

Derrick Coffee
County Officer
Campaign for Better Transport – East Sussex
9 Mayfield Place, Eastbourne
BN22 8XJ
19th October 2009

For the attention of Mr Christopher Tipping, Inspector

Dear Sir

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

- 1. Campaign for Better Transport – East Sussex**
2. I am appearing on behalf of Campaign for Better Transport – East Sussex (CBT – East Sussex) to express an **objection** to the above scheme.
3. We are convinced that the above scheme has been relentlessly promoted over a long period without necessary work having been done to examine alternative measures that would better deliver the objectives claimed for it.
4. We have ourselves been engaged with the process for 10 years, and have commissioned experts to consider the matters above: they have concurred that alternative strategies have not been properly investigated.
5. We have shadowed best practice in sustainable transport elsewhere in the UK and Europe and are aware of the benefits such measures can bring to communities over a wide range of policy areas.
6. For us it has been imperative to make ourselves aware of ‘alternatives’, and the nature of the traffic, since the Bexhill to Hastings Link Road (BHLR) threatens to change for ever and for the worse a very special valley.
7. Many of the sustainable elements of the transport strategy have been set aside, or are delayed.
8. The daily tide of traffic that moves between Bexhill and Hastings sometimes causes congestion on the A259. It performs a function of a local road (it is not a Trunk Road in Hastings) and 95% of the eastbound traffic passing Glyne Gap, between the two towns, in the morning peak hour is moving from somewhere in Bexhill to somewhere in Hastings. Short trips are the easiest to shift from the car to walking, cycling and public transport. That goal should, in our view, be at the core of any transport strategy. Improving access by sustainable modes is almost always more cost effective than major new infrastructure.
9. The ‘birth’ of BHLR has, in our view, obscured better, cheaper, more sustainable ways of doing things. And more traffic is anticipated by the promoters with the new road than without it.

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10. The valley – Combe Haven – is right next door to an urban population of around 130,000. It is surprisingly tranquil, has valued landscape characteristics, statutorily protected natural habitats (SSIs), and a wealth of archeological heritage. All three Statutory Environmental Bodies (SEBs) recognise its special nature and none of them are in favour of the BHLR. There are no roads contiguous with the valley and it offers enjoyment, recreation, relaxation, education and inspiration to all – free of charge: important in an area where there are pockets of deprivation. To risk such a place for the BHLR (anticipated to carry anything up to 30,000 vehicles per day) when alternatives have not been examined and there remain strong doubts that the road will bring any regeneration benefits at all is unacceptable to us.
11. Our best advice is that the BHLR is at best irrelevant, and at worst could damage the local economy.
12. We have supported most of elements of the regeneration strategy, some of which (such as the University Centre) are already bringing benefits to the area. For us (and we are sure for others) there is a need to know just what value each of the strands of the regeneration strategy will bring or are already bringing, to the area. We suspect that the BHLR itself is not good value for money and that the education elements – University Centre, new FE college – are much bigger elements than the BHLR. If only because of the huge increases in cost, we need to know.
13. In terms of costs, there was a proviso to the original approval in 2004 that the opportunity for 'developer contributions' should be explored. There are none, either in the form of contributions to the costs of the road itself, or in terms of infrastructure associated with the development. To make up for this, the promoters are planning to make up any shortfall from their own capital budget. The implications of this are unclear but should be made clear. Indirect costs will also be incurred through links and junctions to BHLR. There is a lack of transparency here too.
14. Any claims that the public are overwhelmingly supportive of the scheme (and there are such claims) must be taken with a large pinch of salt.
15. The consultation brochure delivered to homes in Bexhill and Hastings heavily leads readers into choosing a road option. There 6 shown on a map, and immediately 4 are inadmissible because they threaten protected sites. There is no detail at all of any non-road options. The 'tabloid' format brochure tells its audience that the BHLR is sure to result in investment and suggests that it would help the environment, not damage it. 2% of households responded. Those attending mobile exhibitions could choose 10 dates at 6 venues. On 8 of these, the venue was a car park. A total of 2558 responses were received. 88% of the respondents were car owners against 66% of Hastings households, and 73% of Bexhill households. The only options in the brochure were road routes.

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16. The justification for the BHLR has moved steadily from a means to solve congestion, to a means to open up development land for housing and jobs. The development land, largely in Rother District and north of Bexhill, is said to be totally dependent upon the BHLR.
17. We say that alternative ways to access the development have not been looked at and that the BHLR would make the car the default mode for trips. We also suggest that eco-towns principles should be applied to any development and that a mix of alternatives would lead to more efficient use of land, less biodiversity loss, equality of opportunity when it comes to accessing needs, less traffic and less CO2 emissions which with the BHLR, are set to rise.
18. The BHLR will demonstrably lead to biodiversity loss and increased CO2 emissions. Both are issues of international importance and East Sussex County Council should heed this.
19. It is worrying that on the eve of the Copenhagen conference, we are considering a scheme that leads us towards a larger carbon footprint. It sends a wrong message to other local authorities in the UK and weakens our voice at international level.
20. Derrick Coffee. 19 10 09.

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