

Sussex Wildlife Trust

Woods Mill, Henfield, West Sussex BN5 9SD
Telephone: 01273 492630 Facsimile: 01273 494500
Email: enquiries@sussexwt.org.uk
Website: www.sussexwt.org.uk
WildCall: 01273 494777



Mrs Lynette Duncan
Programme Officer
Persona Associates
West Point
Springfield Road
Horsham
West Sussex
RH12 2PD

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The East Sussex County Council (Bexhill to Hastings Link Road) Compulsory Purchase Order 2009

The East Sussex County Council (Bexhill to Hastings Link Road) (Planning) Compulsory Purchase Order 2009

Sussex Wildlife Trust maintains a **strong objection** to plans to build a road across Combe Haven. We do not consider the current plans for the Bexhill Hastings Link Road (BHLR) to constitute sustainable development and believe that they will devastate the valley and result in negative impacts on its biodiversity.

We therefore object to the Compulsory Purchase Orders and Side Road Orders that will enable the proposed development.

I enclose our objection letters dated 5 July 2007, 28 August 2008 and 13 November 2008 and would like to use this opportunity to further develop our concerns about the scheme's impact on the valley's ecosystems, which form a functioning landscape.

For many years conservationists have sought to protect examples of habitats and species in nature reserves with a degree of success. The continued decline in biodiversity has shown that this approach alone is not sufficient. There is now strong evidence to support an ecosystem approach, which is being developed by Defra and Natural England as well as non-governmental conservation organisations including The Wildlife Trusts.

We do not believe the proposed mitigation measures for this scheme take a holistic approach to tackling the impacts on the valley's ecosystems. The emphasis has been placed on avoiding the designated sites, in effect severing them from surrounding habitats that make up the ecological landscape. Even if all proposed mitigation is delivered there are no guarantees of its success. If successful, mitigation will lessen the negative impacts but will not alter the fact that the valley will be drastically changed by the intrusion of a road carrying traffic.

It is important to see designated sites, e.g. Sites of Special Scientific Interest (SSSIs), as part of a wider, functioning system. A site may be managed at a micro scale but must be part of a coherent package of measures at multiple scales. This is not recognised in the mitigation measures, which treats ecological components of the valley in isolation.

Taking Care of Sussex

President: David Streeter MBE
Chairman: Patrick Berry
Chief Executive: Tony Whitbread

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Sussex Wildlife Trust manages two SSSIs that will be affected by the road scheme, Filsham Reedbed (part of Combe Haven SSSI) and Marline Valley Woods. We have had to find relevant documents during public consultation periods to understand what is planned and try to predict what impact it will have on these nature reserves. The documents refer to consultation with ourselves, which is misleading as we attended one meeting, by invitation from English Nature (now Natural England) in 2005. We have not been consulted other than by notification of public consultations.

Healthy ecosystems are the foundation on which we develop our society and economy. The environmental costs of this scheme are too great for the societal and economic benefits derived from three and a half mile stretch of road. Our dependence on the natural environment means that there will also be socio-economic costs based on loss of ecosystem services.

The True Value of Nature, Natural England's draft policy on the ecosystem approach stresses the importance of treating the natural environment holistically. This is in accordance with *Securing a Healthy Natural Environment: An action plan for embedding an ecosystem approach* (Defra, 2007).

Ecosystem services should be assessed and costed in before the costs of environmental protection to fully understand the overall costs of this scheme. An example of this would be to assess carbon sequestration of the grasslands to be lost, including those areas to be lost to compensation habitat creation. This loss along with the predicted increase in carbon emissions should be measured against the local situation now. The assessment of greenhouse gas emissions is measured against predicted national levels. The applicant claims that the scheme meets the requirements of PPS1 and that it contributes to a reduction in greenhouse gas emissions, despite clearly showing that the scheme will in fact lead to an increase. Accompanying documentation shows several different calculations with regard to greenhouse gas emissions and it would be helpful to see the definitive figures and true impact predicted as a result of this scheme.

Ecosystem services are recognised in the *Millennium Ecosystem Assessment* (2005), as the benefits people obtain from ecosystems (www.millenniumecosystemassessment.org). There are four categories:

- Provisioning services - the products obtained from ecosystems, e.g. food, fuel, fresh water.
- Regulating services - the benefits obtained from the regulation of ecosystem processes, e.g. climate regulation, air quality regulation, water regulation, pollination.
- Cultural services - the non-material benefits derived through spiritual enrichment, recreation, reflection, education, inspiration.
- Supporting services - these underpin the production of all other ecosystem services, e.g. soil formation, photosynthesis, water cycling, nutrient cycling.

The impact on the landscape and its ecological functioning can only be properly assessed if the ecosystem services it provides are measured.

In Sussex, a partnership of organisations led by the Sussex Biodiversity Partnership, have identified Biodiversity Opportunity Areas, in line with the South East Biodiversity Strategy. These areas have been identified through consultation with many Governmental and non-Governmental organisations, including East Sussex County Council, Rother District Council and Hastings Borough Council.

I enclose an information sheet including a map showing the location of these areas in Sussex. Area 58, Combe Haven and Marline is one such Biodiversity Opportunity Area. Further details can be found at www.biodiversitiesussex.org

The road is heralded as the key to unlocking further greenfield land for development, which will further impact on the valley. This makes it difficult to assess the true cumulative impacts of the scheme. This should be measured against the value of the valley without the proposed scheme.

The Combe Haven – A Landscape History (www.hastings.gov.uk) by Simon Jennings (London Metropolitan University) for East Sussex County Council was produced as part of the 'Open Spaces, Access for All' INTERREG Project (June 2005). The report describes The Combe Haven of today as the result of episodes of environmental change, each of which "has left a legacy in the valley that has resulted today in a landscape that is rich both in history, and in a diversity of habitats that are of such importance to wildlife".

Simon Jennings' report concludes that "the variety of habitats, most the consequence of interactions between people and the landscape over several thousand years, has given this valley a priceless quality that should not be compromised by development. At the same time, the valley should also be recognised as a valuable resource that will enhance people's lives through recreation, and perhaps more importantly, by education."

If you imagine the same landscape with a busy road running through it, no amount of mitigation can reverse the impacts.

The importance of ecosystems increases in the light of climate change. The need for a robust environment that is able to adapt to change will be met by well connected matrices of interconnected habitats across landscapes. We should be seeking to improve landscapes and their composite habitats to ensure resilience to change. The development of the Bexhill Hastings Link Road will lead to an increase greenhouse gas emissions as well as reducing the ability of the environment to adapt to climatic changes that are a result of past behaviour.

Compensation habitat is proposed within the valley, thereby changing existing habitats. This loss of existing habitat should also be measured against what is proposed, along with the level of confidence for the success of the proposed mitigation and measures to ensure this in the long term, particularly with regard to securing resources for management and long term monitoring.

East Sussex County Council has pledged its commitment to the first seven years of a proposed Landscape and Ecological Management Plan but accompanying documents show that some compensatory habitats will take far longer than this to establish and will need monitoring in the longer term. We would like to see a longer term commitment, with adequate resources protected for ecological management.

As the leaseholders and managers of Marline Woods, we have not been specifically consulted on what this will mean for this nationally important site. Please see our previous objections to the scheme (enclosed).

Section 11.10 of the Statement of Reason (January 2009) claims that the scheme avoids direct impacts on Marline Valley Woods SSSI and will result in relatively minor impacts, which we find difficult to accept when the road is to be constructed over the woodland edge.

Section 17.34 of the Statement of Case (2009) states that "the centreline of the BHLR will be located approximately 50m to the north of the Combe Haven SSSI". It is difficult to assess how close the edge of the road or greenway will be to the boundary of this protected site. This may pose an even greater threat during construction. The impact of the road on a site currently located in a tranquil valley and designated for its importance to wildlife will be long term and negative to say the least.

Throughout the documents, the scheme fails to recognise the importance of the designated sites within the ecological landscape, despite this being well documented, indeed by East Sussex County Council, Rother District Council and Hastings Borough Council as well as other organisations.

We do not consider the socio-economic needs identified for this 3.5 mile length of road can outweigh the irreversible, environmental damage that will result from its development. Therefore we do not consider there are adequate grounds for purchasing land to enable the delivery of this unsustainable scheme.

Yours sincerely

Janyis Watson
Head of Conservation