

**Schedule of Regulation 19 Issues**

Determining Authority Issue	Author*	Approach – Reference section within the Addendum to the ES	Additional comments/ Accepted?
<p><b>Application Area and Form of Application</b></p> <ul style="list-style-type: none"> <li>▪ The layout and organisation of documents could do with some attention.</li> <li>▪ A contents page for the whole ES would be useful for navigating around the document.</li> <li>▪ Additional plans required. Numbering of plans also needs some attention.</li> </ul>	<b>All</b>	Chapter 4, Section 4.2	Accepted
<p><b>PLANNING</b></p> <p>The applicant should provide further reference to the public consultation carried out in 2004 and 2002 in Chapter 5 / Planning Statement – and potentially the extent to which the conclusions and issues arising have informed scheme design</p>	<b>ARUP</b>	Chapter 5, Section 5.2.2	Accepted

\* ARUP Business Consultants – ESCC Planning Consultees

- HA – The Highways Agency
- EA – The Environment Agency
- NE – Natural England
- SWT – Sussex Wildlife Trust
- WT Consultancy - ESCC Planning Consultees
- RSPB – Royal Society for the Protection of Birds
- EH – English Heritage
- D.H. Associates – ESCC Planning Consultees

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<p>The design and access statement focuses almost exclusively on environmental design there is little information on access or other issues related to design. The design and access statement would benefit from addressing these issues as well as providing further information on how the layout of the proposed link road addresses issues on 'inclusivity'. Information on how consultation with potential users has influenced access arrangements would also be useful.</p>	<p><b>ARUP</b></p>	<p>Please refer to the ESCC Addendum Design and Access Statement.</p>	<p>Accepted</p>
<p><b>The Economic Assessment Report</b></p> <p>The applicant is advised that the economic case forwarded requires clarification on how benefits would be split between business and consumer users – in particular setting out what the benefits are, rather than calling them "TUBA benefits" and "COBA benefits".</p> <p>In addition some clarification / investigation of the following would also be useful:</p> <p>What are DIADEM parameters?</p> <p>Why are indirect tax revenues so high?</p> <p>Why are accident benefits so high?</p>	<p><b>ARUP</b></p>	<p>Chapter 6, Section 6.5.35</p>	

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<p><b>TRANSPORT ASSESSMENT</b></p> <p>There are gaps in the assessment of the impacts of additional traffic on local roads within the model area:</p> <ul style="list-style-type: none"> <li>• Junction capacity analysis of the impact of change in traffic flow on the operation of individual junctions is missing.</li> <li>• Has a junction design and appropriate testing been undertaken for the proposed development junction?</li> <li>• In its own right the link analysis on delay and speed is of limited value in that it contains no ref points that enable the magnitude of the impact to be gauged.</li> <li>• It is unclear how the scope of the complementary measures was devised.</li> <li>• There is no commentary on why the complementary measures do not include mitigation on those local roads where traffic levels would increase substantially.</li> </ul> <p>The proposed junction analysis for junctions at Belle Hill and Queensway are not included in the planning application, but are needed to check that they will operate appropriately.</p>	<p><b>ESCC</b></p>	<p>Chapter 6, Sections 6.5.1 to 6.5.11</p>	<p>Accepted</p>
<p>The proposed new junctions and alterations to existing junctions will need to be subject to Stage 1 safety audits.</p>	<p><b>ESCC</b></p>	<p>Chapter 6, Section 6.5.12</p>	<p>Accepted</p>
<p>The proposed new junctions and alterations to existing junctions will need to be subject to Stage 1 safety audits.</p>	<p><b>ESCC</b></p>	<p>Chapter 6, Section 6.5.13</p>	<p>Stage 1 Safety Audits were carried out in August 2006. They were then revised following slight alterations to the scheme design. The Stage 1 Safety Audits included the proposed new and altered junctions. All issues identified were</p>

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			addressed and reported.
Further clarification required on the alignment of the road with regard to speeds and overtaking.	ESCC	Chapter 6, Section 6.5.14	Accepted
<p>More information is required with regard to sustainable transport modes, including:</p> <ul style="list-style-type: none"> <li>• Information on whether bus operators have agreed to route services along the BHLR.</li> <li>• Where are bus stops to be located?</li> <li>• Should the Scheme be contributing to bus services?</li> <li>• Have ROW been consulted re: the greenway?</li> <li>• What is being done about cycle provisions on the zigzagging ramp that links the Queensway to the link road?</li> <li>• Information is required in what pedestrian/ cycle improvements will occur on the London Road, along the ridge and on the A259.</li> </ul>	ESCC	Chapter 6, Section 6.5.15 to 6.5.20	Accepted
More information is required on how off-site improvements / complimentary measures will be achieved / funded and what benefits are likely to result.	ESCC	Chapter 6, Section 6.5.21	Accepted

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<p>The HA has concerns regarding the forecast levels of queuing identified at the Belle Hill junction on the A259. The LINSIG analysis provided in support of this junction proposal indicates that significant queues are forecast to exist at the junction in both 2010 and 2025, with particular queuing on the western arm approach. By 2025 queuing problems are identified to occur in all the peak hour scenarios modelled. It is noted that the reconfigured junction layout plans do not adequately cater for the volumes of queuing identified</p>	HA	Chapter 6, Section 6.5.22	Accepted
<p>The HA has concerns regarding the forecast levels of queuing identified at the Belle Hill junction on the A259. The LINSIG analysis provided in support of this junction proposal indicates that significant queues are forecast to exist at the junction in both 2010 and 2025, with particular queuing on the western arm approach. By 2025 queuing problems are identified to occur in all the peak hour scenarios modelled. It is noted that the reconfigured junction layout plans do not adequately cater for the volumes of queuing identified</p>	HA	Chapter 6, Section 6.5.22	Accepted
<p>Forecast congestion will mean that there is little scope for the delivery of development above and beyond the identified RSS need</p>	HA	Chapter 6, Section 6.5.23	Accepted
<p>As the Link Road and future development are closely linked we would strongly suggest that a joint transport strategy covering all of Bexhill and Hastings should be developed, with a view to identifying workable and deliverable measures to increase the proportion of travel by sustainable means and manage down travel, particularly by car</p>	HA	Chapter 6, Section 6.5.25	Accepted
<p>Junction capacity analysis is required to demonstrate the impact that the change in traffic flow would have on the operation of individual junctions</p>	HA	Chapter 6, Section 6.5.26	Accepted
<p>Applicant to confirm whether a junction design and testing has been undertaken for the proposed development junction</p>	HA	Not Undertaken as a Regulation 19 issue	-

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The 'link analysis' on delay and speed requires further explanation and clarification	HA	Chapter 6, Section 6.5.27	Accepted
The scope of complimentary measures requires further clarification and explanation as to why they include traffic calming on Woodsgate Park Rd.	HA	Chapter 6, Section 6.5.28	Accepted
Mitigation measures on local roads where traffic levels would increase substantially requires further explanation	HA	Chapter 6, Section 6.5.29	<p>The above paragraph explains that the complementary measures will be subject funding, further consideration, consultation, and, in some cases, statutory processes. The measures will be developed under the umbrella of the Local Area Transport Strategy and implemented as part of the Council's Capital Programme.</p> <p>A number of possible measures have been included in the Most Likely scenario assessed. These potential measures could be made conditions of the planning approval.</p>

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The applicant needs to show how pedestrian and cyclist desire lines have been accommodated together with provisions for bus priority	HA	Chapter 6, Section 6.5.31	Accepted
The applicant to confirm that Passenger Transport have been consulted in relation to bus services and Rights of Way consulted in relation to proposals for the Greenway as a recreational route	HA	Chapter 6, Section 6.5.33	Accepted
The applicant to confirm the scope of improved bus services proposed	HA	Chapter 6, Section 6.5.34	Accepted
The applicant to confirm the extent of improvements to pedestrian/cyclist provision along London Road, the Ridge and A259	HA	Chapter 6, Section 6.5.35	Accepted
Nothing has been done to address the issues of a bottleneck at the eastern end of the Scheme along The Ridge north of Hastings	Ramblers Assoc.	Chapter 6, Section 6.5.36	FURTHER INFORMATION REQUIRED
<p><b>GEOLOGY AND SOILS</b></p> <p><b>Site History</b></p> <p>No site history section is present within the chapter and the report does not refer to a site history section within a source document.</p> <p>Reference is made in 8.3.28 to historical ordnance survey maps for one section of the site suggesting that a site history review may have been undertaken previously (however it is not included within the ES).</p> <p>A site history section is essential for assessing ground contamination and is normally provided within a soils and geology chapter within an ES. The site history is then used (along with other sources of information) to identify potential sources of contamination as part of the CSM (see below). All of the assessment on sources has been provided with respect to current operations in the region of the proposed development.</p>	ARUP	Chapter 8, Section 8.5.1 to 8.5.5	Accepted

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<p><b>Stratigraphy</b> No detailed stratigraphy is provided (e.g. depths, level, thickness of strata, locations of Made Ground).</p>	<p><b>ARUP</b></p>	<p>Chapter 8, Section 8.5.6</p>	<p>Accepted</p>
<p><b>Conceptual Site Model (CSM)</b> A CSM outlining and discussing potential source-pathway-linkages is not included within the chapter. The production of a CSM is fundamental to the risk assessment approach to contaminated land identified within the CLR11 guidance (this guidance is referenced within the chapter). The report provides some ad-hoc discussion on sources, receptors and a few plausible pollutant linkages, but the sum total of this work does not form a CSM.</p>	<p><b>ARUP</b></p>	<p>Chapter 8, Section 8.5.9 to 8.5.22</p>	<p>Accepted</p>
<p><b>Potential Sources of Contamination</b> Potential sources of contamination have been identified for the site from an Envirocheck Report (especially the contemporary trade directory entries and waste licensing sections) and a site walkover survey, and are displayed on Figure 8.2. Two locations identified during the walkover survey (Table 8.2) as potential sources of contamination are not included on the potential sources of contamination figure. No explanation is given for this decision. Two operational licensed waste management and transfer stations (a metal recycling facility and a household, commercial and industrial transfer station) and one waste treatment and disposal site (of scrap metal and lead-acid batteries) are located within 250m of the site. These are not included within the potential sources of contamination figure. No explanation is given for this decision. No historic sources are discussed. No Made Ground is discussed.</p>	<p><b>ARUP</b></p>	<p>Chapter 8, Section 8.5.23</p>	<p>Accepted</p>



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<p><b>Ground Investigation</b></p> <p>No contaminated land investigation has been undertaken. This is planned to be undertaken post planning permission and will include testing for contaminants.</p> <p>No details of the planned future investigation works are included within the chapter e.g. details of areas to be targeted, number of exploratory holes, if groundwater or gas monitoring will be undertaken etc.</p> <p>Historically, it has been acceptable to undertake ground investigation works following the submission of planning applications and the issues arising from ground investigation have been dealt with by conditions placed on planning permission or reserved matters. During the scoping exercise it will be determined whether it is necessary to undertake such surveys (or a proportion of such surveys) during the EIA assessment. Recent legal interpretation of the EIA regulations in court have concluded that relevant detailed site investigation data is necessary to complete an EIA. The assessment will always be weaker, and subject to challenge, if not based on GI data.</p>	<p><b>ARUP</b></p>	<p>Chapter 8, Section 8.5.24 to 8.5.30</p>	<p>Accepted</p>
<p><b>Consultation</b></p> <p>The section does not provide any details on consultations with the local authority or environment agency, either with respect to agreeing the methodology for the assessment, or in respect of part IIa information and other records they may have.</p>	<p><b>ARUP</b></p>	<p>Chapter 8, Section 8.5.31 to 8.5.33</p>	<p>Accepted</p>

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<p><b>Layout</b></p> <p>Potential sources of contamination are discussed in various sections including hydrogeology and hydrology sections, but would be better discussed in a separate section.</p>	<p><b>ARUP</b></p>	<p>Chapter 8, Section 8.5.34</p>	<p>Accepted</p>
<p><b>Operational Impacts</b></p> <p>No contamination operational impacts were identified (despite a number of construction contamination impacts being identified). Maintenance works? Groundwater? Contaminated runoff? Fuel spills from road traffic accidents?</p>	<p><b>ARUP</b></p>	<p>Chapter 8, Section 8.5.35</p>	<p>Accepted</p>
<p><b>WATER RESOURCES AND FLOOD RISK ASSESSMENT</b></p> <p>The outcomes of the FRA are likely to impact upon the Water quality and drainage section of the ES, in particular on the mitigation proposals. The FRA has been identified as being deficient on the following grounds:</p> <ol style="list-style-type: none"> <li>1. Evidence that the sequential approach has been applied</li> <li>2. Evidence that the Exception Test has been applied</li> <li>3. Flood outlines, prior and post development (and calculations)</li> <li>4. Details of the proposed SuDs (and calculations)</li> <li>5. The residual risks of flooding</li> </ol> <p>The applicant is advised that this information should be included within the FRA.</p>	<p><b>EA</b></p>	<p>Chapter 9, Section 9.5</p>	<p>Accepted</p>

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<p><b>AIR QUALITY</b></p> <p>A mitigation section is missing from the air quality chapter of the ES, and should be included. The assessment identifies two areas of adverse impact where there is a need to consider and develop appropriate mitigation measures. The conclusions section (10.4) makes reference to the need for mitigation but goes no further. Schedule 4 of the EIA Regulations require the ES to include a description of the measures to prevent, reduce &amp; where possible offset any significant adverse effects on the environment. Mitigation of air quality impacts during both construction and operational stages should be discussed.</p>	<p><b>ARUP</b></p>	<p>Chapter 10, Section 10.5.1 to 10.5.5</p>	<p>Accepted</p>
<p><b>ECOLOGY</b></p> <p>A complete list of species identified and supplied by third parties that, in the reasonable professional opinion of the applicant, were found within the preferred route corridor and/or the proposed mitigation/compensation areas or within sufficiently close proximity that they may be affected by the proposed development, should be provided. (If possible the data should be in taxonomic order or at least grouped by major taxa divisions. The data should be supplied in an electronic format).</p>	<p><b>ESCC</b></p>	<p>Chapter 12, Section 12.5.1 to 12.5.2</p>	
<p>There are contradictions with regard to the distance of Marline Woods SSSI from the road. This needs reviewing. See specifically Table 12.4 and maps in the Design and Access Statement. The same issue arises for Combe Haven SSSI. Confirm that land from the SSSI's will not be lost as a result of the Scheme.</p>	<p><b>NE</b></p>	<p>Chapter 12, Section 12.5.3 to 12.5.13</p>	
<p>Ancient Woodland is a BAP habitat and should be included in the list of habitats to be lost (section 12.4.3.)</p>	<p><b>NE</b></p>	<p>Chapter 12, Section 12.5.9</p>	
<p>No consideration has been given to the function of the woodland habitat contiguous with the SSSI.</p>	<p><b>NE</b></p>	<p>Chapter 12, Section 12.5.14 to 12.5.15</p>	

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<p>The mitigation strategy fails to recognise the ecological functioning of the valley as a whole and the damage that fragmentation and disturbance will result in. Need greater consideration of connectivity of existing habitats, in particular linear features such as watercourses and hedgerows that can provide wildlife corridors, the loss of which could impact on the movements of species. The mitigation and compensation strategy fails to address the importance of intra-specific and inter-specific interactions and those between organisms and habitats. Species isolation has also been inadequately addressed</p>	<p>SWT/ EA/ WT</p>	<p>Chapter 12, Section 12.5.16 to 12.5.21</p>	
<p>Effects on bats are not adequately addressed.</p>	<p>SWT</p>	<p>Chapter 12, Section 12.5.50 to 12.5.60</p>	
<p>Inadequate mitigation has been proposed for the proposed ecological impacts. The proposed package of mitigation and enhancement options needs to be reconsidered and additional mitigation is required. Further studies are required to prove that mitigation options are feasible and workable</p>	<p>EA / NE</p>	<p>Chapter 12, Section 12.5.22 to 12.5.26</p>	
<p>Proposed mitigation for the severance of the Combe Haven SSSI from the floodplain habitat is considered to be inadequate and poorly assessed.</p>	<p>NE</p>	<p>Chapter 12, Section 12.5.22 to 12.5.26</p>	
<p>The extent of mitigation and the likely effectiveness of proposed habitat re-creation is unknown. The applicant must demonstrate in the ES that compensatory habitat creation will be on a like-for-like basis.</p>	<p>EA / SWT / NE</p>	<p>Chapter 12, Section 12.5.22 to 12.5.26</p>	
<p>The short-medium term impacts whilst mitigation matures should be properly considered.</p>	<p>NE</p>	<p>Chapter 12, Section 12.5.22 to 12.5.26</p>	
<p>The proposals fail to address requirements of PPS9 and other planning policy – the applicant needs to demonstrate and provide further information to show that the proposal provides adequate mitigation and compensation for ecological impacts – in particular the applicant needs to show to what extent the provision for ecological enhancements go above and beyond</p>	<p>EA</p>	<p>Chapter 12, Section 12.5.22 to 12.5.26</p>	

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mitigation and compensation.			
The application is deficient in its assessment of potential impacts from the discharge of road drainage, leachates from construction materials and alteration of air quality and the chemical environment near the road, and the affect that this may have on habitats, particularly downstream habitats, the Ghyll Stream in Marline Woods SSSI, and Combe Haven SSSI. Further evaluation is required so that impacts can be identified and mitigated adequately.	EA / SWT /NE	Chapter 12, Section 12.5.45 to 12.5.49	
Drains have been included as mitigation for runoff during the operation phase but clarification required on how this has been considered with regard to storm/flooding events.	NE	Chapter 12, Section 12.5.44	
Table 9.16 does not consider the indirect effects of runoff and pollution on fish, birds, mammals etc.	SWT	Chapter 12, Section 12.5.45 to 12.5.49	
The effect of nitrogen deposition has not been adequately assessed in the ES for either SSSI.	NE	Chapter 12, Section 12.5.27 to 12.5.43	
The potential impacts of salt spray on the flora within the SSSI should be fully assessed if indeed Marline Woods SSSI is discovered to be nearer to the road than initially assumed.	NE	Chapter 12, Section 12.5.48 to 12.5.49	
The application is deficient in terms of addressing the mitigation of actual and potential indirect impacts on the SSSIs	EA / SWT / WT	Chapter 12, Section 12.5.3 to 12.5.13	
The proposed mitigation strategy fails to address the significance of severance on ecologically valuable and priority UK BAP habitats and species. For example the watercourse crossings are inadequate for a road scheme of this size. Further consideration and improvement to the design of the clear span bridges is required to provide a greater width on either side of the watercourse.	EA / SWT	Chapter 12, Section 12.5.16 to 12.5.21	

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Further work on the impact of noise disturbance during the construction and operational stages, on bird populations.	RSPB / WT / SWT / NE	Chapter 12, Section 12.5.81 to 12.5.85	
Light disturbance on nocturnal species, such as bats, should be considered.	NE	Chapter 12, Section 12.5.50 to 12.5.60	
The assessment of Dormice is unclear and contradictory.	NE	Chapter 12, Section 12.5.61 to 12.5.71	
Great Crested Newt (GCN) Surveys were not in accordance with EN guidelines. Further survey work on GCN and reptile populations should be undertaken to confirm population size. The location of reptile receptor sites also needs to be clarified.	NE	Chapter 12, Section 12.5.72 to 12.5.80	
Further bat survey work should be undertaken to inform mitigation. The ES also fails to assess the severity of the impact on bats from severance of foraging and commuting lines.	NE	Chapter 12, Section 12.5.50 to 12.5.60	
Accurate ornithological surveys of the Combe Haven SSSI are required to produce reliable mitigation.	NE	Chapter 12, Section 12.5.81 to 12.5.85	
Greater detail on management and monitoring of habitats, particularly mitigation/compensation habitats, is needed.	SWT	Chapter 12, Section 12.5.86 to 12.5.90	
Detailed ecological survey information on all parts of Marline Valley Woods SSSI that are within 100 metres of the development boundary. A detailed assessment of the impact of shading resulting from the construction of the road, or any other part of the development proposal, on the species and habitats present within the SSSI. Details of the methods, results, dates, times, weather conditions, locations and surveyors' names for all the following species surveys carried out.	AT	Chapter 12, Section 12.5.91 to 12.5.92	

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<p><b>LANDSCAPE AND VISUAL</b></p> <p>Fuller information is required on the design appearance of the Scheme at the Bexhill end including information about tree loss and working clearances in the former railway cutting, etc. This should include detailed cross sections and new photomontages. Far greater certainty over what can / will be achieved in the proposed footprint needs to be given.</p>	<p><b>D.H. Assoc.</b></p>	<p>Chapter 13, Section 13.5.1 to 13.5.5</p>	
<p>Provide ZVI on the base engineering of the road to demonstrate the effectiveness of the bunding and clarify points raised in detailed comments.</p>	<p><b>D.H. Assoc.</b></p>	<p>Chapter 13, Section 13.5.6 to 13.5.9</p>	
<p>Provide detailed information on the contouring interface with noise fencing at bridges.</p>	<p><b>D.H. Assoc.</b></p>	<p>Chapter 13, Section 13.5.10</p>	
<p>Provide justification for two bridges in Powdermill Valley.</p>	<p><b>D.H. Assoc.</b></p>	<p>Chapter 13, Section 13.5.11</p>	
<p>Avoid engineered landmark to parts of the greenway and equestrian routes and confirm generally how the landscape earthworks are to achieve appropriately graded landforms</p>	<p><b>D.H. Assoc.</b></p>	<p>Chapter 13, Section 13.5.12</p>	
<p>Provide justification for remoteness map having regard to apparent conflict with ZVI.</p>	<p><b>D.H. Assoc.</b></p>	<p>Chapter 13, Section 13.5.13 to 13.5.16</p>	
<p>Provide correction or justification / clarification to points of apparent inconsistency in methodology set out in detailed comments.</p>	<p><b>D.H. Assoc.</b></p>	<p>Chapter 13, Section 13.5.17 to 13.5.22</p>	

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Correct errors in visual impact mapping and suggest representation in a clearer format.	D.H. Assoc.	Chapter 13, Section 13.5.23 to 13.5.27	
Clarify vegetation loss mapping.	D.H. Assoc.	Chapter 13, Section 13.5.28	
Clarify location and proposed design of noise fencing.	D.H. Assoc.	Chapter 13, Section 13.5.29	
Provide fuller fencing details together with, it is hoped, a rationalisation of the fencing.	D.H. Assoc.	Chapter 13, Section 13.5.30	
Clearly demonstrate where the 50 dB(A) contour will be relative to the greenway etc.	D.H. Assoc.	Chapter 13, Section 13.5.31	
Provide full details of how the landscape management of the proposals is to be implemented, presumably linked to the ecological management proposals and a statement on the lifespan of the management works and ring fenced funding.	D.H. Assoc.	Chapter 13, Section 13.5.32	
Clarify historic landscape values and how much they will changed	ESCC	Chapter 13, Section 13.5.33 to 13.5.38	
Townscape 1:500 drawings are required at 'key points' in order to be able to assess the likely environmental impact at particular locations, for example: -	ESCC	Chapter 13, Section 13.5.39 to 13.5.42	



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<p>The new Ninfield Road Overbridge at Sidley.</p> <p>The new Woodgate Park Overbridge.</p> <p>The new London Road Junction.</p> <p>The setting of the Chapel Path Underpass.</p> <p>The Belle Hill Junction at the southern end of the Scheme.</p> <p>The Queensway Junction at the northern end of the Scheme.</p>			
<p>As a detailed planning application, "typical structures" that are 'not to scale' is not acceptable. More detailed drawings are required.</p>	<p><b>ESCC</b></p>	<p>Chapter 13, Section 13.5.43</p>	
<p>In order to assess the environmental impact of the new Link Road being elevated above the height of the existing "Chapel Path", (the pedestrian route to the adjacent schools) more specific information in plan form and section illustrating the extent and potential impact of elevating this section of the new road is required.</p>	<p><b>ESCC</b></p>	<p>Chapter 13, Section 13.5.44</p>	
<p>The two photomontages illustrated on Figure 13.16.11. 02, entitled "Photomontage 24 – Urban Viewpoint 016" are incorrect and misleading as any trees would have to be planted behind, rather than in front of the new fence. New photomontages should be prepared by the applicant.</p>	<p><b>ESCC</b></p>	<p>Chapter 13, Section 13.5.45</p>	
<p>Figure 13.16.11, entitled "Photomontage 26 – Urban Viewpoint 020" is also incorrect and misleading as it claims to illustrate how London Road would look when the new road has been built and in 15 years time, but fails to show: -</p> <p>The new Link Road, as opposed to the retained London Road</p>	<p><b>ESCC</b></p>	<p>Chapter 13, Section 13.5.47</p>	

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<p>The elevated section of the new Link Road that would be required to enable the "Chapel Path Underpass" to be constructed at the point where the existing houses are shown demolished</p> <p>Any details of the junction with Belle Hill, (and associated clutter), in the distance</p> <p>Any details of the new junction with the Link Road, (which would have been to the right of the view illustrated).</p> <p>New photomontages should be prepared by the applicant</p>			
<p><b>CULTURAL HERITAGE – ARCHAEOLOGY</b></p> <p>Results of the Stage One evaluation should form part of the ES in order to help inform a planning decision about the Scheme by providing Scheme-specific detail about where cultural heritage features exist, their nature, condition and significance, along with the nature of any impacts (direct, indirect, temporary, permanent and cumulative) and how these would be mitigated by a combination of design and further archaeological work. The evaluation consists of:</p> <ul style="list-style-type: none"> <li>▪ specialist geoaerchaeological field investigations of four 'wet' zones and margins,</li> <li>▪ LiDAR survey of the Scheme, and;</li> <li>▪ surface artefact collection survey (fieldwalking) (ES Section 14.7.6)</li> </ul> <p>The ES fails to note that construction of the Scheme might also lead to indirect effects, particularly on the hydrology and therefore the long term preservation of waterlogged deposits to the north and south of the Scheme area. This important factor needs to be addressed.</p>	<p><b>ESCC</b></p>	<p>Chapter 14, Section 14.5.1 to 14.5.11</p>	<p>Accepted</p>
<p>Clarification required on whether stage one work would also cover side valleys, borrow pits, balancing ponds, greenway, enabling works etc. Further walkover and geophysical surveys should be undertaken to cover these.</p>	<p><b>ESCC</b></p>	<p>Chapter 14, Section 14.5.12 to 14.5.13</p>	<p>Accepted</p>
	<p><b>EH</b></p>	<p>Chapter 14, Section 14.5.14 to 14.5.15</p>	<p>Accepted</p>

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<p>Stage 2 work – Questions over whether this should have been completed prior to submission of ES. EH refers to government guidance that states it is undesirable to leave it until after the determination of the planning permission.</p>	EH	Chapter 14, Section 14.5.16 to 14.5.22	Accepted
<p><b>SOCIAL AND COMMUNITY EFFECTS</b> There does not appear to be consistency in severance significance criteria between chapter 15A and 15B.</p>	ARUP	Chapter 15, Section 15.5.1 to 15.5.6	Accepted
<p>The severance criteria do not consider the severance impact of the new road in relation to new traffic levels – new severance as outlined in DMRB.</p>	ARUP	Chapter 15, Section 15.5.7 to 15.5.17	Accepted
<p>There does not appear to be a copy of the results from the road side survey data collected in 2004 even though it is referred to in 15B.5.13. This should be in an appendix to give information on survey size etc.</p>	ARUP	Chapter 15, Section 15.5.18 to 15.5.22	Accepted
<p>There is no summary of the number of properties affected by category under direct impacts on private property. Numbers of losses of industrial, commercial, residential properties etc should be outlined.</p>	ARUP	Chapter 15, Section 15.5.23 to 15.5.26	Accepted
<p>For commercial properties there should be an assessment of the number of people employed there on site and potential job losses, along with an assessment of the future viability of the business</p>	ARUP	Chapter 15, Section 15.5.22 to 15.5.26	Accepted
<p><b>Regeneration Statement and Economic Assessment Report</b> Overall, it is important to link the traffic improvement case with the overall economic development case. i.e. typically a two stage approach would be followed i) establishing the direct benefits notably time and distance savings and then commenting on ii) the likelihood / level of development response to these improvements. Such an approach should be demonstrated. The applicant is advised that there are important issues that need to be</p>	ARUP		

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<p>addressed. The Regeneration Statement acknowledges (Para 1.1.3) that the main case for the Scheme is the wider regeneration benefit it is expected to bring, rather than the direct benefits (e.g. in terms of increased efficiency of businesses using the road, or reduced traffic accidents) – a number of issues arise:</p> <p>A key issue is relates to whether there are other suitable employment sites that could be brought forward to generate the same job benefits without the need to construct a new road. I.e. the case does not consider if there are other credible sites (or combination of sites) that could be brought forward to create some or all of the job creation expected at NEBBP - the Regeneration Statement should set out whether or not other credible sites have been considered. Evidence in relation to the consideration and review of local sites should be produced to demonstrate whether or not the predicted new jobs would otherwise be lost to the Hastings-Bexhill area</p> <p>In addition, evidence is also needed to show that the jobs that the road will facilitate creation of are in fact net gains, and not simply transfers from elsewhere in East Sussex.</p> <ul style="list-style-type: none"> <li>▪ The applicant should provide further information to demonstrate whether or not the NEBBP site and any others along the road could only be developed if the road is built. E.g. paragraph 8.3.17 of the Regeneration Statement (p. 68) states “[t]he go-ahead for the Scheme is the sole mechanism that will open up new strategic land for additional employment and housing in North Bexhill” (emphasis added.) Para 2.2.3 also states that “This development [NEBBP] cannot be achieved without the Scheme because of the capacity constraints on the local road network and on the A259 between the two towns in particular”. This needs to be demonstrated.</li> </ul> <p>A lesser point addresses the issue of wider consultation. Para 44 states that “ESCC believes firmly that the building of the Bexhill Hastings Link Road is a key plank for success [i.e. regeneration of Hastings Bexhill]” and that “This vision is shared by all local and regional stakeholders.” A list of stakeholders covering a range of public sector organisations (LAs, LSC,</p>			

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FE, LSP), business representative organisations, and one community organisation (Bexhill Community Partnership / Rother Voluntary Action). But is this comprehensive? Have the local organisations that objected in 2001 also provided further comment?			