

BEXHILL TO HASTINGS LINK ROAD PUBLIC INQUIRY

Supplementary Proof of Evidence by

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On the policies in the South East Plan

on behalf of

The Hastings Alliance

1.1 This Supplementary Proof responds to the final question raised in my cross examination concerning the South East Plan and whether demand management was integral to it.

1.2 This arose because the SoCoMMS report states that all individual schemes (such as the BHLR) “*will only be effective*” if demand management is in place. The full quote is paragraph 3.11 of my Proof OBJ/179/2. The promoters argue that this is not in the SE Plan.

1.3 I wish to separate out this issue from that concerning the reliance on SoCoMMS as representing a full investigation of alternatives. This was considered in my Proof OBJ/179/2. If SoCoMMS is the source of the justification for the current scheme, its crucial demand management element is missing, and if present would have changed all the traffic and mode share forecasts and thus the economic appraisal.

1.4 I wish to focus simply on what the SE Plan says about its transport strategy. Before turning to the Transport Chapter I wish to refer to the “Cross Cutting Policies” on page 31 of CD 6/2. Policy CC1 (Sustainable Development) states,

“All authorities, agencies and individuals responsible for delivering the policies in this Plan shall ensure that their actions contribute to meeting the objectives set out in this policy and in the Regional Sustainability Framework.”

One of the objectives in this same policy is,

“iii. reducing greenhouse gas emissions associated with the region”.

1.5 The importance of a cross cutting policy is that it runs through all plans and schemes. Thus it should not be omitted in the further analysis of the transport strategy. Policy CC2 (Climate Change), also on page 31, sets out regional reduction targets which comply with the Climate Change Act by 2050, but have slightly different timescales to the carbon budgets now set. They are, however, approximately in line with these although using a 1990 baseline. There is no such baseline data for this scheme before the Inquiry.

1.6 Turning now to Chapter 8 of CD 6/2, the Regional Transport Strategy, Policy T1, starts with the following,

“Relevant regional strategies, local development documents and local transport plans should ensure that their management policies and proposals:

- i are consistent with, and supported by, appropriate mobility management measures*
- ii achieve a re-balancing of the transport system in favour of sustainable modes as a means of access to services and facilities”*

Other elements follow but these first two set the conditions under which more detailed proposals are promoted and assessed.

1.7 The scheme as presented to this Inquiry does not conform to this. There is no supporting mobility management, which would have as its main effect a reduction in the forecasts for traffic levels and thus congestion. This would in turn reduce the estimated benefits and the economic assessment. There is no rebalancing of the system, the only growth in sustainable modes is from an outside factor – continuing the increasing trend in use of rail. As Mr Johnston said in cross examination, his modelling suggests that rail growth is not the result of a switch from road use following implementation of the BHLR. Indeed, it would be very surprising if it were.

1.8 The next policy, T2 on Mobility Management itself, says, *The policies and proposals set out in local development documents and local transport plans should include policies to achieve a rebalancing of the transport system in favour of sustainable modes based on an integrated package of measures drawn from the following:”*

It then lists a series of demand management measures. The crucial phrase here is *“integrated package of measures”*. No such mobility management package is before the Inquiry, and specifically is in neither the Do Minimum nor the Do Something. If it were, the relative performance of the Do Something against Do Minimum would decline, since future congestion would be lower in both. The economic case for the scheme depends upon relieving congestion which may not appear (at least to the same extent) if mobility

management were implemented. In addition, improving conditions for car drivers must inevitably make it less likely they will use sustainable modes.

1.9 The South East Plan naturally seeks to safeguard its list of schemes (Appendix A). However, these have only been subject to a broad brush assessment and Policy T14 refers to,

“an Implementation Plan to clarify the partnerships, policy links, timing, scale and cost of the interventions necessary to support the spatial strategy within this plan.”

It goes on to list bodies, including local authorities, who must, *“keep under review investment proposals of regional or sub-regional significance.”*

1.10 It is our position that this Inquiry should undertake a full review of such a significant investment. The promoter has not presented a full range of data in relation to this, but the results for climate change are very clear – the future with this scheme and all other current plans fails to achieve national transport targets or contribute to meeting the overall regional targets.

1.11 Following on from T14, it is envisaged that all Appendix A schemes, *“are subject to value for money and affordability tests and most are subject to the completion of statutory procedures. Specific transport infrastructure projects will be developed through a balanced appreciation of economic, environmental and social considerations, in line with the principles of sustainable development.”*

1.12 I consider that this supports the view that inclusion in Appendix A is not a blank cheque to ignore climate change, or indeed to ignore the requirement for a mobility management package. Without the latter it is impossible to assess whether the scheme is really needed.