (EIR) for major transport schemes to establish whether there is *redistribution* of a fixed total of jobs into or out of Regeneration Areas (RAs), in recognition of the potential social impact of this. The EIR must be based upon an explanation of the working of the local economy of the area affected, and the role of transport in this. For RAs to be valid in the context of WebTAG 3.5.8 they normally require designation as such in the relevant Regional Economic Strategy.

3.23 A further concern, connected with the latter point, is the 'two-way road' effect. The benefit of easier access from deprived areas to new jobs also means that the jobs in such areas are more accessible to people from outside them. RA residents may lose more than they gain. Further, the increased choice of jobs and housing carries a penalty in terms of increasing overall travel, car-dependency and CO_2 output: this issue is returned to in Section 4.

3.24 The EAR reports (5.4.2-8) various land value benefits that might arise from BHLR, though correctly adding that WebTAG methodology does not include guidance on this. The reason is

[1] the apparently impressive percentage changes in travel times with and without the scheme presented in the Regeneration Report (Tables 4.2 and 4.3) need to be read in this light

[2] NB. In future appraisals will have to include figures for the size-distribution of time-savings (see April 09 NATA Refresh document para 40 and para 1.3.8 of webTAG 3.5.2C). They have been sought from ESCC but have not yet been made available. When they are it should be possible to estimate the proportion that should be disallowed on this ground

simple – it would be double counting both to treat user time savings as a direct economic benefit and then add the indirect effect as well. However, it does suggest that if less reliance can be placed upon time-savings as a measure of economic benefit, then this is an *alternative* means of assessment – and such measurements could validly be placed alongside the benefits from relocating of jobs into a Regeneration Area. It should be noted, however, that the benefits estimated under these headings are much smaller than the user time-savings (around one-tenth).

North East Bexhill Business Park

3.25 The main tangible regeneration benefit identified in the Regeneration Report (Ref 46) is the development of the North East Bexhill Business Park (NEBBP). This development has been a constant element from the start, forming a crucial part of the case for the Hastings-Bexhill By-pass scheme rejected following SoCOMMS. The number of additional jobs attributed to NEBBP, after displacement and multiplier effects, has varied over time: it is currently stated as 2020 made up as per Figure 3.4.

Figure 3.4: Additional jobs due to NBBP development

Component	Employment effect
Employment on site	+1880
Displacement (-20%)	-376
Competitiveness from reduced transport cost	+50
Local multiplier	+466
Total additional employment	+2020

Source: Regeneration Report (Oct 2009), Tables 5.2, 5.3

3.26 As noted by the RR (reiterating a point made by in previous reports by economic development specialists) demand from inward investment is fairly weak in East Sussex. While it is possible that a high quality development at NEBBP might improve this situation, neither the development nor the BHLR address the fundamental difficulty that this part of East Sussex is relatively inaccessible to wider markets (Kent is offered as a comparator, but has obvious major advantages in this respect, including better access to national and international trunk rail and road links).

3.27 There is a more realistic recognition of this issue in the latest RR than in some of its predecessors: 80% of the growth is expected to come from the expansion of indigenous firms, and only about 10% each from new starts or inward investment (RR Table 5.4). This cannot be reconciled with the 20% figure for displacement, unless a very large competitiveness boost is suggested from the enhanced access: however, this appears incompatible with the figure of 50 jobs from this source (Table 3.4).

3.28 The authoritative DTZPieda Report (CD 7/5), on which the Five Point Plan (CD 7/6) is based noted that the retention of the existing manufacturing base depends upon a ready supply of small scale sites and encouragement of rebuilding, together with enterprise and skills training. In this context, the identified priority was to bring forward the small/medium scale sites that had already been identified. The NEBBP was peripheral to this strategy.

3.29 In the SoCOMMS work (CD 7/16) over 30 ha of medium sized sites were identified – a large supply for an area this size (equivalent to some 75 years' supply at past development rates (~2.5ha/year)). However, it is important to recognise that in established urban areas like Hastings-Bexhill, most business needs are met by occupying *existing* premises vacated by others ('churn'), and that a large proportion of new development takes place on recycled land ('brownfield'). Both processes are greatly assisted by well-targeted quality urban regeneration activity, and strongly favoured by current RSS policy for the South Coast Towns (SCT1).

Business Surveys

3.30 The business surveys quoted in support of the NBBP/HBLR combination are an unrealistic representation of actual business behaviour. In responding to such surveys, businesses will always seek to maximise the options and benefits they might enjoy from expenditure by the

public sector – this is essentially a 'free throw'. Unless linked to 'trade-off' questions concerning the impact on taxation/business rates, rentals or alternative applications of the same public resources, the results of such surveys are little more than expressions of aspiration.

3.31 A final point to note here is that the RA job benefits are not additional to any economic benefit that may arise from user time-savings. The EIR procedure in WebTAG recognises jobs in an RA as having a value distinct from any increase in employment or GDP to the region or nation. In so far as accessibility improvements *in themselves* generate competitiveness or productivity, and so more jobs (and I have suggested above that this is likely to be quite limited where a large proportion of time-savings are small), RA jobs are part of that number, not additional to it.

Housing development

3.32 While BHLR would resolve the current access constraint, it is not at all clear that it is the only means of accommodating the additional housing in the Hastings-Bexhill area provided for by the RSS. If BHLR was indeed the only means of accommodating much of this development, it raises a serious question about the appropriateness of the location in terms of value for money. This is particularly significant in the context that the Regional Assembly has made a strong case that infrastructure is a serious constraint on achieving the housing targets set by Government (SEERA (2008), RSS Implementation Plan).

3.33 When infrastructure resources are scarce (as seems likely to be the case for many years to come) high cost locations are contra-indicated, unless there is reason for giving them exceptional priority. This does not appear to be the case in the Hastings-Bexhill area – the allocation was not increased from previous levels in the Government's final decision on the RSS, even within much higher national and regional totals following the Housing Green Paper and advice from the National Housing and Planning Advice Unit.

4 Integration

Strategic perspective

DTZPieda Report

4.1 The Secretary of State's 2001 decision against the Hastings-Bexhill by-passes, led to the commissioning of DTZPeida to examine alternative means of regenerating the area. Their Report (CD 7/5) offered a coherent vision, which has been the basis for all subsequent action. The key to regeneration in this view was to grow the indigenous economic base. This had two main strands:

a) Developing new businesses capitalising on the area's environmental potential and minimising the disadvantages of its intrinsic peripherality within the South East;

b) Revitalising the existing economic base, which involved retaining existing manufacturing and developing the traditional tourism activities.

4.2 For these purposes, the highest priority transport scheme was the Bexhill-Ore Metro, which formed an integral part of bid by Hastings Borough Council for Millennium Community funds. The 'String of Pearls' concept would link high quality new housing, renewed townscape and small/medium-scale commercial opportunities along the existing rail spine. The benefits would spread to much of the older parts of the built-up area, both through physical enhancement of the environment and through frequent rail services reducing car-dependency.

4.3 DTZ Pieda identified interest from media and information and computer technology (ICT) industries as the principal targets for the first strand of the strategy outlined above. They saw the key to catalysing business interest from this sector as changing the image of the area. In this context, the environment offered by Hastings/Bexhill becomes a key economic success factor, crucial to attracting the key people on whom such industries depend – and for whom quality of life is a major influence on locational choices. The same considerations applied to the revitalisation of the tourism business.

4.4 The retention of the existing manufacturing base was seen as depending upon a ready supply of small scale sites and encouragement of rebuilding, together with enterprise and skills training. In this context, the identified priority was to bring forward the small/medium scale sites that had already been identified and foster recycling of brownfield land (as discussed above, para 3.29).

4.5 The NBBP, as a relatively large-scale, high-spec development would not in their view be relevant to local industries, but rather implied inward investment. The locational disadvantages of Hastings/Bexhill relative to other parts of the South East (even with the transport improvements proposed by SoCOMMS) would affect the attraction of such a scheme. However, the feasibility of BHLR should be considered. Apart from Ore-Bexhill Metro, the other main transport priority was improved rail links and services to London and Gatwick via Brighton, while the A21 should be a low priority.

The 'Five Point Plan'

4.6 The content of the original 'Five Point Plan' (7/6) is a combination of the DTZ Pieda strategy outlined above with the Millennium Community bid: the 5 strands relate to urban renaissance, education, business and enterprise, broadband and ICT, and transport respectively. While it is to be expected that a regeneration programme will evolve in response to changing conditions (and this is vital to exploiting new opportunities and addressing new problems) the change that has taken place in the last of the themes – transport – seem of a different order. The sharp focus of the DTZ Pieda report on the rail links within and beyond Hastings-Bexhill as an aid to widening the economic base and addressing the environmental impact of excessive traffic has changed to boosting the significance of BHLR.

4.7 Originally the subject of a feasibility study in support of an objective of secondary strategic importance the BHLR has become a strategic priority (and so has the A21 improvement). Since then the prominence and priority attached by ESCC to the BHLR and NEBBP have increased, in spite of rising costs and an increasingly hostile national policy and resource environment. The early reluctance to consider proper alternatives to the BHLR (Section 2) has continued and been reinforced at every step.

Impact on CO_2 – the role of spatial policy

4.8 Keith Buchan's evidence deals with the inappropriate baseline against which the climate change impact of BHLR has been assessed (*'without scheme'*, rather than *'with national target trajectory'*). I am concerned here with the question of how different spatial and transport policies could be used to secure greater conformity with national climate change targets. A difficulty for present appraisal methodologies is that transport measures to achieve the scale of reduction needed are either national (eg widespread adoption of new transport technologies like electric vehicles) or, if local, require heroic levels of intervention (eg road pricing and radical parking restraints) which are difficult to reconcile with local economic regeneration.

4.9 Because of this, promoters of local projects such as BHLR have ignored or minimised the issue. However, there is an alternative which should be considered, particularly as it is very much in tune with the vision (derived from DTZPieda) that underlies the 5PP. The key is the recognition of the central role of the existing stock of buildings: while new build adds only about 1% each year to stock, around 10% of existing stock changes occupants in the same time. Thus in terms of effects on transport generation, this so-called 'churn' has the potential to be 10 times as influential as new build.

4.10 Earlier in this evidence I have drawn attention to the way that a more dispersed pattern of settlement, activity and movement has been the principal driver of the increase in motorised surface travel over the last 30 years or so (paras 3.17-3.19). Road improvements, while initially offering reduced travel times, are in the longer term a major cause of longer journeys and greater car-dependency. Figure 3.3 demonstrated that the two largest changes in CO_2 emissions are the consequence of the more dispersed and car-dependent pattern of economic and social interaction brought about by the general improvement of roads.

4.11 The significance of this observation for CO_2 generation is summarised in Figure 4.1. It can be seen that 75% of the past overall increase of 36 mt CO_2 pa from the sector was the consequence of location-related changes in patterns of movement. This figure is far too high to be accounted for by the pattern of new build, and is in fact the consequence of differential churn.

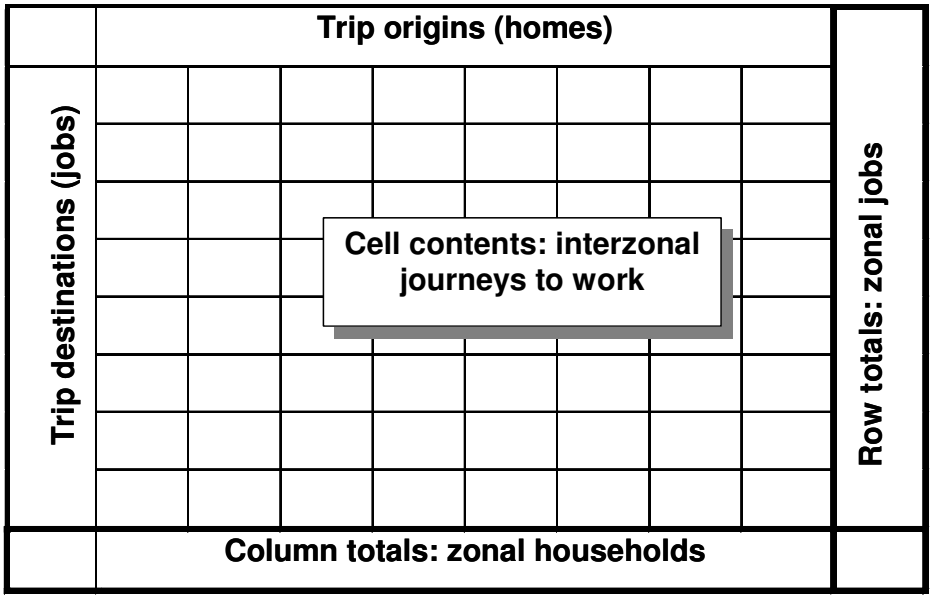
Figure 4.1: Changes in CO_2 emissions from cars, 1972-2006

Components of change	Change (mt CO_2 pa)
Overall change in CO_2 emissions from cars	**36**
1. 12% fuel efficiency gain	**-8**
2. 10% occupancy decrease	**+7**
3. 8% increase in population	**+3**
4. 12% increase in trips/head	**+4**
5. 48% increase in trip lengths	**+16**
6. 109% more car travel (at 70% of public transport fuel efficiency)	**+11**

Source: DfT (2008), *National Travel Statistics GB (2007);* analysis by A Wenban-Smith for Committee on Climate Change workshop, June 2009

4.12 Conventional transport models, such as that used for BHLR, cannot explore this issue, since the scope for households and businesses to make different locational choices from the whole stock is embodied in calibration parameters and not accessible to variations in policy that could alter the relative attractiveness of parts of the stock to different groups. A conventional model takes the land-uses by zone, and predicts the pattern of movements from the transport time-cost between zones and the calibration parameters. Figure 4.2 illustrates this with reference to commuting flows: in this Origin-Destination (OD) matrix 'land-use' is represented by row and column totals, while patterns movement are represented by cell contents.

Figure 4.2: OD matrix for journeys to work



4.13 An idea of the significance of this consideration can be gleaned from the idealised example shown in Figure 4.3. In this example the same 'land-use' (distribution of jobs and homes by zone) is represented by two different patterns of activity and movement (designated 1 and 2). It can be seen that

a) A single pattern of land use is arithmetically compatible with quite markedly different patterns of inter-zonal movement (there is an almost infinite number of ways of completing the cells of an OD matrix while still satisfying the boundary conditions);

b) The more concentrated pattern of interaction (2) generates around half the amount of travel of the 'distance-indifferent' pattern (1).

Figure 4.3: Variations in patterns of activity within a single land-use

1. OD matrix for Journey to Work: Dispersed pattern of movement

Zones	1	2	3	4	5	6	7	8	9	10	Jobs
1	10	10	10	10	10	10	10	10	10	10	100
2	10	10	10	10	10	10	10	10	10	10	100
3	10	10	10	10	10	10	10	10	10	10	100
4	10	10	10	10	10	10	10	10	10	10	100
5	10	10	10	10	10	10	10	10	10	10	100
6	10	10	10	10	10	10	10	10	10	10	100
7	10	10	10	10	10	10	10	10	10	10	100
8	10	10	10	10	10	10	10	10	10	10	100
9	10	10	10	10	10	10	10	10	10	10	100
10	10	10	10	10	10	10	10	10	10	10	100
Worke	100	100	100	100	100	100	100	100	100	100	1000

1. Passenger-km for journey to work - dispersed (Table 1 x Table 3)

Zones	1	2	3	4	5	6	7	8	9	10	
1	10	30	50	70	90	120	150	170	190	210	1090
2	30	10	30	50	70	90	120	150	170	190	910
3	50	30	10	30	50	70	90	120	150	170	770
4	70	50	30	20	30	50	70	90	120	150	680
5	90	70	50	50	20	30	50	70	90	120	640
6	120	90	70	50	50	20	30	50	70	90	640
7	150	120	90	90	50	50	30	30	50	70	730
8	170	150	120	120	90	50	70	30	30	50	880
9	190	170	150	150	120	90	50	70	50	50	1090
10	210	190	170	170	150	100	120	50	70	50	1280
										Total journey to work - pass-km	**8710**

2. OD matrix for Journey to Work: Concentrated pattern of movement
(NB: row/column totals are the same as Table 1: ie represent the same 'land-use')

Zones	1	2	3	4	5	6	7	8	9	10	Jobs
1	40	20	15	10	5	5	0	0	5	0	100
2	20	30	20	15	5	0	5	5	0	0	100
3	15	20	30	20	10	5	0	0	0	0	100
4	15	15	20	30	15	5	0	0	0	0	100
5	5	5	10	15	30	20	10	5	0	0	100
6	5	5	5	10	15	30	15	5	5	5	100
7	0	5	0	0	10	20	30	15	15	5	100
8	0	0	0	0	5	10	15	30	20	20	100
9	0	0	0	0	5	5	10	20	30	30	100
10	0	0	0	0	0	0	15	20	25	40	100
Worke	100	100	100	100	100	100	100	100	100	100	1000

2. Passenger-km for journey to work - concentrated (Table 2 x Table 3)

Zones	1	2	3	4	5	6	7	8	9	10	
1	40	60	75	70	45	60	0	0	95	0	445
2	60	30	60	75	35	0	60	75	0	0	395
3	75	60	30	60	50	35	0	0	0	0	310
4	105	75	60	60	45	25	0	0	0	0	370
5	45	35	50	75	60	60	50	35	0	0	410
6	60	45	35	50	75	60	45	25	35	45	475
7	0	60	0	0	50	100	90	45	75	35	455
8	0	0	0	0	45	50	105	90	60	100	450
9	0	0	0	0	60	45	50	140	150	150	595
10	0	0	0	0	0	0	180	100	175	200	655
										Total journey to work - pass-km	**4560**

3. Interzone distances - km (same for both activity patterns)

Zones	1	2	3	4	5	6	7	8	9	10
1	1	3	5	7	9	12	15	17	19	21
2	3	1	3	5	7	9	12	15	17	19
3	5	3	1	3	5	7	9	12	15	17
4	7	5	3	2	3	5	7	9	12	15
5	9	7	5	5	2	3	5	7	9	12
6	12	9	7	5	5	2	3	5	7	9
7	15	12	9	9	5	5	3	3	5	7
8	17	15	12	12	9	5	7	3	3	5
9	19	17	15	15	12	9	5	7	5	5
10	21	19	17	17	15	10	12	5	7	5

4.14 While a LUTI model could explore this kind of question, it would be virtually impossible, in the current state of knowledge, to specify or apply at this local scale. Nevertheless, the phenomenon illustrated is real and is important to the reconciliation of the regeneration and climate change objectives of Government. This is the subject of the final section of my evidence.

Reconciliation

The need for a different approach

4.15 Two factors are particularly crucial to a more concentrated pattern of settlement, movement and activity in Hastings-Bexhill:

a) The breadth of appeal of centrally located housing to workers and their families;

b) The supply of attractive premises and expansion opportunities to local businesses.

4.16 The continued growth of car-based travel, as assumed by ESCC, runs directly counter to these desiderata as well as making the achievement of CO_2 targets much more difficult. Traffic growth makes living and working in central locations less attractive, while the operation of businesses is inhibited by the resulting congestion. The County Council's response to this problem is to build more roads and to develop more peripheral sites for housing and business. Even if successful in terms of delivering *new* development, by compromising the much larger volume of locational choice represented by the churn of existing stock, this approach to regeneration contains the seeds of continuing failure.

An alternative vision

4.17 BHLR has emerged from a policy process dominated by transport considerations in general – and Trunk Road considerations in particular. Regeneration benefits have featured as a supplementary argument.

4.18 I would suggest that the matter should be approached rather differently. The regeneration of Hastings/Bexhill should have precedence and the debate is then about how transport measures might help to bring this about. I would also suggest that there is a need for local agencies to stop 'chasing every ball' in terms of central funding initiatives and instead to take responsibility for making real choices within a realistic view of resources.

4.19 In this respect, I believe that the DTZ Pieda analysis comes closest to providing a clear strategic vision, compatible with RSS and national policy. Rightly, in my view, they focus on developing a new economic base through capitalising on the area's environmental assets. Rather than seeking to be more like the rest of the South East, they suggest developing the 'Unique Selling Points' (USPs) that help to differentiate it from the rest of the region. To this I would add that the approach also has the merit of offering real progress towards greater sustainability.

Transport's contribution

4.20 Many of the measures proposed by DTZ Pieda have found expression in the action plans being pursued through the 5PP. Most of the proposals under the headings of 'urban renaissance', 'education', 'broadband and ICT', and 'business and enterprise' seem entirely appropriate. However, the NBBP proposal is irrelevant and potentially damaging to the rest of the strategy, monopolising both official attention and a large share of the potential regeneration budget.

4.21 Without the Business Park, the regeneration case for the BHLR reduces to the potential for widening the labour market available by car to businesses in each of the two towns. No effort has been made by supporters of BHLR to place a value on this case: we would merely note that it runs counter to the Government's desire to reduce car-dependency.

4.22 The remaining plank is the relief offered to the function of the A259 as a Trunk Road. We have given our reasons for considering its designation as such to be anomalous. This is not to say that the interests of longer distance road users are of no value: merely that they need to be placed in perspective. I believe that the regeneration of Hastings/Bexhill must rate far more highly than the needs of this relatively small group of road-users.

Demand management

4.23 The Government's response to SoCoMMS put the onus on local authorities along the South Coast to consider demand management in general and local transport charges in particular as part of their Local Transport Plans and bids for central transport funding. Demand management does not seem to have been seriously considered in the Hastings/Bexhill area, possibly because it is seen as a potential deterrent to inward investment, and therefore as a response to problems of high growth rather than to a need for regeneration.

4.24 However, demand management could play a significant role in reconciling conflicting aspects of the 5PP and realising the vision described earlier. Environmental quality is a critical success factor for Hastings/Bexhill, and the impact of traffic is one of the major challenges to be overcome. Demand management presents a means of providing the better quality of access that will support economic regeneration without encouraging the traffic growth that currently threatens the area's future. Indeed, it provides a means of tackling the existing environmental problems already caused by excessive traffic.

4.25 Bus priorities, improvements to pedestrian and cycle facilities, school and employee Travel Plans, car sharing and TravelWise awareness campaigns were part of the MMS baseline, and are assumed to continue. However, research suggests that by themselves these will not reduce traffic by much, if at all – for the simple reason that any road space vacated will draw forth additional demand in much the same way as building more roads. Probably the most important complementary demand management measure is the control and pricing of car parking. Measures that should be considered include:

a) Limiting the overall amount of car parking, both public and private (non residential);

b) Discriminating more clearly between provision for visitor/customer parking and commuter use. This discrimination can be expressed in term of time limits or price, or both, and could be implemented relatively quickly:
   - Maximum time limited to short/medium stay close to town centres and other visitor attractions[3];
   - Long stay parking located further away from town centres and other locations well-served by public transport;
   - Where parking is metered, prices rising steeply after 2-3 hours;
   - The general level of public parking charges increased, perhaps earmarked to fund specific other improvements;
   - A workplace parking levy imposed upon private non residential spaces (using Transport Act 2000 powers), either generally or in particular areas.

c) In the longer term it is clear that more general demand management measures will become necessary.

4.26 A crucial point in any charging regime is the use of the funds generated: apart from the environmental benefit of reduced traffic, this represents the principal source of economic benefit. In his response to SoCoMMS the Secretary of State emphasised that local authorities would be able to keep the money from local transport charges. Such local finance sources will become increasingly important since more devolution is being endorsed by all political parties. RFA guidelines are helpful in this respect, since they provide a benchmark for checking additionality, which is vital to 'selling' such measures to employers and residents.

An integrated approach

4.27 The over-riding message of this evidence is the need for and benefits of integrated approach. There is way of reconciling regeneration and climate change imperatives problem within any likely resource envelope without achieving lower transport intensity. This means exploiting capacity of churn of existing stock to bring about different pattern of activity, settlement and movement. The urgent need is for radical thinking about making better use of existing assets, and not being distracted by big ticket schemes like NBBP and BHLR.

[3] this does not have to be enforced with payment meters – for example many French resorts use the windscreen display of a simple arrival/departure disc in designated areas ('zone bleu')

Appendix 1: Chronology

Date	Document/source	Content/comment
Nov 2000	Access to Hastings MMS report	Alternatives: By-pass (£225m) or local transport package (£90m)
Mar 2001	RPG for South East issued	South Coast Towns made a Priority Area for Economic Regeneration (PAER)
July 2001	DfT decision on Access to Hastings MMS	By-pass rejected: LAs asked for broader regeneration plans
Sep 2001	DTZ-Peida *'Prosperity for Hastings'*	Grow indigenous economic base: (a) new business attracted by environment (b) retain/develop existing manufacturing/tourism. Transport priority: rail links to London; NEBBP unlikely to attract inward investment – low priority; BHLR feasibility to be examined
Mar 2002	'Five Point Plan' (SEEDA/HBTF)	Plan based on DTZPeida principles – but BHLR has become a priority
Aug 2002	'Hastings Strategy Development Plan' (Halcrow Fox, SoCoMMS)	Favourable transport evaluation of BHLR (on basis that all development proceeds); major rail improvements also endorsed
July 2003	Govt response to SoCoMMS	Rail improvements unaffordable; further appraisal of BHLR required
July 2003	ESCC LTP 2003 APR	Reiterates need for BHLR for regeneration
Nov 2003	Rother Local Plan (deposit)	NEBBP + housing depends on access; BHLR line reserved
Feb 2004	Options for BHLR publicised	Six options put forward for public participation
July 2004	ESCC LTP 2004 Annual Progress Report	Major scheme bid for BHLR. NPV costs £48m, benefits £97m (of which £23m regeneration, rest time and accident savings)
Aug 2004	BHLR – Regeneration Issues (URP for E Sussex T2000))	Critique of regeneration case for BHLR: focus on NEBBP inappropriate given lack of inward investment interest; transport benefits overstated; alternative uses of resources neglected
Not dated – late 2004?	Transport 2000 Report – comments on behalf of the Task Force (author unnamed)	Critique of URP Report, primarily on grounds that it under-states role of BHLR in DTZPeida Report and Five Point Plan proposals
Dec 2004	BHLR provisionally accepted (DfT)	Subject to unchanged costs and value for money; developer contributions explored in detail; consultation with SEBs about mitigation of impacts
July 2006	Rother District Plan (adopted)	BHLR proposals not represented in detail, so must be treated as a departure
Mar 2007	Planning application (to ESCC Planning from ESCC Transport)	Full planning application with Sustainability raisal, Regeneration and Environmental Statements and port appraisal. Major cost increase anticipated
Nov 2007	Regional Transport Board letter to SoS Transport	Cost increase of BHLR supported by increased share of RFA, slippage, and reallocation from A21 Baldslow Link
Aug 2008	ESCC revised Planning Application advertised	Accompanied by Addendums to Regeneration and Environmental Statements and a revised transport appraisal, reporting large cost increase (~50% NPV), but even larger benefits

Aug 2008	BHLR – Regeneration Issues Revisited (URP for Hastings Alliance)	Commentary on Planning Application and supporting documents: no significant change in rationale offered; dependence on large numbers of small time-savings casts doubts on value of economic benefits, and large increases in both costs and benefits reduce credibility of appraisal. Conclusions of 2004 URP Report stand or are further reinforced
Dec 2008	BHLR Report to ESCC Planning Committee (and addendum)	ESCC officers' report recommending approval, unless called in (Appendix of responses to objections received, including by Hastings Alliance)
Feb 2009	Letter from SoS CLG	No call-in of application intended
May 2009	BHLR Business Case (and Appendices)	Revised Business Case, including Appendix F (Economic Appraisal) and G (Regeneration Statement)
Aug 2009	HBLR Business Case update	Updated cost figures (slightly lower), revised environmental impact (slightly worse), with consequent changes to Business Case and AST
Oct 2009	Regeneration Report	Revised justification in terms of regeneration

Appendix 2: Documents considered

(a) Inputs to 2004 report		
PLI ref	**Report ref/date**	**Title, source**
	1. July 1995:	Bexhill Northern Approach Road - non-technical summary of environmental statement. East Sussex County Council,
	2. July 2000	*'Access to Hastings MMS: Economic Impact Report (consultation draft)'*
	3. Oct 2000	Access to Hastings MMS - excerpt from working paper for draft final report. Steer Davies Gleave, Llewellyn Davies, WSAtkins
CD7/16	4. Nov 2000	*'Access to Hastings MMS'* – final Report + Appendices, SDG *et al*
	5. June 2001	*'Millennium community by the sea: Hastings "string of pearls"'*, Expression of Interest to Millennium Commission, Hastings BC
CD9/16	6. July 2001	DfT response to Hastings MMS (press release and copy SoS letter to Chairman of SEERA)
	7. Aug 2001	*'Transport improvements and Regeneration of Hastings'*, presentation by DTZ Pieda
	8. Sept 2001	*'Prosperity for Hastings'*, DTZ Pieda for SEEDA (Full report on above)
	9. 2002?	SEEDA leaflet on proposed Hastings & Bexhill regeneration strategy.
	10. June 2002	*'SoCOMMS Strategy Development Report'*, Halcrow Fox for DfT
CD7/10	11. Aug 2002	*'Hastings Strategy Development Plan'*, Halcrow *et al* for GO-SE
	12. Nov 2002	*'The Future of Hastings & St Leonards'*. Consultation brochure by Hastings Borough Council
	13. Nov 2002	public consultation material on Five Point Plan
	14. July 2003	*'Local Transport Plan: APR 2003'*, East Sussex CC
CD9/17	15. July 2003	SoS response to SE MMSs (inc SoCoMMS)
	16. Aug and Oct 2003	Hastings & Bexhill area investment framework. Four documents by Arup for SEEDA
	17. Nov 2003	*'Rother District Plan: revised deposit draft'*, Rother District Council – extracts on Development Strategy (mainly housing), Transport and Bexhill sub area
	18. Dec 2003	Summary of Sea Space business plan. Hastings & Bexhill Task Force
	19. Jan 2004	*'2004: a year for partnership and progress'*, John Shaw, Sea Space
	20. Feb 2004	*'Bexhill & Hastings: future travel options'*, consultation by E Sussex CC on routes for Hastings-Bexhill link, E Sussex CC, Hastings BC, Rother DC, Highways Agency, Sea Space
	21. April 2004	*'Station Plaza Development Framework'*. Hastings & Bexhill Task Force
	22. June 2004	*'BHLR: selection of preferred route'* Report of Director of Transport and Environment to E Sussex CC Cabinet
	23. June 2004	LTT reports (17/6/04) that A21 Kipping's Cross to Lamberhurst dualling added to HA's targeted programme of improvements
	24. July 2004	*'Local Transport Plan Annual Progress Report 2004'*, East Sussex County Council
CD9/28	25. July 2004	*'Major Scheme Bid: Bexhill to Hastings Link Road'* • Main Report, East Sussex County Council and Mott Macdonald • Appendix A: *Reference sources* • Appendix F: *Economic Impact Report*, Llewelyn Davies • Appendix G: *Responses from Statutory Environmental Bodies and other key stakeholders*

(b) Additional inputs to 2008 report		
PLI ref	**Report ref/date**	**Title, source**
	26. Aug 2004	Previous Report: *'BHLR – regeneration issues'*, Urban & Regional Policy for E Sussex T2000
	27. undated (late 2004 ?)	*Transport 2000 Report – comments on behalf of the Task Force* (authorship not identified)
CD9/18	28. Dec 2004	*DfT letter: Provisional Acceptance of BHLR*
CD9/1B	29. Mar 2007	*'BHLR – Environmental Statement (17 Chapters)'* and *'ES – non-technical summary', East Sussex County Council*
	30. Mar 2007	*'BHLR - Sustainability Appraisal'* Mott MacDonald for ESCC
	31. April 2007	*'BHLR – Regeneration Statement'*, ESCC
	32. April 2007	*'BHLR – Economic Assessment Report'* ESCC
CD9/1C	33. Dec 2007	*'Environmental Statement Review – BHLR'*, Institute of Environmental Management & Assessment, for ESCC
CD6.2	34. July 2008	*'SE Plan –Secretary of State's proposed changes for consultation'*, Government Office for the South East
CD9/1D	35. Aug 2008	*'BHLR – Regeneration Statement, Addendum'*, ESCC
CD9/1G	36. Aug 2008	*'BHLR – Traffic & transport report, Addendum'*, ESCC

(c) Additional inputs to present evidence		
PLI ref	**Report ref/date**	**Title, source**
	37. Aug 2008	Previous Report: *'BHLR – regeneration issues revisited'*, Urban & Regional Policy for Hastings Alliance
CD9/35	38. Sept 2004	Letter from the Highways Agency to Rother District Council on access to A259 from North Bexhill developments
CD9/29	39. July 2006	Letter from the Secretary of State regarding funding for the BHLR
CD9/30	40. Nov 2007	Letter from the Regional Transport Board to the Secretary of State regarding funding of BHLR and Baldslow Link
CD9/37	41. Aug 2008	*'Evaluation of Early Wins and Phase Two Projects'*, for Sea Space by Grant Thornton LLP
CD9/3	42. Dec 2008	Report by Head of Planning to East Sussex County Council Planning Committee relating to the Bexhill to Hastings Link Road (inc addendum)
CD9/12	43. May 2009	Local Transport Plan Major Scheme Business Case, ESCC
CD9/12a	44. Aug 2009	Local Transport Plan Major Scheme Business Case – updated information, ESCC
CD9/22	45. 2001-9	Transport Analysis Guidance – DfT (WebTAG)
CD9/23	46. 2003	*'The Green Book: Appraisal and evaluation in Central Government'* HM Treasury
	47. July 2006	*'BHLR – Investigation of Alternatives'*, Denvil Coombe Practice for East Sussex T2000
	48. Oct 2009	Regeneration Report, ESCC
	49. 1999	*'Transport and the Economy'*, Report by SACTRA to DfT
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Appendix 3:– consideration given to objections

ESCC Planning Committee Report, Dec 2008, Appendix 1 – V: Local economy, regeneration and associated development

1 The scheme is not a necessary condition for economic growth in the area	Access to Hastings concluded that without the bypasses there would not be potential for substantial regeneration benefits, even if all the other measures were implemented. This identified need for substantial investment in transport infrastructure was looked at as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's assumptions were tested in the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road would be required.
2. Scheme is not essential for regeneration and to service the proposed development north of Bexhill	Access to Hastings concluded that without the bypasses there would not be potential for substantial regeneration benefits, even if all the other measures were implemented. This identified need for substantial investment in transport infrastructure was looked at as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's assumptions were tested in the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road would be required. More road capacity is required to accommodate the traffic generation from the new development. The Highways Agency have indicated that they would be minded to refuse any new development that would have an impact on the A259 trunk road through Bexhill until the link road or similar had been implemented.
3 Link Road is irrelevant to, and would be likely to jeopardise, economic regeneration of the area	31 Access to Hastings concluded that without the bypasses there would not be potential for substantial regeneration benefits, even if all the other measures were implemented. This identified need for substantial investment in transport infrastructure was looked at as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's assumptions were tested in the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road would be required.
4 The approach to economic regeneration focuses on growing the existing manufacturing base and building on knowledge based industries and tourism. Regenerating the environment and enhancing the quality of life are critical to success. The road and associated business park are irrelevant or highly damaging to this vision. Any short term gain from development would be dwarfed by longer term increases in traffic and car dependency	6 Access to Hastings concluded that without the bypasses there would not be potential for substantial regeneration benefits, even if all the other measures were implemented. This identified need for substantial investment in transport infrastructure was looked at as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's assumptions were tested in the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road would be required.
5 Hastings should build on strengths of its 'environmental economy'; this would be undermined by Link Road	1 Access to Hastings concluded that without the bypasses there would not be potential for substantial regeneration benefits, even if all the other measures were implemented. This identified need for substantial investment in transport infrastructure was looked at as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's assumptions were tested in the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road would be required.

6 Wealth generated from more locally based 'environmental economy' and sustainable transport strategy would be more likely to stay in the area and strengthen local economy	4 Access to Hastings concluded that without the bypasses there would not be potential for substantial regeneration benefits, even if all the other measures were implemented. This identified need for substantial investment in transport infrastructure was looked at as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's assumptions were tested in the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road would be required.
7 Regeneration should be linked to a low carbon economy	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions within the Environmental Statement. The consideration of the information is necessary against development plan policies and government guidance in Planning Policy Statement 1 (PPS1).
8 Scheme could undermine the "Five Point Plan" for the area	The scheme is part of the Five Point Plan.
9 Road is not required to service proposed housing and industrial development areas in north Bexhill	Access to Hastings concluded that without the bypasses there would not be potential for substantial regeneration benefits, even if all the other measures were implemented. This identified need for substantial investment in transport infrastructure was looked at as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's assumptions were tested in the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road would be required. More road capacity is required to accommodate the traffic generation from the new development. The Highways Agency have indicated that they would be minded to refuse any new development that would have an impact on the A259 trunk road through Bexhill until the link road or similar had been implemented.
10 More modest development proposal could be serviced with shorter roads linked to the existing network in Bexhill; with a package of smarter choice measures planned in to development.	More road capacity is required to accommodate the traffic generation from the new development. The Highways Agency have with a indicated that they would be minded to refuse any new development that would have an impact on the A259 trunk road through Bexhill until the link road or similar had been implemented. A programme of Smarter Choice measures is being developed and implemented . The overall impact of the Smarter Choice measures is limited leaving a need for additional road capacity.
11 Government's consultants do not agree with the number of jobs to be created by the new business park development	The necessary inward investment cannot be guaranteed; all that can be done is to create the most favourable conditions for it to occur. The Five Point Plan regeneration package sets out the strategy for that to occur.
12 Will the necessary inward investment for the business park happen?	The necessary inward investment cannot be guaranteed; all that can be done is to create the most favourable conditions for it to occur. The Five Point Plan regeneration package sets out the strategy for that to occur.
13 Government's consultants note that the new business park may well attract businesses from business parks in Hastings	The necessary inward investment cannot be guaranteed; all that can be done is to create the most favourable conditions for it to occur. The Five Point Plan regeneration package sets out the strategy for that to occur.
14 Business sites would not attract inward investment but would be occupied by relocations from firms in town, thus increasing journey to work and weakening town centre economies	The necessary inward investment cannot be guaranteed; all that can be done is to create the most favourable conditions for it to occur. The Five Point Plan regeneration package sets out the strategy for that to occur.

16 Any new job creation from business parks opened up by the road is likely to be at the expense of jobs created in the centres of Hastings, St. Leonards and Bexhill	The necessary inward investment cannot be guaranteed; all that can be done is to create the most favourable conditions for it to occur. The Five Point Plan regeneration package sets out the strategy for that to occur.
17 Once the greenfield land has been "opened up", other business and leisure activities can relocate to outside the towns, lessening chances of a successful revival of the deprived town centres of Hastings and St. Leonards, contrary to government policy	The necessary inward investment cannot be guaranteed; all that can be done is to create the most favourable conditions for it to occur. The Five Point Plan regeneration package sets out the strategy for that to occur.
18 There is land suitable for local business expansion other than the business park in north Bexhill	North Bexhill was determined as the most suitable location through the Rother Local Plan process including a public inquiry.
19 There are more attractive locations for inward investment than the business park in north Bexhill	North Bexhill was determined as the most appropriate location through the Rother Local Plan process including a public inquiry.
20 Link Road would not make area more accessible to wider UK	The BHLR will not make Bexhill and Hastings significantly more accessible to the wider UK as it is a local road linking the two towns. It will relieve a bottleneck on the strategic road network that will make the two towns more accessible locally.
21 Concerned that part of planning application for the road would mean about 1100 homes and a 48000m2 business park	Whilst the BHLR would help create the necessary conditions for additional development they are not part of this application, although the likely traffic impacts of those developments have been assessed and built into the assessment of the link road to ensure that they can be accommodated.
22 Access to Hastings Multi Modal study found that 80% of the proposed housing could be delivered without the Link Road	Access to Hastings might have been correct at that time, but substantial new developments have been constructed since then that have used up the capacity on the network. The Highways Agency have indicated that they would be minded to refuse any new development that would have an impact on the A259 trunk road through Bexhill until the link road or similar had been implemented.
23 Ample capacity for planned housing provision without the road	Access to Hastings might have been correct at that time, but substantial new developments have been constructed since then that have used up the capacity on the network. The Highways Agency have indicated that they would be minded to refuse any new development that would have an impact on the A259 trunk road through Bexhill until the link road or similar had been implemented
24 5000 empty properties in Hastings undermine rationale for scheme, especially as Link Road is proposed to assist creation of more housing land	It is not known where the figure of 5000 empty properties in Hastings came from. The latest estimate shows only 1745 properties empty or 4.4% of the stock. It is generally recognised that at least 3% of the stock should be empty to enable a satisfactory turnover of properties. On that basis, the current proportion empty in Hastings is about right. Even if that were not the case, however, the requirement for the new housing is over and above the existing housing stock.

25 Any new road will undermine much needed public transport	The new road will facilitate the provision of better bus services by relieving the congestion on the A259, which currently prevents improvements seen as vital to the area's regeneration reliable services from being run. In addition, there will be bus priority measures built into the new road and a programme of complimentary measures including additional bus infrastructure. The new road will also facilitate access to a potential new station at Wilting Farm.
26 Low car ownership but high car usage in Hastings and St. Leonards suggests opportunity for development of sustainable transport in support of local economy	The new road will facilitate the provision of better bus services by relieving the congestion on the A259, which currently prevents reliable services from being run. In addition, there will be bus priority measures built into the new road and a programme of complimentary measures including additional bus infrastructure. The new road will also facilitate access to a potential new station at Wilting Farm.
27 The claimed economic benefits for the road have not been demonstrated and regeneration within the towns may actually suffer	More road capacity is required to accommodate the traffic generation from the new development. The Highways Agency have indicated that they would be minded to refuse any new development that would have an impact on the A259 trunk road through Bexhill until the link road or similar had been implemented. A programme of Smarter Choice measures is being developed and implemented. The overall impact of the Smarter Choice measures is limited leaving a need for additional road capacity. The necessary inward investment cannot be guaranteed; all that can be done is to create the most favourable conditions for it to occur. The Five Point Plan regeneration package sets out the strategy for that to occur
28 Link road will increase congestion. Planners should publish details of estimated queuing time lengths and volumes for link locally and how much longer local trips will take	Access to Hastings concluded that without the bypasses there would not be potential for substantial regeneration benefits, even if all the other measures were implemented. This identified need for substantial investment in transport infrastructure was looked at road traffic, so how much congestion will be introduced as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's assumptions were tested in the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road would be required.
29 It will put local farms out of business	The impacts on agricultural enterprises would be considered in relation to development plan policies and current government guidance.

ESCC Appendix 1 — I: Travel & transport (selected)

12 The Ridge contains the hospital and two school sites and was diagnosed as at full capacity during the Public Inquiry into the bypasses eleven years ago. The effects on these areas do not square with the government's promotion of safer routes to school and to improve safety and security through the transport system	25 While there would be increased traffic flows on The Ridge, it is predicted to be within the practical capacity of the road. The BHLR is a much smaller scale, local road carrying less traffic than was being predicted for the A259 bypasses. While schools along The Ridge will experience increased traffic, others elsewhere in Hastings will experience reduced flows.
18 Very little has been done by the councils to restrain traffic which has led to congestion getting worse over the years	2 There have been a number of initiatives implemented over the years, such as parking controls, provision of parking below the level of demand for new development, reallocation of roadspace for more sustainable modes and others. There continues to be an ongoing programme to introduce such measures as part of a coherent strategy for the Bexhill and Hastings area.

23 Traffic on A259 is overwhelmingly local (most of it generated by Glyne Gap) so what is supposed benefit of the proposal? Either traffic will continue to use the A259 or it will transfer to the new road, bringing even greater congestion to other already over-used residential areas, principally the Wishing Tree and The Ridge areas	20 The traffic will use both routes as outlined in the traffic and transport chapter of the ES, bringing substantial traffic relief to many areas, in particular the A259 Bexhill Road where the air quality in the Air Quality Management Area will be improved and where buses would then be able to run effective, punctual services.
36 The road scheme, at best, may remove traffic from one residential area on the A259, but only to dump it into another residential area, which holds three schools and which is composed of roads entirely unsuitable for the volume of traffic which will arise	359 While some areas will experience increased traffic flows, other areas will experience traffic relief, in particular the A259 Bexhill Road Air Quality Management Area. It also enables the introduction of more effective bus services and other measures that will help to reduce the reliance on the private car.
45 Reduced travel times will be only a few minutes and are therefore insignificant in real terms over the year of average journeys - significantly distorted view of transport benefits	2 Small reductions in travel times for the individual accrue into significant benefits across the population for the life of the scheme.