

Campaign for Better Transport - East Sussex

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SUMMARY VERSION

Dear Sir

Bexhill to Hastings Link Road - BHLR - RR/2474/CC (EIA)

Campaign for Better Transport - East Sussex

1. I am appearing on behalf of the above organization, founded in the early 1980s with the following aims to explore and promote alternatives to the car and improve integration between non-car modes. It is a countywide organisation and has had a membership of between 30 and 40 throughout that period.
2. From the early days it has been clear to us that a whole range of 'quality of life' benefits flow from a less car dependent society, where walking, cycling, public transport, and supporting patterns of land use help to deliver objectives across a wide range of local and national policies.
3. **History of Involvement**
4. Because we believed that BHLR was prematurely determined as viable within the South Coast Corridor Multi-Modal Study (SoCoMMS) before any proper investigation into alternatives had been undertaken (and we were members of the steering group for the study), we commissioned a study from consultants.
5. In brief, the consultant reported that there was little analysis of problems on the A259, or of the range of potential solutions that would flow from a proper analysis. The promoters continued to claim that SoCoMMS had adequately looked at alternatives.

6. Consultation on Inadmissible Schemes

7. The consultation document describes in detail precise routes of 6 'alternative' (including 4 actually inadmissible) road routes and is exceptionally brief and vague on 'alternative travel choices'. It led its audience into choosing one road or another, though there was a poor response in any case.

8. Appendix 1 'Future Travel Options' ESCC.

9. Alternatives Ignored Again

10. The Major Scheme Bid document gives little attention to the consideration of alternatives: less than a page in a document of almost 700 pages.

11. Scheme Provisionally Approved

12. The bid was given provisional approval in December 2004 at £47.12m (SoCoMMS had estimated the cost in 2002 at £24m).

13. The provisions for approval were described as follows:

14. No change in costs; 2. Design and value for money remain unchanged; 3. Satisfactory completion of statutory procedures; 4. Suitable consultation with the relevant Statutory Environmental Bodies; 5. Explore in detail scope for securing developer contributions.

15. Provisions Appear Optional

16. Costs are now officially £95m; There are some changes in design and doubts over 'value for money'; After 2 and a half years of work with the SEBs two objected and one raised significant doubts over the scheme.

17. Ignoring advice from the Environment Agency added considerably to the costs of the scheme.

18. No SEBs support the scheme, and environmental impacts have very recently been re-assessed as more serious.

19. There are at present no developer contributions, and, uncertainty over where any sums to cover funding shortfall will come from, what implications this has for ESCC's budget, and what the money would be used for.

20. BHLR - the promoter's single and exclusive transport focus.

21. It is recognised that positive cumulative impacts of a number of smaller transport schemes working together can bring significant benefits, but in this case, the pre-disposition towards the BHLR has precluded any testing of this scenario.

22. We have campaigned over two decades for such schemes in East Sussex but we are still left with the overwhelming impression that the scheme promoters are determined at all costs to see a major road scheme come to fruition, rather than to look at a mosaic of smaller, cheaper interventions, with high benefit cost

ratios, that would accumulate into a strategy that could deliver benefits across several policy areas.

23. Appendices 2/3:

24. Minister Gillian Merron's letter to local authorities; Lynn Sloman 'Less Traffic Where People Live'.

25. Strategy for Bexhill and Hastings?

26. The Highways Agency, in 2007, recommended that a joint transport strategy for the two towns would be desirable. We agree. It was actually suggested during the Access to Hastings Multi-Modal Study 9 years ago.

27. Appendix 4 Highways Agency Letter to ESCC, 2007

28. Sustainable Transport Saves Land

29. Combinations of alternatives of course really come into their own where new settlements are designed around 'eco-town' principles. The north Bexhill developments alongside a BHLR would influence the first choice of mode for short trips: the car would be it, whereas 'eco-town' standards *without* the BHLR would lead to a greater take-up of alternatives and a more efficient use of a scarce commodity - land. Where conditions are created for safe cycling and walking, there is also a higher chance of social interaction and sense of community.

30. Appendix 5; Three Streets in.....

31. Planning Policy Guidance Note 13: Transport

32. We believe that the proposal would conflict with PPG 13:

33. The objectives seek to promote more sustainable transport choices; promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and to reduce the need to travel, especially by car.

34. Climate Change and Air Quality

35. This scheme does not contribute at all to any strategy to achieve the goal of becoming 'low carbon economy' and for that alone should be shelved immediately. In the run-up to the Copenhagen conference it sends the wrong signal to all local authorities in the UK, and must weaken the voice off the UK at international level.

36. Tourism Without Traffic - a forgotten route to sustainable regeneration.

37. For Hastings and Bexhill, the 'tourism economy' is very important. For south-east England, it has been estimated to be worth £600m Gross Value Added per year.

38. The creation of a South Downs National Park is likely to increase the prominence of this part of the South East as a potential tourism destination, especially for visitors from the near continent. It would help if environmental assets were improved, and alternatives were well developed.

39. The Five Point Plan

40. We always had a problem with BHLR but not with the other transport elements of the Five Point Plan. We supported the other 4 points - Education, Broadband, Enterprise and Urban Renaissance.

41. We supported the transport elements of the Hastings BC Millennium Communities bid to English Partnerships and the 'String of Pearls' concept of new developments around new and existing railway stations.

42. We have played a part in supporting plans and advancing prospects for a new station at Glyne Gap.

43. Appendix 6 Access to Hastings Rail Issues - New Passenger Station at Glyne Gap. Mott McDonald report for ESCC, 2004

44. Relativities of the Five Point Plan Elements

45. The BHLR has become the scheme around which the future prosperity of the two towns is based.

46. An understanding of the relative values of the component parts of the Five Point Plan would give some rare clarity as to the value of the BHLR to the other elements, and show just how indispensable (or not) it is.

47. Process - Environmental Statement (ES) too complex and impenetrable for public understanding.

48. The 'Non-Technical Summary' (NTS) of the ES presents an attempt to analyse the ES in terms that members of the public would understand. Since the publication of that document, the pile has swollen from just under 200 to c575 documents, not including those here today.

49. We believe that there was a real need for a revised NTS to reflect the need for clarity and understanding by a lay audience. We expected it and had reasons to do so, but it never happened.

50. Appendix 7 - E-mail dialogue; Peter Hayward (ESCC) and Derrick Coffee (CBT E Sx).

51. Cumulative Environmental Damage

52. For us, the cumulative damage to the environment in terms of habitats and ecology, landscape and archeology is unacceptable. Whatever mitigation measures are implemented, the Combe Haven valley will be a poorer and degraded environment, and its integrity permanently disrupted. Mitigation, by definition, simply means making things 'less worse'.

53. Local Development Framework flags up strong negative environmental impact of BHLR

54. The Hastings LDF describes the BHLR as having a 'significant negative effect' on both biodiversity, and greenhouse gas (CO₂) emissions. (Shaping Hastings - Sustainability Appraisal of the Core Strategy, May 2008). The BHLR scheme therefore also contradicts the objectives of the LDF

Derrick Coffee, County Officer, Campaign for Better Transport - East Sussex.