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Green Party

for the South East of England

Development Control Team
Development, Minerals and Waste Group
Transport & Environment
East Sussex County Council
County Hall
St Anne's Crescent
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To whom it may concern,

Re: Bexhill to Hastings link road – planning application RR/2474/CC (EIA)

I am writing to object to this planning application, and ask that this letter be placed before Members of the Planning Committee as they consider the application.

My principal reasons for objecting are:

Transport implications and CO2 emissions

Increase in traffic and CO2 emissions

Predicting traffic growth is not a precise art. The scheme's Environmental Statement acknowledges a 3.2% increase in overall vehicle trips by the 'Design Year' (2015) when compared with not building the scheme at all, whereas analysis of East Sussex County Council's funding bid's business case shows an increase of 14% traffic in Hastings and Bexhill. What is without doubt is that traffic will increase overall by 2015, and continue to do so as vehicle ownership and use escalates in subsequent years.

In any event, any unnecessary traffic growth brings the project into direct conflict with South East Plan policy CCI and CC2 objectives (*italicised, below*). CCI & 2 are cross cutting policies designed to embed greenhouse gas reductions at the heart of development proposals. At a time where road transport accounts for 13.09% of Hastings's CO2 emissions (DEFRA 2003) national and regional policies require reductions in CO2 and other GHG emissions, not increases.

Failure to encourage transport modal shift

The government commissioned 'Access to Hastings Multi Modal Study, 2000' forecasts that, if the link road was built, the train company could lose much of its business between Hastings and Bexhill – with a possible drop in passenger traffic travelling between the towns of up to 70%. We need more train services and stations, but although these were recommended by the same study, there are still no firm plans or funds for any rail improvements.

The Link Road has a cycleway planned alongside it, but most cyclists prefer short direct routes from A to B, as could be provided along the seafront and as championed by cycle charity Sustrans. The seafront cycleway would run parallel to an existing road, would be inexpensive, and could attract significant numbers of motorists to leave their cars at home, thus encouraging modal shift for a much smaller capital investment.

Contrary to South East Plan objectives

In policy CC1 of the South East Plan, SEERA pledges that the Plan's principal objective is to achieve and to maintain sustainable development. The policy areas designed to secure sustainable development are (my emphasis);

- i Achieving a sustainable economy
- ii Promoting good governance
- iii Using sound science responsibly
- iv ***Living within environmental limits***
- v Ensuring a strong, healthy and just society

Additionally in policy CC2, which deals with carbon emissions, SEERA prioritises measures to mitigate and adapt to the forecast effects of climate change, and recognises the need for behavioural change and robust local planning policies to implement the necessary reductions.

In identifying resource efficiency as a primary method of mitigation, the plan highlights (my emphasis):

- i improving energy efficiency performance of new and existing buildings and influencing behaviour of occupants
- ii ***Reducing the need to travel and ensuring good accessibility to public and other sustainable modes of transport***
- iii Promoting land use that acts as carbon sinks
- iv Encouraging development and use of renewable energy
- v Reducing the amount of biodegradable waste landfilled.

Failure to promote economic regeneration

Link Road not necessary for new housing development

The government's 'Access to Hastings Multi Modal Study, 2000' showed that the Link Road is not essential in order to 'open up land for housing', and that housing needs could be largely met without it. Furthermore, without the road, the housing is much more likely to be well connected to pedestrian, cycle, and expanded bus routes.

Business Park on Greenfield land

The new 'greenfield' business park would be unlikely to attract new businesses from elsewhere. If anything, it is much more likely to be occupied by local firms relocating from existing premises nearer the town centre. Workers would then have to travel out of town to work – hardly helpful to those unemployed in deprived wards. It is quite possible that the business park, if built, would prove difficult to let.

“The regeneration argument for the link road 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 with the link road” (Urban & Regional Policy Consultants, 2004).

Impact on environment

Air quality & nature conservation

The scheme will raise levels of nitrogen oxides, resulting in significant increases in nitric acid deposits, which can in turn have serious potential adverse impacts on habitats and species. The SSSI sites are at potential risk.

Pollution

The predicted 26,000 vehicles using this road daily will create light and noise pollution

Visual Impact

It is acknowledged in the scheme's Environmental Statement that the project will have a significant adverse visual impact on residential and commercial properties

Loss of agricultural land

The scheme would result in the loss of 38.6 hectares of the 'best and most versatile agricultural land'. It would also divide farm estates and create management difficulties for several local farms

Summary

Unnecessary, ineffective and unwelcome

A beautiful valley will be lost forever if this project wins permission to proceed. This area is a precious asset worth conserving, and not one to sacrifice to shaky assumptions about roads bringing wealth.

The County's funding bid application for the road show that there would be 14% more traffic in Hastings and Bexhill with the new road than without it, while they predict just a 'slight improvement in travel reliability'. At an estimated £89 million project cost – nearly double the amount originally approved by government – this represents very poor value for money, as far as I am concerned. That same amount invested in more sustainable travel modes would reduce CO2 emissions, as well as air, noise and light pollution, rather than increasing them. Additionally, increasing sustainable transport measures also carry social benefits and promote social inclusion.

I fully recognise the problems of the congested coastal road system and agree that Hastings and Bexhill need less traffic overall. However, using public funds to simply shift an increased volume of traffic from one area to another is no solution whatsoever, let alone an economically, environmentally and socially sustainable alternative.

Please, dismiss this application.

Yours sincerely,



Dr Caroline Lucas - Green MEP, South East England