

# **Bexhill to Hastings Link Road – regeneration issues revisited**

**Final Report**

**to Hastings Alliance**

**26 August 2008]**

***Urban & Regional Policy***

48 St Agnes Road  
Birmingham  
B13 9PN

Tel 0121 442 2341  
Fax 0121 247 4601  
e-mail [alanwenbansmith@pobox.com](mailto:alanwenbansmith@pobox.com)

## Bexhill to Hastings Link Road – regeneration issues revisited

### Contents

<b>Section</b>	<b>Title</b>	<b>Page</b>
	<b>Overview</b>	<b>ii</b>
<b>1</b>	<b>Introduction</b>	<b>1</b>
<b>2</b>	<b>Context and chronology</b>	<b>1</b>
<b>3</b>	<b>Changes to national policy context since 2004</b>	<b>2</b>
<b>4</b>	<b>The current regeneration case for BHLR</b>	<b>4</b>
<b>5</b>	<b>Conclusions</b>	<b>8</b>
	<b>Appendix: Reports considered</b>	<b>10</b>

### *Urban & Regional policy*

*Urban & Regional Policy* is the practice of Alan Wenban-Smith as an independent consultant. Established in 1996, it specialises in linking urban and regional economic, spatial and transport policies. Recent projects include chairing TfL's Peer Review Group for the London Land-Use & Transport Integrated model, a Risk Assessment of the Regional Spatial Strategy for the West Midlands Regional Assembly, advising the English Regions Network on implementation of RSSs, a study of the integration of regional transport with spatial strategies for DfT, a 'State of the Region' Report for the West Midlands Regional Development Agency and the production of Regional Planning Guidance and Transport Strategy for the Yorkshire & Humber Regional Assembly.

Alan Wenban-Smith was previously responsible for planning and transport policy for Birmingham City Council. In this capacity he led Birmingham's first Unitary Development Plan, its first Economic Strategy and the policy direction of the Inner City Partnership. He also chaired West Midlands planning, transport and economic development advisers groups at both regional and Metropolitan levels, leading the first Metropolitan Transport 'Packages', Regional Planning Guidance and the first integrated Regional Transport Strategy.

He is currently a member of the RTPI General Assembly and its Policy Committee. He writes and speaks widely on planning and transport issues, has acted as witness and as adviser to Commons Select Committees and is Visiting Professor of Planning at Birmingham City University.

---

## **Bexhill to Hastings Link Road – regeneration issues revisited**

### **Overview**

*Urban & Regional Policy was commissioned by the Hastings Alliance to examine the regeneration case for the BHLR as currently proposed (August 2008). This report revisits our 2004 critique in the light of changes to the scheme, its supporting information and circumstances since then. Our broad conclusions are:*

- 1. Changes in national and regional circumstances suggest that the importance of reducing car-dependency, and the priority of other uses of limited transport investment resources have both increased;*
- 2. The design and transport purpose of the BHLR scheme has not changed significantly since the 2004 appraisal. However, the costs appear to have escalated by up to 50%, while the benefits are estimated to have increased by over 130%. In the absence of an explanation, such large differences cast doubt on the usefulness of the figures as a basis for decision-making;*
- 3. Although the scheme is now justified primarily in terms of regeneration, the vast bulk (~80%) of the quantified benefits are in the form of time-savings to road-users. Given the mainly local significance of the scheme in terms of trips made using it, the conversion of these time-savings into economic or regeneration benefit is of dubious validity. The scheme may even be counter-productive in these terms;*
- 4. The major direct regeneration benefit from BHLR depends on (a) enabling development of the North East Bexhill Business Park (NEBBP) and (b) this attracting inward investment rather than purely local interest. However, (a) alternative, cheaper means of overcoming NEBBP access problems have not been explored and (b) NEBBP is admitted to be unlikely to be attractive to inward investment;*
- 5. In essence, rather than BHLR supporting regeneration, the current scheme justification makes it more a case of regeneration supporting BHLR;*
- 6. In these circumstances the recommendations of our previous report remain valid. This supported a more balanced package of rail, traffic management and limited road improvements, integrated with environmental, housing and training measures, in the spirit of the original 'Five Point Plan', as being both cheaper and more effective in fostering the regeneration of Hastings and Bexhill.*

## **Bexhill to Hastings Link Road – regeneration issues revisited**

### **1 Introduction**

- 1.1 We were commissioned by the Hastings Alliance to review the regeneration case made by East Sussex County Council in relation to their revised planning application for the Bexhill-Hastings Link Road (BHLR), advertised on 28 July 2008.
- 1.2 This report reviews and updates the analysis that we carried out for East Sussex T2000 in 2004 of the proposals by East Sussex County Council (ESCC) for BHLR and their subsequent Major Scheme bid to DfT for funding. The timescale for objections to the scheme is 29 August 2008. To meet this date the present report does not repeat the earlier analysis, but rather revisits its conclusions in the light of new information about the scheme characteristics, impacts and costs put forward by the scheme's promoters, and relevant changes in the wider policy context.
- 1.3 So that this report is free-standing, key points from the earlier work are summarised here. For more detail than this, the reader is referred to our earlier report (Ref. 26)
- 1.4 The main new material considered for the present report is the Regeneration and Environmental Statements, the Sustainability Appraisal and the transport appraisal produced for the original planning application in 2007, together with the addenda to these reports accompanying the present planning application (Refs 29-36). The full list of documents considered, in current and earlier work, is given in Appendix 1, and references in the text are to the sequence numbers there.

### **2 Context and chronology**

#### ***National context***

- 2.1 The BHLR has attracted more national attention than most schemes of its relatively limited regional significance. This may be because it has been a test case for some of the arguments about the role of transport in regeneration, and about the balance that should be struck between economic and environmental objectives.
- 2.2 Such arguments have been complicated by the status of parts of the A259 as a Trunk Road. However, no part of the Trunk Road route along the south coast (A27/A259/A2070) is regarded by DfT as being 'a route of Strategic National Importance', and through Hastings the A259 itself is not classified as a Trunk Road (though it is in Bexhill). The DfT comment that *"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."*<sup>1</sup>
- 2.3 However, it should be noted in this context that only 5% of the peak traffic on the A259 crossing the Glyne Gap between Bexhill and Hastings is *not* local. It is above all a local road for local people, and any arguments about the strategic significance of peak time congestion on the A259 need to be seen in this light.

#### ***Local chronology***

- 2.4 The predecessor to BHLR was the Bexhill and Hastings Bypass, which would have carried the trunk route right around both towns. This was the subject of the first MultiModal Study (MMS), to be completed of those conducted by DfT in the context of the national Transport 10-year Plan (2000-2010). Figure 2.1 summarises the subsequent chronology of significant reports and other events culminating in the present proposal.

---

<sup>1</sup> DfT (2005) Categorisation of core trunk roads in England

**Figure 2.1: BHLR chronology 2000-2008**

Date	Document/source	Content/comment
Nov 2000	Access to Hastings MMS report	Alternatives: By-pass (3225m) or local transport package (£90m)
Mar 2001	RPG for South East issued	S Coast Towns Priority Area for Econ Regeneration
July 2001	DfT decision on ATH MMS	By-pass rejected: LAs asked for broader regeneration plans
Sep 2001	DTZ-Peida ' <i>Prosperity for Hastings</i> '	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; HBLR 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
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 APR	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
Mar 2007	Planning application (to ESCC Planning from ESCC Transport)	Full planning application with Sustainability Appraisal, Regeneration and Environmental Statements and transport appraisal; 1854 objections (inc 2 SEBs), 49 letters of support
?	Rother District Plan (adopted)	BHLR proposals not represented in detail, so must be treated as a departure
Aug 2008	ESCC revised Planning Application advertised	Accompanied by Addendums to Regeneration and Environmental Statements and a revised transport appraisal

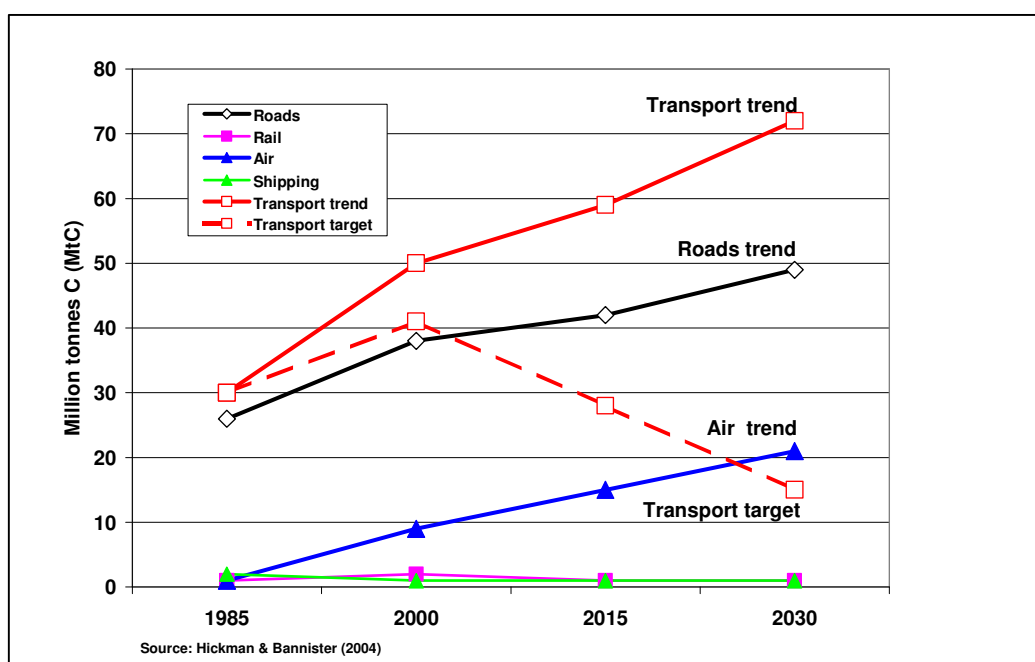
2.5 Notably absent from the material supporting the present application are considered responses by the scheme promoters to the concerns of the many objectors. Even the Statutory Environmental Bodies (SEBs) seem to have had difficulty in this respect, with outstanding objections remaining 2½ years after the proposals were published. No attempt is made to respond to the strategic critique made in our 2004 report (Ref 26). Throughout the documentation it is apparent that only supportive commentary is properly reported or seriously responded to.

### 3 Changes to national policy context since 2004

#### *Climate change*

- 3.1 Since 2004 there has been significant change in the national policy context. In particular, the increasing importance attaching to combating climate change is reflected in draft legislation currently going through Parliament. The concern about the vulnerability of increasing car-dependency is reinforced by the rapid recent increase in the price of oil (which few commentators expect to see significantly reversed).
- 3.2 To achieve the overall reductions targeted by the Climate Change Bill (26-32% by 2020 and 60% by 2050) the transport sector will have to make a significant contribution – and in doing so will have to reverse its present trajectory of growth (Figure 3.1). The difficulties in making such reductions are such that it may take longer, but that is an argument for starting sooner (and the longer they are put off the sharper will be the cuts eventually required).

**Figure 3.1: Transport emission trends and targets**



- 3.3 It is also worth stressing that reducing our economic and lifestyle dependence on ever-increasing travel is a good thing in a wide range of circumstances. Our economy will be more competitive if we have found means of reducing the amount of travel needed to deliver a given amount of output (alternative, non fossil fuels are unlikely to be cheaper); our health and social well-being will be improved if we have a less motorised society; and (incidentally) congestion will also be less.

#### *Infrastructure priorities*

- 3.4 The 2007 Housing Green Paper proposes large increases in the amounts of new housing to be built nationally (2 million by 2016 and 3 million by 2020). The National Housing and Planning Advice Unit has suggested that for maximum effect on affordability, provision should be biased towards the South East<sup>2</sup>. In its RSS Implementation Plan and Regional Funding Allocation advice SEERA has emphasised that delivery of such increases is critically dependent on infrastructure – particularly transport.

<sup>2</sup> National Housing and Planning Advice Unit (June 2008) *'Meeting the housing requirements of an aspiring and growing nation: taking the medium and long-term view'*

- 3.5 Our previous report emphasised that growth of travel demand depends a great deal more on the locational choices made by residents within the *existing* stock of housing than on the amount and location of *new* housing. The transport capacity of the Bexhill/Hastings area to accommodate increased housing provision will depend more on factors influencing households' choices of neighbourhood and means of transport than on the presence or absence of the BHLR.
- 3.6 The Government's recently published proposals for change to the South East Plan increase housing provision by some 15% above the draft plan (Ref 34), but these increases are primarily elsewhere in the region: the housing targets for Hastings and Rother remain unchanged at 4200 and 5600 respectively to 2026. Whether BHLR is relevant to the provision of housing in Hastings and Bexhill depends on the particular locations chosen, but any housing-related priority must inevitably be reduced relative to other schemes in the South East.

## 4 The current regeneration case for BHLR

### *The scheme*

- 4.1 The scheme itself is not significantly different from that considered in our previous report, though the estimate of its cost has risen substantially (in terms of 'headline' costs, doubling from £48m to £96m). The following sections of this report review the regeneration case made for BHLR in the 2007 Regeneration Statement and 2008 Addendum, with reference to the other recent material as appropriate.
- 4.2 The County Council's case for the scheme has not shifted in any significant way since the previous report. In essence the case is based upon economic development, with reduction of congestion on the A259 as a subsidiary benefit: *"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).
- 4.3 As in 2004, the focus of the regeneration case is 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 investment to the area, and when fully occupied could accommodate some 1500 jobs. However, this development could not be permitted without new means of access to the main road system – particularly the A259. The relationship of the BHLR to the NEBBP is described in the following terms:
- "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".* (2007 Regeneration Statement (Ref 30), para 1.3.3)
- 4.4 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 proposed Western ByPass) was costed at £4m. This would provide a good quality direct access from the NEBBP to the A259 where it becomes a Trunk Road. On the face of it this would seem sufficient to overcome the Highway Agency's objection to development, though the point does not seem to have been tested.
- 4.5 Even allowing for price increases on BNAR, the major part of the cost of BHLR 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). Thus the major part of the cost of the BHLR appears to be associated with the subsidiary objective for its construction (general relief of congestion on the A259).

### ***The scheme appraisal***

- 4.6 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 Major Scheme Bid, as summarised in Figure 4.1:

**Figure 4.1 Costs and benefits, 2004 and 2008 (NPV<sup>1</sup> £m)**

<b>Benefit or Cost</b>	<b>2004 Bid</b>	<b>2007/8 PA<sup>3</sup></b>
Business user time-savings (NPV, £m)	63.8	75.3
Other user time savings (NPV, £m)		136.0
Accident savings (NPV, £m)	9.9	28.5
All Transport Benefits (NPV, £m)	96.8	226.2
Costs <sup>2</sup> (NPV, £m)	40.7	61.8
Transport Benefit:Cost Ratio	2.4:1	3.7:1
Regeneration benefits (NPV, £m)	23.1	22.2
Regeneration benefits (jobs)	1800	2000

**Notes:** 1. the costs and benefits reported here have all been discounted to net present values (NPV), so are not the same as the crude 'headline' costs; 2. current costs *include* risk and optimism bias (~£23m gross) but *exclude* the link to NEBBP (~£18m gross); 3. the current scheme is costed at 2006 prices (Ref 33, 2.2.1). If the 2004 bid was in current prices it would need to be increased by about 25% to be comparable (Source: BERR (2007) cost indices for road construction).

- 4.7 It can be seen that there are some very large differences in both costs and benefits, with costs increasing by some 50%<sup>3</sup> while transport benefits increased by 134%. 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. Some further comments are appropriate, however:

- a) It is significant that the user time-savings form such a large proportion (~80%) of the overall benefits, because:
  - The congestion benefit (of which they are a measure) is stated to be a *subsidiary* aim of the scheme compared with regeneration;
  - Especially in the case of a local scheme of this nature, a large proportion of the time-savings will be so short as to be of negligible value (estimated in my previous report as averaging some 15 seconds per vehicle each day – Ref 26 Appendix 2 para 10b). The simple aggregation of such time-savings, though conventional practice, is not a valid estimate of their real economic value;
  - It appears that the With/Without Scheme comparison was done with the NEBBP development in both cases (ref 32, 2.1.1). Since the NEBBP could not go ahead in the Without Scheme situation this inflates the time-savings benefit of the scheme<sup>4</sup>.
- b) In addition to the development of NEBBP, BHLR is supposed to deliver employment benefits through the general improvement of accessibility. However, at no point is the

<sup>3</sup> See footnotes to Figure 4.1: while risk, optimism and developer contributions roughly cancel out, the remaining differences may be partly the result of different cost bases: (Ref 32, 2.3.1)

<sup>4</sup> This is the consequence of slavishly following DfT appraisal guidance without thinking about the reality of the situation (or taking account of more recent DfT thinking on transport appraisal, notably DfT (2005) 'Transport, Wider Economic Benefits and impacts on GDP'. A more valid and integrated approach would be to compare transport benefits without NEBBP in either case, then add the jobs benefit to the 'With' case.



economic case in terms of user time-savings brought together with the growth in employment that is supposed to result:

- This is symptomatic of the lack of integration between transport, economic and environmental factors in the ESCC approach as a whole: essentially transport is treated as existing in and for itself alone;
- There is a failure to recognise that time savings will be exchanged for wider locational choices by businesses and individuals, eroding any congestion benefits. The procedure of adding together discounted values of time-savings for many years ahead is therefore invalid;
- The conversion of time-savings into broader economic benefits is complex. In an imperfect market (ie normally) the economic value of changed locational choices will not necessarily equate to the value of the time savings foregone (and recent thinking about transport appraisal suggests they could even be negative<sup>5</sup>).

- 4.8 Against these considerations, ESCC put great weight on surveys of business opinion, which appear to strongly support provision of BHLR. The defect of such surveys is that unless respondents are fully informed about the other impacts of the scheme and alternative uses of the resources, their responses about access and premises improvements will be biased in favour. In this case there is no indication that respondents were informed that traffic (and congestion) would substantially increase on Queensway (which serves many existing businesses), nor is there any indication that there might be significantly different ways of deploying nearly £100m.

### ***Regeneration in the Bexhill-Hastings RA***

- 4.9 Evidence is put forward that the extent of deprivation in the area has increased since the 2004 Bid was assembled (Ref 29, 2.1), and this is thought to strengthen the case for BHLR. However, it does so only if BHLR is an effective means of achieving regeneration<sup>6</sup>. There are good reasons for doubting this, as set out in more detail the previous report (Ref 26). In summary:
- a) the case for BHLR as an aid to regeneration relies primarily on its role in enabling the development of NEBBP in such a way as to attract inward investment to the area. However, the opinion of those economic development specialists who have reported is that what inhibits inward investment is the accessibility of Bexhill and Hastings within the wider South East, not its internal linkages. The Regeneration Statement (Ref 31 para 5.3.3) refers to demand from local industry for modern B1, B2 and B8 accommodation, but meeting this is part of the normal ‘churn’ and redevelopment processes and would not deliver the new jobs ascribed to NEBBP. Inward investment of the sort required to make good the purpose of this proposal is admitted to be weak (Ref 31, para 5.5.2);
  - b) a secondary regeneration benefit proposed is that the general reduction in congestion represented by business user time-savings will benefit existing businesses in the area and help them maintain employment at higher levels than would otherwise be the case. However, as pointed out above the time-savings benefits are mostly very small, and in so far as they are perceptible, are likely to lead to changed locational choices which will ultimately negate them.
- 4.10 The vision underlying the Five Point Plan for regeneration was the DTZPeida report (especially Ref 9). This recognised the reality of the geography of Bexhill and Hastings in the wider region: transport improvements therefore “... *though helpful ... would have*

---

<sup>5</sup> This is a large subject, explored by SACTRA (1999) ‘*Transport and the Economy*’ and DfT (2005) ‘*Transport, Wider Economic Benefits and impacts on GDP*’

<sup>6</sup> and in so far as the Task Force has been pursuing a less focused approach than that recommended by DTZPeida, suggests that this might not be delivering regeneration

*limited impact on regeneration*". While transport was not irrelevant, the key to regeneration was to grow the indigenous economic base. This strategy 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.

- 4.11 For these purposes, the only high priority transport scheme was the Bexhill-Ore Metro, because it was linked with 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.
- 4.12 This would catalyse interest from new businesses (eg in media and ICT industries), because the environment and quality of life of Hastings/Bexhill could then offer would attract the key people on whom such industries depend. External rail links to London and Brighton would support this strand of strategy, and the same considerations applied to the revitalisation of the tourism business.
- 4.13 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<sup>7</sup>. The NEBBP was peripheral to this strategy – it was irrelevant to local industry, depending on inward investment (for which demand was weak) and requiring expensive improvements to access (eg BHLR). It was thus a low priority project, though the report did recommend that the access road should be the subject of a feasibility study.
- 4.14 The hierarchy of priorities in the DTZPieda report was based on an explicit rationale of a customised programme, building on inherent local strengths, rather than rolling out a standard array of economic development measures that would be applicable anywhere. This coherent regeneration strategy and clear set of priorities remains valid, but has been lost sight of in present plans<sup>8</sup>. There has been a general 'levelling up' in which anything mentioned is given an equal priority. The principal beneficiary of this loss of discrimination has been BHLR, to the extent that rather than BHLR supporting regeneration, it has become a case of regeneration supporting BHLR.

---

<sup>7</sup> In the Access to Hastings MMS work (2000) 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 this, most business needs are met by occupying *existing* premises vacated by others ('churn'), and 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)

<sup>8</sup> The critique prepared by the Task Force of our 2004 Report (Ref 27) suffers the same loss of coherence

## 5 Conclusions

- 5.1 Figure 5.1 below sets out the conclusions of our 2004 report, and revisits these in the light of the above review of the new information and changed circumstances since then.

**Figure 5.1 Conclusions of 2004 report revisited**

Conclusions of 2004 Report	Comments in current context
1. The Trunk Road status of most of the A259 in Hastings/Bexhill has been a major driver behind the BHLR proposal, even though the function of the A259 is primarily local. The perspective for the consideration of the BHLR has thus been dominated by transport considerations, in particular the relief of traffic on the A259 Coast Road.	Though the case is now stated very much more in terms of regeneration (see para 4.2), but the evidence put forward makes it clear that the vast bulk (~80%) of benefits are in the form of congestion relief, and that this is focused on the A259 (see para 4.7 above). <b>The previous conclusion therefore remains valid.</b>
2. The BHLR would have no impact on the regional accessibility of Hastings/Bexhill. Its construction would shift some local traffic to new routes, but these would also be within the urban area and the overall volume of traffic would tend to increase. There is no evidence that these new routes are any less environmentally sensitive than those relieved.	The scheme has not changed in terms of its broad design or purpose (see paras 4.1-4.2 above), and though larger congestion benefits are claimed (see para 4.7) their distribution is likely to be similar. <b>This conclusion therefore remains valid</b>
3. The regeneration argument for BHLR rests primarily upon the opening up of land for a proposed high quality Business Park in North Bexhill. However, this would require inward investment, for which there are many more attractive locations in the region: market demand in this area would be weak regardless of the BHLR. There is other land suitable for expansion of local businesses, and ample capacity for planned housing provision can be provided without BHLR..	Inward investment interest is admitted to remain weak and without this the NEBBP would simply accommodate local relocations, for which other premises and locations are available (see para 4.9). <b>This conclusion therefore remains valid</b>
4. The approach to economic regeneration adopted by SEEDA and currently being carried out by the Hastings/Bexhill Task Force focuses on growing the existing manufacturing base and building on potential strengths in knowledge-based industries and tourism. In this view regenerating the local environment of Hastings/Bexhill and enhancing the quality of life it offers are critical to success.	The current regeneration policy lacks the focus of the original 'Five Point Plan' which in turn was less coherent than the DTZPeida proposal on which it was based (see paras 4.10 - 4.13. As a result the priority accorded to an urban renaissance, the environment and quality of life has diminished. <b>This conclusion is therefore no longer valid as a statement of current Task Force policy.</b>

Conclusions of 2004 Report	Comments in current context
<p>5. The BHLR and associated business park are at best irrelevant and at worst highly damaging to this vision. Any short-run gain from development would be dwarfed by longer-run increases in traffic and car-dependency (and recent inflation in BHLR scale and cost reinforce this view). The continued support for BHLR of some of the Task Force partners (and acquiescence of others) appears to be the product of a ‘bidding culture’ rather than the expression of a coherent strategy.</p>	<p>The increase in costs and the diminished focus on a broad, integrated regeneration strategy (see paras 4.10 - 4.14) <b>increases the validity of this conclusion</b></p>
<p>6. With the exceptions of the BHLR and associated business park we endorse the Task Force’s general approach to the urban and economic regeneration of Hastings/Bexhill. In this context the most important transport investments are those that: underpin high quality regeneration in the urban core (eg Ore-Bexhill Metro); increase accessibility to the rest of the region (upgrading rail services to Brighton, London and Gatwick, including the Willingdon chord); improve local access within the urban area without generating additional traffic (improved public transport facilities, services, ticketing and integration); traffic calming and bus priority on the A259, shifting the balance in favour of pedestrians in sensitive sections, and realigning on the sea front to provide a pedestrian boulevard; demand management to prevent future traffic growth from undermining essential attractions and to raise money towards transport and environmental improvements.</p>	<p>The NEBBP and the support it gives to the case for BHLR have become such high priorities for the Task Force that it puts at risk the achievement of the original priorities of the Five Point Plan in a balanced and coherent manner (see paras 4.10 - 4.14). <b>This increases the validity of this conclusion</b></p>
<p>7. The capital cost of the transport component of regeneration would be reduced by these measures from nearly £140m to less than £40m, and revenue costs from £9.5m to £3.3m pa. Meeting more of the cost through local charges is in accordance with current government thinking, asserts local ownership and provides a powerful argument for central support where this is really needed.</p>	<p>No new information evidence has been given on costs of alternatives. The need to meet more costs locally was confirmed by DfT (Ref 28). <b>This conclusion remains valid</b></p>
<p>8. By firmly and finally rejecting the current major scheme bid the Government would help to focus local effort on this more appropriate and sustainable approach.</p>	<p><b>This conclusion remains valid</b></p>

## Appendix 1: Reports considered

<b>(a) Inputs to previous report (August 2004)</b>	
1. July 1995:	Bexhill Northern Approach Road - non-technical summary of environmental statement. East Sussex County Council,
2. July 2000	<i>'Access to Hastings MMS: Economic Impact Report (consultation draft)'</i>
3. Oct 2000	Access to Hastings MMS - excerpt from working paper for draft final report. Steer Davies Gleave, Llewellyn Davies, WSAtkins
4. Nov 2000	<i>'Access to Hastings MMS'</i> – final Report + Appendices, SDG <i>et al</i>
5. May 2001	<i>"New Jobs without New Roads"</i> . Report by CAG Consultants for Friends of the Earth
6. June 2001	<i>'Millennium community by the sea: Hastings "string of pearls"'</i> , Expression of Interest to Millennium Commission, Hastings BC
7. July 2001	DfT response to Hastings MMS (press release and copy SoS letter to Chairman of SEERA)
8. Aug 2001	<i>'Transport improvements and Regeneration of Hastings'</i> , presentation by DTZ Pidea
9. Sept 2001	<i>'Prosperity for Hastings'</i> , DTZ Pidea for SEEDA (Full report on above)
10. early 2002?	SEEDA leaflet on proposed Hastings & Bexhill regeneration strategy.
11. Aug 2002	<i>'Hastings Strategy Development Plan'</i> , Halcrow <i>et al</i> for GO-SE
12. Nov 2002	<i>'The Future of Hastings &amp; St Leonards'</i> . Consultation brochure by Hastings Borough Council
13. Nov 2002	public consultation material on Five Point Plan
14. July 2003	<i>'Local Transport Plan: APR 2003'</i> , East Sussex CC
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	<i>'Rother District Plan: revised deposit draft'</i> , 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	<i>'2004: a year for partnership and progress'</i> , John Shaw, Sea Space
20. Feb 2004	<i>'Bexhill &amp; Hastings: future travel options'</i> , 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	<i>'Station Plaza Development Framework'</i> . Hastings & Bexhill Task Force
22. June 2004	<i>'BHLR: selection of preferred route'</i> 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	<i>'Local Transport Plan Annual Progress Report 2004'</i> , East Sussex County Council
25. July 2004	<i>'Major Scheme Bid: Bexhill to Hastings Link Road'</i> <ul style="list-style-type: none"> <li>• Main Report, East Sussex County Council and Mott Macdonald</li> <li>• Appendix A: <i>Reference sources</i></li> <li>• Appendix F: <i>Economic Impact Report</i>, Llewelyn Davies</li> <li>• Appendix G: <i>Responses from Statutory Environmental Bodies and other key stakeholders</i></li> </ul>

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