

LTP funding bid for Bexhill to Hastings Link Road

Hastings Alliance response

INTRODUCTION

The Bexhill to Hastings Link Road (BHLR) is a major road scheme proposed by East Sussex County Council (ESCC). In July this year, ESCC submitted a bid for funding for the scheme to the Government as part of its local transport plan annual progress report.

The Hastings Alliance was set up in 2000 to oppose the Hastings bypasses, which were rejected by the Government in July 2001. The Alliance now opposes the Bexhill to Hastings Link Road, which it regards as the son of the rejected Hastings western bypass.

National organisations in the Alliance include CPRE (Campaign to Protect Rural England), Friends of the Earth and Transport 2000. Local members include branches of the national organisations and also the Friends of the Brede Valley, Sussex Wildlife Trust and Wishing Tree Residents Association.

This document is the response of the Hastings Alliance to the BHLR funding bid. The document contains the following sections:

- Alternative options
- Environmental impacts
- Regeneration impacts
- Traffic impacts
- Involvement of the statutory environmental bodies
- Public consultation

ALTERNATIVE OPTIONS

Summary

In developing the BHLR scheme bid, ESCC has not seriously considered alternative options. This is a fundamental flaw. Transport Analysis Guidance (TAG) Unit 1.4 states that “Any major scheme for which the appraisal of alternative options is considered inadequate will not be accepted for funding” (para 2.9.1). We therefore expect the Government not to accept the BHLR.

Detailed response

Government guidance on alternative options

TAG Unit 1.1, quoting the Treasury Green Book, says the purpose of appraisal by the Government is “ensuring that no course of action is adopted without first having the answer to these questions:

- Are there better ways to achieve the objectives?
- Does it provide value for money?”

Clearly answering the first question involves coming up with different ways of achieving objectives and assessing these, and concerning the transport system this is precisely the approach set out on the TAG website. TAG Unit 1.4 covers major schemes in local transport plans and contains clear and strong guidance on the appraisal of alternatives, in paragraphs 1.1.10 and 2.5.3 and section 2.9.

This guidance makes clear:

- Alternative options must be assessed (2.9.1)
- A “wide range” of possible options should be considered (1.1.10, 2.9.3)
- Alternatives must be assessed in detail – an appraisal summary table and worksheets are required for each (2.9.1, 2.9.3, 2.5.3)

Concerning the second point above, the specific guidance on road schemes is as follows:

“For highway schemes there should be consideration of different link/junction standards and other alternatives to address the problems in the area, such as public transport provision, demand management policies, traffic management measures and strategies.” (2.9.2)

Concerning demand management policies, the draft guidance on second LTPs clearly states their potential as an alternative to roadbuilding and their importance to the Government, and provides a list of different measures:

“Local transport authorities should consider how they could manage demand for transport services through policies aimed at bringing about behavioural change. *Policies of this kind could, if introduced in the context of a high-quality LTP, prove highly cost-effective and avoid the need to spend larger sums on infrastructure-based solutions* [our emphasis]. There is a wide range of possible activities in this area, including road user charging and workplace car parking charging schemes, active management of the availability and cost of car parking and public transport, school and workplace travel planning, personalised marketing, and innovative use of intelligent transport technologies (such as the Transport Direct information service). *Demand management measures are central to the Government’s transport strategy* [our emphasis]; the Department for Transport will therefore consider authorities’ demand management proposals carefully, as part of LTP assessment.” (Part 2, para 41)

Alternatives to the Bexhill to Hastings Link Road

ESCC covers alternative options in chapter 9 of the BHLR bid main report. It is very clear from this chapter that ESCC has seriously failed to comply with the Government guidance summarised above.

Alternatives to a new road between Bexhill and Hastings are covered in section 9.2 of chapter 9. This section is less than a page long, in a bid submission of nearly 700 pages.

In this section, improving public transport is the only alternative mentioned. Demand management, smart (soft) measures, traffic management, minor road improvements, walking and cycling are all completely ignored (in fact there is not a single reference to demand management or soft measures anywhere in the bid document). And no public transport improvements were actually appraised – we are told “solutions based on improvements to public transport were considered” but it is clear that no proper appraisal – option generation and assessment – was done.

The only appraisal has been of different link road routes. Concerning these, specific guidance was given by the Department for Transport: that “environmentally designated areas, and in particular the Combe Haven SSSI, should not be directly impacted by the scheme” (BHLR report, page 90). Bafflingly this was blatantly ignored by ESCC, who developed four routes crossing the SSSI.

So summing up, ESCC has wasted precious public resources on appraising ruled-out road options while completely failing to appraise non-road options in accordance with guidance.

Some detailed comments on section 9.2 follow.

- The first sentence is oddly worded but seems to be saying that, as the Hastings and Bexhill Task Force wants the link road, non-road options are off the agenda. This is of course a complete non sequitur. The support of the Task Force or anyone else for the link road in no way obviates the need for a dispassionate appraisal of alternatives, as required by Government guidance. And, who knows,

information on alternatives may change the Task Force's views! Lastly, for ESCC to portray the Task Force as an independent supporter of the link road is nonsense – ESCC is a key member.

- The first bullet point says “the development potential in north Bexhill is dependent on the construction of the link road”. However, the Access to Hastings multi-modal study showed that 600 houses could be built at north Bexhill without any new roads and 1660 with just the Bexhill Connection (then called the Bexhill Northern Approach Road) (draft final report, October 2000, pages 147-148). Concerning the proposed business park, we believe this would harm the regeneration of the area – see below. But in any case as alternative ways of providing access have not been properly appraised, the bullet point statement is invalid.
- The second bullet point concerns rail improvements. It says “such improvements would be at a significant cost”. However, the South Coast multi-modal study gives the capital and running costs of a turn up and go service between Bexhill and Ore with new stations at Glyne Gap and West Marina as £12m and £5m, which seem a lot less significant than the cost of the BHLR (£47m excluding optimism bias). The bullet point is also pessimistic about funding, while failing to mention several potential sources: congestion and parking charges (which would also encourage modal shift); the DfT LTP budget, as explained in the draft guidance on second LTPs (Part 4, paras 43-44); and the new DfT Transport Innovation Fund (ibid, Part 2, para 36). The bullet point concludes by saying that modal shift from car to rail would be small and so “the possibility of significantly improving bus reliability through reduced road congestion also limited”. While ESCC should prove this statement, we agree improving rail alone is unlikely to be enough. Packages of different measures should be appraised, including demand management.
- The third bullet point concerns bus improvements. It says congestion on the A259 affects the reliability of bus services and that “there is little scope to make an improvement along this important road that would, in itself, lead to such an improvement in reliability that increased patronage and modal shift occurred”. The Access to Hastings multi-modal study identified several possible minor improvements to the A259, including to Glyne Gap roundabout; we think any others should be identified and all properly assessed. But as with rail improvements, online road improvements alone are unlikely to be the solution. Packages of different measures should be appraised, including demand management. Concerning new bus services, the bullet point is pessimistic about patronage. But again the key is not seeing measures in isolation. New bus services should be tested in combination with measures to incentivise their use and also pay for services which are uncommercial but value for money.
- Section 9.2 concludes by saying the link road would reduce general traffic on the A259 Bexhill Road and so help bus journeys directly and through making space for bus priority measures. Our response is so would other measures, and ESCC should have appraised these.

The way forward

Our preferred way forward is for the Government to finally rule out roadbuilding across Combe Haven valley for environmental reasons (see below) and invite ESCC to develop alternative solutions to Hastings' transport problems. But at the least the Government should require the proper investigation of alternatives, fully complying with its own guidance, before making a decision on the BHLR.

We believe an optimal package of the following measures would perform very well in terms of both value for money and affordability:

- Congestion charging or workplace parking charges
- Public parking measures
- School and workplace travel plans
- Personalised travel planning
- Minor online improvements to the A259

- Improved bus services, particularly along the A259
- New stations and a turn up and go train service between Bexhill and Ore

It should be noted that none of the many studies of transport in Hastings and Bexhill has properly developed and appraised packages of this sort. And this is certainly not because these measures have already been implemented in the area – the scope for introducing demand management and smart measures in particular remains huge (eg not even the largest public sector organisations have workplace travel plans and there are no school travel plans).

The above package plus the Bexhill Connection could also be tested. As already mentioned, this road alone would allow 1660 houses to be built at north Bexhill.

ENVIRONMENTAL IMPACTS

Summary

Government policy is that "for all environmentally sensitive areas or sites there will be a strong presumption against new or expanded transport infrastructure which would significantly affect such sites or important species, habitats or landscapes" (1998 and 2004 transport white papers).

The proposed Bexhill to Hastings Link Road would significantly harm the very special Combe Haven area – its landscape, heritage and wildlife – and we urge the Government to apply the above policy and reject it.

The BHLR would also:

- fail to reduce transport noise;
- worsen air quality for many residents;
- harm the townscape; and
- increase emissions of the main gas responsible for climate change.

So the environmental case for rejecting the scheme is very strong indeed.

The way forward is for East Sussex County Council to develop the best *sustainable* solution to Hastings' transport problems.

Introduction

The Hastings Alliance supports the *sustainable* regeneration of Hastings and Bexhill, ie actions delivering economic, social and/or environmental benefits with no significant disbenefits. Our main concern is that regeneration is environmentally sustainable, ie delivers benefits while avoiding any significant environmental disbenefits.

In our view the BHLR would be environmentally unsustainable, mainly due to its impacts on the rural environment, but also its urban and global impacts. We expand on this below.

Rural impacts

Hastings Alliance position

For us the countryside between Bexhill and Hastings – the Combe Haven area – is very special.

We are referring here to the main Combe Haven valley and northern Powdermill and Watermill valleys and ridges leading to it, which form an unbroken whole – we reject ESCC's conceptual splitting of the area (to try to hide the actual splitting it is proposing – see the next section).

Many factors contribute to this specialness – summarising these, Combe Haven is beautiful, tranquil, heritage-rich, wildlife-rich countryside.

In calling Combe Haven special, we are just reflecting the general view, as the following quotes illustrate:

- East Sussex County Council: "The Combe Haven Valley is probably the finest medium-sized valley in East Sussex, outside of areas of outstanding natural beauty. It is set within a high-quality landscape of historic and wildlife interest and contains peaceful and remote countryside." (report on BHLR for ESCC Cabinet meeting on 8 June 2004, appendix 5)
- Rother District Council: "Extensive views are obtained across the [Combe Haven] Valley from many vantage points and in particular the views looking north from Bexhill across the Combe Haven river are quite unspoilt and the landscape character is equal to the best of the High Weald Area of Outstanding Natural Beauty." (Rother District Local Plan, Initial Draft Deposit, para 3.86)
- Countryside Agency: "The whole area of search for the [BHLR] is very sensitive environmentally. It has high landscape quality and is rich in biodiversity." (letter to ESCC, 9 June 2004)
- English Heritage: "English Heritage concurs with CBA's conclusion that the [BHLR] study area contains a rich and diverse series of historic environment features, comprising a combination of archaeological and palaeo-environmental deposits, historic landscapes and built heritage features. In particular, we agree that the potential for the preservation of palaeo-environmental evidence is very high within the low-lying areas of the Combe Valley. The likelihood is that this could be of regional or national importance, while the higher ground extending into the valley also has a high potential archaeological interest." (letter to ESCC, 10 May 2004)

The area's specialness is also confirmed by how much is officially recognised – there are the large Combe Haven Site of Special Scientific Interest and other designated wildlife areas, several ancient woods and many listed and historic buildings.

Our position is that it is not possible to build a major road through the Combe Haven area without destroying its specialness. As advocates of sustainable transport, we therefore opposed the Bexhill and Hastings western bypass and now oppose its son, the Bexhill to Hastings Link Road. Any benefits of a new road should be delivered in other (sustainable) ways.

A major strength of Hastings and Bexhill is the tremendous environmental (and hence economic) assets on their doorstep. The Combe Haven area is one of these. But the area is underused by local people and visitors (and so undervalued), for reasons including poor accessibility within the area and no publicity. We therefore support the proposed country park, which should see these problems addressed. A fraction of the effort devoted to the bypasses and BHLR by the local authorities would deliver the park, which should have happened years ago.

It is important to note that implementation of the country park in no way depends on the BHLR and that the BHLR would indisputably damage the park. The Hastings and Bexhill Task Force's comment that the BHLR "would form a useful northern boundary" to the park is laughable (main bid document, page 71).

Response to environmental assessment

Our position is that it is not possible to build a major road through the Combe Haven area without destroying its specialness. We think the assessment of BHLR routes, including the preferred route, proves us right.

The Government's environmental objective for transport is "to protect the built and natural environment". Concerning the BHLR's impacts on Combe Haven, the key sub-objectives are

- "to protect and enhance the landscape"
- "to protect the heritage of historic resources"
- "to support biodiversity"

The assessment of the BHLR preferred route option against these shows that the landscape, historic heritage and biodiversity of Combe Haven would all be significantly damaged (as a "moderate adverse" impact is a significantly harmful one).

And in our view the damage to the Combe Haven landscape has been underestimated by ESCC – particularly as they, the scheme promoter, carried out the landscape appraisal themselves, optimism bias was inevitable ("Optimism bias is the tendency of appraisers to underestimate costs and to overestimate benefits" (TAG Unit 1.4)).

The Hastings Alliance has excellent direct knowledge of the Combe Haven area. On this basis, we are sure the BHLR preferred route option would seriously damage the landscape. So we think ESCC's conclusion that the damage might only be slight is a ludicrous underestimate.

Our point here is supported by the South Coast multi-modal study consultants. They assessed a very similar scheme to the BHLR preferred route option – a single carriageway just north of the Combe Haven SSSI (Hastings Strategy Development Plan, paras 3.3.2 and 5.6.1). According to the appraisal summary table, the scheme would have a "large negative impact" on the landscape (ibid, page 25).

The BHLR historic heritage assessment also supports us. The worksheet for the preferred route option sets out the impacts on the "historic landscape" (as well as archaeology and the built heritage). These are consistently assessed as "moderate adverse", ie significantly damaging.

An important point made by the historic heritage worksheet is that the environmental mitigation proposed by ESCC would itself be damaging: "The proposed tree-planting would create new linear features in the landscape affecting the grain and structure of the historic landscape".

We referred in the previous section to ESCC's conceptual splitting of the Combe Haven area. This splitting is the basis for their underestimation of landscape impacts.

In the landscape worksheet, appraisal summary table and main bid document (page 44), ESCC treat the Combe Haven area as two separate areas: (1) the main Combe Haven valley, where the SSSI is; and (2) the western Combe Haven valley and northern Watermill and Powdermill valleys and ridges leading to the main valley. The BHLR preferred route option would go through the latter.

This splitting of the area allows ESCC to make the following impressive-sounding claims: "the Preferred Route will retain the overall integrity of the Combe Haven valley as a tract of landscape of county/regional importance" (main report); "the Preferred Route minimises significant harm to the landscape in the Combe Haven valley" (AST). The reader may think these claims relate to the area through which the road would go. In fact, they are about area 1 above. Even if the reader realises this, they may not notice that the report and AST give absolutely no information about the impact on area 2. And without this information, the reader is less likely to question the basic approach, which is to protect area 1 by sacrificing area 2.

The landscape worksheet does refer to the impact of the BHLR on area 2 – this would be "significant".

We completely reject ESCC's approach, for three main reasons:

- Areas 1 and 2 are both special – we should protect both, not try to save one at the expense of the other
- Areas 1 and 2 form a single greater landscape, and it is precisely the different contribution of each that makes the whole so very special – ruining 2 (or 1) would ruin the whole
- Area 1, the main Combe Haven valley, would still suffer significant harm, as even ESCC admits: “There will be a loss of remoteness and tranquillity in the countryside section [of the BHLR], which will endure” (landscape worksheet)

To sum up, the landscape assessment was carried out by the scheme promoter and is biased as a result. In the worksheet and appraisal summary table, ESCC is clearly trying to establish that the BHLR preferred route option is acceptable in landscape terms. Fundamental problems with the scheme that we refer to above are ignored or played down.

The historic heritage and biodiversity assessments were carried out by outside organisations and seem better, although clearly the latter is very basic. But we are concerned that the AST entries inadequately reflect the worksheets. Some examples of this are:

- Historic heritage: The worksheet says: “The route would have a large adverse impact on the setting of Adam’s Farm and adversely affect the setting of three other Grade II listed buildings and two historic buildings”. The AST says: “The Preferred Route would impact on the setting of the listed building at Upper Wilting Farm and on Adam’s Farm (Grade II)”.
- Biodiversity: The worksheet says the BHLR would have a “moderate adverse” – significantly harmful – impact on the Bexhill disused railway site of nature conservation importance. The AST does not mention the SNCI.
- Biodiversity: The worksheet says the BHLR would have a moderate adverse impact on each of three protected species – badgers, bats and dormice. The AST makes no mention of this.
- Biodiversity: The worksheet says: “Further survey and research may change the overall assessment score”. The AST makes no mention of this.

We are also concerned that the worksheet and AST say the overall impact of the BHLR on biodiversity would be “moderate to slight adverse”. In line with TAG Unit 3.3.6, section 1.5, the overall assessment should clearly be “moderate adverse”.

Government policy and action

Government policy is that “for all environmentally sensitive areas or sites there will be a strong presumption against new or expanded transport infrastructure which would significantly affect such sites or important species, habitats or landscapes”. This policy was first set out in the 1998 transport white paper and has been repeatedly reaffirmed, most recently in the 2004 transport white paper (paras 10.28 and 10.29). Importantly, the policy does not only apply to designated areas, as the decisions on the road schemes recommended by the South Coast multi-modal study show.

As a result of this policy, the Government rejected the Bexhill and Hastings western bypass, explicitly citing the damage that would be done to Combe Haven. The proposed BHLR is not identical to the rejected bypass scheme. However, the link road would undoubtedly significantly harm the very special Combe Haven area – its landscape, heritage and wildlife – and we urge the Government to again apply the above policy and reject it.

Urban impacts

Noise

The BHLR noise assessment is concerned with the number of residents in “front-line” houses in the Hastings and Bexhill area who would be “annoyed” (= “highly bothered”) by road traffic noise in 2023 (the design year). The assessment shows that more residents would be annoyed by traffic noise with the BHLR (1087) than without it (1062).

The Government's objective is to reduce transport noise. Clearly the BHLR would completely fail to do this.

We think alternative options to deliver the BHLR local objectives (main bid document, table 2.1) would also perform well against the noise objective.

Local air quality

Clearly the main local air quality problem in Hastings and Bexhill is particulate emissions at Glyne Gap. In 2003 Hastings Borough Council declared an air quality management area for PM10 there, along the A259.

Strangely, the sources of the PM10 are not stated in the BHLR bid submission. The local transport plan annual progress report says these include road traffic but that "there is also a particularly high background level of PM10 pollutants in this location arising from sea salt and a number of other factors, which need to be taken into consideration before an action plan to tackle the problem is developed" (page 26).

With the BHLR, "the need for the AQMA along the A259 could be removed" (appraisal summary table), due to traffic shifting from the A259 to the new road. The Hastings Alliance of course agrees that the PM10 problem at Glyne Gap should be tackled. But looking at the AST, we are not impressed by the overall performance of the BHLR against the local air quality objective, for the following reasons:

- The overall assessment scores for both PM10 and NO2 are low
- Approximately 37% of houses would experience worse air quality
- Approximately 44% of road links would have higher levels of both PM10 and NO2

We think alternative options to deliver the BHLR local objectives (main bid document, table 2.1) would perform better against the local air quality objective.

Townscape

Like the BHLR landscape assessment, the townscape assessment was carried out by ESCC themselves and is biased as a result. So ESCC's conclusion that the BHLR would be slightly beneficial should be rejected. We think the BHLR would harm the townscape. We note that the South Coast multi-modal study consultants concluded a scheme very like the BHLR preferred option would have a "moderate negative impact" (Hastings Strategy Development Plan, page 25).

We think alternative options to deliver the BHLR local objectives (main bid document, table 2.1) would also perform well against the townscape objective.

ESCC's bias is clear from the following – we show they have ignored obvious disbenefits of the BHLR and obvious problems with assumptions.

ESCC claims the BHLR would have a "slight beneficial" impact on the townscape of Hastings and Bexhill. Two key impacts contributing to this overall assessment are that the scheme would "enable significant relief of traffic in local communities in the towns and Crowhurst village" and "facilitate major new townscape development in north Bexhill" (appraisal summary table). However, the inclusion of these impacts in the assessment involves basic flaws, as explained below.

Concerning traffic and townscape, the townscape worksheet repeatedly makes the point that the townscape in some areas – London Road in Bexhill, Bulverhythe and Harley Shute in Hastings, and Crowhurst village – would be improved by the BHLR, as it would attract traffic away from them.

However, the worksheet makes no mention of those roads where the BHLR would cause significant traffic increases and so damage the townscape. These roads are identified in section 4.2 of the main bid document, and include A21 The Ridge West, B2093 The Ridge, B2092 Queensway, B2092 Crowhurst Road, Gillsmans Hill and Napier Road.

Concerning new development and townscape, ESCC is arguing that (1) the BHLR would facilitate new development and (2) therefore new townscapes which (3) would be of good quality and so (4) enhance the Hastings and Bexhill townscape. The new development would be housing and business uses on greenfield sites in north Bexhill, to which the BHLR would provide access.

We accept the second point above, because new development will inevitably generate new townscapes, but not the others, as they involve the following crucial but very unsafe assumptions:

- that providing access to the land will result in the development occurring
- that the new development is bound to generate good rather than poor-quality townscapes
- that the existing urban areas will not suffer townscape disbenefits, eg through the relocation of residents and businesses to the new sites

Two other problems with ESCC's approach here are that the "facilitates new townscape development" claim crops up repeatedly in the townscape worksheet, ie has been multiple-counted, and that the new development would certainly have landscape disbenefits, which ESCC has completely ignored.

Finally, we are concerned that in making the "facilitates new townscape development" claim ESCC has both gone beyond TAG Unit 3.3.8 and counted an impact also counted in the wider economic impacts and land-use policy assessments.

Global impacts

The Government is committed to tackling climate change – "the world's greatest environmental challenge" (the Prime Minister in September).

Climate change or global warming is of course caused by the carbon dioxide and other greenhouse gases arising from human activities. The Government has a target under the Kyoto Protocol to cut greenhouse gas emissions by 12.5% below 1990 levels by 2008-12 and domestic target to cut CO2 emissions by 20% below 1990 levels by 2010.

Transport is a major source of greenhouse gas emissions and so the Department for Transport public service agreement includes helping to achieve the two targets above. In line with this, the New Approach to Appraisal requires assessment of transport options against the objective "to reduce greenhouse gases".

The draft guidance on second local transport plans says local authorities should consider climate change "in all their LTP policy and scheme proposals" (Part 3, para 78). It goes on to say (paras 92 and 93):

"Road transport is estimated to produce about 20% of total UK CO2 emissions and is the fastest-growing source of CO2; measures to reduce emissions from transport are therefore vital if the UK is to meet its climate change objectives.

"LTPs should take account of the UK's CO2 targets and should complement the wider aims of Local Agenda 21. Strategies for reducing congestion and improving air quality, in particular, will themselves contribute to CO2 targets. The Department is however also keen for authorities to lead by example and demonstrate through LTPs how wider local transport policies would contribute to the achievement of CO2 targets."

The assessment of the BHLR shows that in the assumed opening year, 2008, the preferred route option would increase local road transport CO2 emissions by 7% above 2004 levels.

The BHLR main report wrongly states that, without the BHLR, CO2 levels in 2008 would be 5% higher than in 2004 (page 43) – it can be calculated from the worksheet that the correct figure is 2%. So in 2008, there would be 5% more CO2 with the scheme than without it.

Apart from the wrong information just referred to, the main report adds nothing to the information on greenhouse gases in the appraisal summary table. There is no comment on the significance of the results. Neither climate change nor the Government's CO2 targets are referred to. In the environment section of the executive summary (pages xv-xvi), not even the greenhouse gas assessment is referred to. The impression given is that, for ESCC, the performance of the BHLR in relation to climate change is simply not an issue.

In our view, the Government should only consider funding transport measures which would help deliver its CO2 targets. As the BHLR would clearly not do this, we urge the Government to reject it.

We think alternative options to deliver the BHLR local objectives (main bid document, table 2.1) would also perform well against the greenhouse gases objective.

REGENERATION IMPACTS

The Hastings Alliance thinks the BHLR should be rejected on environmental grounds (see above). But ESCC is claiming the scheme is essential to the regeneration of Hastings and Bexhill, and we know the Government will consider this. So an Alliance member, with the financial help of other members, engaged the consultancy Urban & Regional Policy to review the claim. The report of Urban & Regional Policy is attached. We ask the Government to take the report into account as it assesses the BHLR bid.

A key paragraph in the report is 3.6:

"The main reason put forward for the regeneration benefit of the BHLR is that it is essential to the development of the North Bexhill Business Park, and this would provide around 2000 jobs. This is only superficially convincing, for the following reasons:

- a) The large-scale, high-spec accommodation specified in the Rother Local Plan (necessary to justify greenfield development in this sensitive location) would only be implemented by inward investment from elsewhere in the region, country or Europe. The BHLR does not improve regional accessibility, only local access. As pointed out by both the Access to Hastings multi-modal study and DTZ Piedad, even with good local access Hastings-Bexhill is not a competitive location for such projects compared with other parts of the South East, either in terms of regional accessibility or skills in the labour market. This point is not rebutted by the BHLR Economic Impact Report – see Appendix 2.
- b) In any case, the type of jobs provided by such uses would not respond to the skills present in the local labour market. This is not to say that higher-skilled, better-paid jobs should not be sought for Hastings-Bexhill: but if local people are to benefit, skills and opportunities must develop in tandem, in a more organic fashion. Large-scale imports, driven by development imperatives, would merely generate in-commuting from further afield (and mainly by car).
- c) If the BHLR is provided and substantial (public) resources also expended on site assembly, preparation and enticement of investors, weak external demand will lead to pressure to develop piecemeal in response to more local demand. In this case the effect will be simply to displace to the Business Park demand which could have been met by the wide range of existing sites within

the urban areas, with no net gain of jobs. The quality aspirations of the Local Plan would be unlikely to be met, but the level of car-dependency would be increased.”

The report concludes that the BHLR and associated business park “are at best irrelevant and at worst highly damaging” to the regeneration of the area.

TRAFFIC IMPACTS

Traffic and congestion impacts

In the BHLR main report, section 2.1.3 is about Bexhill and Hastings’ transport problems. According to this, there is really only one – high traffic levels and congestion on the A259 and Bexhill Road in particular. The other problems referred to (mostly also on the A259) all stem from these.

ESCC’s proposed solution to this problem is of course the BHLR. And the assessment of the BHLR shows it would reduce traffic and congestion on the A259 (at least for a while).

However, the assessment also shows that traffic and congestion on other roads in the towns would get significantly worse – or in other words that the BHLR would simply shift traffic and congestion around.

This important information is in the BHLR main report, but buried away – to our knowledge, ESCC has never drawn attention to it. We set out the details briefly below.

Traffic assessment

The results of the BHLR traffic assessment are set out in section 4.2 of the main bid document. As expected, the BHLR would result in less traffic on the A259 and particularly the Bexhill Road in both forecast years – 2008 (the assumed scheme opening year) and 2023 (design year).

The section also states that “traffic is increased significantly” at other “key points in the network” – all the roads in the table below plus St Helen’s Road (north).

The table shows the percentage increases in 2-way vehicle flows that would occur if the BHLR preferred route option were built. The increases relate to flows in 2008 and 2023 without the BHLR (not current flows). The percentages are copied from figures 4.1 and 4.2 in the main bid document.

TRAFFIC INCREASES WITH THE BEXHILL TO HASTINGS LINK ROAD

	2008 (opening year)		2023 (design year)	
	AM peak hour	PM peak hour	AM peak hour	PM peak hour
A2100 The Ridge West	+ 29%	+ 40%	+ 22%	+ 35%
B2093 The Ridge	+ 26%	+ 23%	+ 16%	+ 20%
B2092 Queensway	+ 35%	+ 91%	+ 24%	+ 78%
B2092 Crowhurst Road	+ 2%	+ 52%	+ 7%	+ 51%
Gillsman’s Hill	+ 22%	+ 30%	+ 26%	+ 38%
Napier Road	+ 57%	+ 48%	+ 66%	+ 43%

Congestion assessment

As required by the Government, ESCC has assessed the contribution of the BHLR to the achievement of the transport 10-year plan targets. The results are set out in table 6.2 of the main bid document.

One of the eight targets is “to reduce road congestion on the inter-urban network and in large urban areas below current levels by 2010”. Assessment of the BHLR against this target shows the following:

In 2023 with the BHLR,

- congestion on the A259 in Hastings and Bexhill would be 17% less than in 2003
- congestion on all other roads in the area would be 39% worse than in 2003
- congestion on all other roads would be 25% worse than in 2023 without the BHLR

Impact on journey time reliability

As required by the Government, ESCC has assessed the impact of the BHLR on the reliability of road journey times. For private road users, the reliability of a journey time refers to how much the average journey time varies unpredictably. Road users often say they would rather have more reliable journey times than quicker ones.

The BHLR appraisal summary table states that in 2008 the scheme would result in a “Slight improvement to travel reliability on the local road network. The improvement will result from the redistribution of traffic following the opening of the Link Road and the subsequent congestion relief on the main existing roads in the area.”

So looking at the whole road network, the BHLR would hardly improve reliability. For us this finding is more evidence that the traffic benefits of the BHLR are largely cancelled out by the disbenefits.

The way forward on congestion

ESCC's own assessment of the BHLR shows it is a poor solution to congestion in Hastings and Bexhill. We are sure a better solution could be developed based on managing demand, which would reduce congestion on the A259 without increasing it on other roads.

The draft guidance on second local transport plans states as follows on tackling congestion:

“The causes, nature and patterns of congestion are different in every area, and there is no single solution to congestion. The right balance between demand-side solutions (eg road pricing / congestion charging, parking pricing and restraints, travel planning, provision of services in a way that reduces demand for travel) and supply-side solutions (eg intelligent transport systems, other traffic management measures, public transport support) will be different from area to area. But LTPs should provide evidence that authorities have considered and assessed the potential of all parts of the toolkit – not just capital projects – and an assessment of what the impact of these measures will be.” (Part 3, para 13)

The way forward in Hastings and Bexhill is for ESCC to follow this guidance.

Impacts on non-car modes

The car and non-car modes are in competition with each other and so providing the BHLR, which mainly helps the former, would undermine the latter.

The BHLR bid submission should include a proper assessment of the impact of the BHLR on the use of existing and proposed public transport services and walking and cycling facilities.

But the main report merely describes proposed public transport, walking and cycling schemes (in sections 3.1 and 3.3) – no information is provided on outcomes, ie the impact of the BHLR on modal shares.

The Access to Hastings multi-modal study showed the Hastings bypasses would undermine the proposed metro rail service between Bexhill and Ore (referred to in section 3.3), so the issue we are raising here is very real.

Comments on traffic impacts by Urban & Regional Policy

The report by consultancy Urban & Regional Policy submitted with this response also contains comments on the traffic impacts of the BHLR. These are in appendix 2 of the report.

INVOLVEMENT OF STATUTORY ENVIRONMENTAL BODIES

In the first section above, we highlight the key flaw in the process of developing the BHLR scheme bid – alternative options were not properly considered. As we say, we expect this flaw to result in the Government not accepting the BHLR.

In this section and the next, we highlight flaws in the narrow process ESCC did carry out – deciding on their preferred route for the BHLR across Combe Haven. These flaws are of less concern than failing to appraise alternatives but still serious.

Concerning the involvement of the statutory environmental bodies, ESCC failed to work “closely” with the SEBs on the BHLR as requested by the Government in its response to the South Coast multi-modal study. The clearest evidence for this is that ESCC developed six alternative road routes for public consultation of which four were unacceptable to the SEBs.

The BHLR routes for public consultation are called the red, blue, brown, orange, purple and pink routes. The SEBs’ formal responses to these routes are included in appendix G of the bid submission. It can be seen from these that all four SEBs rule out the orange, purple and pink routes, and that English Nature and the Environment Agency also rule out the brown route. A main factor is that all these routes cross Combe Haven Site of Special Scientific Interest.

So why did ESCC carry out public consultation on four BHLR routes which are non-starters for the SEBs? Either ESCC did not know the SEBs’ views before the consultation (in February) or did know them and ignored them – whichever is true, ESCC was certainly not working closely with the SEBs.

It seems from English Nature’s response that ESCC did know the SEBs’ views beforehand:

“Our initial response to the options was laid out in the email of 15 January 2004 and this letter is to mainly confirm our position. Therefore, our comments are largely the same.”

English Nature goes on to say:

“We strongly believe that the study should not be re-examining decisions already taken on the principle and nature of the proposed scheme. We would argue that twice already the Secretary of State has quite clearly not accepted proposals for a dual carriageway and a new road across Combe Haven SSSI.”

Presumably English Nature also said the above on 15 January.

Of course, whatever the SEBs' views, ESCC should not have developed routes across Combe Haven SSSI, as the Department for Transport told them not to (BHLR main report, page 90).

It can also be seen from the SEBs' formal responses to the BHLR consultation routes that ESCC did not give the SEBs the results of the relevant environmental assessments when asking them to respond (in February). Reports on the historic heritage assessment at least were available in February but only provided to English Heritage in April and at EH's request. This is further clear evidence of ESCC's failure to work closely with the SEBs. The outcome was that three SEBs responded to the consultation routes without any detailed environmental assessment information on them and at no stage commented on the quality of the relevant environmental assessment.

PUBLIC CONSULTATION

The BHLR public consultation was riddled with major and minor flaws, and only a small unrepresentative group responded to the (flawed) consultation document. In our view the exercise was worthless and should be disregarded by the Government.

The most fundamental flaw was that no non-road alternatives were presented to the public. The next biggest flaw was that four of the six road routes presented had already been ruled out by the Department for Transport and statutory environmental bodies. The consultation document of course reflects these flaws but in addition is biased and misleading about the road scheme. Finally, the consultation period was too short.

Below are specific comments on the consultation document and consultation period and also the consultation responses.

Consultation document

Title: The consultation document is called "Bexhill and Hastings Future Travel Options" with the subtitle "Your 4-page guide to transport choices". As the only options/choices are different BHLR routes, the document is immediately highly misleading.

Leading article (on front page):

- The headline is "Transport links around Bexhill and Hastings need improvement" rather than, say, "Transport around Bexhill and Hastings needs improvement" or "Travel around Bexhill and Hastings needs improvement" or "Accessibility around Bexhill and Hastings needs improvement". The focus is immediately on road infrastructure.
- The article states emphatically that "Doing nothing is not an option". The misleading implication is that the only alternative to the BHLR is doing nothing, ie that there are no non-road alternatives.
- The article states that ESCC "worked closely" with the statutory environmental bodies to develop the BHLR route options. As we have shown above, this is not true.

Second article on front page:

- The article sets out the "common benefits" of the BHLR route options but completely ignores the common disbenefits.
- Concerning economic benefits, the article is grossly misleading in implying that the BHLR *is sure* to result in new development which *is sure* to result in "much-needed investment and economic activity", "new jobs" and "increased training opportunities".
- Concerning environmental impacts, the article gives the highly inaccurate message that the BHLR would help the environment without harming it. This is done by only referring to benefits in the article – better air quality – and having a prominent quote from the Hastings MP alongside that the BHLR will help the towns "without cost to the surrounding countryside".
- Concerning traffic and congestion, the article states the BHLR would cut these on the A259 but makes no mention of the many roads where they would be increased.

- The article states the BHLR “will be complemented” by improvements to the non-car modes. This is misleadingly definite, particularly in relation to “new trains and stations” and “more [train] services”, and completely denies the reality that the car and other modes are in competition – the BHLR would undermine these “complementary” improvements.

Detailed information about BHLR routes (middle pages):

- ESCC includes information on four routes already ruled out on environmental grounds – why? We think to create the illusion of choice and to encourage acceptance of the other two as less bad in comparison.
- The map and text assume far too much local and technical knowledge on the part of the reader, and fail to give comprehensive, precise and clear information on environmental impacts.

Questionnaire (on back page):

- The basic problem with the questionnaire was inevitable – it only asks about different road routes. However, following on from question 2 – “If you do NOT support the development of a new link road, please tick this box” – people could at least have been asked about the alternative measures they do support, with a list of these provided (including demand management measures).
- Also following on from question 2, people could have been asked why they don’t support a new road.

Consultation period

The Government’s “Code of Practice on Consultation” was published in January 2004. The introduction states that “local authorities are encouraged to follow this code”. It sets out six consultation criteria, including the following:

“Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.”

The BHLR consultation document was published in February 2004 and asks people to respond by 12 March, ie the BHLR consultation period was less than six weeks. So ESCC has seriously breached the Government’s code.

Consultation responses

As the public consultation on the BHLR was so flawed, the response to it is of little significance. However, we make some points below anyway. Our information sources are the BHLR consultation “Raw Data Report” published by ESCC and ONS Census 2001.

How many responded: ESCC delivered consultation documents – the 4-page “newspaper” – to about 65,000 households in Bexhill, Hastings and Crowhurst (BHLR main report, page 69). In response they received 1425 questionnaires, ie just 2% of households responded. In addition, 1133 people attending the mobile exhibition filled in questionnaires, making the total received 2558. In terms of the population of Hastings and Bexhill, this is a 2% response rate.

Who responded: In terms of age, gender and car ownership, the respondents were unrepresentative of Hastings and Bexhill people:

- Age: 60% of the respondents were 55 or older, compared to 28% of the Hastings population and 46% of the Bexhill population
- Gender: 59% of the respondents were male, compared to 48% of the Hastings population and 45% of the Bexhill population
- Car ownership: 88% of the respondents were car owners, compared to 66% of Hastings households and 73% of Bexhill households

Support for BHLR: The consultation questionnaire asks people to tick a box “if you do NOT support the development of a new link road”. 419 respondents ticked the box, and so by implication the remainder – 2139 or 84% – support a new road. However, this response says nothing about how much of a priority a new road is for supporters. Question 10 asks “where you would most like to see future investment in local transport”. For more than half the respondents – 52% – investment in the non-car modes is the priority (the other 48% chose “roads”).

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