

- Committee: **Regulatory
Planning Committee**
- Date: **10 December 2008**
- Report by: **Head of Planning**
- Proposal: **Construction of a new road, including environmental treatment with earthworks, planting flood & noise attenuation, wildlife compensation, and facilities for non-motorised users.**
- Site Address: **A259 Belle Hill, Bexhill-on-Sea to B2092 Queensway, St. Leonards-on-Sea, East Sussex**
- Applicant: **Assistant Director Delivery, Transport & Environment Dept**
- Application No. **RR/2474/CC(EIA)**
- Key Issues:
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 2. **Alternatives – page 55**
 3. **Regeneration and Economic Assessment – page 59**
 4. **Sustainability and Climate Change – page 65**
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RECOMMENDATIONS

The Committee is recommended to approve the application subject to the completion of the following procedure by the Head of Planning:

1. To refer the application to the Secretary of State as being contrary to certain provisions of the Development Plan
2. Subject to confirmation from the Secretary of State that she does not wish to call in the application and the completion of the undertaking set out in paragraph 9, to authorise the Head of Planning to authorise the grant of planning permission subject to conditions along the lines set out in paragraph 10 of this report.

CONSIDERATION BY Head of Planning

1 INTRODUCTION

Scheme Overview

1.1 **Outline of proposal:** The proposed scheme is for a dual carriageway which is 5.6km long, from its junction with the A259 in Bexhill to its junction with Queensway in Hastings. The proposed scheme will link the outskirts of Bexhill and Hastings, easing congestion and improving air quality on the A259 at Glyne Gap. It will partly run along the line of the disused Bexhill to Crowhurst railway line and then pass around the northern side of the Combe Haven Site of Special Scientific Interest (SSSI). From there it will go to the southern edge of the Marline Valley Woods SSSI crossing the Hastings to London railway line to join Queensway just north of Crowhurst Road.

1.2 The application with accompanying Environmental Statement (ES) was submitted to the County Council on 18 April 2007. The application was advertised on 25 May 2007 following its receipt for a period of six weeks until 6 July 2007. Following an initial assessment by Council officers and comments on the scope and content of the application, the applicant prepared an addendum to the ES. The Addendum to the ES was prepared in compliance with Regulation 19 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulation 1999. The further information on the Environmental Statement was submitted to the Council in August 2008 and was advertised for this reason and as a departure to the development plan. Subsequently the applicant submitted a Supplementary Nature Conservation Report in October 2008 comprising additional environmental information which was also advertised.

1.3 The proposal has generated a substantial amount of public interest and response from statutory consultees. The consultation process has resulted in a large number of objections with all the representations being made available for inspection as public documents as well as being made available in the members' room. All comments that were received in relation to the original application, the Addendum ES and Supplementary Nature Conservation Report have been summarised in appendix 1 of this report. The representations which have been received relating to this application and

supporting documents have been accorded due weight in the consideration of the application. The report includes a number of abbreviations and therefore to assist its reading these are set out in Appendix 2.

1.4 In addition to making this planning application, the applicant has also submitted an application for listed building consent (ref RR/2612/CCLB) which is the subject of a separate report. In accordance with the relevant procedures the decision on the listed building consent application rests with the Secretary of State.

2 THE SITE AND SURROUNDINGS

2.1 The proposed Link Road runs from the A259 in Bexhill to its junction with Queensway in Hastings. The most westward section of the road (which is urban in character) starts at the southern end of London Road, where it meets the A259 trunk road at the Belle Hill Junction. From here it heads roughly north, along the route of the abandoned Crowhurst, Sidley & Bexhill Branch Railway, which passes through the built up area of Bexhill, beneath bridges at Woodgate Park and Ninfield Road at Sidley, before continuing to Glovers Farm on the northern fringe of Bexhill. The remainder of the scheme passes through open countryside between Bexhill and Hastings.

2.2 North of Ninfield Road, the route passes along the base of an existing deep cutting, to a point just north of Glovers Farm from which it runs downhill, heading north from Sidley to the west of the main Combe Haven Valley, avoiding the nearby SSSI. The scheme then crosses the upper Combe Haven Valley, before passing to the west of Acton's Farm, a grade II listed building.

2.3 From Acton's Farm, the route turns eastwards toward the Watermill Stream Valley, from which it continues east across the Watermill Stream Valley and across the southern end of the Hillcroft Farm ridge. Beyond Hillcroft Farm, the proposed Link Road crosses the southern end of Powdermill valley, just south of Adam's Farm and some 1km to the south of Crowhurst village.

2.4 Beyond Powdermill Valley, the proposed route passes through the Decoy Stream Valley and past Decoy Farm, to the north of Decoy Pond Wood and the Combe Haven SSSI, before crossing the Decoy Stream and climbing to cross the realigned Crowhurst Road. The route continues eastward, crossing the London to Hastings Railway and the southern tip of the Marline Valley Woods SSSI which is located to the north of the proposed route. East of the railway, the route terminates in a new junction to Queensway, at the western edge of the Hastings urban area, some 140metres to the north of the current Crowhurst Road junction.

2.5 The Scheme would be crossed by or lie adjacent to two Byways Open to All Traffic (BOATs), one bridleway and a number of public footpaths and permissive footpaths including the 1066 Country Walk long distance footpath. The Scheme generally follows the northern perimeter of the Pebsham Countryside Park but is also partially within it. Whilst partly in public ownership, it is largely farmed and so access is restricted to a network of public rights of way and permissive routes. These routes feed into the proposed Pebsham Countryside Park from the conurbation to the south, south-east and west and from the open countryside towards Crowhurst to the

north. To the south they link further to the east-west seafront of Bexhill and Hastings and to the north they link to a system of lanes and footpaths penetrating inland to the Weald. At the south-west corner the Chapel Path and Bancroft Road Path cross the existing London Road.

3 HISTORY OF THE SCHEME

3.1 As early as the 1970s, local road improvements between Bexhill and Hastings were recognised as a key component in facilitating new development and regeneration in a local area suffering from an increasing economic decline and social deprivation.

3.2 In 2001, the Secretary of State for Transport (SOSs) rejected proposals from the Highways Agency for a Hastings and Bexhill bypass, with the view that the argument presented did not build a convincing regeneration case and that although it could possibly help to generate employment in the area this would not necessarily help those in most need. The Secretary of State accepted that the bypasses(s) would release land for the proposed North Bexhill business park though the arguments presented in favour of the bypasses(s) was not sufficient to outweigh the very strong environmental presumption against harming sensitive sites including sites of special scientific interest, AONBs and habitats.

3.3 Following the SOSs rejection of the bypass, the South East England Development Agency (SEEDA) was instructed to develop a regeneration strategy for Bexhill, Hastings and Rye area. The result was the Hastings and Bexhill Five Point Plan (FPP) - a ten year investment programme with a £400 million strategy for regeneration. Amongst other things, road improvements between Bexhill and Hastings were identified by the FPP as a vital component of the regeneration Hastings and Bexhill, as it would help to release new employment and housing land in Bexhill as well as allowing other projects currently constrained by congestion and capacity on the A259 corridor to be realised.

3.4 Concurrent to the FPP, the South Coast Multi Modal Study (SoCoMMS) was commissioned in 2001, to develop a 30 year transportation strategy for the coastal corridor between Southampton and Ramsgate. The strategy was concerned with providing transport improvements that would assist regeneration areas - in particular the Priority Areas for Economic Regeneration identified by the Government Office for the South East, which included Bexhill and Hastings. As part of this package, a smaller, more local scheme than that of the Bexhill and Hastings bypass was developed which addressed the local context (i.e. poor highway connectivity between the two towns and its associated impacts on local development and regeneration) whilst avoiding encroachment on statutory environmental designations.

3.5 Further work by the Hastings Strategy Development Plan (HSDP), which helped to inform the overall SoCoMMS Strategy proposals, concluded that despite environmental disbenefits, the proposed scheme was an important component of the strategy in Hastings, providing local and, potentially, strategic economic and accessibility benefits. The report also concluded that as land use developments in north Bexhill could not be accommodated

without increased highway capacity, the Scheme also addressed wider economic regeneration issues. Transport modelling demonstrated that a single carriageway link road would provide sufficient capacity to relieve congestion by diverting mainly local trips whilst increasing accessibility to employment opportunities and generating a strong Benefit Cost Ratio.

3.6 Following SoCoMMS recommendations, the Secretary of State for Transport in July 2003 invited East Sussex County Council (ESCC) to develop proposals for the construction of a local link road between Bexhill and Hastings.

3.7 Several alternative schemes and link road routes were considered prior to the selection of a preferred route, including:

- Alternative A259 Schemes;
- Public Transport Improvements; and
- Alternative link road route options.

3.8 In relation to the alternative road route options, six alternative route options for the BHLR were developed in 2003/04. The options were designed to provide a wide range of alternatives for consultation and stimulate the assessment of how the optimum balance between competing environmental, economic and other objectives might best be struck.

3.9 All of the six route options shared the 1.7km (1.1 mile) Bexhill urban section, following the route of an old railway through the built-up area to just beyond the town where it would link up with the proposed North East Bexhill Development. From this point to the junction with Queensway, the options followed different northern, central and southerly routes. The six route options for a link road were also subject to extensive public consultation, for a period of 6 weeks, in 2004. Public awareness and reaction was promoted by the circulation of a four-page newsletter (with questionnaire) to households in the Bexhill and Hastings area (including Crowhurst) and by a mobile exhibition.

3.10 A key consideration in route selection was minimising the potential environmental impact of the new route, as required by the Secretary of State and the Statutory Environmental Bodies (SEB) and in 2004 the ESCC Cabinet agreed to develop the 'Preferred Route Option' upon which the BHLR application is based. In 2004, the Government also approved in principle a funding bid for the link road scheme.

3.11 When the Secretary of State considered the proposals for the Bexhill and Hastings bypass, he also directed the further investigation of a range of public transport measures to tackle transport issues in Hastings, based on the recommendations of the Access to Hastings Study: a frequent 'metro' train service between Bexhill and Ore, providing a turn up and go service, using existing infrastructure and new trains (where required); a new station at Glyne Gap on the metro line; electrification and dualling of the rail track between Ashford and Hastings enabling a fast service to be provided; more frequent train services between Wadhurst and Tonbridge; and strengthening Quality Bus Partnership between Bexhill and Hastings on the A259. These schemes were also further examined as part of the SoCoMMS and the HSDP.

3.12 Overall, assessment of the public transport alternatives revealed that improved rail services were seen as essential elements of the County Council's integrated transport policy, and as an essential element of the total package required to achieve the economic revitalisation of the Bexhill and Hastings area. A number of the schemes have already been implemented or are being pursued through the County's Local Transport Plan (LTP). However, these improvements were not seen as an alternative to the Link Road, given the diverse and dispersed nature of transport demands in the area and the need to open up and provide local and sub-regional access to the new development areas on the urban fringes.

3.13 In addition to the public transport improvements, several alternative traffic management measures along the A259 were also considered. These alternatives looked at additional highway capacity at a number of bottleneck junctions, including Little Common Roundabout and Glyne Gap roundabout. However, A259 on-line improvements were rejected as they were not considered to improve access to areas not served by the existing A259 - particularly areas of existing and potential development on the edges of urban areas. In terms of revisiting the potential for a bypass, following the Secretary of State's rejection of schemes in 2001, the statutory protection of these routes in the relevant development plans was removed. As a result, these schemes were no longer considered to be viable options for development.

4 THE PROPOSAL

4.1 The application is for the construction of a new road, including environmental treatment with earthworks, planting flood and noise attenuation, wildlife compensation, and facilities for non-motorised users.

4.2 The proposed Bexhill-Hastings Link Road is 5.6km long from its junction with the A259 in Bexhill to its junction with the B2092 Queensway in Hastings. The first 1.4km section of the road follows the bed of an abandoned railway line, where it would pass through the built up area of Bexhill. From Bexhill, the proposed route passes eastwards through the countryside towards Hastings, where it terminates at its junction with the Queensway, on the western edge of the town.

4.3 The road through the built up area of Bexhill would be constructed as a standard single two lane carriageway. The remainder of the Link Road would be constructed to a wide two lane single carriageway standard. Signalised junctions, including bus priority, would connect the western end of the Scheme with the A259 Belle Hill and A269 London Road in Bexhill, and the eastern end with the B2092 Queensway in Hastings. The Scheme is seen as part of a 'green' access corridor between Bexhill and Hastings and would be accompanied by a Greenway to accommodate activities such as cycling, walking and horse riding.

4.4 The Bexhill urban section starts from the A259 trunk road at the Belle Hill Junction with London Road, heading approximately northwards. The London Road junction would be enlarged involving the demolition of the Viking Fish Bar and Eighteen residential properties, as well as a nursery school. Beyond this the road would be diverted through the existing Rother District Council's depot site where it would join the Scheme at a new traffic signal

controlled junction. The use of the current alignment of London Road, south of this junction would be restricted to residents and buses, with a bus only link to the new road created immediately to the north of the Belle Hill Junction.

4.5 The Bexhill Urban section then continues along the line of the abandoned railway line through the built up area of north Bexhill beneath two new bridges at Woodsgate Park and Ninfield Road. North of Ninfield Road, the proposed route runs along the base of the existing deep cutting, to a point just north of Glovers Farm, where it emerges from the cutting into open countryside. The route then runs downhill, heading approximately due north from Sidley to cross the Upper Combe Haven Valley at a narrow point of the valley on an embankment up to 3.5 metres above existing river bank level, before climbing and entering a cutting to pass west of Acton's Farm. Where the road is on embankment, the proposed earthworks would be extended so that 3 to 4 metre high bunds would be created to provide both noise attenuation and visual screening for the road. At the Combe Haven stream crossing, the clear span bridge would be provided with 2.0 metres high noise fencing on the bridge parapets where the road would otherwise be open to view. The noise fencing would extend on both sides of the bridge to merge into the adjacent flanking bunds thus seeking to maintain the screening effect.

4.6 The route then continues eastwards to cross the Watermill Stream Valley on embankment up to 5 metres above Ordnance datum level - but generally only 3.5 metres high. Earth bunding and environmental barriers would be provided across the valley with a clear span bridge at the stream, in a similar manner to that for the Combe Haven. The Scheme would continue eastwards through the southern end of the Hillcroft Farm ridge, passing into cutting up to 7.2 metres deep. Emerging from the Hillcroft Farm ridge in cutting, the road crosses the valley of the Powdermill Stream on embankment 4 to 5 metres above the existing valley level, crossing in turn the Powdermill Valley Stream and the Powdermill Stream on clear span bridges. Earth bunding and environmental barriers would again be provided in this location. The road would pass into cutting once more to the south of Adam's Farm and emerge from cutting onto an embankment 4 to 6.2 metres high across the Decoy Stream Valley, passing north of Decoy Pond Wood and the Combe Haven SSSI, before entering another cutting as it climbs up the valley side.

4.7 As it climbs from Decoy Stream the gradient of the road increases rapidly to a maximum gradient of 7.3% (1 in 14) as it climbs eastwards, with provision for an east bound climbing lane. From Crowhurst Road the route then continues eastward crossing the London to Hastings Railway on a bridge. The existing Crowhurst Road would be diverted to the east of its current alignment to enable the new bridge to be constructed offline without a complete closure of the existing road. East of the railway, the route terminates at a new traffic signal junction on Queensway at the western edge of the Hastings urban area.

Junction Design

4.8 Three new junctions are required as part of the proposed Scheme. A key aspect of the design of each junction is to facilitate bus movements by incorporating bus priority measures.

4.9 The Belle Hill Junction is an existing traffic signal controlled junction with pedestrian crossings on each approach. As part of the Link Road proposals, the northern arm of the junction would be amended to incorporate the Bexhill urban section, removing the direct urban section for general traffic to London Road. The new arrangement would retain pedestrian facilities at the junction, and provide 'Bus Only' access between London Road and the Bexhill urban section immediately north of the Belle Hill junction. All other local traffic would access London Road via a new junction on the link road, located 150 metres north of Belle Hill.

4.10 The London Road Junction would become a signal controlled junction providing access between the Bexhill urban section of the link road and London Road. No pedestrian facilities would be provided at this junction as there are no footway links between London Road and the Bexhill urban section. There would however be a 2 metres wide footway to the west of the new road linking Chapel Path to Bancroft Road. A priority junction would provide access to the southern arm of London Road for buses and local access only.

4.11 The Queensway Junction would also be a signal controlled junction providing bus priority on all approaches. New footways would be constructed from Mayfield Lane to the crossing and from the crossing along Crowhurst Road. The existing Crowhurst Road railway bridge, which is narrow, would have traffic signals installed to allow only one lane of traffic to use the bridge at any time. This would then allow a raised footway to be provided along the south side of the bridge connecting to the existing footpath and proposed Greenway.

4.12 The potential future position of a junction to serve new development in north Bexhill is illustrated on the submitted drawings just to the north of Glovers Farm but does not form part of this application.

Greenway Design

4.13 The Scheme is seen as part of a "green" access corridor between Bexhill and Hastings and would be accompanied by a Greenway to accommodate activities such as cycling, walking and horse riding. The Greenway has been partially located to be outside of the 50dB noise contour from the road but substantial lengths lie within this zone. Over much of the length of the Greenway the equestrian provision and the pedestrian and cycle route would be separate. Over these lengths the equestrian route would be a 3 metres wide track with 1 metre verges. The pedestrian and cycle route would be a 3.0 metres wide surface dressed bituminous path with 1 metre wide verges. Where it is not possible to separate the equestrians from other users, the Greenway would be increased in width and a 3.5 metres dressed bituminous surface provided. The grass verges would be provided either 2.5 metres on each side or 4 metres on one side and 1 metre on the other.

4.14 The Greenway would be designed with gentle gradients (5%) where possible, but the nature of the landscape it passes through means that this cannot be achieved in all locations without employing considerable earthworks. Generally gradients would not exceed 6%, except for a section

east of Decoy Pond where two short sections with gradients of 10% would be required to climb the hill near Upper Wilting Farm. Resting places would be provided at intervals over the whole route but special provision would be made were gradients exceed 5%.

Structures

4.15 A total of 21 new major structures would need to be constructed along the route of the Link Road, additional to a number of culverts and retaining walls. The major structures proposed are:

- A pedestrian underpass at Chapel Path;
- Six new overbridges including three to replace existing bridges;
- Seven new underbridges including five river crossings and crossings over Crowhurst Road and the railway;
- Six new river crossings for the Greenway; and,
- One new river crossing for the Environment Agency.

4.16 It would be necessary to replace the existing railway bridges at Woodsgate Park, Ninfield Road and Glovers Farm as they do not have sufficient width or provide the headroom that would be required for the Bexhill urban section to pass underneath. Other elements of these structures do not meet current highway engineering standards and some of the bridges are in a poor state of repair or have been extensively altered.

4.17 At Woodsgate Park the bridge would have to be constructed on the line of the existing road to minimise land take. The Woodsgate Park Overbridge has been designed to carry a replacement for the existing road 6 metres wide with 2 metres footways on either side. Due to the constrained nature of the site at Ninfield Road, the new bridge would have to be constructed on the line of the existing road.

4.18 The Ninfield Road Overbridge has been designed to carry a replacement for the existing road 7.3 metres wide with 3 metres minimum width footways on either side. This new bridge would also have to be constructed on the line of the existing road. The four rural overbridges at Glovers Farm, Acton's Farms, Hillcroft Farm, and Adam's Farm have been designed to create a family of similar structures. Each would be a single span slightly arched bridge with the abutments set well back from the highway verge at or near the top of the cutting. Each of these bridges would be formed of a concrete deck supported on steel beams with 1.8m high parapets. The remaining accommodation overbridges would all be constructed off the line of any existing access route to maintain continuous access, and each would carry a 3.5 metres access track with 0.6 metre verges on either side. The track would be suitable for all users including agricultural vehicles.

4.19 Four of the five river crossings would carry the new road over main rivers maintained by the Environment Agency, these being Combe Haven, Watermill Stream, Powdermill Stream, and Decoy Stream. Each structure is designed to span the relevant watercourse plus a 2 metres wide margin from each bank to meet the Environment Agency requirements. The fifth crossing

would be over Powdermill Valley Stream. This is an ordinary watercourse and not subject to the same restrictions as main rivers. This bridge would be constructed off line and the stream diverted to its new course.

4.20 Crowhurst Road Underbridge would be constructed off the line of the existing Crowhurst Road, which would be realigned following the completion of the new bridge. It would be similar in form to the other rural underbridges with a concrete deck supported by precast concrete beams. The Railway Underbridge would cross the railway line, the high pressure gas main, and the southern tip of the Marline Valley Woods SSSI in a single span of approximately 35 metres. Although no physical disturbance would take place at ground level a small area of the SSSI (35m²) would be by shaded by the bridge. The structure is 13 metres high to the west of the railway, due to the vertical alignment of the new road and the need to cross Crowhurst Road and align with Queensway.

4.21 At Chapel Path a pedestrian underpass would be provided on the line of the existing path. The subway is proposed to be 5 metres wide, 2.4 metres high with clear views through it to provide a feeling of openness. Either side of the underpass the road is proposed on embankments which has the effect of placing the road approximately three metres above the current level of London Road. For much of this length the road would be partially screened from view by 1.8 metre high noise barriers.

Culverts

4.22 It is proposed to culvert the Egerton Stream between a point just south of the Sidley Depot and the existing culvert at Chapel Path. The stream would be maintained but only as a low flow channel as far as Bancroft Road. Any storm or flood flow would be diverted into the culvert and stored in an underground tank between Chapel Path and Bancroft Road. The culvert comprises a 2.1 metres diameter pipe from the Sidley Depot to Bancroft Road where the remaining Egerton Stream flows and other surface water run off would be collected. South of this point a 3 metres by 1.8 metres underground box would be provided. Another new culvert would be required at the Decoy Valley. The existing drainage ditch flowing along the west side of the valley would need to be culverted under the earthworks, new road, and Greenway for a length of some 150 metres.

Retaining Walls

4.23 North of Ninfield Road retaining walls would be required on both sides of the new road within the cutting to avoid extensive earthworks and additional land take. These would both be approximately 200 metres long and have a maximum height of 1.5 to 2.0 metres. It is likely they would be constructed in bored piles or steel sheet piles, if driven piles are not required. The finished retaining walls would be clad in masonry with concrete coping stones.

Greenway Structures

4.24 The six Greenway structures and the Environment Agency access bridge would all be of similar form and constructed with a steel beam and

timber deck and parapets. Four of these would be relatively light weight structures as most would take only pedestrian, cycle, equestrian traffic and light maintenance vehicles. In order to prevent inadvertent use by heavier vehicles, bollards or other features would be installed on both approaches to each bridge. The two bridges across the Powdermill Stream, one on the Greenway and the Environment Agency access, would have to carry heavier vehicles and would therefore have to be of a heavier construction although still with timber parapets. In addition a number of small culverts would be required on the Greenway where it crosses the minor ditches and watercourses created as a part of the environmental mitigation scheme.

Speed Limits

4.25 A combination of 30mph and 40mph, and derestricted sections would be imposed across the scheme. A 30mph speed limit would be imposed on the new road from Belle Hill, covering the extent of the two southern Bexhill to Hastings Link junctions. North of this point, a 40mph speed limit would be introduced to make provision in the Scheme for a future junction serving the North East Bexhill Development. The immediate approaches to the junction with Queensway would also have 40mph speed limits imposed. Over the remaining rural section of the scheme national speed limits would apply.

Lighting

4.26 All junctions would be lit but no lighting would be provided between junctions. The proposed lighting uses a maximum of 12 metres high columns with full cut-off lanterns to minimise light overspill. The majority of the road would be unlit.

Drainage Design

4.27 Drainage in rural areas would be provided mainly through a soft engineering solution with shallow grass channels to collect the highway run-off draining via petrol interceptors, and sediment forebays to landscaped attenuation ponds. Concrete channels are proposed from where the carriageway is too steep for grassed channels. Carrier pipes with inspection chambers would collect the run-off past the first channel outfall. Pollution risk would be reduced by inclusion of the oil interceptors on all drainage systems to collect hydrocarbon pollutants and silts. To mitigate the risk of contamination from accidental spills, additional tanks would be provided for all rural catchments (i.e. all outfalls not draining to Egerton Stream). The spill tanks would be located downstream of the petrol interceptor and could be isolated via valves directing flow to the tanks instead of the attenuation ponds. Shut off valves would be provided upstream of the outfalls to contain the spills until the storage pipes could be emptied. Hardstands would be provided to access the by-pass interceptors and spill tanks.

4.28 Outfall into the attenuation ponds would be via a headwall with sediment forebay, which would allow sediment to settle out before entering the attenuation pond and would be separated from it by gabion baskets. The

inlet from the drainage system would be located above the normal pool level and would be provided with erosion protection. The attenuation ponds would include a semi permanent pool below the outlet with the base having undulating levels and an irregular shape. Bunding would be provided around the ponds to provide 300mm freeboard above the maximum water level with a control device located in a chamber downstream of the outlet to limit the pond discharges. The outfall from the ponds would disperse overland via a spreading channel. Maintenance access would be provided to all ponds. The outfall flow would be restricted to a rate equivalent to the Greenfield discharge rate.

4.29 Urban sections of the road and junctions would use traditional drainage systems consisting of kerbs and gullies, with carrier pipes with inspection chambers collecting the run-off from the gullies. Due to the limited capacity of the existing culvert on the Egerton Stream, run off from the Bexhill urban section would have to be stored in oversize pipes under the highway verge before outfalling at a controlled rate, equivalent to the green field flow, into the Egerton Stream.

4.30 The Scheme requires the diversion of Egerton Stream flood flow. The existing Egerton Stream channel would take normal flow levels only and a diversion culvert would be provided along the west side of the Scheme to accommodate the flood flow. The culvert would extend from the proposed control structure at the head of the diversion connecting to the existing culvert at Chapel Footpath. An offline storage tank would be provided prior to the outfall to provide flood protection for events up to 1 in 100 (plus 20%) years. The storage tank invert level would be located below the Egerton Stream outfall, and would be pumped down following large rainfall events.

Rights of Way

4.31 The introduction of a new road through an area of countryside will cause the severance of existing access routes including public rights of way, agricultural access to severed fields and Environment Agency access to statutory watercourses. Many of the existing accesses, tracks and public rights of way follow higher ground on the flanks of the Combe Haven Valley but locally descend to cross the valley floor. The waymarked 1066 country walk public footpath runs north to south along the base of the Powdermill Valley and across Combe Haven to Little Worsham Farm near Pebsham.

4.32 In general the existing accesses, tracks, and public rights of way follow the high ground and as a result would be severed by the cutting required for the new road. In these areas these routes would be diverted to bridges provided to cross the new road. Whilst there would be some diversions of public rights of way this would be compensated for to some extent by the Greenway; at no point would non-motorised users be required to

cross the new road at grade, either in the urban or rural sections of the Scheme.

4.33 In terms of maintaining agricultural access, the proposals seek to provide alternative access via the proposed structures. The lengths of the diversions which result from this strategy would generally be reasonably short with the exception of north south access along the Decoy Stream Valley where the diversion route would be approximately 1km in length.

4.34 The Environment Agency requires access routes for the Watermill Stream, Powdermill Stream and Decoy Stream, primarily for maintenance work. Here, access is proposed to be provided using a combination of parts of the Greenway, the proposed overbridges and a few specially provided tracks.

5 CONSULTATIONS AND REPRESENTATIONS

5.1 The planning application, the Environmental Statement and the Addendum to the Environmental Statement, and the Supplementary Nature Conservation Report have been the subject of extensive consultation with other local authorities, statutory bodies, local community groups and the general public. The initial consultation period lasted 6 weeks, from 25 May 2007 to 6 July 2007. There were two further consultation periods in August and October / November related to specific advertisements.

5.2 With regard to public comment, in total, 2592 letters have been received from 2221 different addresses. Of these, 77 were letters of support. From 1st August 2008, covering two consultation periods, 687 additional objections have been received (in response to the applicant's ES Addendum, the departure advertisement and the Supplementary Nature Conservation Report).

5.3 One petition against the proposal has been received, which contained 335 signatures of visitors to Combe Haven and users of the Public Rights of Way. Objections were raised on the grounds of landscape harm, the need to reduce car use, the road scheme was not wanted by the local community, the Scheme would have an adverse effect on wildlife and would be environmentally destructive due to carbon emissions, the Scheme is financially too expensive, and the fog in the Valley would present a danger.

5.4 Most common objections from members of public (with number of times each comment was made):

- The claimed economic benefits for the road have not been demonstrated and regeneration within the towns may actually suffer – 1,561

- Cost of the road has nearly doubled already and has not been fully compared with other schemes for addressing transport issues in the area, which are likely to be more cost effective – 1,356
- The environmental impact of the road (and its associated development) on Combe Haven would be unacceptable in terms of landscape, heritage, wildlife, water quality, noise and pollution – 1,339
- Government Policy – conflicts with climate change policies – 1,151
- The Link Road will simply shift traffic congestion and air pollution around Hastings; it does not address existing transport problems – 1,107
- There have been no serious attempts to produce a comprehensive and sustainable transport strategy for Hastings and Bexhill – 1,103
- Non-road options have never been offered as choices to the public as possible alternatives to the road – 1,098
- Draft South East Plan – conflicts with Policies CC1, CC2 and CC3 – 1,091
- Claim that the Link Road is essential for housing development at North Bexhill is wrong – 1500 homes could be built without it – 1,088
- The estimated £89 million cost (£42 million more than originally approved) will take valuable funds away from other schemes across the region – 1,084
- The road scheme, at best, may remove traffic from one residential area on the A259, but only dump it onto another residential area, which holds three schools and which is composed of roads entirely unsuitable for the volume of traffic which will arise – 359
- Substantial negative impacts on several LNRs and SNCIs, important for scientific and historical value and as breathing spaces between Hastings and Bexhill – 348
- The Scheme would result in the loss of ancient woodland – 345
- The Scheme would cause unacceptable damage to Combe Haven SSSI and Marline Woods SSSI – 323
- The Scheme will lead to increased carbon emissions and aggravate climate change just when need to act has been accepted - 300
- Opening the eastern edge of Bexhill for residential development will result in further damage and loss of ancient woodland – 298
- Government Policy requires ESCC to fully explore all possible alternatives before it proposes such a damaging road scheme and not convinced that it has done so – 295

- The Scheme would have a harmful effect on Hastings. It would add traffic to Crowhurst Road and its continuations. By moving traffic from the A259 onto other roads in Hastings, it would increase rather than reduce impact of traffic and the impact would be felt over a wider area – 293
- Government Policy – conflicts with PPS9 on delivering sustainability benefits - 288
- The tranquillity of Combe Haven valley and the surrounding countryside would be destroyed with high-speed traffic noise – 282

5.5 All the public comment has been subject to detailed assessment and consideration, the analysis is outlined in Appendix 1.

5.6 The representations of other local authorities, local councils and statutory and other bodies have been considered and are summarised below. The body's response to the consultations is followed by its response to the second consultation and the third consultation on the further supplementary information where applicable. Some bodies responded only to one consultation:

5.7 Hastings Borough Council strongly supports the Link Road. It considers the Link Road to be vital to the achievement of the regeneration of the most deprived community in the South East of England. The Link Road is an essential element of the package of regeneration measures being implemented in the Bexhill and Hastings areas through the Task Force and other agencies.

5.8 The opening up of North Bexhill - the only sub regionally significant employment land in Bexhill or Hastings (capable of generating up to 2000 jobs) is dependent on the Link Road. North Bexhill could also accommodate 1200 dwellings, which would make an important contribution to the local housing market. The Link Road will also ease congestion on the A259, improve journey times, reduce severance between Hastings and Bexhill, provide a new transport link between Hastings and Bexhill and facilitate the improvement of an existing one. Reduction in traffic flows on the A259 will allow air quality problems to be addressed; facilitate improved public transport facilities and the development of key regeneration sites such as West Marina; and provide greater accessibility to important local projects, such as Pebsham Countryside Park. The combined impact of a new transport route and improved accessibility on an existing one will enhance regional transport accessibility generally along the South Coast Corridor, and will greatly assist Hastings function as a Regional Hub.

5.9 The withdrawal of the Link Road would damage business confidence in the area, making it more difficult to attract private sector funding and result in a slow down or loss of complementary important projects - particularly those being undertaken by Sea Space in Hastings Town Centre. It is considered that the County Council has sought to minimise the environmental impact and that even the moderate adverse environmental impact identified in the Environmental Impact Assessment would be far outweighed by the regeneration benefits that the scheme will bring to Hastings and Bexhill.

5.10 The Council considers it essential that the Baldslow Junction scheme is constructed in parallel with the Link Road and will continue to support the County Council in lobbying Government to ensure that it happens. The Borough Council would expect the County Council's series of complementary measures around the wider Hastings and Bexhill areas to address any issues arising from increased traffic flow on other roads in Hastings, including The Ridge and Gillsman's Hill.

5.11 In response to the Supplementary Nature Conservation Report Addendum to the ES the Borough Council supports the road and whilst the Borough Council has some concerns as to the extent and location of the compensatory planting on land adjacent to Marline Wood Valley SSSI this is reluctantly accepted to provide compensation with remaining land being pursued as a preferred location for new housing.

5.12 Rother District Council strongly supports the Link Road proposal. It draws attention to the following matters in the consideration and further development of the scheme: the desirability and prospect of an A21 link to Baldslow; compatibility of the scheme with the emerging North East Bexhill Supplementary Planning Document, notably regarding early construction of the link to Wrestwood Road and contributions to bus and cycle provision, as well as to the Link Road itself, as part of the developments; the role of the Link Road, together with complementary bus and cycle measures, as part of the overall transport and accessibility strategy for Hastings and Bexhill; the views of the Highways Agency in respect of the A259 west of Bexhill town centre, in particular Little Common roundabout; the importance of high design standards in ensuring the Link Road presents a 'welcoming' approach to Bexhill.

5.13 In response to the consultation on the Addendum ES and departure advertisement, Rother District Council repeats its strong support for the Link Road proposal and acknowledges the additional design information now received. It draws attention to the desirability and prospect of an A21 link to Baldslow; compatibility of the scheme with the emerging North East Bexhill Supplementary Planning Document, including the specific need to provide for a junction in the North East Bexhill area by a relevant condition on any planning permission; the role of the Link Road in the overall transport and accessibility strategy for Hastings and Bexhill (but notes further progress on this since 2007); the need for the County Council through its Local Transport

Plan, design details (including traffic light phasing) and discussion with the Highways Agency, to minimise queue lengths on the A259; the importance of high design standards in ensuring that the Link Road presents a 'welcoming' approach to Bexhill (in which respect the District Council wishes to be consulted further on the details of the approaches to Bexhill and the arrangements for the London Road junction).

5.14 Crowhurst Parish Council is not in favour of the current proposal for the Link Road and considered that the road should be built further south using the old railway line. The current proposal will have a severe detrimental effect on the village and its quality of life. The Parish Council fully supports the comments made by the Crowhurst Action committee (see below).

5.15 The Parish Council is concerned that the Environment Agency will not reject the scheme, even if Crowhurst cannot be protected from potential flooding. The Parish Council also disagrees with the findings of the Environmental Assessment, which conclude that the Link Road will have a 'slight to moderate' impact on the Combe Haven valley – compared to independent experts in the Multi Modal Study's conclusion of a "large negative impact". The greatest impacts would be from noise, light intrusion and a lowering of air quality, with associated impacts on local residents' health and wellbeing. The Link Road would also impact significantly on local levels of greenhouse gases and corresponding damage to adjacent ecosystems – including those in the SSSI. There was no evidence in support of the claim that traffic movements in the village are likely to be reduced and the Parish Council challenges the conclusion that the Link Road will have a positive impact in this respect.

5.16 The Parish Council notes East Sussex's policies to protect listed buildings, agriculture and prevent development in open countryside. Development of the Link Road will affect nine listed buildings, and over 36 hectares of the best farmland and 1 farm will be lost. The Parish Council also query the Link Road's contribution to local regeneration with regards to North Bexhill, which may not generate as many jobs as expected by the County Council, whilst also attracting businesses away from existing parks in Hastings. The Parish Council also note the increased cost of the scheme, which has increased from £47m in 2004 to £89m, whilst the final cost could be in excess of £100m.

5.17 In response to the consultation on the Addendum ES and departure advertisement, the Parish Council is very strongly opposed to the chosen route which is considered totally detrimental to the wellbeing of the village residents. It does not oppose in principle the road, and the opportunities it may bring to the locality. The project is not justified in terms of the increasing financial implications and the total devastation of the Combe Haven Valley, a major recreational area for the village and surrounding neighbourhoods.

5.18 The consultation process is considered undemocratic, because it was undertaken at holiday times and with only 21 days to respond, which is totally inadequate given the vast detail involved, and the lack of expertise of their councillors and residents. The Parish Council fully supports the professional and detailed submission of the Crowhurst Society (see below). The Council has particular concerns about the scheduling of an archaeological survey after the grant of planning permission, and finds this incomprehensible.

5.19 Guestling Parish Council objects strongly to the traffic implications of the Link Road as the traffic will filter off The Ridge (B2095) to join the A259 east of Guestling Green. Rural lanes will be turned into urban through ways with unacceptable environmental and safety implications. Increases in traffic in rural lanes (additional 82 vehicles per hour at peak times) will be far too high. There are current increases in traffic using local attractions, few places in Ivyhouse Lane where two vehicles can pass, width and weight restrictions in Butchers Lane, and caravans and agricultural traffic using the lanes in the harvesting season.

5.20 The Environment Agency initially raised objections to the application on flood risk management and ecological grounds. The Agency noted that the Flood Risk Assessment did not give enough information to fully assess the flood risk management implications and that it did not comply with PPS25, the companion guide to PPS25 or other guidance such as "Flood Risk Guidance for New Development". The Agency also objected to the inadequate consideration of, and compensation for, ecological impacts and considered that there was inadequate mitigation proposed for the loss and disruption of ecologically valuable and UK Biodiversity Action Plan habitat, including floodplain grassland and fen, ditches and streams, hedgerows with wet ditches, ancient woodland associated with ghylls, plus their various associated wildlife species. In addition, in several areas the impacts were considered to be unknown and therefore not addressed; for example the impact of increased noise and vehicle emissions. The Agency also objected to the impacts of severance of habitats. The EA noted that the mitigation strategy focused on impacts on individual species and habitat types. It did not address the significance of severance of ecologically valuable and priority UK BAP habitats, causing disruption of ecological networks, and habitat isolation and fragmentation.

5.21 The Agency stated that it would be able to review its objection on flood risk grounds once further information requested was provided. It highlighted that its objection on nature conservation may be overcome by re-consideration of the road scheme design and the mitigation and enhancement measures that were proposed. This would include improvement to the design of the clear span bridges to provide a greater width on either side of the watercourse; studies to assess and prove the mitigation options were feasible and workable; re-consideration of further mitigation and enhancement options.

5.22 Subsequent to the submission of the Addendum ES and Supplementary Nature Conservation Report, the EA reviewed and assessed the additional information and has provided further commentary on its adequacy and confirmed that it is satisfied with the flood protection measures proposed, subject to the imposition of standard conditions on surface water attenuation and implementation of the submitted Flood Risk Assessment. The Agency has also reviewed the additional supporting information submitted by the applicant and withdrawn its previous objection on biodiversity grounds, subject to the imposition of a number of conditions, to provide compensatory habitats, bridge details to provide a bank beneath bridges with shade tolerant planting; controls on construction works near watercourses; surface water drainage and the implementation of the works in accordance with the submitted Flood Risk Assessment.

5.23 The Highways Agency on behalf of the Secretary of State for Transport is responsible for managing and operating a safe and efficient Strategic Road Network (i.e. the all purpose Trunk Road and Motorway network) in England. As such the Agency is primarily concerned with the impacts of the Link Road on the A259 in Bexhill and on the A21 to the north of Hastings.

5.24 The Agency is content to provide 'in principle' support for the Link Road proposals subject to a number of concerns being addressed. It is primarily concerned with the impacts of the Link Road on the A259 trunk road in Bexhill and the A21 trunk road north of Hastings. The Agency notes that its own Baldslow Junction scheme on the A21 is complementary to the proposed Link Road and is planned to address current problems and the impact of the Link Road on this part of north Hastings. In this connection, a preferred route for the scheme was indicated to be announced early in 2008, with construction planned to start in 2011. As the scheme is not formally included within its road programme, the Agency accepts the approach of not including it in the forecast year network modelling for the Link Road assessment. (The Agency is awaiting the outcome of the forthcoming review of regional transport interventions and the Minister's approval of a preferred route).

5.25 The Agency is concerned at the forecast levels of queuing at the A259 Belle Hill junction, with significant queues forecast at the junction in both 2010 and 2025 and is of the view that the reconfigured junction plans do not adequately cater for the volumes of queuing identified. The Agency notes that forecast congestion would mean that there was little scope for delivery of development above the identified Regional Spatial Strategy (RSS) need. It notes the need to demonstrate how to achieve adequate mitigation of traffic impacts not just in relation to RSS development allocations but also in relation to any further development identified via the Local Development Frameworks.

5.26 The Agency seeks confirmation that the County Council is committed to future Local Transport Plan funding as part of the delivery of the proposed

complementary measures for the scheme, and associated with the overall package of development.

5.27 The Agency therefore strongly suggests that a joint strategy covering all of Bexhill and Hastings should be developed, to identify workable and deliverable measures to increase the proportion of travel by sustainable means and manage down travel, particularly by car.

5.28 In its response to the Addendum ES consultation and departure advertisement, the Highway Agency's review of the Addendum Environmental Statement notes that the further information does not fully address the points raised by the Agency during the initial consultation and raises the following key points.

5.29 The Agency's analysis of junction impacts raises concerns regarding the forecast levels of queuing identified at the Belle Hill junction on the A259. The LINSIG analysis (i.e. detailed traffic signalled junction design and modelling) 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 also noted that the reconfigured junction layout plans do not adequately cater for the volumes of queuing identified. The HA has identified that the modelling of the Link Road proposals also forecasts traffic congestion at junctions on the A259 west of Belle Hill. In particular vehicle delay problems are forecast in both 2010 and 2025, at the Little Common roundabout junction on the A259 and at the junction of the A259 with the B2095 (Lamb Inn). In the context of the above concerns, the Agency notes that forecast congestion will mean that there is little scope for the delivery of development above and beyond the identified Regional Spatial Strategy (RSS) need. It notes the need to demonstrate how to achieve adequate mitigation of traffic impacts, not just in relation to RSS development allocations, but also in relation to any further development identified via the Local Development Frameworks.

5.30 The Agency indicates its willingness to continue to work with local councils on the Hastings Bexhill Local Area Transport Strategy, to identify measures to increase the proportion of sustainable travel, manage down travel, and thereby address its concerns over increased queuing at the A259 junctions resulting from the Link Road.

5.31 Natural England initially objected to the proposal on the grounds that the potential impacts to Marline Valley Woods SSSI and to Combe Haven SSSI, and the potential impact on protected species, has not been adequately assessed or mitigated for, and that sufficient information should have been provided to clearly demonstrate that statutorily protected sites have been fully considered. Mitigation was considered to be lacking with sound assessment,

and in some areas may not be achievable. Natural England advised the Council to refuse planning permission. It advised the Council to request further information to address the aforementioned issues before the grant of planning permission, and that Natural England would review its position on receipt of the information.

5.32 Natural England raised a number of concerns on the potential impact on Marline Valley Woods SSSI. It considered it unacceptable that the location of the proposed road in relation to the Marline Valley Woods SSSI is unclear and confused and requests confirmation that the southern tip of the SSSI would not be lost. The assessment of the loss of ancient woodland in the area was also considered to be unclear in the Environmental Statement and no consideration had been given to its function as a buffer to the SSSI. The impact of surface water runoff, including the construction phase, had not been adequately assessed, particularly on the ghyll stream. Natural England echoed the concerns of the Environment Agency on flooding and runoff. The impact of noise on breeding birds had also not been properly explored in the Environmental Statement. The effect of nitrogen deposition had not been adequately addressed; appropriate mitigation should therefore be investigated. Further, if the road runs as close to the SSSI as the maps indicate then the potential impact of salt spray on the flora should also be fully assessed.

5.33 Natural England also raised a number of concerns in relation to the potential impact on Combe Haven SSSI as the road scheme severs the SSSI from floodplain grassland and fen and the creation of new wetland habitats is suggested as mitigation. The mitigation was considered to be inadequate and poorly assessed. It would therefore fail to mitigate the risk to the SSSI. The need to enhance the SSSI by raising water levels relies on the cooperation of landowners and this had not been investigated. Mitigation for species populations was also inadequate.

5.34 No mitigation was proposed for the impact of noise and visual disturbance on breeding lapwing, redshank and snipe, contrary to the duty to conserve and enhance the SSSI; this opportunity for enhancement should be explored. Mitigation for other breeding bird species is either not proposed or linked to potentially unviable habitat creation. Accurate surveys had not been done to investigate whether surrounding habitat could accommodate a shift in species away from disturbed areas. Accurate surveys were required for the use of areas up to one kilometre from the scheme by birds, in particular waders and waterfowl, as uncertainty makes any suggested mitigation more unreliable. Mitigation should not take place on habitats required by key species; habitats valuable to wildlife; habitats created alongside the road. This was not like-for-like mitigation. The scheme had not properly acknowledged the short-medium term loss of habitats whilst mitigation reaches maturity (20 years for hedgerow). The effect of nitrogen deposition had not been addressed; appropriate mitigation should be investigated.

5.35 Natural England also had several concerns regarding protected species. The level of survey of dormice was insufficient and not in accordance with advice. Population size is required to assess the impact of severance of habitat and no mitigation was proposed for this. It is unlikely that a European Protected Species (EPS) mitigation licence would be issued under these conditions. Surveys of great crested newts have not been undertaken in accordance with guidelines and population size is required to produce precise information for mitigation and for an application for an EPS licence. More details of the surveys should therefore be included in the Environmental Statement with further survey work required to inform mitigation. Proposed methods of moving reptiles were not satisfactory and the details of proposed receptor sites needed to be clarified. It notes that mitigation for bats needed to await further survey work to identify the number, location and status of roosts and species. The severity of the impact on bats of artificial lighting and of severance of foraging and commuting lines was also not acknowledged and that some proposed mitigation for bats was potentially ineffective or unacceptable.

5.36 Natural England also had further concerns on the ecological impacts of the proposals and mitigation for the scheme as a whole, in addition to its objection; there is no specific mitigation for the loss of species-rich neutral grassland; ditch re-creation does not appear to be on a 2 for 1 ratio; there is uncertainty on the reliability of measures to protect water bodies from pollution; no mitigation for aquatic invertebrate populations; clarification is required of the benefits of active management of targeted woodland; no mitigation for landscape scale effects (e.g. through severance of hedgerows) was proposed having regard to PPS9 and the protection of networks of valuable habitat; the validity of proposed mitigation for the loss of wet grassland and fen habitats and their severance from floodplains.

5.37 It stated that it would have expected a development of this nature and scale to demonstrate innovation in proposed mitigation and a commitment to enhanced biodiversity. It does not do so and opportunities for enhancement have not been explored. Further to a more satisfactory scheme being implemented Natural England would wish to see, for example, a commuted sum being made available to be used for biodiversity enhancement projects within the wider area. The Environmental Statement mitigation strategy has failed to realise such potential.

5.38 In response to the Addendum ES consultation and departure advertisement, Natural England reviewed the Addendum Environmental Statement and considered that the information submitted still failed to address many of its concerns including; inadequate mitigation for the loss of small areas of woodland ground flora, loss of connectivity and nitrogen deposition on Marline Valley Woods; air quality effects both Marline Valley and Combe Haven SSSI sites; incomplete bat surveys and inappropriate mitigation including for loss of maternity roosts; and incomplete information on dormice.

5.39 Proposed areas of mitigation woodland planting for Marline Valley Woods SSSI were considered to be highly fragmented and within the zone of influence of the proposed Link Road and therefore will be subject to reduced air quality. The new road and development would cut Marline Valley off from the wider environment on three sides, removing potential for linking it and reducing its fragmentation on all but one side. Suitable mitigation would include native local provenance planting and/or areas of natural woodland regeneration of broadleaved woodland that is continuous with an uninfluenced section of the Marline Valley Woods SSSI. This should include a strip of native broadleaved woodland large enough to improve the adaptability of the SSSI to air quality and climate change influences, and provide an opportunity for the bryophytes to spread away from the zone of influence of the road. Details and security of provision of mitigation for the grassland areas of the SSSI are required. Local (dry) deposition of nitrogen and ammonia from the road contributes to local acid deposition so the effects of this should be assessed for both SSSIs. The bat survey was still incomplete and a site specific mitigation proposal is required for the loss of the long eared bat maternity roosts. Information was required on whether the proposed scheme would result in small isolated population of dormice and whether the mitigation would be suitable to ensure their survival.

5.40 Subsequent to the applicant's submission of the additional information in respect of bats, dormice and impacts on Marline Valley Woods SSSI, Natural England confirmed that they have withdrawn its previous objection to the Scheme. Natural England noted that are satisfied that a commitment had been made to secure a suitable area of land to compensate for the effects on Marline Valley Woods SSSI; that the mitigation proposed for the loss of bat roosts within the zone of the scheme was suitable, in principle; and that the dormouse mitigation was also considered suitable. Safeguarding conditions were also proposed.

5.41 English Heritage does not object to the selection of the preferred route for the road by the Council. However it considers that planning permission should not be determined until: further archaeological evaluation has been undertaken (over and above what is proposed in the Environmental Statement); reports of all archaeological evaluations disseminated and their implications for the Environmental Statement considered; and various unresolved issues relating to the evaluation of cultural heritage and mitigation of impacts on it clarified. English Heritage draws the Council's attention to the failure to fully comply with government guidance on the process of archaeological assessment during the preparation of the Environmental Statement, in particular the intention to defer part of the field evaluation until after the determination of the application. This is contrary to government guidance PPG16 and The Design Manual for Roads and Bridges, and would impair the Council's ability to make an informed decision, and undermine its ability to make proper provision for the nature and cost of mitigation measures.

5.42 English Heritage concurs with the assessment of significance of historic buildings and archaeological remains in the Environmental Statement. There is substantial potential for the discovery of hitherto unknown sites. The design of further archaeological evaluation should therefore address the archaeological potential in each of the defined zones. Before the application is determined English Heritage requested: to receive a copy of the Light Detection and Ranging (LIDAR) survey report and filed working report and be able to comment on it; to review the coverage and results of the Stage 1 geo-archaeological work; to receive clarification of the programme, design, and funding for Stage 2 evaluation and mitigation. Archaeological remains that require full excavation and post-excavation work or preservation-in-situ may be discovered, and this requires adequate funding, time and design flexibility. It wishes to comment on the proposed archaeological mitigation works in due course but concurs that the proposed mitigation for the impacts on historic structures and on historic landscape character is appropriate.

5.43 English Heritage has commented on the Addendum Environmental Statement and is of the view that the works proposed by the applicant are acceptable, but notes that, as part of this, the “financial worst case scenario” for future archaeological work is to be incorporated in documents. In response to the second formal consultation, EH recommends that the application should be determined in accordance with national and local policy guidance and on the basis of the Council’s specialist conservation advice.

5.44 Sussex Police has no comments from a traffic management perspective.

5.45 South East Water confirms that no problems are envisaged with existing apparatus for the majority of the Link Road route, providing finished ground levels do not change significantly. It has two areas of concern where diversion of apparatus is required; diversion of two mains at London Road junction and diversion of three mains at Holliers Hill Bridge.

5.46 Southern Water has no objections to the Scheme.

5.47 National Grid states that the risk to operational electricity and gas transmission networks is negligible and confirms that, in response to the second formal consultation.

5.48 EDF Energy requires contact about underground cables within the proposed area. In response to the second formal consultation it has no objection, providing rights of access and maintenance of its cables are maintained.

5.49 The South East England Regional Assembly considers that the proposed development would not materially conflict with or prejudice the implementation of the Regional Spatial Strategy (RPG9 and Alterations) or the draft South East Plan (March 2006). The Assembly observes that the County Council must be satisfied that the proposal is the most appropriate scheme for a link road between Bexhill and Hastings to deliver regional and sub-regional social and economic regeneration, housing and infrastructure objectives, in line with policies SCT1 ('Core Strategy'), SCT2 ('Enabling Economic Regeneration'), SCT6 ('Affordable Housing'), SCT7 ('Implementation and Delivery'), SCT9 of the draft South East Plan. If planning permission is granted, it should, through appropriate conditions and/or legal agreements, secure appropriate and adequate mitigation measures to the satisfaction of Natural England, the Environment Agency and other statutory environmental bodies.

5.50 In response to the second consultation, the Assembly does not feel that the Addendum to the Environmental Statement raises any new regionally significant issues.

5.51 Seaspace (Hastings and Bexhill Renaissance), the regeneration company established to implement the Five Point Plan for Hastings and Bexhill, support the application. They consider the Link Road to be a critical element of the Five Point Plan and one of several identified transport improvements within the Plan. They consider the road will provide a number of direct benefits which contribute to regeneration efforts through release of employment land in North Bexhill, improved local journey reliability by relieving the A259 Bexhill Road, better connectivity between Bexhill and the A21, better bus connectivity and reliability, and environmental improvements particularly tackling air quality in Bexhill Road. The Link Road is seen as a regeneration project and part of a multi-stranded package of interventions that are mutually supportive. It is confirmed that some developments within this package are directly tied to the Link Road and others restricted by it. Most developments are seen to be indirectly dependent on the Link Road and without it are likely to take longer to develop because of reduced market interest, difficulty in financing, and the attraction of lower quality occupants. It is considered that without the Link Road the scale of improvements required to deliver regeneration for the area would not be achieved and the strategy would fail along with the wider strategic land use and transport planning package.

5.52 The South East England Development Agency supports the proposed road and considers the scheme as one of the most important infrastructure schemes currently in the South East Region. It is aware that the scheme is important to the delivery of a number of regeneration projects including a strategic employment site at North Bexhill. The road and the employment development would assist the implementation of the Regional Economic

Strategy for the Coastal South East sub-region, including ensuring sufficient employment land and improving connectivity along the south coast.

5.53 Sussex Enterprise considers that, after the Government's decision in 2001 to block the building of a bypass, it is now more crucial than ever for the future prosperity of the area that this road is built. Regeneration of the Hastings area, the most deprived in Sussex, could only be truly effective if the transport infrastructure is in place to meet the needs of businesses, residents and commuters.

5.54 Sussex Enterprise is also encouraged by results for traffic models, that the traffic on the A259 (Bexhill Road) would be reduced by at least one third. Results from the Voice of Business survey shows that traffic congestion has a negative impact on businesses, some of whom would consider relocation if transport infrastructure in the area does not improve. The Link Road would contribute enormously to the regeneration of this area, encourage inward investment, open up new areas for new business parks, and facilitate access to areas for residential developments, thus helping to address the lack of affordable housing for the local workforce.

5.55 Hastings and St. Leonards Strategic Partnership supports the proposed Link Road. It considers the scheme to be an important component to the successful delivery of the Community Strategy and the regeneration of the area. The benefits of the road would assist in achieving a number of the key targets - specifically the housing targets through the release of land. This would also increase business use land with the potential for new jobs. Without the Link Road, it is possible that other key targets would be unachievable, including better bus connectivity and improved journey time. It is hoped that road accidents will decrease. With possible changes in local services at the Conquest Hospital a Link Road may be vital in providing a faster and more direct link with other services elsewhere in the vicinity.

5.56 Crowhurst Action Committee (Crowhurst Society) considers that some of the conclusions are highly selective, resulting in the presentation of the most favourable case, rather than providing an objective stance. The Action Committee has produced its own document which represents the views of the majority of householders in the village. The document's conclusions highlight weaknesses in both the execution and reporting of the consultation process; lack of evidence in the Economic Assessment Report for the Benefit Cost Analysis; missing data on adverse effects of the Link Road on traffic flows in Hollington; omission of consideration of fog as an issue; and inclusion of three sharp bends in the scheme.

5.57 The Action Committee considers that the Link Road will bring about significant and irreversible changes to the Crowhurst environment. The historic landscape surrounding the village will be altered, whereby the scale of

its loss is not compensated for in the benefits created by the Link Road. The Committee notes the changing purpose of the Link Road scheme – in particular its current role in the regeneration strategy. In light of other development projects in the area, they query whether the scale of development at North Bexhill is either feasible or required. The Link Road should be discussed at a Public Inquiry.

5.58 In response to the Addendum ES consultation and departure advertisement, the Crowhurst Action Committee has produced a further document, commenting on the Addendum to the Environmental Statement. The Committee's document reiterates all the conclusions of its earlier document and considers there is an urgent case for a Public Inquiry.

5.59 The document includes detailed comments on many aspects of the Addendum to the Environmental Statement including, the lack of research to show the Link Road is indispensable to the economic growth of Hastings and Bexhill; lack of work on ambient noise levels in Crowhurst; poor interpretation of public consultation results; uncertainty about junction analysis and about designing and financing complementary transport measures; wildlife will suffer despite any mitigation measures; the conclusion that the effect of runoff will be neutral is very hard to believe; lack of long term commitment to the conservation management plan; lack of opportunity for public comment on promised further reports on dormice, great crested newts and reptiles; the scheme is all about Hastings and is most likely to adversely affect trade in Rother/Bexhill; existing suitable employment sites have not been properly considered as an alternative; questions on the accuracy of traffic flow figures remain unanswered; the increase in the Benefit Cost Ratio for the scheme does not make sense; evidence from some later crucial archaeological investigations will not be available to Councillors making the decision; English Heritage's support for the scheme depends on finance for further archaeological work; effect of the Link Road on the Combe Haven Valley SSSI would contrast dramatically with the control over a wide range of agricultural activities in the Combe Haven Valley SSSI.

5.60 The Society considers that a short consultation period on a very large technical addendum in the peak family holiday period caused disenfranchisement, and conflicts with government aims to involve communities and local people. Whilst responses were accepted after the consultation period it is considered unlikely that they would receive the same consideration by the County Council who had no intention of allowing proper consultation to take place. The dismantling of the Link Road planning team already is not 'due diligence' and requires an explanation.

5.61 Wishing Tree Residents' Association objects to the application. The proposed road mirrors much of the route of the rejected Western Bypass, replicating its negative impact by redirecting a huge volume of traffic into our residential area. The local nature of the traffic on the A259 means that road

users will either continue to use the A259, or transfer to the new road, bringing more congestion, principally to the local area and The Ridge – which reached full capacity eleven years ago. The effects of the new road also do not reflect the government’s promotion of safer routes to school and improved safety and security in the transport system.

5.62 The Link Road will also compromise many areas of environmental importance and natural beauty. It will irrevocably scar Combe Haven Valley; result in the loss of 0.4 hectares of woodland and damage at least four other areas; and cause “substantial negative impacts” on several Local Nature Reserves and Sites of Nature Conservation, which, as well as having scientific and historical value, provide indispensable open spaces between Hastings and Bexhill. Combe Haven is a leisure and tourist asset and should be preserved and enhanced. It is also possible that Crowhurst will become an adjunct of Hastings and Bexhill in a few years, permanently altering the character of the entire area.

5.63 The Association is also concerned about the effects of opening up sites for greenfield development. This is contrary to government policy as it will increase car usage and encourage the relocation of other business and leisure activities outside the towns, thus lessening the chances of reversing the deprivation of Hastings and St. Leonards town centres. A new road will undermine local public transport improvements - particularly the coastal rail service. The Link Road will also bring increased carbon emissions and aggravate climate change - the road has the second highest CO2 assessment of all local authority road schemes in the government’s Local Transport Plan programme.

5.64 In response to the Addendum ES consultation and departure advertisement, Wishing Tree Residents Association continues to object to the application. The road is considered a continuation of the threat to their common environment which has hung over the area for nearly thirty years. The road would bring increased traffic damaging the environment and quality of life. There is no definite timetable for any mitigation measures for increased traffic in this area and it is increasingly unlikely that any such “mitigating” link will ever be built.

5.65 It opposes the Link Road whether or not any “mitigation” is offered. As well as increased traffic, it would damage ancient woodland, with immediate loss of 0.4 hectares and damage four other blocks; it would cross the lovely and tranquil environment of Combe Haven Valley close to nature reserves and SSSIs, ruining forever the escape this landscape offers to the residents of the area; it would cost almost £100 million of public money; the suggested regeneration is entirely speculative; even if companies come to the proposed retail park they might leave the town centre causing further decline.

5.66 The road would be a denial of the acknowledged need to avoid action which increases pollution as it would increase CO2 emissions. It is backward looking and unsustainable and should be replaced with a progressive plan to improve public transport for the benefit of our residents and the town in general.

5.67 Friends of the Brede Valley objects to the application. It is strongly opposed to any increase in road capacity or new road scheme that will increase traffic on the A259 and A28 between Hastings and Ashford. The road is likely to increase traffic on the A28 and A259 east of Hastings, creating pressure for the Eastern Bypass. The Link Road will also move traffic from the A259 onto other roads in Hastings, thus increasing rather than reducing the impact of traffic over a wider area. A significant amount of new traffic will also be generated by removing the restriction of limited road capacity between Harley Shute Road and Glyne Gap.

5.68 The Friends of the Brede Valley are also concerned that upgrading the A259 east of Hastings would cause serious damage to the remarkable landscape of the Brede Valley, the settings of Rye and Winchelsea, and Romney Marsh between Rye and Brenzett. The Link Road will also increase CO2 emissions, which is contrary to government policies on climate change. In a list of current local authority road proposals in England, the Link Road is the second worst for impact on carbon dioxide emissions.

5.69 The published route would have an impact on both the Combe Haven SSSI and the High Weald AONB, in relation to Combe Haven, the effects are the same as the 'Modified Orange' route promoted by the County Council in 1990, and rejected by the Secretary of State on the basis that it would be more damaging to landscape, farming and nature conservation than routes further south. The landscape along the proposed route is considered to be even more attractive and valuable than it was in 1990.

5.70 In response to the Addendum ES consultation and departure advertisement, Friends of the Brede Valley consider the application should be withdrawn and other solutions to the needs of the Bexhill-Hastings area adopted. It reiterates its original reasons. It notes that some work has been done to mitigate some of the criticisms of English Heritage, Natural England and the Environment Agency, but any road across the north of Combe Haven will do enormous damage to landscape and to the overall ecological functioning of the valley. The road will increase local traffic, it will increase pressure to build roads east of Hastings, it is most unlikely to achieve the hoped for regeneration benefits, and it will greatly increase CO2 figures. Whatever form it takes it will irreparably damage the environment of the Combe Haven, one of the finest valleys in the area and a huge asset for Hastings and Bexhill. It will also cost close to £100 million and more when further mitigation and the essential link to the A21 are added. It is extremely

hard to understand why the County Council would persist in supporting such an inappropriate use of public funds.

5.71 Hastings Alliance for Sustainable Transport Solutions objects strongly to the planning application. The road project does not comply with the national planning policies and guidelines in many important areas, including sustainability (PPS1), sustainable development in rural areas (PPS7), biodiversity and geological conservation (PPS9), transport (PPG13), historic environment (PPG15), archaeology (PPG16), coastal planning (PPG20), tourism (PPG21), noise (PPG24), flood risk (PPS25) and climate change.

5.72 The Alliance objects, because public consultation was short and inadequate; Additional quantities of CO₂ emissions are considered to be unacceptable and inconsistent with the County Council's "Carbon Management Plan"; The original budget of £47.2 million has risen to £89 million and additional mitigation measures required by the statutory environmental bodies will make it higher. The County Council's claim of a higher cost benefit ratio is not considered credible. No proper study has been carried out to examine alternative non-road strategies. The proposal does not address rising traffic levels and will lead to more traffic in Hastings and Bexhill than currently. Contrary to recommendations in the South Coast Multi Modal Study, it will also lead to pressure for new roads east of Hastings. The Link Road will not make Hastings or Bexhill more accessible to the wider region, and is therefore unlikely to attract investment from elsewhere. It might however cause the relocation of local firms out of town centres, generating more commuter flows and creating new jobs at the expense of existing jobs in the centres of Hastings, St. Leonards and Bexhill. The road will also undermine investment in public transport.

5.73 The Alliance considers that the comments on the road by the SEB's indicate that cooperation with the County Council, as requested by the Secretary of State, has not been effective. Recent changes to the scheme do not justify an alteration of the Minister's assessment when proposals for Hastings Western and Eastern Bypasses in 2001 were turned down.

5.74 In response to the Addendum ES consultation and departure advertisement, the Alliance maintains its strong objection and requests that planning permission is not granted. The very limited consultation period in the main August holiday season made it extremely hard to study and respond to the large volume of complex new material. Despite a great deal of possibly worthwhile work by and on behalf of the County Council, the Alliance is still convinced that this is a flawed project, which does not represent sustainable development, will not achieve the regeneration benefits claimed for it, will result in unacceptable environmental damage to the Combe Haven valley and will now cost the taxpayer close to double its original sum. It sees no significant changes to justify altering the Minister's assessment when he turned down proposals for Hastings Western and eastern Bypasses in 2001.

5.75 The Alliance reiterates its view that the road project does not comply with the national planning policies and guidelines in many important areas . It maintains its view on its other objections and adds that concern about climate change has increased, and that the County Council's piecemeal attempts at 'mitigation' fail to consider the Combe Haven valley as a whole. In response to the Supplementary Nature Conservation report they reiterate the difficulty in assessing the large number of documents and continue to strongly object. Reference is made to the very special landscape quality of the tranquil Combe Haven Valley; its biodiversity, heritage and archaeology; its importance to the local population as a place for leisure and education. That the 'least worse' option does not guarantee that mitigation will be achieved and the asset of the area protected for future generations. A number of detailed points regarding the quality and effectiveness of the measures are raised in terms of overall effects and the degradation of the area.

5.76 The Alliance submitted a further letter of representation in November 2008 and raised a number of further concerns including; lack of a revised non-technical summary to follow on from the document published in April 2007; the adverse impact of the Scheme upon the Combe Haven valley; limited regeneration effects of the Scheme; increase in traffic on all other roads other than the Bexhill to Hastings stretch of the A259; increase in CO2 emissions and increase in scheme costs since 2003. In addition the Alliance re-states their support of the objections from FoE South East; Sussex Wildlife Trust; The Campaign for Better Transport and Hastings and Rother Local Agenda 21.

5.77 Hastings and Rother Local Agenda 21 objects to the application. It considers that the application seeks to do the very thing that the Secretary of State, consultants etc. said should not happen: i.e. a stand alone western link inflicting severe damage on the SSSI and the Combe Haven valley, encouraging more car dependence, and moving the traffic problems from Glyne Gap to Hastings Ridge and other areas; whilst making no serious attempt to produce a comprehensive and sustainable transport strategy for Hastings and Bexhill based on public transport options endorsed by the Secretary of State when he rejected both the Eastern and Western road schemes. The application should be refused because it would simply transfer the traffic problem from the A259 at Glyne Gap to other local roads; it would substantially increase CO2 and other pollutants; the additional investment on the edge of Bexhill could have adverse effects on deprived wards in central Hastings; claims that the Link Road is essential for housing development are not supported by consultants' findings; the environmental impact on Combe Haven would be unacceptable in terms of landscape, water quality and systems, noise and biodiversity.

5.78 In response to the second formal consultation, Hastings and Rother Local Agenda 21 reinforces its objection to the Link Road, and wishes the application to be recommended for refusal or withdrawn in view of the

statements of the Statutory Environmental Bodies. It reiterates its view that the application seeks to do the very thing that the Secretary of State, consultants etc. said should not happen: To move traffic jams from an area where they could be substantially reduced by alternatives to areas where this would be much more difficult, and to do this at considerable financial and huge environmental cost would seem difficult to defend given present government policies and guidance.

5.79 It reiterates and expands on its reasons to refuse the application (see above) as follows: it would simply transfer traffic from the A259 at Glyne Gap to Hastings Ridge and other local roads; extra and longer journeys induced by the Link Road would increase CO2 and other pollution substantially negating emission reduction targets; claims that the Link Road is essential for housing development are not supported by consultants' findings; a considerable proportion of Hastings' housing allocation is near The Ridge and extra traffic could affect these developments; the large greenfield business park and housing area is to attract a large scale employer from outside the area, but this is unlikely; there is significant local demand for medium/smaller and starter units in the town and there is a supply of vacant industrial and business floorspace and more expected; high quality units on the business park may attract interest from local businesses but will probably encourage others to relocate from rural areas and Hastings, increasing car travel to the detriment of the most deprived areas of Hastings; Combe Haven Valley is nationally important, particularly for its wetland system and habitats, and its natural systems rely on broad virtually unimpeded interaction with open countryside to the north; the Link Road would sever the lower part of the valley turning Combe Haven Valley into an island like open space; mitigation for the severance of ecological systems is woefully inadequate, and to assume that can be rectified later is completely unacceptable, particularly as the Statutory Environmental Bodies consider that the impact on severance cannot be mitigated with the current road design.

5.80 In response to the supplementary Nature Conservation report they wish to maintain their view that the application should be recommended for refusal, or withdrawn. It is considered that the span of bridges should be increased to maintain the ecological functionality of the valley and the applicant's resistance to this change is considered to be evidence of a lack of commitment to the nationally important environmental systems of the valley.

5.81 The School Farm and Country Trust (St. Leonards-on-Sea) objects strongly to the Link Road. This is a very controversial project and conflicts with numerous national planning and environmental guidelines. In particular the road will cause irreversible damage to the landscape, habitats and archaeological heritage of the beautiful Combe Haven; it will not resolve traffic problems, merely move mostly local traffic from one road to another, thereby bringing some relief to one residential area but blighting others; it is most unlikely to lead to the County Council's hoped for regeneration and could

easily have the opposite effect; its current cost of about £100 million could be much better spent on other local and more sustainable projects, few of which have been properly examined.

5.82 The Trust notes that the Addendum to the Environmental Statement of over 1000 pages was released during the first week in August; a move to prevent anyone on holiday from commenting on the Addendum. The County Council had no intention to allow proper consultation to take place.

5.83 Sussex Wildlife Trust strongly objects to the proposed Bexhill Hastings Link Road Scheme. The proposals do not represent sustainable development, the justification for the scheme is flawed and transport management alternatives to the road have not been adequately investigated. The scheme will have a negative effect on the Marline Valley Woods SSSI and Combe Haven SSSI, and on a matrix of Sites of Nature Conservation Importance. It fails to deliver biodiversity benefits as required by PPS9 and results in biodiversity loss. The Trust also notes the inadequacy of the consultation process and period, both in terms of consideration of alternative schemes, availability of key documents and time allowed for responses.

5.84 The Trust comments that the fundamental change in the landscape and functioning of the valley will not be adequately mitigated by habitat creation and management. Natural systems will be compromised and a man-made matrix of habitats bisected by a busy main road will not function in the same way so will not necessarily support the same suite of species; i.e. biodiversity will be adversely affected. The mitigation strategy for wildlife does not recognise the ecological functioning of the valley as a whole. The scheme will result in severance of habitats and loss of key ecological network features. It will lead to fragmentation and habitat loss that will disrupt the ecological functioning of the area and impact on the movement of species, including protected species. The waterways, ditches and floodplain which are vital to the functioning of the valley will be altered forever as will the biodiversity resource. The mitigation strategy for the biodiversity of the area is partly aspirational and there is little evidence that it will be successful. Even if fully implemented, the scheme will not deliver net biodiversity gains required by PPS9. The Trust does not consider that the planning authority has adequately addressed its requirement to actively seek in development proposals; measures that promote appropriate habitats and species listed in the Biodiversity Action Plan and in accordance with the CROW Act, and treat these as material considerations. The Mitigation and Compensation Strategy for habitats focuses on individual issues and sites but does not address the functional aspects of the ecological network in this area. This approach will not recreate the matrix of habitats that currently constitute a functioning ecosystem within the valley.

5.85 The Trust does not accept that the social and economic case for the scheme outweighs the enormous environmental damage that will result,

particularly as estimated costs have increased from £47 million in 2004 to current estimates of £89.3 million. If cost increases from flood amelioration, compensatory land and environmental impacts had been factored into the original bid, this would have affected the cost benefit ratio of the scheme, which should be investigated further before a planning decision.

5.86 The scheme will not address current transport problems and will not reduce traffic in the area. Further traffic from additional development will fill the proposed road to capacity and result in more traffic on already congested local roads. Alternative methods of transport management have not been adequately investigated whilst the proposed scheme conflicts with numerous national and regional policies to reduce greenhouse gases.

5.87 In response to the Addendum ES consultation and departure advertisement, Sussex Wildlife Trust considers that the information that has come forward at this stage has not convinced it that this scheme represents sustainable development or that the residual environmental damage after mitigation is acceptable. It does not accept that the works are imperative for reasons of overriding public interest, including those of a social or economic nature. The Trust maintains its strong objection to the scheme on all its original grounds. The 21 day consultation period over the busiest holiday season is not sufficient time to study lengthy documents, or for the public to get involved.

5.88 The Trust comments that the Addendum to the Environmental Statement does not imply a good understanding of ecological functioning. It is not possible to adequately mitigate the effects of the proposed scheme on the natural functioning of this landscape. Isolated designated nature sites will not halt the decline in biodiversity. The cumulative effects of development associated with this scheme should be assessed as part of the planning application. The substantial environmental damage from the enabled development will impact further on the Combe Haven valley and its biodiversity.

5.89 The Trust comments further and in detail on a number of adverse impacts on, and inadequate information and mitigation for both Combe Haven SSSI and Marline Woods SSSI, and considers that the significance of the impact of fragmentation is underestimated, as is the cumulative impact on biodiversity. It notes that the close to £100 million cost is more than double the approved funding and repeats its view that increased costs due to flood amelioration, compensation land and mitigating environmental impacts should have been included in the original bid. It is widely acknowledged that the greatest threat to biodiversity is currently climate change. The estimated increase in carbon dioxide emissions of about 6000 tonnes per annum by 2025 is acknowledged but not adequately addressed.

5.90 In response to the Additional Supporting Information the Trust reconfirmed their strong objection to the planning application on the grounds of environmental damage and therefore the unsustainability of the proposed scheme. The absence of a holistic assessment fails to reveal the damaging nature of the proposal to the whole valley and its ecological and hydrological functions. In addition to concerns regarding the proposed habitat compensation woodland the Trust is concerned that any work in the area of the compensation woodland has the potential to impact on the streams that currently feed the ghyll in the SSSI and that valuable hedgerows may be compromised by habitat creation on adjoining land. The compensation proposals are inadequate and the tranquillity of the Valley will be lost.

5.91 Royal Society for the Protection of Birds has several specific concerns. It is concerned about potential noise disturbance to breeding and wintering in the nationally important Combe Haven SSSI during construction and operation of the road. It is also concerned about the direct loss of 0.4 hectares of ancient semi natural woodland, contiguous with the Marline Valley Woods SSSI and an important area of wildlife habitat; and about the damage to at least four other blocks of woodland. It is concerned that significant increase in nitric acid deposition will adversely impact the sensitive grassland and reed bed habitats and species for which the Combe Haven SSSI is designated.

5.92 Despite the mitigation measures in the Environmental Statement, the Society remains concerned about the potential impacts of residual run-off from the road and fuel spillage on the same habitats. The Society is also very concerned about the negative impact the road will have on climate change, the greatest long-term threat to birds and other wildlife. The County Council should support a shift towards the use of sustainable modes of transport rather than the construction of a road in an environmentally sensitive area.

5.93 The Woodland Trust objects to the Link Road as it will result in the loss of 0.4 hectares of ancient woodland, damage to several blocks of ancient woodland and destroy the tranquillity and naturalness of the Combe Haven Valley. Whilst the Trust accepts that there is a need to address the transport and regeneration needs in this area, it is very concerned over the effects that this is going to have on the ancient woodland and Sites of Nature Conservation Importance of the Combe Haven Valley. Where woodland remains in the route of the road, the Trust strongly objects to the scheme on the basis that there will be either direct or indirect damage to a habitat that is highly important to England's natural heritage, which is against government policy.

5.94 The Trust do not consider that 'alternative sites or methods different' to the Link Road have been fully evaluated before a decision was made to take the road forward, in line with government guidance.

5.95 The Link Road and its traffic will affect a number of ancient semi natural woodland priority habitats, and other blocks of woodland which have ancient woodland flora and frequent field maple, indicating high biodiversity. Ancient woodland is the richest habitat for wildlife, and the most valuable habitat in terms of biodiversity. Remaining ancient woodland covers less than 2% of the UK, and is irreplaceable. Its protection is advocated in a number of planning and policy documents including PPS9, the UK strategy and indicators for sustainable development, the UK Forestry Standard, the biodiversity strategy for England, and the East Sussex and Brighton and Hove Structure Plan.

5.96 Any pollution resulting from the road will have a major adverse affect on the wildlife within the ghyll woodland habitat in Churchwood Complex and Marline Valley Woods SSSI. The road will dissect the Combe Haven Valley, eroding the existing habitat, isolating areas from the existing network of habitats and creating a barrier for species dispersal, presenting a serious threat to biodiversity. Whilst the Trust acknowledges the steps taken by the County Council to mitigate against the loss of habitat, it disagrees that "overall there would be a minor positive impact on woodland". It is not possible to mitigate the loss of ancient woodland and an "overall gain of woodland" does not therefore offset the loss of this habitat. Neither is the management of existing woodland a compensatory measure for the loss and damage of ancient woodland. No action is proposed to mitigate the high level of noise in very sensitive areas. In light of budgetary pressures, the Trust also have concerns over the security of proposed funding for mitigation, and therefore its capacity to offset the high level of environmental damage caused by the scheme.

5.97 In response to the second formal consultation, the Woodland Trust maintains its objection to the Link Road because of the unacceptable impacts on nationally and locally protected sites of ecological value. It is concerned over the impacts on ancient woodland. Changes in atmospheric nitrogen levels extend 100-200 metres either side of the carriageway, with significant impacts on vegetation through changes in biodiversity and species composition. The relatively low nitrogen concentrations in Combe Haven Valley should be maintained to protect its ecological value. The Link Road will dissect the Combe Haven Valley, eroding the existing habitat, isolating areas from the existing network of habitats and creating a barrier for species dispersal, presenting a serious threat to biodiversity. Noise and light intrusion will have a large effect on species within the woodlands.

5.98 In PPS9 Government has emphasised the importance of conserving ancient woodland and its value as a biodiversity resource. The Trust considers climate change to be the greatest single threat to long term survival of ancient woodland. The Government and Opposition endorsed Stern Report identifies measures to tackle climate change including the opportunity to affect emissions through the investments of the next 10 to 20 years. Sustainable transport improvements should be at the forefront of regeneration.

5.99 The Ramblers' Association considers that the benefits of the new road scheme and associated new development are far outweighed by its detrimental effects on the countryside. The road will dissect Combe Haven valley, and the High Weald AONB around Crowhurst will be badly affected by noise and visual scarring. Much of the traffic removed from the A259 at Glyne Gap is local and therefore unlikely to use the road. The extra traffic generated by new development will outweigh any relief provided by the road. Existing bottlenecks will simply be relocated and there is nothing in the current proposal to address this (e.g. The Ridge). The Association considers that the proposal should be called in by the Secretary of State.

5.100 Friends of the Earth – National (FoE) objects to the proposal. It is questionable whether the scheme is necessary for the economic growth of the area and it could actually undermine the rest of the “Five Point Plan”. There remain questions about whether inward investment will happen or whether existing companies in the area will relocate to the new out-of-town sites. New development in these areas will also create further traffic problems.

5.101 The County Council has not considered to have thoroughly assessed a package of alternative measures. Local Councils have done little to restrain traffic in the area. The economic strategy only considers alternatives in so far as they would work alongside the road. Alternative measures would alleviate the problems at lower financial and environmental cost. Before the Link Road is pursued, FoE would like the County Council to implement a package of measures to deliver reductions in traffic, using the experience of similar schemes in other towns which have shown remarkable results in modal shift. It is also concerned that public and councillors have never been given a choice about how to address the area's transport problems due to the claimed regeneration basis for the scheme. FoE suggests that there are simpler and less costly solutions to opening up greenfield sites to meet regional housing needs.

5.102 Having some of the highest CO2 emissions of any proposed road scheme, the application conflicts with national and regional guidance on climate change. The scheme also conflicts with regional and national policies on transport, and rail companies are unlikely to invest in stations and services in the local area if the road goes ahead.

5.103 Whilst the County Council has tried to avoid direct impacts on protected areas, the indirect impacts seem unclear in the Environmental Statement, and the overall damage caused by the scheme is unacceptable. Environmental impacts contravene national and regional policies; not enough account has been taken of the impacts of bisecting a wildlife corridor and the ensuing fragmentation; splitting the valley will diminish the overall value of the wider area as well as the SSSIs; mitigation plans cannot be certain to provide equivalent or extra habitat; the whole character of the valley will be irretrievably damaged; the impacts of noise on wildlife in the rural area appear to be untested; the tranquil nature of the whole area will be destroyed; impacts on water quality in the area appear not to have been fully investigated; whilst further work is required to assess impacts on an archaeologically sensitive area, the overall positive beneficial impact described appears premature; landscape impacts will be more strongly negative than described in the Environmental Statement; the discrepancy in the assessment of landscape impact for the Blue Route remains an issue; impacts seem to have been looked at in a wide study area which allows negative impacts near the road to be “cancelled out” by benefits to residents in other areas; and it is unwise to build a road through a valley known to have flooding problems, given that flood risk may increase in the future.

5.104 FoE is also extremely concerned at the cost of the scheme and how it can offer value for money. It would prefer greater investment in rail services to shift journeys away from cars and reduce CO2 emissions. Such schemes are however unlikely to progress whilst more road based access is provided. It requests that the scheme is turned down or there is a Public Inquiry.

5.105 Friends of the Earth – Hastings (FoE) objects to the proposed Link Road as it traverses a high quality landscape containing a SSSI, whilst increasing congestion elsewhere. FoE queries whether any serious attempt has been made to produce an alternative transport strategy for Hastings and Bexhill, including the options set out in the Access to Hastings Study and SoCoMMS reports. There must be incentives for people to leave their cars at home, and superior public transport systems such as light/ultra light rail would cost less than the Link Road, cause little or no pollution, and be a sustainable alternative to road building; have trams been examined?

5.106 FoE comments that the Environmental Impact Assessment should include addressing the effects of building a road through a fog pocket as well as its environmental impact from noise, light, air quality and flood risk, as the previous route was rejected for this reason. They also enquire whether a detailed archaeological survey of the historic landscape will be undertaken and note that increases in CO2 emissions will swamp the County Council's attempts to reduce them in other sectors.

5.107 In response to Addendum ES consultation and departure advertisement, Friends of the Earth – Hastings reiterates its earlier objections (see above) and adds that it is essential that the scheme must be called in for

a Public Inquiry for the following reasons: it traverses an area with wildlife habitats and archaeological heritage in the Combe Haven Valley; it is questionable whether any regeneration benefits will result; the cost is still rising and the money could be better spent elsewhere.

5.108 Campaign to Protect Rural England – National (CPRE) objects to the application. The scheme will not achieve the sustainable use of land and protection of important landscapes. A thorough investigation into the alternatives should be carried out, and a new public consultation opened on the findings. The scheme would irretrievably damage the character of Combe Haven, one of the most beautiful valleys in East Sussex, close to the High Weald AONB, and the SSSI within the valley, alongside other Sites of Nature Conservation Importance.

5.109 CPRE is concerned that no serious consideration has been given to alternative ideas for traffic management between Bexhill and Hastings. The Link Road is likely to encourage more car use rather than public transport, thereby increasing CO2 levels. The Link Road may reduce traffic on the A259, but it will displace traffic on to roads in north Hastings, which will be unable to cope and further resources will be required to increase their capacity. Encouraging the use of public transport would therefore be preferable, and other more practical and economic measures would negate the supposed need for a new bypass (e.g. schools and workplaces sustainable travel plans; demand management measures; improvements to public transport; and investigating minor improvements to the A259). It is concerned that associated residential and business development along the road would cause ribbon development and encroachment on the proposed Pebsham Countryside Park and adjacent SSSI.

5.110 In response to the second formal consultation, it reiterates its earlier response and asks that all previous points be taken into account when considering the re-advertised application.

5.111 Campaign to Protect Rural England – South East objects to the scheme. In the context of the South East, the scheme is extremely expensive for a 'link road' of 3.4 miles which primarily addresses local issues. The money would be better spent on smaller schemes in the South East, which focus on reducing the economic footprint, encouraging behavioural change away from dependence on the private car, retaining the tranquillity of diminishing rural areas, and maintaining separate communities such as Bexhill and Hastings along an already overdeveloped South Coast.

5.112 The rationale for the scheme with regards to new housing opportunities is partly undermined by the 5,000 empty properties in Hastings. Future pressures to extend the developed area out towards the line of the new road may engulf yet more countryside.

5.113 The Campaign to Protect Rural England – Sussex (CPRE) objects to the application on the grounds of the economic, environmental and ecological cases presented by the Council. There is no evidence the road will facilitate regeneration but such a road is as likely to take people and trade away from a town. The majority of the proposed houses in north Bexhill could be built without the road, and, in any case, would delay and remove the need to refurbish about 5000 homes in the town. The estimated costs have risen from £47 million to about £100 million, are increasing annually and do not include the costs of junction work at either end of the road. Previously proposed investigations of less injurious and more worthwhile solutions, including public transport, have not been done despite the demonstration of more effective results at less cost. The development would ruin what the Council describes as one of the loveliest valleys in Sussex. Council estimates of carbon dioxide emissions are likely to be an underestimate given evidence from other bypasses, and government and international bodies are calling for reductions in global warming gases. There is a serious risk of water pollution from runoff from the road. Trees, many of them specimen, will be destroyed in the building or damaged by the after effects. Some efforts have been made to reduce the effect on wildlife but sufficiently detailed studies have not been carried out on some species. The limited proposed habitats, even with connecting corridors and bridges, are inadequate to sustain the many species in the valley.

5.114 CPRE considers that the road would cause massively excessive damage on the area and cannot be justified when government is calling for a reduction in road traffic. CPRE wants the application withdrawn in favour of available more effective and less expensive alternatives.

5.115 In response to the Addendum ES consultation and departure advertisement, Campaign to Protect Rural England – Rother and Hastings (CPRE) finds it impossible to think of a proposal more inimical to the tenets of the CPRE than the current Link Road. It will have a devastating effect on the local human and non-human environment in order to redraw an extremely costly line for development, the key driver to the proposal. Even as a road it makes no sense even economically, as with the rejected bypass proposal. Traffic problems could be solved by small scale less environmentally damaging improvement to the existing road and public transport networks. The road is a ludicrously expensive folly, with illusory gains. The only winners would be land owners through increased land values; the rest of us, human and non-human, would be immeasurably poorer.

5.116 Transport 2000 objects to the application. A scheme that could eventually cost the taxpayer £89 million should be expected to decrease, not increase, CO2 emissions. As the second worst local authority major road scheme for CO2 in the whole country, the scheme will contribute to Britain failing to meet its obligations to reduce CO2 emissions. Planning decisions taken now are critically important to not building a carbon intensive future, and

Councils should lead by example - the County Council's forecast of CO2 savings will be eliminated by the CO2 increase arising from the road.

5.117 The proposed development is inconsistent with planning policy on climate change (PPS1) and conflicts with the transport objectives of PPG13, and with PPS7 as it would not protect the character of the countryside and the diversity of its landscape. The route runs very close to Combe Haven SSSI, and cuts off a corner of the Marline Valley Woods ancient woodland. Traffic noise is a significant consideration along the rural section of the scheme. Whilst the County Council proposes to integrate the road into the landscape it will still be a scar across the valley.

5.118 The proposal also conflicts with regional policies to rebalance transport systems in favour of non-car modes, minimise negative environmental impacts of transport, and to enhance the environment and communities through transport. In this respect, there is excellent local potential to transfer passengers from road to the existing rail line, and the new road is likely to undermine the market for rail.

5.119 Transport 2000 notes that the scheme was accepted into the government Local Transport Plan programme at £47.3 million, provided that the gross and net costs of the scheme remain unchanged. The current cost of the scheme has risen to £89 million which may break the condition for funding from the government. In light of rising costs, Transport 2000 also query the evidence for the increase in its Benefit Cost Ratio (BCR) from 2.6 to 3.4, and note that there are cheaper alternatives with higher BCRs.

5.120 Transport 2000 does not consider that the scheme is essential for regeneration and the proposed development north of Bexhill. There are more attractive and suitable locations for inward investment in the region. Market demand in this area will be weak; the road will encourage car dependency; and lack of interest in running a bus service on the new road indicates limited demand for travel in the Link Road corridor.

5.121 The full range of alternatives to the new road must be properly assessed. These were not thoroughly examined in the SoCoMMS or the County Council's Hastings Strategy Development Plan. A package of "smarter choices" measures including TravelSmart (which has produced startling results), school and workplace travel plans, Bike It, car clubs, car sharing, teleworking and teleconferencing would significantly reduce car journeys across the two towns at a fraction of the cost of the road whilst helping to meet policy objectives such as decreasing carbon emissions.

5.122 In response to the Addendum ES consultation and departure advertisement, Campaign for Better Transport (successor body to Transport 2000) objects to the revised application for the Link Road. The scheme contradicts a number of government policies on sustainable development, biodiversity and the environment, which leads to a presumption against the scheme receiving planning permission. The scheme conflicts with PPS1, PPS7, PPS9 and PPG13 as it increases emissions, has a significant negative impact on biodiversity, encourages people into unsustainable car-based travel patterns, and will irreparably damage the Combe Haven Valley SSSI.

5.123 When the Secretary of State granted conditional approval to the scheme in 2004, it was a condition that the County Council work closely with the Statutory Environmental Bodies (SEBs) to ensure that appropriate environmental measures are incorporated. This condition has not been met as all three SEBs raise serious concerns on the application and there are still substantial unresolved environmental issues on the revised planning application. Studies have not adequately considered non-road alternatives to the scheme. Original cost estimates of £47 million for the scheme have risen to £96 million and local tax payers will be expected to cover the shortfall. The Benefit Cost Ratio for the scheme should be re-calculated to take account of the increased cost.

5.124 Transport 2000 – East Sussex objects to the scheme. Alternative non-road strategies have not been fully considered in their own right, and any examination of alternatives has been as ‘complementary measures’ to the Link Road. Development of the Link Road will lead to car based development and dependency, and is contrary to national and regional policy in terms of encouraging sustainable development based on walking and cycling and public transport nodes.

5.125 It draws attention to ‘smart choices’ as set out in the White Paper on “The future of transport”. Themes such as soft measures, traffic restraint, demand management, individualised marketing, workplace, schools and college travel planning and road user charging have led to well tried measures and growing best practice. Sustainable transport demonstration towns have delivered large reductions in traffic and very high ‘benefit cost ratios’.

5.126 Transport 2000 queries the value of the scheme in light of an almost doubling of its cost, which breaks a key condition on which government approval was given. There is also huge uncertainty over funding from developer contributions as required by the government. Regardless of the source of funding, the money could be better spent elsewhere through the development of a sustainable non-road based strategy, especially since 80% of the housing could be delivered without the Link Road.

5.127 Transport 2000 also notes that the CO2 emissions for the scheme cancel out the County Council's 'carbon footprint reduction strategy' target for its own activities across the entire county – although the County Council describes the emissions from the Link Road as 'negligible'.

5.128 Transport 2000 is also concerned that the Link Road would significantly harm the landscape heritage and wildlife of the Combe Haven area. There has been no appraisal of the state of the SSSI and the main and tributary valleys, in a 'do minimum' scenario, and assumptions have been made in advance about the success of proposed mitigation measures. Allowing negative impacts on nearby SSSIs does not comply with the CROW Act.

5.129 The proposal conflicts with regional transport policies regarding the rebalancing of the transport system in favour of non-car modes through an integrated package of measures, minimising negative environmental impacts and enhancing the environment and communities where possible. Transport 2000 notes that investor confidence has previously grown in the area without any road building. Development of the Link Road would not make the area more widely accessible, out of town business sites would cause relocation of existing firms rather than attracting inward investment, journeys to work would be increased and existing town centres weakened. Regeneration should be linked to a low carbon economy, which will minimise leakage from the local economy. Sustainable transport strategies are far more likely to support local services and shops, the strengthening of local economies and increased local business start-ups.

5.130 In response to the second formal consultation, Campaign for Better Transport – East Sussex (successor body to Transport 2000 - East Sussex) objects to the Link Road scheme on a number of environmental and transport and development grounds, described in this and its earlier response (see above). It submits its commissioned reports on regeneration issues and on the investigation of alternatives.

5.131 The cumulative damage to habitats, ecology, landscape and archaeology is unacceptable. Whatever mitigation measures are implemented the Combe Haven valley will be a poorer and degraded environment, and its integrity permanently disrupted. All three statutory environmental bodies raise serious concerns about the scheme (two formally objected), and there are still substantial unresolved environmental issues. This breaches the condition of close working to address environmental impact set by the Secretary of State's approval in 2004. The proposal conflicts with government policy of a strong presumption against new or expanded transport infrastructure in environmentally sensitive areas or sites, which resulted in the government rejecting the Bexhill and Hastings western bypass. The duty in the CROW Act on authorities to further the conservation and enhancement of SSSIs has not been met because there has been no appraisal of the SSSI and its

surroundings in a 'do minimum' scenario, and assumptions have been made which anticipate the success of proposed mitigation measures. Environmental impacts have been assessed on a piecemeal basis, whereas the valley has integrity, and unusually it has silence and tranquillity.

5.132 Alternative non-road strategies have still not been considered, except as complementary to the Link Road and this is reflected in the Environmental Statement. No full 'do-minimum' case has ever been developed and there are additional options available now to manage down travel, particularly by car. Fifteen out of twenty five targets in the County Council's Local Transport Plan would be met more easily without the Link Road. It is very surprising that there is no comprehensive transport strategy for Bexhill and Hastings.

5.133 The Link Road solution would lead to car based development; contradicting national and regional policy, including PPG13. Sustainable regeneration would build on the strengths of the two towns and conserve and enhance the high quality environmental assets, including the Combe Haven valley. It would include 'smarter choices'. The County Council has never studied access to development without the Link Road, although it has been shown that 80% of the housing in north Bexhill could be provided without it, which could reduce car trips, be a more efficient use of the development land, reduce CO2 emissions, and be a general and widespread improvement in air quality for thousands of households. You can have it all: social equity, environmental sustainability, regeneration, by building a strategy out of many small coherent "fixes". In a time of recession this would be far more likely to lead to regeneration and deliver the benefits to all.

5.134 There was inadequate time to consider the revised planning application, given the volume and complexity of documents, and the three week period for representations in the August holiday period.

5.135 Sustrans objects to the application. The level of expenditure is not justified, especially considering how the money could be spent elsewhere. A package of "smarter choices" measures would significantly reduce car journeys at a fraction of the cost of the road. A sum of around £10 million should be allowed to transform Bexhill and Hastings as Sustainable Travel Demonstration Towns, to include infrastructure for walking, cycling and public transport as well as the smarter choices.

5.136 The Link Road is the second worst for CO2 emissions out of 59 major road schemes in England. It should be reassessed in light of government climate change targets. A package of sustainable transport measures would significantly reduce CO2 emissions across the area at a fraction of the cost. The full range of alternatives to the new road must be properly assessed, one of which should be a seafront path for walking and cycling between Glyne Gap and Cinque Ports Way, which could make a significant contribution to

reducing congestion on the A259. Sustrans also queries the increase in Benefit Cost Ratio from 2.6 to 3.4 when the cost of the scheme has nearly doubled.

5.137 Sustrans comments that housing and industrial development areas to the north of Bexhill should be sustainable without the road. A smaller development could be serviced with a shorter road linked to the existing network, and a package of smarter choice measures planned into the development would reduce car travel. Sustrans also queries the regeneration justification for the Link Road with regards to the business park. Market demand in this area will be weak regardless of the road and would require inward investment for which there are more attractive locations in the region. There is other land suitable for business and ample capacity for planned housing provision without the Link Road. Any short term gains from development would also be dwarfed by longer-run increases in traffic and car-dependency.

5.138 Lack of interest in running a bus service on the new road suggests limited demand for travel within the Link Road corridor. However, there is excellent potential to transfer passengers from road to the existing rail line as an alternative option. Development of the Link Road would however undermine the market for rail.

5.139 In response to the Addendum ES consultation and departure advertisement, Sustrans objects most strongly to the proposed Link Road. It urges the County Council and Government to cancel this expensive road scheme and fully appraise the alternative options. Sustrans reiterates the points made in its earlier objection and in particular the transformative effect that £10 million spent on sustainable travel measures would have in Hastings and Bexhill, including a proper network of walking and cycling routes. The dramatic increase in the price of oil has further undermined the case for significant investment in new roads.

5.140 The road will cause irreversible damage to the landscape, habitats and archaeological heritage of the beautiful Combe Haven. It will not resolve traffic problems, merely move mostly local traffic from one road to another, thereby bringing some relief to one area but blighting others. It will increase overall traffic and produce large quantities of CO₂ when we must reduce the causes of climate change. It is most unlikely to lead to the County Council's hoped for regeneration, and its current cost of about £100 million could be much better spent on other local and more sustainable projects, few of which have been properly examined.

5.141 This very controversial project conflicts with numerous national planning and environmental guidelines and should be submitted to a proper public examination. It is entirely inappropriate that the County Council should

be able to award itself planning permission without an open and democratic examination.

5.142 Common Cause opposes the proposed Link Road because it will conflict with national planning and environmental guidelines and will cause more problems than it solves. It is considered that it will cause irreversible damage to nationally important habitats, including SSSIs and ancient woodland; the beautiful ecologically and archaeologically rich Combe Haven Valley will be entirely fragmented; the road will not resolve traffic problems, merely move mostly local traffic from one road to another, thereby bringing some relief to one area but blighting others; it will increase overall traffic and produce large quantities of additional CO₂; it is most unlikely to lead to regeneration; and the £100 million cost could be much better spent on other local more sustainable projects and this should be examined more fully.

5.143 Hastings Urban Bikes objects to the proposed Link Road. It is a highly controversial project which runs completely contrary to government policies on reducing carbon emissions, pollution and car usage. It should be cancelled and the alternatives re-appraised. The enormous cost of about £100 million is not justified by the claimed benefits. There is no evidence that it will reduce traffic or lead to the regeneration of Hastings and Bexhill. It will lead to increased traffic and CO₂ emissions. The vast sums would be better spent on creating a sustainable network of walking and cycling tracks in Hastings and Bexhill.

6 DEVELOPMENT PLAN

6.1 The decision on all development plans should be taken in accordance with the development plans unless material considerations indicate otherwise. The development plan policies of relevance are set out below:

Regional Planning Guidance for the South East RPG 9 – The development plan consists of Regional Planning Guidance note 9, with its more recent alterations, as the current Regional Spatial Strategy. Relevant policies from RPG9 include T1 (Manage and Invest), T2 (Key Management Issues), T3 (Rural Dimension), T5 (Regional Spokes), T10 (Mobility Management), T17 (Priorities for Investment), Q1 (Urban Renaissance), Q2 (Form and Design of Urban Development), Q4 (Urban Fringe), Q5 (Town and Local Centres), Q6 (Provision of Services), Q8 (Sustaining Rural Communities), E1 (Areas of International and National Importance for Nature Conservation, Landscape and Cultural Value), E2 (Biodiversity), E4 (Coastal and River Environment), E5 (Woodland Habitats), E6 (Access to the Countryside), E7 (Air and Water Quality), E8 (Soil and land quality), INF2 (The Water Cycle), RE1 (Economic Success), RE3 (Long Term Approach), RE5 (Existing Employment Land Resources), RE7 (Economic Distribution), H5 (Housing on Previously Developed Land).

The East Sussex and Brighton and Hove Structure Plan 1991-2001 (Adopted 1999) - S1 (Strategy for a more Sustainable Future), S2 (Infrastructure), S3 (Infrastructure), S4 (Strategic Pattern of Development), S10 (The Countryside), EN1 (General Environment), EN6 (The Coast), EN7 (Urban Fringe Areas), EN8 (Remote and Tranquil Areas), EN9 (Extensive and Noisy Activities), EN11 (Water Quality and Conservation), EN13 (Air Quality), EN17 (Nature Conservation), EN18 (Nature Conservation [enhancement]) EN20 (Habitat Compensation), EN26 (Built Environment), E1 (Economy and Employment), TR1 (Integrated Transport and Environment Strategy), TR4 (Walking), TR5 (Cycling [facilities]), TR6 (Cycling [strategic network of routes]), TR39 (Bexhill and Hastings) and TR40 (Bexhill and Hastings [bypass link roads])

Hastings Local Plan (adopted 2004) - DG1 (Development Form); DG2 (Access and Parking); DG33 (Environmental Pollution); DG4 (- Noisy Activities); DG8 (Protection of Views); DG26 (Flood Risk); DG27 (Surface Water); NC2 (Sites of Special Scientific Interest); NC3 (Local Nature Reserves); NC6 (Sites of Nature Conservation Importance); NC8 (General Planning Requirements); NC9 (Information to Accompany Planning Applications); NC10 (Ancient Woodland); L1 (Landscape Character); L3 (Development Outside the Built-Up Area), C1 (Development within Conservation Areas), C2 (Demolition in a Conservation Area), C3 (Development involving Listed Buildings), C4 (Demolition of Listed Buildings) and C6 (Archaeological Sites and Ancient Monuments).

Rother District Local Plan (adopted 2006) - DS1 (Development Principles); DS4 (Development Boundaries); GD1 (General Development Considerations); TR1 (Bexhill-Hastings link road area of search); TR2 (Improvements to sustainable Transport); BX1 (Bexhill Planning Strategy); and BX2 (Land North of Pebsham)

East Sussex and Brighton & Hove Waste Local Plan (adopted 2006) – WLP11 (waste minimisation)

6.2 The **draft South East Plan** has been submitted to Government as a revision of RPG9, which will ultimately form the new Regional Spatial Strategy. The Proposed Changes carry increased weight following publication, as the EIP report has been published by the Government and emerging relevant policies are: SCT1 ('Core Strategy'), SCT2 ('Enabling Economic Regeneration'), SCT6 ('Affordable Housing'), SCT7 ('Implementation and Delivery'), SP2 (Regional Hubs); CC1 (Sustainable Development), CC2 (Climate Change), CC7 (Infrastructure and Implementation), RE3 (Employment and Land Provision), RE6 (Competitiveness and addressing structural economic weakness), H1 (Regional Housing Provision 2006-2026), T1 (Manage and Invest), T8 (Regional Spokes), T2 (Mobility Management), NRM1 (Sustainable water resources, groundwater and river water quality management), NRM5 (Conservation and Improvement of Biodiversity), NRM7 (Woodlands), NRM8 (Coastal Management), NRM9 (Air Quality), NRM10 (Noise), C4 (Landscape and Countryside Management), BE1 Management for Urban Renaissance, BE6 (Management of the Historic Environment), S1 (Supporting Healthy Communities), S6 (Community Infrastructure), SCT 1

(Sussex Coast Core Strategy) and SCT 2 (Sussex Coast enabling economic regeneration).

6.3 Other documents considered material to this planning application are Government policy set out in Planning Policy Statements (PPS) and Planning Policy Guidance Notes (PPG).

7 CONSIDERATIONS

Introduction

7.1 This report has been prepared following a detailed and extensive examination of the issues, comments from the public and statutory consultees, technical advice, together with the Development Plan policies which are considered relevant to its determination and other material considerations.

7.2 The Environmental Statement (ES) and Addendum to the ES (submitted August 2008) have also been the subject of a review by the Council's officers and peer review by the Institute of Environmental Management and Assessment (IEMA). Specific areas of clarification and additional information requirements were identified from IEMA's initial review of the ES. In response to a number of queries on the planning application and ES, the applicant has submitted further clarification, by way of the Addendum to the ES, to support the submission. The applicant has also submitted a Supplementary Nature Conservation Report in October 2008 comprising additional environmental information.

7.3 The key considerations involved in the determination of this application are whether:-

- (a) The proposal conforms to the relevant Development Plan policies;
- (b) Whether the Scheme is needed and is the appropriate solution;
- (c) Whether the Link Road route is in an acceptable location;
- (d) Whether the proposal has unacceptable adverse environmental, social, transport and economic impacts, and
- (e) Whether the need for the Scheme outweighs the adverse effects identified in this report.

Key Issues:

Need

7.4 The Scheme has been identified as a mechanism for addressing transportation, socio-economic and environmental issues in the area. The Scheme is an integral part of a package of measures that seek to achieve regeneration and transport objectives; significant reductions in traffic and improvements to public transport reliability.

7.5 The need for transport initiatives has previously been well documented in submissions made to the Department of Transport in the past and more recently (including the Scheme submission bid in 2004) and in regeneration strategies for Bexhill and Hastings. The Scheme also forms an integral part of the defined package of regeneration measures promoted by

the Hastings and Bexhill Task Force (including representatives from the County Council, South East England Development Agency (SEEDA), GOSE, Hastings Borough and Rother District Councils, English Partnerships, University of Brighton and the local MPs) as poor accessibility between Hastings and Bexhill has been highlighted as a major impediment to improving the economic integration of the two towns. The Scheme was also considered to be a critical factor in unlocking major employment and housing allocations in north Bexhill. These factors are reviewed in more detail below.

7.6 The provision of a link road from Bexhill to St. Leonards/north Hastings has been recognised in the Adopted Rother District Local Plan and an area of search has been safeguarded from prejudicial development within Policy TR1 of the plan and is shown in the Proposals Map to the plan. The current application site falls within this area of search. This must carry considerable weight for development control purposes. There is no corresponding policy within the Hastings Local Plan as the development of route options came forward after its preparation and adoption in 2004. The consideration of the application needs to have particular regard to the Local Policy framework and development proposals specially tailored to meet key objectives.

Release of Land

7.7 The Link Road is of importance to the delivery of the masterplan for Bexhill and specifically to the development of land to the north-east of Bexhill (known as the North East Bexhill Development – NEBD), which is allocated in the Rother District Local Plan for major development under Policy BX2. This land is to provide the focus for sustainable growth involving some 50,000 sq. metres of business floorspace, with the potential for 1,500 to 2,000 jobs, along with 1110 dwellings.. The Highway Agency have indicated that a substantial development cannot be accommodated in terms of current trunk road capacity on the A259 between Bexhill and Hastings. As well as directly enabling NEBD, it is suggested that the relief of traffic congestion in the A259 corridor would also enable other regeneration projects to be realised given that capacity constraints and existing levels of congestion currently restrict the potential for new developments along the A259. The Scheme would allow further improvements in bus services to be made, both on the new road and on the relieved A259 corridor.

Regeneration and Economic Benefits

7.8 The Link road is considered to be important in its regeneration potential and forms part of the clearly defined package of regeneration measures promoted by the Hastings and Bexhill Task Force. The applicant's Regeneration Statement sets out the current socio-economic conditions and regeneration potential that would be facilitated by the Scheme, and highlights the fact that the need for regeneration in Hastings and Bexhill has been recognised by the Government as a priority for the region.

7.9 Hastings Borough as well as Rother District are also expected to deliver a significant number of new dwellings with the growth in the number of households in Hastings and Rother also increasing the supply of the workforce, the number of potential new business start ups and transport

usage. This recognises the long-term locational advantages that the NEBD will have and its significant contribution that its development would have to the regeneration and workforce needs of the area. Further, Rother District Council's 'Consultation on Strategy Directions' 2008, which is part of developing their Core Strategy, clearly identifies housing growth (with a preferred housing target of 3,100 – 3,300 dwellings) at Bexhill and business growth (with a target of 60,000 sq. metres) contributing to the town's economic and social objectives.

7.10 In addition, it is advocated that the Scheme will address social policy priorities for tackling deprivation, low skills and poor housing in Hastings and Bexhill, through the development possibilities the road provides, increased access to local employment from deprived wards and the creation of an economic circle for local communities.

7.11 Regional level policies recognise the importance of regeneration to the Sussex Coast and identify Hastings as a Regional Hub where there should be a focus for investment in transport infrastructure, new investment in economic activity and regeneration, as well as community facilities and housing (draft South East Plan Policy SP2) Improvements in transport networks in coastal towns in South East England are identified as being critical in order to increase their connectivity with the prosperous parts of the region and thus raise competitiveness. The Link Road proposals are consistent with this Regional direction and is supported at the local level including the Rother District Council's 'Consultation on Strategy Directions' 2008 which gives priority to improving strategic transport infrastructure that increases access to jobs and provides the regeneration of the coastal towns and identifies the early construction of the Bexhill Hastings Link Road as a means to achieving this objective.

Traffic and Local Environmental Issues

7.12 The A27/A259 is identified as the principal east-west route for the East Sussex Area, and as the only direct route between Bexhill and Hastings. The A259 corridor suffers from traffic congestion, poor bus reliability, community severance, poor pedestrian and cycle provision and a high accident rate and as such the Scheme has been developed to relieve congestion and reliability pressures on the A259.

7.13 Air quality problems along the A259 Bexhill Road on the coastal strip between the two towns have also been identified. The corridor has been designated an Air Quality Management Area, it is proposed that the construction of the Scheme is the action with the greatest impact to reduce PM10 emissions within the AQMA and as such would constitute a principal management measure. The appropriateness of such a measure when considered against Regional Policy (RPG9 Policy E7 and draft South East Plan Policy NRM9) and local policies (including Hastings Local Plan Policy DG33) is appraised in the 'air quality' section of this report.

7.14 The congestion on the coastal A259 trunk road has led to a number of alternative inland routes being used to accommodate traffic that is seeking to travel between Bexhill and Hastings and to destinations either side. This involves the use of unsuitable rural roads that take traffic into the High

Weald AONB, along country lanes and into towns such as Battle where there are additional journeys through the heart of the conservation area. The Link Road would remove much of this traffic and provide safer conditions on the local road network which are often shared with pedestrian, cyclists and horse riders.

Alternatives

Background

7.15 Following the SoS rejection of proposals from the Highways Agency for a Hastings and Bexhill bypass, a number of alternative options were considered to ensure a sustainable economic growth in the area. Such an assessment of alternatives is also required by the EIA regulations.

Public Transport Solutions

7.16 When the SoS rejected proposals for the Bexhill and Hastings bypass, he also directed the further investigation of a range of public transport measures to tackle transport issues in Hastings, based on the recommendations of the Access to Hastings Study:

- A frequent ‘metro’ train service between Bexhill and Ore, providing a turn up and go service, using existing infrastructure and new trains (where required);
- A new station at Glyne Gap on the metro line;
- Electrification and dualling of the rail track between Ashford and Hastings, enabling a fast service to be provided;
- More frequent train services between Wadhurst and Tonbridge; and,
- Strengthened Quality Bus Partnership between Bexhill and Hastings on the A259.

7.17 These schemes were also further examined as part of the SoCoMMS and Hastings Strategy Development Plan (HSDP), which supported these recommendations and also recommended the possibility of a new passenger rail station at Wilting Farm. However, the Secretary of State indicated that the capacity to deliver the additional significant investment recommended by SoCoMMS was limited.

7.18 A summary consideration of each of the public transport measures is set out below:

- **Bexhill to Ore Metro** - Services were expected to generate little additional passenger demand and costs would greatly exceed benefits. The work did not fully include the impact of regeneration benefits, which would need to be very large for the services to deliver value for money.
- **London to Hastings Service (Tonbridge to Wadhurst)** - A business case exists for providing additional peak services on this

route. One additional peak service was introduced in September 2002, funded by SEEDA for one year, and subsequently a modified version of this service has been incorporated into the permanent timetable.

- **Glyne Gap Station** – Study findings indicated that a new station to be viable, and that a Metro style service in the Hastings area was feasible. A new station at Glyne Gap is recognised as a project within Network Rail’s Strategy, but is not identified as a priority. Without an immediate source of funding therefore, other local rail projects were likely to take priority.
- **Ashford to Hastings Increased Capacity and Quality Service** – Patronage on this line has increased as a result of recent improvements to services. Further assessments of the line have been undertaken and Network Rail is reviewing recommendations.
- **Wilting Farm Station** - The originally proposed site was found to be far from ideal for the construction of a new station for several reasons, including non-compliance of track gradient and radius with the maximum allowed by Railway Group Standards, extensive works required to existing embankments, and further site clearance and drainage requirements.
- **Quality Bus Partnership on A259 Corridor** - A Quality Bus Partnership has been formed along the A259 Corridor and the bus priority complementary measures proposed with the Scheme would assist in improving bus running along this corridor.

7.19 Overall, the assessment of the public transport alternatives recognised that improved rail services were seen as essential elements of the County Council’s integrated transport policy, and as an essential element of the total package required to achieve the economic revitalisation of the Bexhill and Hastings area. A number of the schemes have already been implemented or are being pursued through the County’s Local Transport Plan. However, these improvements were not seen as an alternative to the Link Road, given the diverse and dispersed nature of transport demands in the area and the need to open up and provide local and sub-regional access to the new development areas on the urban fringes.

7.20 It was recognised that a link road option was important to providing local and, strategic economic and accessibility benefits and that land use developments in north Bexhill could not be accommodated without increased highway capacity. The link road option would also address wider economic regeneration issues. Further transport modelling demonstrated that a single carriageway link road between Bexhill and Hastings would provide sufficient capacity to relieve congestion by diverting mainly local trips whilst increasing accessibility to employment opportunities.

Alternative A259 Schemes

7.21 In addition to the alternative route assessment that has been carried out and prior to proposals for the Bexhill and Hastings bypass being

proposed, several alternative traffic management measures along the A259 were also considered. A brief overview of these proposals is provided below:

On Line Improvements

7.22 These alternatives considered the influence of additional highway capacity at a number of bottleneck junctions, including Little Common Roundabout and Glyne Gap roundabout. However, A259 on-line improvements were rejected as they were not considered to improve access to areas not served by the existing A259 - particularly areas of existing and potential development on the edges of urban areas.

Bypass

7.23 In terms of revisiting the potential for a bypass, following the SOSs rejection of schemes in 2001, the statutory protection of these routes in the relevant development plans was removed. As a result, these schemes were no longer considered to be viable options for development.

7.24 However, these public transport solutions and other initiatives were not seen as an alternative to the Link Road, given the diverse and dispersed nature of transport demands in the area and the need to open up and provide local and sub-regional access to the new development areas on the urban fringes

Alternative Route Options

7.25 The need for a link road having been identified, six alternative route options for the Bexhill – Hastings Link Road were developed in 2003/04. The options were designed to provide a wide range of alternatives for consultation and stimulate the assessment of how the optimum balance between competing environmental, economic and other objectives might best be struck.

7.26 All of the six route options shared the 1.7km (1.1 mile) Bexhill urban section, following the route of an old railway through the built-up area to just beyond the town where it would link up with the proposed North East Bexhill Development. From this point to the junction with Queensway, the option followed different northern, central and southerly routes (see plan within additional Committee information).

7.27 The northern routes skirted the Combe Haven SSSI. The Red Route Option ran in deep cuttings and tunnels to minimise its potential environmental impact which resulted in a very high scheme cost of £145m. The Blue and Brown Route Options involved less engineering which reduced the scheme cost of the Blue Route Option to £60m. The scheme cost of the Brown Route Option reduced to £50m, but at the environmental cost of directly crossing the SSSI. The northern routes had a greater potential than the other routes to disrupt the historic landscape pattern, although this could have been reduced by going into tunnel (as on the Red Route Option) - but at a considerably higher capital cost. The Blue and Brown Route Options would be visually intrusive to the Combe Haven SSSI, although this could be mitigated to some extent. The northern routes - Red, Blue, or Brown, could

have helped to define the northern edge to the proposed Pebsham Countryside Park.

7.28 The Orange Route Option was the shortest, but in doing so directly crossed the Combe Haven SSSI on a viaduct. The Purple Route Option followed the ridge to the south of the disused railway line and crossed Combe Haven on viaduct. The Orange and Purple Route Options were potentially visible on the Worsham Ridge from the AONB and they crossed an area of very high archaeological potential and national wildlife value. These options would also have compromised the development of the proposed Pebsham Countryside Park.

7.29 The longest route was the (southern) Pink Route Option, which ran close to the built up area and was able to provide a direct access to the north Bexhill developments. However, it had the most adverse environmental impacts of all the routes: it had the longest crossing of the Combe Haven SSSI, crossed the Local Nature Reserve, affected more households and compromised the proposed Pebsham Countryside Park.

7.30 The six route options were taken to public consultation in February 2004. As a result of consultation, an additional Green Route Option was added to the assessment, which ran closer to the existing Bexhill and Hastings built up areas in order to minimise the incursion in to the countryside. The suggested route was not costed due to its high environmental impact.

Route Assessment and Selection of Preferred Option

7.31 The key driver in route selection was minimising the potential environmental impact of the new route, as required by the Secretary of State and the Statutory Environmental Bodies (SEB). The selection of the Preferred Route Option was based upon:

- Results of public consultation;
- Consultation with SEBs; and
- Technical assessments against DfT WebTAG criteria (the Department for Transport's Transport Analysis Guidance)

7.32 Preliminary Appraisal Summary Tables were prepared for each of the route options. All of the routes that directly crossed the Combe Haven SSSI (Brown, Orange, Purple, Pink and Green) were rejected by at least one of the SEBs. The Blue and Red Route Options were supported by the SEBs, with the Blue Route Option emerging as the most popular. The Blue Route Option was also strongly supported by the public - although the Orange Route Option was the most popular as it was considered by many to be the Option that would most directly solve congestion problems on the A259. Routes closer to the existing settlements - Pink, Purple and Green Route Options - were generally not supported by the public.

7.33 The Red and Pink Route Options were the most costly schemes (£145 million and £85 million respectively), whilst the other options were similar at some £50-£60 million each. The technical assessment identified the

Blue Route Option as corresponding most closely with the Government's objectives for transport.

7.34 Based on this assessment, in 2004 the County Council Cabinet agreed to develop the Blue Route Option as the Preferred Route Option for the Scheme, with some design and alignment modifications arising from consultation with the public and SEBs. The current application is based on this route.

Regeneration and Economic Assessment

7.35 RPG9 Policy RE1 encourages further development which will contribute fully to national growth whilst following the principles of sustainable development. In this regard, Policy RE3 recommends a long term and holistic approach to economic development, which reflects local capacity and anticipates the needs of the local economy to support economic growth in the future. With regards to new employment opportunities, Policy Q1 adopts a preferential approach in favour of the redevelopment of existing employment and previously developed land resources within existing urban areas over new land wherever possible. However, Policy RE7 recognises that strategic spatial inequalities in the region must be addressed, giving particular attention to inward investment in Priority Areas for Economic Regeneration. The proposed Link Road is located within the Sussex Coast and Towns Priority Area for Economic Regeneration.

7.36 RPG9 Policies Q4 and Q5 emphasise that urban areas should be the primary focus for redevelopment and new development in order to support an urban renaissance and encourage more sustainable patterns of development. Areas on the urban fringe should be effectively managed and appropriately used. Policy RE7 however focuses on the development of rural areas as 'multi-purpose' countryside through necessary renewal and investment.

7.37 Structure Plan Policy EN26 encourages development that will help to regenerate urban areas, including linked initiatives on environmental, economic and transport improvements.

7.38 Structure Plan Policy E1 encourages a positive approach to economic development, integrated with environmental protection, which includes continuing to lobby for major improvements in strategic road communications which are environmentally acceptable.

7.39 Rother Local Plan Policy BX1 requires development proposals to contribute positively towards the development of Bexhill's residential, employment, shopping and service centre functions and the accompanying regeneration of Bexhill town centre. Rother Local Plan Policy BX1 also requires that proposals for development and change in Bexhill should contribute positively to the growth of local firms and appropriate inward investment in order to improve the range of job opportunities for local people and to ensure that new residential development is sustainable. As well as Bexhill itself, Policy BX2 identifies North East Bexhill as an area for sustainable long term growth, which will include significant new housing and employment development which will need the area's regeneration needs for the foreseeable future. The Link Road is identified as a key component in

determining the location, scale and form of new development in this area and is identified as a complementary development that will help to deliver development opportunities in this area.

7.40 Draft South East Plan Policy RE3 adopts a preferential approach in favour of the redevelopment of existing employment and previously developed land resources within existing urban areas over new land wherever possible. Through Policy SCT1 the proactive pursuit and promotion of sustainable economic growth and regeneration is sought including the delivery of major improvements in strategic transport infrastructure to reduce peripherality and improve sub regional accessibility. Under Policy SCT 2 Bexhill/Hastings is recognised as a priority for investment decisions and other direct support, to promote the social and economic regeneration of an area in greatest need.

7.41 PPS1 (Delivering Sustainable Development) requires local authorities to promote urban and rural regeneration to improve the well being of communities, improve facilities, promote high quality and safe development and create new opportunities for the people living in those communities. Authorities should develop locations which promote the creation of linkages between different uses and the creation of more vibrant places. PPS1 also directs Local Authorities to ensure that infrastructure and services are provided to support new and existing economic development and identify opportunities for future investment to deliver economic objectives.

7.42 A Regeneration Statement (RS), to assess the potential regeneration impacts of the proposed Scheme to a defined Regeneration Area (RA) covering Bexhill and Hastings, and an Economic Assessment (ES) Report have been submitted by the applicant in support of the Scheme. Both documents make use of relevant guidance on assessing the economic impacts of transport projects (i.e. the Department of Transport's WebTAG guidance); standard methodologies for assessing the delivery of economic impacts and other regional studies are used to support the adoption of particular assumptions. Both documents provide detailed analysis and evidentiary research in the analysis of the potential regeneration and economic impacts of the Scheme.

7.43 It is well documented that the RA suffers from a number of serious economic problems including:

- A local economy that is highly dependent upon (i) a high level of public sector employment, (ii) a few large employers and (iii) a plethora of Small Medium Enterprises ;
- A shortage of commercial and industrial premises that is inhibiting private sector development;
- Accessibility problems and congestion that will continue to deteriorate; and
- High levels of economic inactivity.

7.44 The RS has therefore been prepared to provide evidence to support the case that the Link Road Scheme will:

- Open up a substantial area of land in North East Bexhill with considerable potential to assist the regeneration of the RA;
- Provide about 2000 extra jobs of which of which approximately 60% will be captured by local residents
- The Scheme will safeguard a number of existing jobs; and
- Provide essential traffic congestion relief along the A259 that would ensure both improved and consistent journey times that will in turn encourage increased public transport services, enhanced regional accessibility along the South Coast Corridor, reduce severance between Bexhill and Hastings and provide greater accessibility to important local projects.

Accessibility Impacts

7.45 Measuring accessibility is crucial for the appraisal of wider economic benefits, particularly relating to the local labour market – as such supporting evidence has been submitted analysing the impacts on accessibility ‘with’ and ‘without the scheme’.

7.46 By 2010, it is estimated that the average journey time between Bexhill and Hastings without the Scheme will increase to 21 minutes. Without the Scheme, journey times between other areas of Bexhill and Hastings will also increase significantly. The applicant’s accessibility model also indicates that during the AM peak period the average journey time between the town centres of Bexhill and Hastings along the A259 corridor will be 16 minutes with the Scheme. The Scheme will also improve journey times along this corridor for general traffic between Bexhill and Hastings by five minutes. Overall, it is estimated that the Scheme will improve journey times, particularly for those inter ward journeys between the central area of Bexhill and the northern wards of Hastings.

7.47 The relationship between willingness to commute and drive times (the ‘deterrence curve’) is described in WebTAG Unit ‘Measuring Accessibility for the Appraisal of Wider Economic Impacts’. Such analysis has been used to forecast the change in mobility and accessible employment opportunities for the residents of Bexhill and Hastings for example, the deterrence curve suggests that 56% of people are willing to make the 21 minutes commute from the deprived ward of Central St Leonards to Bexhill Central. With the Scheme, the drive time is forecast to be 15.5 minutes, and using the deterrence function curve indicates that the proportion of commuters willing to travel will increase to 81% - a increase of almost 50% in the willingness to travel. The improvements in journey time with the Scheme will give rise to increased opportunities for local residents to travel to places of work, and vice versa for local businesses to benefit from a larger pool of accessible labour. Similarly access to supplies and services will be improved.

Accessibility Impact with the Scheme - Public Transport

7.48 In addition to private transport improvements, improved and increased bus services are put forward – it is anticipated that there are likely

to be two principal improvements as a result. The first is an improved journey time and improved journey time reliability for the current services on the A259. The second is the potential for additional bus services to run between Bexhill and Hastings along the Scheme. These services and the improvements afforded to bus services along the A259 with the improvement in travel conditions are likely to offer better access from Bexhill to key employment sites in Hastings, and between Hastings, particularly the deprived Hollington ward in north-west Hastings to North and Central Bexhill. In addition, Regional accessibility to Bexhill and Hastings along the South Coast Corridor will be improved. Journey times between Hastings and other towns to the west, such as Eastbourne, Lewes, Brighton and Hove, and the Southampton-Portsmouth conurbation, will be reduced by between five and ten minutes. The applicant has also provided evidence of accessibility analysis shows that, for example, a reduction in drive time to Eastbourne of just five minutes, from twenty-five to twenty minutes, will result in the proportion of people willing to commute rising from 35% to 61%.

Deprivation

7.49 The ES highlights that the effect of the Scheme will be to benefit disproportionately residents of the more deprived wards. The ES makes reference to SEEDAs 'Hastings and Bexhill Five Point Plan' (DTZ Piedad 2002) and the Seafront Strategy (SeaSpace 2005) which both recognise the Scheme as part of a comprehensive regeneration strategy and the prerequisite for the development of specific strategic employment and residential land in Bexhill that will also serve Hastings. It is also stated that the Scheme also fits with relevant social policy priorities for tackling deprivation in Bexhill and Hastings. SEEDAs 'The Prosperity for Hastings and Bexhill Report (DTZ Piedad 2001) also asserts that the benefits of the Scheme will help tackle low skills and poor housing and increase access to local employment from deprived wards.

7.50 The ES also emphasises that the Scheme will also help stimulate significant additional private sector investment in Bexhill and Hastings by signalling Government recognition of the importance and potential of Hastings and Bexhill. This is indicated to add value to existing public sector spend and will also lead to additional investment by firms who move to the area and/or expand as their competitiveness improves. It is advised that this increased private sector investment is likely to be accompanied by increased willingness by the private sector to lend, which will also help tailor the public expenditure on projects to secure additional socio economic benefits which will result in reduced deprivation in Bexhill and Hastings.

Business Constraints

7.51 Evidentiary reference has also been made to survey data that has found that 61% of businesses in East Sussex considered that improved transport links would make the area more attractive to business. The efficiencies in road access, made possible by the Scheme would therefore assist local businesses to trade more competitively both with their mainstay local markets and also encourage them to trade with markets further afield thereby potentially increasing their profitability, competitiveness and sustainability. Further the reductions in journey time would give rise to

increased opportunities for local businesses, including employment sites in the Churchfields/Castleham and North Bexhill areas to make use of a larger pool of accessible labour.

7.52 The applicant stresses that critically, the Scheme will open up the new strategic employment and housing land in North Bexhill and allow some early smaller land releases for new employment premises and redevelopment of existing employment land in the town centres. This in turn this will encourage business growth and inward investment to Hastings.

Employment Land

7.53 The Hastings and Bexhill Five Point Plan indicates that the link road will facilitate some early release of new employment premises, mainly in Hastings' town centre, the redevelopment of existing employment land and the encouragement of business growth and inward investment to Hastings. Additionally the Scheme will stimulate significant additional private sector investment in Bexhill and Hastings as the new sites, and some existing ones, are developed for offices, industrial, recreational and housing uses. It is expected there will also be additional investment by firms who move to the area and/or expand as their competitiveness improves. Employment growth is expected to increase the incomes of residents and enhance their local spending power that will have a positive knock on effect onto the local and wider economy and the Exchequer.

Employment Issues

7.54 The link road is the principal mechanism to opening up new strategic land for additional employment and housing in North Bexhill. As set out above, it is proposed that the provision of the Scheme will also increase willingness to commute from Hastings to Bexhill from 56% for the current average 21 minute journey time, to 81% for a 15.5 minutes. The ES indicates that the reductions in journey time will give rise to increased employment opportunities for residents, especially those from the more deprived wards, to travel to places of work. The provision of the Scheme will also significantly improve public transport penetration and reliability, which will provide a viable alternative to the car.

Housing

7.55 The Five Point Plan produced by SEEDA and its local partners (the Hastings and Bexhill Task Force) forecasts that the expected growth in the number of households in Hastings and Rother will increase the supply of the workforce, the number of potential new business start ups and transport usage. Linked to this the Applicant has made reference to market research that has identified an underlying issue that the projected demand for housing in Hastings and Rother over the medium term will depend largely on the success of regeneration initiatives and improvements in the transport infrastructure, notably road links.

7.56 Further, it is advised that the Scheme fits into the social policy priorities for tackling deprivation, low skills, poor housing and a lack of affordable housing in Hastings and Bexhill.

7.57 Based upon the information within both the Regeneration Statement and Economic Assessment additional evidence was sought from the applicant in relation to:

- Whether there were other suitable employment sites that could be brought forward to generate the same job benefits expected at the North East Bexhill Business Park without the need to construct the BHLR i.e. whether other alternative sites (or combination of sites) could be brought forward to create some or all of the job creation expected
- Confirmation as to whether the forecast numbers of jobs that the road will facilitate the creation of are net gains rather than transfers from elsewhere in East Sussex.
- Further evidence sought to confirm that that the sites suggested could only be brought forward if the road was constructed
- Clarification on how the wider economic benefits arising would be split between business and consumer users.

7.58 Taking each one of these issues in turn the applicant has submitted an Addendum to the ES and has confirmed that the scope of possible employment sites was discussed in detail with ESCC and SeaSpace and that a joint employment land review is currently being undertaken (as part of the Local Development Framework) exercise. The applicant has verified that to-date the North East Bexhill Development site remains the only site that has the potential to facilitate major additional employment and housing growth.

7.59 In relation to the number of jobs that the road is forecast to create, it is accepted that there are problems of deprivation in Hastings and Bexhill. Therefore, the issue of the possible displacement of employment opportunities from the rest of East Sussex to Hastings/Rother is not significant to the overall decision on the link road. As to whether the construction of the road is the only way of bringing forward key sites, the applicant has provided further cross-references in the ES to clarify the issue.

7.60 On the basis of the above, it is considered that the applicant has provided a robust economic and regeneration case for the urgent provision of the link road. The applicant has also addressed those matters raised following the initial review of the ES and supporting reports I consider that taking these aspects together the information submitted by the applicant provides sufficient detail to address the queries raised by consultees, including Crowhurst Action Committee, in relation to development potential at North Bexhill.

7.61 The Scheme is in accordance with the principles of RPG9 and the South East Plan in so far as the proposals are located within a Priority Area for Economic Regeneration and complies with Structure and Local Plan policies in relation to encouraging development that will help to regenerate urban areas; requiring proposals to contribute positively towards the development of Bexhill's functions and accompanying regeneration of Bexhill town centre and supporting the Link Road as a key component in determining the location, scale and form of new development in the area.

7.62 Given the aforementioned and documentary evidence provided, I am satisfied that in broad regeneration and economic terms the Link Road provides clear benefits and will deliver development and employment opportunities in this area and will not result in material conflict with prevailing regeneration policies. It is considered that the Scheme is consistent with RPG policies RE1, RE3, RE5, Q1, Q4 and Q5 in so far as the Scheme will support economic growth and sustainable patterns of development in the area and Policy RE7 which identifies the Link Road as being located within the Sussex Coast and Towns Priority Area for Economic Regeneration. The Scheme also accords with Policies E1 and EN26 of the Structure Plan and Rother Local Plan policies (BX1 and BX2), Hastings Local Plan policies and Policies SCT1 and SCT2 of the draft South East Plan in so far as the Scheme will facilitate the long term growth and regeneration of the area.

Sustainability and Climate Change

7.63 Structure Plan Policy S1, Rother Local Plan Policy DS1 and Hastings Local Plan Policy DG1 and draft South East Plan Policies CC1 and CC2 set out a number of development principles in relation to sustainable development and climate change including:

- Making the most efficient use of land and prioritising the use of previously developed land;
- Making best use of existing infrastructure, including transport;
- Ensuring good accessibility to services and jobs (especially via public transport) and reducing the need to travel;
- Fostering inclusive communities, meeting local needs and protecting the needs of future residents;
- Ensuring a sufficient supply of employment sites to foster economic regeneration;
- Protecting of the character and quality of the landscape and natural environment;
- Protecting areas of biodiversity, conservation and cultural heritage from negative impacts;
- Restricting development in areas of flood risk;
- Protecting and enhancing water and air quality, including the reduction of greenhouse gases and
- Including proposals which help to reduce carbon dioxide emissions.

7.64 The South East Plan, once approved, will replace RPG9 forming the statutory document with which local authority development plans will need to be in general conformity. Regeneration of the Bexhill and Hastings areas is an important issue for the South East Plan, and the Bexhill to Hastings Link Road is specifically identified in the South East Plan Implementation Plan Sub-Regional Investment Framework as a significant piece of infrastructure

which relieves congestion on A259 between Hastings and Bexhill and enables delivery of the area's major housing and employment land allocations at North Bexhill.

7.65 One of the principal objectives of the draft South East Plan is to achieve and to maintain sustainable development in the region. Similarly the East Sussex and Brighton and Hove Structure Plan's overall objective is "To seek a more environmentally sustainable future for the County and to meet the needs for development and change in a manner that is more sustainable in the longer term". It allocates a new community at Bexhill contingent upon the appropriate transport improvements, to meet regional housing targets in the most sustainable manner for Rother District. Both Hastings and Rother Local Plans set out development principles in relation to sustainable development and climate change.

7.66 Government planning policy on sustainability is set out in PPS 1 'Delivering Sustainable Development' (2005) and the supplement to PPS1 on Climate Change. New development should contribute towards social progress that meets the needs of everyone; effective protection of the environment; prudent use of natural resources; and maintenance of high and stable levels of economic growth and employment. Sustainable development should also incorporate an appropriate response to climate change and be consistent with the objectives of reducing carbon emissions, improving energy efficiency, delivering patterns of growth that support sustainable transport, minimising vulnerability to climate change, conserving biodiversity, and encouraging innovation in mitigating and adapting to climate change. Referring to Regional Spatial Strategy, in particular PPS 1 advises that "strategic targets, including any developed for cutting carbon dioxide emissions, and trajectories...should be used as a strategic tool for shaping policies and contributing to the annual monitoring and reporting expected of regional planning bodies. They should not be applied directly to individual planning applications." (Para. 16).

7.67 The Government's Climate Change Strategic Framework (2007) and the Climate Change Bill set out the UK's targets to reduce carbon dioxide emissions through domestic and international action by at least 60% by 2050 and 26-32% by 2020, against a 1990 baseline. In October 2008, the Government changed its long term target to a reduction of 80% by 2050. In addition, the Climate Change Bill has now received royal assent. In East Sussex, the Local Area Agreement adopted in 2008, has agreed the target of a reduction of 10% in carbon dioxide emissions from our area over the three year period 2008/9 to 2010/11, this is a reduction total of 320,000 tonnes, of which 75,000 tonnes would come from solely local policies and action, and the rest from national effort.

7.68 The Sustainability Appraisal (SA) that accompanies the application summarises the review process which was undertaken of the various proposed route options for the BHLR project to establish the sustainability benefits and disbenefits of each option to determine which route has the greatest potential to deliver a more sustainable outcome. The SA provides an overview of the scoping exercise that was undertaken and identifies and reviews the range of relevant plans, programmes and sustainability objectives relevant to the BHLR project. The SA goes on to describe the different route

options and design evolution of the preferred route and includes the development of objectives and targets and appraises the seven route options for the BHLR scheme, in the form of a sustainability matrix and associated commentary text. The SA concludes with the identification of a number of mitigation measures to assist in improving the sustainability aspects of the scheme and identifies the potential future consultation and monitoring arrangements for the project.

7.69 The SA provides a summary of the implications on the BHLR scheme arising from the prevailing sustainability policy framework at National, Regional and Local level. The SA in particular highlights the local policy context in relation to policies on biodiversity, noise and visual intrusion, air and water pollution, traffic congestion, economic regeneration and policies in relation to the safeguarding and protection of designated SSSIs. The SA notes the BHLR's close proximity to two SSSI, the Combe Haven Valley and Marline Valley Woods merits mitigation measures during construction and operation of the scheme to avoid any damage to the SSSIs. The SA highlights the fact that the Hastings Local Plan states that development proposals within a SNCI will not be permitted unless there is a local need which outweighs any harm to nature conservation interest and that the Rother District Local Plan indicates that existing natural resources of species, habitats and geological features including SNCI will be protected from damage.

7.70 Equally, the SA acknowledges that the need for the BHLR scheme in terms of relieving traffic congestion, improving air quality and opening up links to deprived communities would need to outweigh any adverse impacts on nature conservation in order to accord with the Hastings Local Plan and Rother District Local Plan. The SA also highlights the fact that the Rother District Local Plan contains policies to improve basic transport infrastructure and that the proposed scheme would encourage cycling and walking and that the Greenway, which would be developed as part of the scheme, would also contribute positively to Rother's policies on cycling and walking by providing a new, safe footpath and cycle route through the countryside. It is also noted that the development strategy of the Rother District Local Plan also depends on the release of development land facilitated by the link road.

7.71 In my assessment and evaluation of the SA I have had regard to the issues raised by many of the objectors in relation to a number of matters including; additional traffic movements in an area currently free from traffic; compromising the sustainable use of land; the perceived unsustainability of a car-based solution; increased carbon dioxide emissions in the local area; potential impact on global warming amongst other matters. I have also had regard to the mitigation measures proposed by the applicant and the need for a detailed monitoring programme for a range of sustainability issues to confirm whether the road is having the effects predicted.

7.72 I consider that the applicant has reasonably assessed the Scheme (and alternative road options) within the Sustainability Appraisal and Addendum ES. The applicant has identified a comprehensive 'Sustainability Policy Register' and has identified a full range of issues arising. The Register identifies climate change as an issue and that transport is a significant contributor to climate change. The Register recognises that the project should

aim to help reduce climate change. Notwithstanding this, some of the applicant's mitigation recommendations are still imprecise – for example “reduction of congestion may mean that bus priority lanes can be implemented, possibly resulting in a modal shift from car to bus”. I have therefore proposed a number of requirements for an undertaking and safeguarding conditions to ensure that appropriate mechanisms are implemented for the proposed scheme given that some increase in CO₂ emissions resulting from the Link Road will need to be balanced against the need for the Scheme

7.73 Specific issues have also been raised by the IEMA review and these have been addressed, with reference to the ES and additional information. With regards to Greenhouse Gas Emissions, the assessment in the ES concluded that there would be an increase in CO₂ emissions of approximately 5.7% over the ten year study period. This is a cumulative change, so that the actual change over this period is approximately 0.6% increase per annum. It should be noted that the increase here is less than the projected nationwide increase in emissions over the same period. Although this is still an increase compared to the baseline case, the assessment concluded that this was a reduction relative to the national projections and therefore would have a negligible effect on overall greenhouse gas emissions.

7.74 There is also a need to monitor the effects of the scheme to determine whether the predicted future environmental effects have taken place, as the requirements of the undertaking and the safeguarding conditions are based on these predictions. It may turn out that some detrimental environmental effects are more severe or some milder, in which case an adjustment of effort will be required.

7.75 The Environmental Statement has set out the performance of the Scheme against the goal that the project should aim to reduce climate change. It forecasts that the additional CO₂ emissions that will take place as a consequence of the scheme, both in the construction phase and in its operation. It estimates that in construction around 38,418 tonnes will be emitted: 1,568 tonnes from the transport of materials and personnel, 14,350 tonnes from construction activities, and 22,500 tonnes from the production of materials (cement). In operation, around 5,000 tonnes of extra CO₂ per year is expected to be emitted as a result of the scheme in years 2010-2020 and 6,000 tonnes in years 2021-2025. These estimates are approximate and the actual emissions would need to be assessed as part of the monitoring of the construction and operation of the road, as well as the wider changes derived within the transportation system.

7.76 The Environmental Statement concludes that “Overall, the impact of the Scheme in terms of greenhouse gases is negative but is of negligible significance.” However the additional emissions are significant, rather than negligible, locally where 40,000 tonnes CO₂ in construction is over one-half of the 75,000 tonnes of the agreed local reduction agreed in the LAA.

7.77 The concerns in this regard as also expressed by objectors in relation to additional CO₂ emissions need to be examined. Whilst PPS 1 makes comment that regional targets need not be applied to each planning application, having regard to the nature of this proposal, there should be

consideration of the East Sussex LAA target of a 3% reduction per year, the national policy 'slope' of -2% per year. Whilst no direct mitigation is proposed in the Scheme for the likely CO₂ emissions, associated tree planting, would only assist if the trees were harvested and the wood used as a substitute for fossil fuels in a complete scheme. This is possible but not currently proposed and would have a number of practical difficulties.

7.78 It remains important to try to contain any increase in CO₂ emissions as a result of the Scheme, to prevent harm. This needs to be addressed, firstly, by minimising impact by rigorously examining the construction programme or any offsetting measures in operation, and, secondly identifying how any net effect will be managed.

7.79 I conclude that the potential harm due to the CO₂ emissions from this Scheme should be managed by the requirement for an undertaking to establish a programme that would deliver some reductions of and at a similar time to the emissions from the Scheme. There should also be a monitoring programme to establish the actual emissions from construction and operation, and an adjustment of the programme accordingly. The undertaking would also cover how the net effect of CO₂ emissions would be managed as a commitment through the County Council's climate change strategy.

7.80 Overall I consider, on the basis of the above measures, the Scheme has had regard to the principles of sustainable development and has sought to minimise its impact. The Scheme will have to incorporate a range of responses to climate change, via a proposed undertaking. On this basis, the Scheme would not be inconsistent with the guidance in PPS1 and Policies CC1 'Sustainable Development', CC2 'Climate Change' of the draft South East Plan and conforms with the Policies S1 of the Structure Plan, DS1 of the Rother Local Plan and Policy DG1 of the Hastings Local Plan.

Transport and Traffic

7.81 RPG9 Policy T1 encourages investment in upgrading the regional transport system whilst Policy T17 identifies the Bexhill-Hastings link road as a Priority for Investment, considered to be of regional importance by the Regional Assembly. Policy T1 also advocates shortened average journey times, as well as a rebalancing of the transport system in favour of more sustainable modes. Similarly, Policy T10 sets out a range of measures to achieve a rebalancing of the transport system towards more sustainable modes. Policy T2 sets out the principles for managing and investing in the transport system, which should facilitate sustained economic growth, environmental enhancement and social inclusion. Policy T5 identifies the A259 as a Regional Spoke, the role of which should be supported and developed in order to improve journey reliability, rebalance the transport system in favour of non car modes, facilitate economic activity, and support regional hubs and their gateway function.

7.82 Structure Plan Policy TR1 sets out a strategy reduce the effects of transport upon the natural environment, whilst improving the local transport system, including measures to improve local Trunk Roads, reduce the need to travel and the promotion of more sustainable modes of travel, which is also

advocated by Policies TR4, TR5 and TR6 encourage the provision of measures to encourage walking, cycling and improved public transport. In line with Policy TR1 identifies Trunk Roads for improvement, including the A259, whilst Policies TR39 and TR40 aim to implement a transport and environment strategy for Bexhill and Hastings, which emphasises the need for economic regeneration and outlines the role which transport can play in this process.

7.83 Rother Local Plan Policy TR1 identifies an area of search for the Bexhill – Hastings Link Road, whilst Hastings Local Plan Policy DG2 advocates the promotion of more sustainable travel choices.

7.84 The draft South East of England Plan Policy T1 sets out the principles for the management of and investment in regional transport. Policy T8 places particular emphasis on the support and development of regional spokes, which provide key connections between regional hubs.

7.85 PPG13 (Transport) emphasises the importance of promoting more sustainable modes of travel, including improved public transport provision, encouragement of walking and cycling and reduced dependency on the private car. It also emphasises the role of adequate and appropriate transport provision in ensuring easy access to jobs, shopping, leisure facilities and services through a safe, efficient and integrated transport system that supports a strong and prosperous economy.

Strategic Transport Impact

7.86 The Bexhill - Hastings Link Road would provide a second link between the two towns (the other being the A259 coast road) and improve access to Bexhill and Hastings, and ultimately the A21 trunk road. The A27/A259 is the principal east-west route for the East Sussex Area, and is the only direct route between Bexhill and Hastings. It is accepted that the A259 trunk road corridor, in particular through Glyne Gap, suffers from traffic congestion, poor bus reliability, community severance, poor pedestrian and cycle provision, and a high accident rate. An Air Quality Management Area (AQMA) has also been declared for the Glyne Gap area, and the proposed scheme would form part of the strategy and action plan to address this issue. The applicant has forecast that in 2010, traffic flows would be reduced by 33% on the existing A259 Glyne Gap between Bexhill and Hastings, and by over 40% on the rural roads through Henleys Down, Catsfield and Crowhurst between the two towns.

7.87 The applicant has prepared a transport appraisal of the scheme in order to support the Environmental Statement and has included the methodology for undertaking the transport assessment. This is in accordance with Structure Plan Policies TR1 (i) and TR3 which require a travel impact assessment to be undertaken.

7.88 Consultation with the Highways Agency (HA) has confirmed their 'in principle' support for the BHLR proposals. They raised a number of concerns in relation to the forecast levels of queuing identified at the Belle Hill junction on the A259; potential vehicle delay problems at the Little Common roundabout junction on the A259 and at the junction of the A259 with the B2095; the scope for the delivery of development above and beyond the

identified Regional Spatial Strategy need and the commitment to the future funding of complementary measures identified within the scheme.

7.89 Subsequent to these initial concerns, the applicant has engaged with the HA and sought to address the above matters in the published Addendum to the ES. The HA has had regard to the consideration of forecast impacts of the Link Road on the Strategic Road Network and, in particular, the impact on the junctions and has taken into account the suitability of the land use assumptions applied in developing the traffic forecasts that underpin the modelling assessment.

7.90 The HA has concluded that based upon the applicant's modelling of the Link Road proposals forecast traffic congestion at junctions on the A259 west of Belle Hill; that there is little scope for the delivery of development above and beyond the identified Regional Spatial Strategy need, and the suitability of the land use assumptions applied in developing the traffic forecasts that underpin the modelling assessment, it does not object to the proposed scheme. The HA will therefore seek to continue working with East Sussex CC, Rother DC and Hastings BC on the Hastings Bexhill Local Area Transport Strategy (HBLATS), which is intended to identify workable and deliverable measures to increase the proportion of travel by sustainable means and manage travel, particularly by car and, as a consequence address the concerns the HA has highlighted in relation to the increased queuing at the junctions on the A259 from Link Road traffic. Initial traffic assessments indicate that through the delivery of scheme commitments, such as bus priority measures, and strategic pedestrian and cycle routes in conjunction with the introduction of 'Smarter choice' measures such as personalised / workplace / school travel planning, there would be a resultant relative traffic reduction. This would help facilitate development beyond that identified in the RSS.

7.91 Neither the Highway Authority nor the Highways Agency, which is responsible for the A259, has raised objection on the grounds that the proposed scheme would have an adverse impact on the capacity of the Strategic Road Network. These conclusions are considered to be reasonable and therefore the proposals are considered to accord with Policy T1 and T17 of RPG 9, Policy T1 and T14 of the draft South East Plan and relevant policies from the Structure Plan including Policies TR39 and TR40, Policies TR1 and TR2 of the Rother District Local Plan and Policy DG2 of the Hastings Borough Local Plan.

Local Transport Impact

7.92 In the preliminary assessment by the Highway Authority, a number of issues were raised with the applicant, including

- the impacts of the additional traffic on local roads within the model area;
- the impact on junctions along The Ridge, the A259 within Hastings and other junctions in the model area, which are highlighted as having additional traffic due to the construction of the new road;

- the design of the junctions at the southern end (Belle Hill) and the northern end (Queensway);
- the alignment of the proposed road and associated junctions; and
- the impact of the road in respect of sustainable transport modes.

7.93 These issues have been addressed in additional documents submitted as 'Addendum to the Environmental Statement' dated August 2008 and taking each of these points in turn:

Traffic impact on local roads

7.94 The traffic impact of the proposal has been assessed using a SATURN model (Simulation and Assignment of Traffic to Urban Road Networks which is a proprietary traffic model). Traffic surveys and road side interviews were used to build the SATURN model and the assessment has been undertaken in accordance with the DfT's guidance contained within the (Design Manual for Roads & Bridges) DMRB and their WebTAG guidance. The SATURN model also takes into account the allocated development with the Rother District Local Plan together with predicted development within the future Local Development Frameworks of Hastings Borough and Rother District,.

7.95 The scheme has been assessed against the base highway model assuming the link road opening being 2010, together with a future year assessment of 2025 (the 'Do minimum' network). This has additionally been assessed against the 'Do something' network, which is the network with the link road.

7.96 The additional information provided in the addendum ES notes that there is an impact of the proposed scheme in terms of additional vehicle numbers on a number of different roads in the area. Those affected roads include the B2092 Queensway (83%), the B2093 (33%) (The Ridge near Grange Road), the A259 Barnhorn Road (25%) and the B2093 (25%) (The Ridge). However, whilst there are roads leading to the link road both from the south, but more particularly from the north which show high increases in vehicle numbers and percentages, it should be noted that a significant part of the increases on some local roads is due to the proposed future development traffic that has been included within the model rather than the redistribution of traffic associated with the scheme.

7.97 Conversely, there are a number of roads that show a significant reduction in traffic, including A259 King Offa Way/Belle Hill (43%), B2095 Powdermill Lane (45%), Watermill Lane (51%) and the B2095 Hooe Road (52%). There are therefore a number of roads, and thus residents living along those roads, that would benefit significantly from the provision of the Link Road.

7.98 It is my view that, on the basis of the above modelling, the proposed scheme will provide additional capacity across the network between Hastings and Bexhill. The proposed route would also lead to reductions in traffic using all the other alternative east-west routes within the SATURN model, although east-west traffic levels would increase with the scheme (0.3%

in 2010 and by 3.2% in 2025). Significantly the link road will remove much of the traffic that currently uses inland rural routes as an alternative link, between the two towns, including through the villages of Crowhurst and Henley Down.

7.99 I therefore consider that the Scheme is consistent with Policy T1 and T17 of RPG9 which encourages the upgrading of the regional transport system, Structure Plan policies which identify Trunk Roads (including the A259) for improvement and Rother District Local Plan and Hastings Borough Local Plan policies which provide improved transport facilities and services.

Traffic impact on The Ridge

7.100 The proposal is estimated to give rise to a significant increase in the amount of traffic that would use The Ridge amounting to 33% in the Grange Road area, west of The Conquest Hospital. Through work on HBLATS there are a number of traffic management initiatives being considered to improve the flow of traffic in this area, with junction improvements together with traffic calming measures to provide the opportunity for on-street parking without affecting the flow of traffic. It is appropriate that such improvements are secured through an undertaking that may be attached to any permission, and implemented within an agreed timescale. Whilst there is some uncertainty over the traffic impacts, these proposals are indicative of what could be achieved to mitigate the impacts with an intended commitment to implementing measures that would be no less effective.

7.101 Whilst the HA's complimentary scheme at the junction of The Ridge with the A21 Baldslow link has yet to identify a preferred design option, it is understood that it has been placed in a draft programme of major schemes for 2013/14 and an announcement is expected in the near future on the chosen scheme.

7.102 It is considered, in terms of the traffic impact on The Ridge, that the mitigation measures and improvements proposed (including off-site road works and complimentary measures developed through the HBLATS would improve the flow of traffic in the area.

Junction Design and Analysis

7.103 The applicant has provided further LINSIG analysis to assist in the assessment of the traffic signal controlled junctions proposed as a result of the scheme. On the basis of the additional information, there will be significant benefits at a number of key junctions (Hastings: A259/B2092 Harley Shute Road and the A259/Filsham Road; Bexhill: A259 Bexhill Road/A2036 Hastings Road at western end of Glyne Gap and Battle: A2100 (north and south of Battle); A269 Bexhill Road/B2204 at Ninfield) outweigh the minor negative impact of additional congestion at four other junctions at Hastings: Crowhurst Road/Queensway, Braybrooke Road/South Terrace/Priory Avenue and at Bexhill: A259 junctions to the west of the scheme and the A269 London Road/B2182 Holliers Hill. Additional LINSIG analysis on the Belle Hill junction has shown that the maximum junction

saturation is 90% and whilst there would be queuing, this means that the junction would clear on each traffic signal cycle, which is an improvement on the current situation. Overall the junction arrangements are considered satisfactory having regard to the wider transportation context.

Link Road alignment and construction

7.104 The link road is some 5.58km long with 1.4km standard single carriageway section in Bexhill located along the bed of a former railway with the remaining section laid out to a wide single carriageway outside of the built up area. On the basis of the submitted information the proposed horizontal and vertical alignments of the new route appear are generally appropriate with provision for a crawl lane at the eastern end in response to the climb from the valley floor. The design speed of the road relate to the proposed speed restrictions for the road. The proposed road layout and character of the highway is not designed to encourage excessive speed. The design seeks to minimise severance for pedestrians. With the provision of under and overbridges, and the inclusion of an underpass at the southern end, within the built up area, appropriate crossings for all road users are provided in new and existing locations so as not to compromise existing movements. Outside the urban area, the pedestrian/cycle routes affected are retained on similar alignments, but would be primarily for recreational users. The addition of the greenway between Hastings and Bexhill provides an important link both between the two towns and with existing Rights of Way.

Sustainable Transport Modes

7.105 There are a number of transport issues with the current situation on east-west routes between Bexhill and Hastings that I have had regard to. These include:

- The significant congestion on the A259
- The inappropriate use of minor roads
- The high accident rates along the A259
- The potential for community severance
- The poor facilities for pedestrians and cyclists on the A259 and other roads used as 'short cuts'
- The poor bus reliability on the A259
- The fact that modal shift would be hindered without the scheme (in particular bus use)

7.106 It is acknowledged that the proposed link road scheme would result in certain roads within the study area having additional traffic; principally these are roads leading to the link road at its southern and northern ends and that other roads within Hastings would become more attractive to road users. The

worst affected roads would be Queensway, The Ridge and the A259 through Bexhill.

7.107 However, it should be noted that there are a large number of roads within the study area that show a significant reduction in the number of vehicles. These are principally roads which are currently used as 'rat runs' to avoid the existing congestion.

7.108 I consider that the application has shown that the proposed link road would offer travel time benefits in the wider area including at certain junctions. From a highway and transport perspective, the proposed link road would therefore offer a number of benefits including:

- Improved journey times between Bexhill and Hastings
- Reduced accident rates
- The opportunity to deliver wider LTP objectives in the area
- Provides the opportunity for bus route improvements
- Significant reductions in traffic on inappropriate minor roads in the area.
- Provides the opportunity for sustainable development linked to the existing urban areas (thus avoiding scattered car dependant rural development)

7.109 On this assessment I consider that the layout and circulation arrangements are satisfactory and subject to the identified improvements proposed as part of the Scheme to improve the flow of traffic in the area being implemented I consider that the scheme meets national, regional and local transport and traffic objectives, relevant Transport and Traffic policies and that the scheme offers 'major beneficial' impacts in terms of travel and transport in accordance with the assessment. The Scheme accords with RPG9 Policy T17 which identifies the Bexhill to Hastings Link Road as a Priority for Investment and Policy T5 which identifies the A259 as a Regional Spoke (the role for which should be supported and developed in order to improve journey reliability), Structure Plan Policy TR1 which seeks to, inter alia, improve local Trunk Roads and Policy TR40 which emphasises the need for economic regeneration and outlines the role which transport can play in this process, Rother District and Hastings Borough Local Plan which advocate the promotion of more sustainable development travel choices and Policy T8 of the draft South East Plan which also supports the role of regional spokes.

7.110 The Scheme accords with regionally identified priorities for transport investment which identifies the Bexhill-Hastings Link Road as a 'Priority for Investment' (RPG9 Policy T1) and is consistent with local plan policies (TR1 and TR2) within the Rother District Local Plan and Hastings Local Plan which seek to improve the local transport system; seek to improve identified Trunk Roads (including the A259) and support the role which transport can play in economic regeneration.

Landscape and Visual Effects

7.111 RPG Policy E1 states that priority should be given to protecting areas designated at international or national level, either for their intrinsic nature conservation value, their landscape quality or their cultural importance.

7.112 Structure Plan Policy EN1 requires new development to conserve and, where possible, enhance the character, quality and local diversity of the landscape, whilst Policy EN8 places particular emphasis on the protection of remote and tranquil areas.

7.113 Rother District Local Plan Policies GD1 and DS1 and Hastings Local Plan Policies L1 and L3 require development to conserve and enhance the distinctive character and quality of the local landscape, respect existing areas of tranquillity and remoteness, consider local topography and protect established local views.

7.114 Outside designated areas, Draft South East Plan Policy C4 encourages positive and high quality management of the region's open countryside in order to protect and enhance its distinctive qualities.

7.115 PPS7 (Sustainable Development in Rural Areas) requires that Planning Authorities should continue to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced. They should have particular regard to any areas that have been statutorily designated for their landscape, wildlife or historic qualities where greater priority should be given to restraint of potentially damaging development.

7.116 Part of the Link Road lies within an area of townscape in the urban area of North Bexhill and passes into the countryside to the north of the urban area. North Bexhill has developed from the core of original villages and historic farmsteads which were scattered across the area. Following the development of the railway branch line from Bexhill to Crowhurst in 1897 to 1902 the London Road North was constructed and associated houses in the early 1900s. Much of the development is similar in age and character and the distinction between different areas is fairly subtle, dominated with terraced or semi detached residential housing with occasional business uses. The Scheme would follow the existing disused railway corridor through this residential urban area. Ninfield Road and Holliers Hill in Sidley form the commercial centre in this part of Bexhill.

7.117 The rural landscape to the north of Bexhill is dominated by the Combe Haven Valley. The High Weald AONB extends just south of Crowhurst and touches on the Study Area to the north – at its closest point the road is approximately 450 metres to the south and it is not considered to adversely affect its setting or character. The Combe Haven Valley is an attractive swathe of farmed countryside flanked by intricate side valleys and intervening ridges and more wooded hill tops, the whole area forming a good quality buffer between the AONB to the north and the urban area to the south. Much of the valley is of designated wildlife significance, notably the wetlands and woods. Part of the valley is recognised as being remote countryside and on the lower scale of relative tranquillity being separated from settlements and noise corridors, such as roads and railways.

7.118 The Environmental Statement sets out a detailed landscape and townscape impact assessment of the Scheme. In response to the initial

assessment, a number of matters have been raised with the applicant, including:

- Additional information on the design and appearance of the Scheme at the Bexhill end within the urban area
- Clarification as to the vegetation loss and the need for fuller details regarding engineered landforms incorporating the Greenway and interface between landform and noise fencing
- A series of Zone of Visual Influence (ZVI) drawings to assist in the understanding of the contribution which proposed landform would have on minimising visual effects upon the countryside
- Further clarity about fences in both the urban and rural area, including where further details would need to be agreed in the future
- Avoid engineered landform to parts of the greenway and equestrian routes and confirm generally how the landscape earthworks are to achieve appropriately graded landforms
- Additional plans to illustrate the LAeq 50dB(A) noise contours for 2010 and 2025 over the proposed Scheme, including the Greenway
- The need for two bridges in the Powdermill Valley.
- General design of structures and
- Landscape Management Proposals

In response to these concerns and issues further information has been submitted by the applicant.

Bexhill urban section of the Scheme

7.119 The Addendum to the ES emphasises that the applicant would seek to develop a Scheme with the local community, which helps meet some local needs. The applicant has, however, provided a more detailed scheme showing the creation of special features, in this case brick mazes set in grass and paving, shelter and seating for children waiting for transport from school. The applicant has also highlighted the key drivers for the design of the Scheme, including the provision of a landscape buffer between the proposed road and the houses in London Road; seeking to calm traffic in the area and create an environment in which there are surfaces shared by people and vehicles; providing a general upgrading of the townscape and local environment for this area; and minimising the effects upon the site containing the schools to the west of the proposed Scheme.

7.120 There remain a number of concerns in relation to this element of the scheme in terms of location and arrangement of trees; the profile and appearance of the underpass and installation of environmental barriers. In addition, whilst accepting that the submitted photomontages are 'indicative only', there is a need to provide a high quality and distinctive townscape with measures that integrate the Scheme with its setting. It is noted that the applicant's stated desire is to engage with the neighbouring residents in the

vicinity of the 'southern end' of the scheme in agreeing a designed solution which creates an upgraded townscape and local environment for this area. Being mindful of the importance of this section of the Scheme as a 'gateway' to the proposals it is considered that the details of this urban section can be enhanced and that without the imposition of conditions the Bexhill urban connection section would be contrary to development plan policies. Therefore, if the proposal was to be supported the imposition of a condition is required for a detailed design for this section of the Scheme prior to works commencing, including the Chapel Lane underpass. Such a condition would, in my judgement, provide sufficient safeguards to ensure that the Scheme provides an appropriate designed solution. Wider townscape issues are considered below.

Visual impact

7.121 In order to assess the visual impact of the scheme, zone of visual influence plans were prepared by the applicant. These seek to demonstrate the effectiveness of the extensive mitigation bunding at Day One and the further mitigation afforded by maturing planting proposed as part of the scheme at Year 15. The applicant has also produced a set of plans showing the changed zone of visual influence if the bunding were to be altered and on the basis of different vehicle heights. There remains some doubt to the clarity of this information, but I accept that they are a useful tool in forming an impression of the likely differing effects of the scheme.

7.122 It is acknowledged that the fundamental principle behind the route of the Scheme inevitably impacts on the natural grain of the Combe Haven Valley landform and its associated side valleys which can be considered to be an essential part of the area's attractive character. In any assessment the landform mitigation inevitably runs counter to this in several instances, perhaps most notably where the scheme crosses the Powdermill Stream valley. Purely on this basis, the proposals would not be in accordance with Structure Plan Policy EN1 and EN8 which seek to conserve and where possible enhance the character and quality of the landscape and Policies GD1 of the Rother District Local Plan and DS1 of the Hastings Borough Local Plan which require development to conserve and enhance the distinctive character of the local landscape.

7.123 Whilst the ES conclusions are noted I am of the view that the landscape and visual effects of the scheme overall could be greater than predicted by the applicant, and whilst there would be some beneficial visual effects to parts of the AONB, from a redirection in current traffic flows, these would not offset to any significantly material degree the direct adverse landscape and visual effects of the proposals on the area.

7.124 The Bexhill and Hasting Link Road would inevitably adversely impact upon the area which is of significant landscape quality and distinctive character. The road and some of its mitigation such as extensive noise barriers introduce some unfamiliar features into this landscape, and the extensive greenway and equestrian routes, with the associated fencing tend to slightly suburbanise the rural character. There would, therefore, be a

significant loss of the intrinsic landscape resource from the Link Road within the rural area.

7.125 The applicant has stated that the primary reason for the bunding is for noise attenuation but the scheme still requires significant lengths of noise fencing in the rural section. Thus the impact of the extensive mounding has not been wholly successful and there remain concerns about the impact of the extensive landform and the engineered features of the road in the open countryside and the Combe Haven Valley. Consequently I consider the scheme is not in total conformity with the County Council landscape objectives for this area which include the reduction of engineered features.

Vegetation and Tree Loss

7.126 The applicant has provided further details clarifying the extent of vegetation loss as a result of the Scheme. The Addendum ES acknowledges that several large oaks are to be removed in the urban section of the Scheme and has provided further vegetation loss mapping for the section of the route that passes through the railway cutting. The tree loss now shown recognises the working areas required to construct the Scheme and includes the need for tree surgery and coppicing on retained trees to enable them to better cope with changed circumstances as a result of the construction of the Scheme.

7.127 I acknowledge that the additional information provides greater clarity on proposed vegetation and tree loss but consider that the Addendum has also highlighted a number of inconsistencies between figures showing tree loss and tree loss schedules that are appended to the Addendum. Notwithstanding this, I consider that overall the route alignment has sought to minimise tree loss and disturbance to landscape features.

7.128 It is accepted that a scheme of this nature will inevitably give rise to some tree and other vegetation loss, however, this needs to be considered against the introduction and long term management of new planting in the new road corridor. I am consider that subject to a condition requiring the submission of detailed vegetation clearance and retention plans to establish appropriate protection and clear boundaries on the ground to the exact extent of vegetation loss, supported by detailed arboricultural recommendations for tree surgery, I consider this aspect of the proposal is acceptable . A detailed scheme providing for the future maintenance and management of the soft landscape works and the subsequent implementation of the scheme thereafter is also required. This should be secured through an undertaking.

Interfaces with noise fencing at bridges

7.129 The assessment of the initial information in relation to the key interface of fencing and bridges raised a number of concerns in relation to the use of different forms of fencing, including the use of 'greenscreen' (over which natural climbing vegetation can grow) fencing at particular locations. The applicant has since submitted an Addendum Design and Access Statement which provides additional illustrations of the proposed structures, guiding principles for the design of the fencing and their relationship with

landform and has clarified the intention to create a noise barrier which would be as continuous as possible. The applicant has noted that where noise fences would have to be used instead of bunds, in the rural areas, their height would be continued so as to emulate similar height noise bunding near by. In this way, no gaps would be left in the noise barrier between the road and the adjacent countryside, and the maximum effect could be achieved.

7.130 Whilst it is accepted that the Addendum ES and Design and Access Statement provides further clarity on certain aspects of the noise fencing, there remains a number of outstanding concerns in relation to the use of particular types of fencing in certain areas as well as the detailed design and materials of the fencing itself. A condition is recommended to ensure that detailed setting out and use of materials is approved prior to their installation to ensure a high standard of design throughout the scheme.

Landform

7.131 The applicant has confirmed that the new landforms have been designed to accommodate all features in as natural a way as possible. The Addendum Design and Access Statement illustrates contours which interpret the bank and cutting symbols on the application plans to meet this objective and includes additional drawings to illustrate how banks would be interpreted in the landscape to produce an appearance of natural landform of which the Greenway routes are a part.

7.132 Whilst the additional information and clarification is welcome it is evident that it is inherently difficult to ensure that the engineering setting out of the Scheme is suitably tempered by landscape design so that the base engineering does not dominate the environment. The avoidance of such features as standard batters and profiles will be vital if the landform is to appear reasonably "natural". The Additional Habitat and Updated Contours provided by the applicant provide a degree of comfort in this regard but the contours are only indicated at 2.0m vertical intervals. I consider that further controls are required over the finesse of the landform, particularly in terms of the screening crest heights of mounds and their vertical profiles.

7.133 It is proposed therefore that detailed plans of contouring proposals at not more than 0.5m vertical intervals covering all areas, from the back of the new highway verge, where levels are to be changed, together with suitably located cross sections, will need to be submitted for prior approval. The details to be submitted should also include the maximum and minimum crest heights and gradients to be adopted. The submission of as constructed' survey plans (with contours at no more than 0.5m vertical intervals) to show the finished landform should also be required.

Tranquility

7.134 The Link road proposals introduce a significant linear noise generating feature into an area which is currently relatively tranquil and peaceful. In these terms the proposal will have an adverse impact. Whilst the detailed route alignment and landscape treatment has sought to minimise the

intrusive qualities with bunded landforms and care in the selection of the road surface the success of this containment is has not been entirely successful. The addendum to the ES has provided the 50dB LAeq noise contour plotted over the environmental design base, both for the year of opening and the design year. From a review of this additional material it can be concluded that one of the design parameters for the Greenway to be located outside the 50dB contour has not been fully met. This would reduce to some degree the perception of open tranquil countryside experienced by users of the Greenway.

7.135 Whilst the applicant's assessment has been carried out in accordance with the requirements of the DMRB and DFT WebTAG, it is considered that the location of parts of the Greenway within the 50dB contour would be contrary to the design parameters previously established and would therefore give rise to a degree of intrusiveness when using the Greenway in those locations.

Powdermill Valley Bridges

7.136 The Scheme proposes two bridges in Powdermill Valley which is a very sensitive location within an unspoilt valley adjacent to the wider Combe Haven valley. Consequently structures in this location will be particularly visible giving rise to damage to the landscape quality.

7.137 The applicant has confirmed that two bridges are necessary in the Powdermill Valley to accommodate the Powdermill Stream including the 1066 Country Walk and the Powdermill Valley_ stream, so that both flows are accommodated.. At time of flood, the Powdermill Stream overtops the banks to flood the valley. The flow from the valley is relieved by the original course in the Powdermill Valley Stream, which is normally a smaller water course in the valley floor. A free span structure is proposed at this stream crossing, in order to accommodate flood flows, which are much greater than the normal flow – thus avoiding the build up of flood water upstream of the proposed Scheme. Because the streams are at different levels it is not possible to take all the flood water through one water course, particularly given the need to accommodate wildlife requirements. Also the flows are too great, and the wildlife requirement such, that reducing the size of either of the bridges is not considered appropriate.

General Design of Structures

7.138 A number of bridges and overbridges are proposed as part of the Scheme. The plans submitted by the applicant are primarily general arrangement drawings which indicate a range of concrete and brick finishes with associated retaining walls and fencing. Given the nature and detail of the drawings submitted, a condition is recommended ensuring prior approval of external finishes to bridges and associated structures (including railings, parapets, surfacing, concrete finishes and fencing).

Landscape Management Proposals

7.139 It is considered that the applicant's assessment of the Scheme is generally thorough in terms of the landscape and visual assessment and provides a general strategy for the adoption of appropriate mitigation. The fundamental principle behind the Scheme's route inevitably impacts on the natural grain of the Combe Haven Valley landform and its associated side valleys which are an essential part of the area's attractive character. The landform mitigation and compensation inevitably introduces a new and different landform into the existing landscape.

7.140 The applicant's own assessment of direct landscape and visual effects indicates that there would be some beneficial visual effects to parts of the AONB as a result of the redirection of traffic, these would need to be balanced against the direct adverse landscape and visual effects of the proposals.

7.141 It should also be noted that the road and some of its mitigation such as extensive noise barriers, would also inevitably introduce alien features into this landscape and the extensive greenway and equestrian routes and the associated fencing would, at the least, tend to slightly suburbanise the existing rural character. There would be a significant loss of the intrinsic landscape resource.

7.142 Policies in the Structure Plan, the two local plans and the draft South East Plan, require development to conserve and enhance the distinctive character and quality of the local landscape, respect existing areas of tranquillity and remoteness, consider local topography and protect established local views. Hastings Local Plan Policy L3 and Structure Plan Policy EN 8 acknowledge, however, that prejudicial development may be permitted where it can be demonstrated that environmental loss has been kept to a minimum, there is a compelling justification for there being overriding benefits in the wider public interest and no reasonable alternatives for a proposed development. This evidently requires a wider evaluation than just a consideration of the landscape and visual issues.

7.143 Further, in relation to Rother Local Plan Policy BX 4 which allocates land between Bexhill and St. Leonards as a Countryside Park it is noted that not only will the Link Road relieve the access constraint on development of the Countryside Park but that certain design features of the Scheme, such as the Greenway and new habitats can make a positive contribution to the Park. Rother District Council have also noted that without the development of the Scheme there would be substantial pressure for further development elsewhere in the District to replace that proposed at North Bexhill, which would no longer be implementable. Thus there would be increased pressure on other locations, including the High Weald Area of Outstanding Natural Beauty.

7.144 Having regard to the prevailing policy framework and the wider assessment of other issues arising from the Scheme set out in this report there are considerable disbenefits to the Scheme in landscape terms. The weight of these disbenefits is reduced by the scope of mitigation proposed, the imposition of safeguarding conditions and the long term landscape and ecological management and maintenance of the proposals.

7.145 Policies in the Structure Plan and in the Rother and Hastings Local Plans require that development conserves and enhances the distinctive character and quality of the local landscape, respect existing areas of tranquillity and remoteness, considers local topography and protects established local views. Having regard to the landscape assessment of the Scheme, it is not considered that the submitted material demonstrates that the Bexhill Hastings Link Road fully meets these aims and objectives and it conflicts with Policy EN1 of the Structure Plan and partly conflicts with Policies GD1 and DS1 of the Rother Local Plan.

7.146 Therefore, in my assessment of the Scheme, solely against the interests of acknowledged landscape importance referred to above, the Scheme does not fully accord with the overarching objectives of the prevailing landscape policy framework and will adversely impact upon the landscape and visual character of the area.

Nature Conservation and Biodiversity

7.147 RPG9 Policy E2 requires that the Region's biodiversity is maintained and enhanced. Policy E1 gives priority to the protection of designated areas of international and national importance. Similarly Structure Plan Policy EN17 gives protection to existing natural resources – in particular sites of national and international importance - and that particular regard will be paid to the protection of ancient woodland from damage. Policy EN20 requires that where there is an established need for a major development that would result in the loss of an important habitat, measures to provide compensation and equivalent habitat will be required. Policy EN18 encourages actions to increase the extent and diversity of natural resources.

7.148 Rother District Local Plan Policy DS1 and Hastings Borough Local Plan Policies NC2, NC3 and NC6 give protection to natural resources, species and habitats of regional, local, national and international importance, whilst Hastings Local Plan Policy NC8 and Rother Local Plan Policy GD1 require that development should protect and thereby minimise damage to wildlife and habitats. Where the loss of areas of nature conservation is unavoidable, this should be minimised and compensation provided through the creation of replacement habitats and other appropriate measures.

7.149 Draft South East Plan Policy NRM5 emphasises that there should be no net loss of biodiversity in pursuit of an active gain across the Region

7.150 PPS9 (Biodiversity and Geological Conservation) requires that decisions on planning applications should prevent harm to biodiversity. Where granting planning permission would result in significant harm to those interests, local planning authorities will need to be satisfied that the development cannot reasonably be located on any alternative sites that would result in less or no harm. In the absence of any such alternatives, local planning authorities should ensure that, before planning permission is granted, adequate mitigation measures are put in place. Where a planning decision would result in significant harm to biodiversity which cannot be prevented or adequately mitigated against, appropriate compensation measures should be sought. If that significant harm cannot be prevented,

adequately mitigated against, or compensated for, then planning permission should be refused.

7.151 Schedule 9 of the Countryside and Rights of Way Act 2000 amends the Wildlife and Countryside Act 1981 (section 28G) to place a duty on public authorities (including County Councils), in exercising their functions in relation to Sites of Special Scientific Interest: to take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest.

7.152 The Natural Environment and Rural Communities Act 2006 (NERC), Section 40, places a duty on each public authority, in exercising its functions, to have a regard to the purpose of conserving (and enhancing) biodiversity. In the case of this application the duty applies to both the applicant and to the planning authority.

7.153 The UK Conservation (Natural Habitats, etc) Regulations 1994 (as amended) require that the planning authority must be satisfied that species and habitats that are protected under European Directives will not be damaged as a result of granting permission for a development. In addition, where a development requires an Environmental Impact Assessment, the planning authority must have sufficient information to properly judge the impact of a development on a protected species before it comes to a decision on a planning application. No habitats which are protected under European Directives are affected by this application but several species are affected, including: Great Crested Newts, dormice and several species of bats.

7.154 The applicant carried out extensive surveys of the application area and, for some species, adjoining land. The surveys were necessary to establish both direct impacts of the proposed works and the extent and viability of populations that might be affected by both the construction and operation of the scheme. The surveys included species protected under European and national law, including the Wildlife and Countryside Act 1981, and other species of biodiversity importance.

7.155 The ES reviews the surveys and assessments that were carried out in order to identify the potential direct, indirect, temporary, short-term and long-term impacts arising from the proposed Scheme. Surveys have been carried out in accordance with Department for Transport (DfT) Transport Analysis Guidance (TAG) and other guidance within DMRB and DETR Guidance on the Methodology for Multi-Modal Studies (GOMMMS) guidelines. In addition, the applicant has made reference to the Institute of Ecology and Environmental Management Guidelines for Ecological Impact Assessment.

7.156 The assessment of the ES and the review undertaken by Natural England identified a number of matters which were objectionable and others that required the submission of further detail. These matters included the potential impact to Marline Valley Woods SSSI, the potential impact to Combe Haven SSSI and the potential impact to protected species and the subsequent needs for any additional mitigation. In addition, the Environment Agency raised a number of concerns in relation to an inadequate consideration of, and mitigation and compensation for ecological impacts; the impacts of severance

of habitats and a failure to address requirements of PPS9 and other planning policy.

7.157 The Addendum ES has been submitted to address these and other issues, however Natural England maintained its objection to the Scheme on the basis of:

- Inadequate mitigation for the loss of small areas of woodland ground flora, loss of connectivity and nitrogen deposition on Marline Valley Woods
- Air quality effects on both Marline Valley and Combe Haven SSSI sites
- Incomplete bat surveys and inappropriate mitigation including for loss of maternity roosts
- Incomplete information on dormice

7.158 The addendum ES also provides further information and additional mitigation and compensation proposals relating to Great Crested Newts. The information and proposals are considered sufficient to ensure that the Great Crested Newt populations will not be adversely affected by the development, Natural England did not raise any objection to these proposals.

7.158 Supplementary Nature Conservation information relating to the above objections has been submitted and Natural England has withdrawn these objections. In relation to Marline Valley Woods SSSI, an additional area of compensatory habitat has been identified to compensate for the impacts to the SSSI. The additional habitat includes an area of woodland that can be enhanced by improved management and an area of agricultural land that can be partly planted with trees and shrubs and partly managed as woodland glades. The compensation area surrounds a narrow extension of the SSSI along a stream and has topographical characteristics similar to the ghyll woodland of the SSSI. No other area adjacent to the SSSI has comparable characteristics and the same potential for providing suitable compensation.

7.159 Further survey information has been provided on bat populations and proposals have been made for the relocation of roosts, however the exact locations of these roosts, within defined parameters, will need to be determined under a proposed undertaking and conditions. In particular there will be the relocation of a barn at Adams Farm that is on the route of the link road. The existing barn will be demolished and relocated to an agreed site that is similar in elevation and aspect to the existing location and will be of equivalent value to the bats. The precise details of the relocation works, including timing and reconstruction methods, will be agreed and controlled under planning obligation and Natural England licence.

7.160 An additional dormice survey has clarified the extent of the populations affected by the scheme and has indicated that the viability of these can be maintained by providing for connectivity across the scheme. In particular design features will be incorporated in road bridges to encourage dormice to pass under the road. The features include tunnels, wide stream banks and shrub planting. Specialist advice has been obtained by the applicant which confirms that the measures proposed will maintain

connectivity and provide adequate mitigation of the impacts to the dormice populations. This advice is accepted by Natural England.

7.161 With specific reference to the Environment Agency's objection, and subsequent to the submission of the further environmental information by the applicant in September 2008, the EA has also confirmed that the details submitted are sufficient to address the outstanding nature conservation and ecological impacts on the proposed development and on this basis (and subject to conditions) have withdrawn their biodiversity objection to the proposal.

7.162 The ES, and its addenda, identify a complex set of impacts on wildlife habitats and species including direct loss, severance, noise and air quality. The alignment of the scheme has avoided major direct loss of important habitats, including designated sites, but there is some loss of significant habitats and adverse impacts from severance of habitat areas into smaller and less viable parcels. It is impossible to construct such a major scheme in an area so rich in wildlife without significant adverse impacts to wildlife but it is my view that the design and mitigation proposals minimise such impacts. However, there are impacts remaining that require compensation including those identified in the ES.

7.163 Planning policy and national legislation requires that planning decisions should prevent harm to biodiversity and seek to achieve its enhancement. Therefore the compensation provided by this scheme must ensure no net loss of biodiversity and aim to provide some enhancement. The compensation proposed by the applicant principally involves creation or modification of habitats with the aims of replacing lost habitats and providing improvements that will benefit the species that will be impacted by the scheme.

7.164 The creation of compensatory habitats can be difficult and the outcomes are not entirely predictable due to uncontrollable factors such as weather and adjoining land management, also, ecological processes are very complex and not always fully understood. In addition, most new or significantly modified habitats take many years to reach the desired outcome and to provide the level of compensation required. It is therefore necessary to provide a greater area of compensatory habitat than that which is lost. In this case the applicant proposes, in the ES, to provide an overall ratio of compensatory habitat to habitat lost of 2:1. The proposed ratio is acceptable to Natural England and, in my view, can provide sufficient compensation to ensure no net loss of biodiversity.

7.165 The mitigation and compensation proposals in the initial ES, and subsequent addenda, will require a significant period to implement and therefore it is important that they are implemented as early as possible in any programme of works. As mentioned above, the creation of habitats is not entirely predictable and therefore progress will need to be monitored and provision made for remedial measures to be taken if necessary. To improve the chances of success and to ensure that local genetic integrity is maintained it is essential that all planting or seeding uses native species of UK provenance which are, where possible, of local origin. Appropriate schemes of implementation and monitoring will be secured by condition.

7.166 In order to ensure that there is no long term loss of biodiversity the mitigation features, such as badger underpasses, and compensatory habitats will require maintenance and management for as long as the impacts that they are addressing remain, that is for as long as the road remains in use. An appropriate scheme of management will be secured by condition and its long-term implementation secured by appropriate undertaking along with the provision of off site compensatory arrangements.

7.167 The construction of such a major scheme will cause significant short term disturbance and disruption to wildlife species and habitats. There is also a significant risk of damage either through: accidental killing or injury of species, incidental or accidental pollution from oil or other chemicals, silt run-off from disturbed ground or excessive noise. I have therefore recommended that the CEMP include details of precautions, contingency plans and working methods to minimise the disturbance and the risk of damage to species and habitats.

7.168 The introduction of the Link Road into this locality does have both general and specific biodiversity impacts. Most of those impacts on SSSI's and Ancient Woodland have been contained by the careful alignment of the link road through this sensitive tract of countryside. If it can be concluded that there is a pressing need for the Link Road, and that there is no less damaging route, the proposals can be considered an acceptable departure from RPG9 Policy E2. The direct impact on the Marline Valley Woods SSSI is relatively minor and this, together with other impacts of the scheme have, subject to an undertaking, been specifically mitigated and compensated to ensure that there will be no overall net loss; furthermore it is expected that in the longer term an enhancement should be achieved consistent with RPG9 Policy E1, Structure Plan Policy EN17, Rother District Local Plan Policy DS1 and Hastings Local Plan Policies NC2, NC3 and NC6. In these terms through mitigation, compensation and the provision of broadly equivalent habitats the requirements of Structure Plan Policies EN18 and EN20, Hastings Local Plan Policy NC8, Rother District Local Plan Policy GD1 and Draft South East Plan Policy NRM5 are adhered to. Species protected under the Wildlife and Countryside Act 1981 will be safeguarded through the mitigation and compensation measures and the CEMP. On this basis the specific duties under CROW and The Natural Environment and Rural Communities Act 2006 are considered to have been met.

Townscape

7.169 RPG9 Policy Q2 requires development to contribute to improvements in the quality of life in urban areas by enhancing and preserving the value of the urban environment. Improvements in the quality of the urban environment should be accompanied by the protection of existing areas valued for their cultural or conservation value, as required by Policy E1.

7.170 Structure Plan Policies EN1 and EN26 require that buildings or building groups, historic parks or historic towns and their settings and the wider build environment should be conserved and enhanced.

7.171 Hastings Local Plan Policy DG1 states that planning permission will not be granted for development that obstructs public views – in particular local landmarks which contribute to townscape, important urban or natural features or positions which provide an appreciation of the character, form or setting of the town. Similarly, Rother District Local Plan Policy GD1 requires new development to respect important views and features that contribute to the character and amenity of the local area.

7.172 Draft South East Plan Policy BE1 emphasises that new development should be relevant to its context and build upon existing local character, distinctiveness and sense of place. Similarly, PPG15 encourages new development to respect those features that contribute to the quality and distinctiveness of the existing townscape.

7.173 The review of the ES identified the need for additional information in order to fully assess the townscape impact of the Link Road. It was identified that further plans were required at key points along the route in order to assess the likely environmental impact at particular locations, including; the new Ninfield Road Overbridge at Sidley; the new Woodsgate Park Overbridge; the new London Road Junction; the setting of the Chapel Path Underpass; the Belle Hill Junction at the southern end of the Scheme and the Queensway Junction at the northern end of the Scheme.

7.174 To assess the environmental impact of the Scheme 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 was requested. Additional photomontages were also sought in to clearly illustrate a number of viewpoints including the elevated section of the Scheme that would be required to enable the “Chapel Path Underpass” to be constructed at the point where the existing houses were shown demolished and details of the junction with Belle Hill in the distance.

7.175 The Addendum ES and Design and Access Addendum have been reviewed and whilst the additional photomontages assist in the appraisal as to whether the elements of the Scheme achieve a fully integrated townscape solution rather than an ‘engineering design’ solution, I remain concerned that this part of the scheme does not provide a high enough quality townscape solution, that I believe is required.

7.176 Whilst the indicative nature of the landscaping and tree planting around the junction of the Belle Hill and London Road is helpful, it is not considered that the tree cover shown on a number of photomontages is reasonable and it is therefore recommended that a condition requiring that detailed proposals for tree planting (as well as noise barriers, water features, greenwalls etc) be agreed prior to their planting and maintained thereafter. Similarly, my concerns in relation to the Bexhill urban connection section in the landscape section above.

7.177 Whilst there are some concerns over the engineering solutions that are sometimes adopted in the proposals, I consider that, on balance, the Scheme does not sufficiently propose such discordant structures as to warrant a refusal in terms of the townscape policies at national, regional and local

level. However, it would be imperative for the conditions outlined above to be attached to any permission to ensure that appropriately designed solutions are constructed. On this basis the Scheme accords with the guiding principles of Policy BE1 of the draft South East Plan and Policy Q2 of RPG9, which seek to raise the quality of life in urban areas through significant improvement to the urban environment; Structure Plan policies EN1 and EN26 which require the wider built environment to be conserved or enhanced and Policies GD1 of the Rother Local Plan and DG1 of the Hastings Local Plan which seek to contribute to the townscape and have regard to the form and setting of the town.

Cultural Heritage

7.178 Policy S1 of the Structure Plan seeks to ensure that (m) listed buildings and their settings are protected and enhanced. Policy GD1 (viii) of the Rother District Local Plan seeks to ensure that development does not prejudice the character, appearance or setting of Listed Buildings.

7.179 PPG15 (Planning and the Historic Environment) states that effective protection for all aspects of the historic environment (including listed buildings, conservation areas, parks and gardens, battlefields and the wider historic landscape) is fundamental to the Government's policies for environmental stewardship. Planning authorities are therefore directed to reconcile the need for economic growth with the need to protect the natural and historic environment.

7.180 In terms of archaeology, PPG16 (Archaeology and Planning) states that the desirability of preserving an ancient monument and its setting is a material consideration in determining planning applications. Where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development there should be a presumption in favour of their physical preservation. Cases involving archaeological remains of lesser importance will require planning authorities to weigh the relative importance of archaeology against other factors, including the need for the proposed development.

7.181 Comments received from English Heritage related to requirements for a further assessment of significance of historic buildings and archaeological and palaeo-environmental remains. The applicant was also requested to submit the results from a 'Stage One' evaluation in order to provide 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 was to consist of:

- Specialist geoarchaeological field investigations of four 'wet' zones and margins;
- LiDAR survey of the Scheme; and,
- Surface artefact collection survey (fieldwalking).

7.182 In addition, further clarity was sought in relation to:

- Identification of indirect effects, particularly on the hydrology and the long term preservation of waterlogged deposits to the north and south of the Scheme area;
- Clarification required on whether stage one work would also cover side valleys, borrow pits, balancing ponds, greenway, enabling works etc; and
- Results from archaeological surveys including test pit assessment of the valley areas.

7.183 In summary, the applicant has carried out the outstanding surveys referred to as ‘Stage 1’ surveys and have been submitted as part of the Addendum ES. In addition the mapping of the wet area deposits using geophysics which was to form part of the ‘Stage 2’ works has been brought forward and is also included in the Addendum ES along with a draft Written Scheme of Investigation (WSI) setting out the approach for undertaking further intrusive evaluation of the Scheme post-determination. The WSI also outlines the range of mitigation responses that can be anticipated, including where possible, the need for preservation *in situ* and, where this is not achievable, preservation by record (excavation). The WSI provides estimated of the budgets that will be required to ensure the proper implementation of this programme of archaeological works, including, if necessary, provision for the archaeological excavation of significant water-logged remains.

7.184 English Heritage has reviewed the additional information submitted by the applicant and has confirmed that the Addendum ES information clarifies their outstanding queries and, subject to safeguarding conditions, the Scheme is acceptable to them.

7.185 The prevailing cultural heritage policy framework seeks to protect the character, appearance and setting of heritage features and listed buildings and where archaeological remains are affected then there should be a presumption in favour of their physical preservation. Taking into account the expert advice provided by English Heritage and the submission of additional survey material by the applicant the Scheme proposals, subject to the imposition of suitable conditions, are not considered contrary to the guidance in PPG15 and PPG16 and is consistent with Rother Local Plan policies GD1 and Hasting Local Plan policies C1, C2, C3, C4 and C6.

7.186 The Link Road proposals also need to be considered in terms of the impact on listed buildings along its route. The route is generally well separated from Listed buildings but comes close to Upper Wilting Farmhouse, where the edge of the road is 150m distant, and particularly Adams Farmhouse, both of which are grade II Listed. Other listed buildings in the study area are generally further from the Link Road. The ES indicates that there will be temporary indirect visual and noise impacts during the construction period. The visual impacts range from large significant to Adams Farm and moderate significant to Upper Wilting Farm. Construction noise impacts have a large significance in the case of five listed buildings including Bynes Farm and Royal Oak Cottages but following mitigation this is indicated to be confined to a moderate impact at Adams Farmhouse.

7.187 The Link Road does come very close to Adams Farmhouse and involves the demolition of out buildings within the curtilage, including a brick barn. A separate listed building consent application has been made and this is considered elsewhere on the agenda. Whilst there will be no physical impact on the listed Adam's Farmhouse, the construction of the BHLR does involve works that are at their closest point 30 metres from the house. Approximately 1.86 Ha of land would be lost from the holding. This would consist of a small part of the garden, part of the former quarry and grazing land to the north. It is anticipated that 30 trees would be lost, mostly just outside its boundary. The loss of part of the treed setting and the noise impacts will be detrimental to this buildings setting but the buildings essential architectural character and qualities will not be harmed.

7.188 The buildings to be lost include a barn constructed of modern materials unsympathetic to the site, a dilapidated timber woodshed, is a small structure in very poor structural condition. A more traditional red brick barn has a greater value Barn but given its separation from the farmhouse and the proposal to rebuild it as a bat roost as part of this scheme its demolition and repositioning is considered acceptable. The proposed landscaping works associated with the Road, comprising of earthworks and tree and shrub planting, will have some effect in reducing the adverse effect on the Farmhouse and to the retention of the historic relationship of the house to the valley and integrity of its hillside setting. However, a significant adverse effect will remain.

7.189 The scheme involves the demolition of railway bridges within Bexhill. This is necessary for engineering and because of their state of repair. The bridges include some features that are worthy of reuse if at all possible with capping stones and bricks and is included in a proposed condition.

7.190 It is considered that the demolition of the bridges is acceptable and that the loss of outbuildings at Adams Farmhouse will not affect the character or setting of the listed building and their removal is therefore considered acceptable. The applicant has confirmed that the impact upon Adam's Farmhouse has arisen from the need for the route of the Link Road and conforms with RPG9 Policy E1, Draft South East Plan Policy BE6 requires new development to protect the character, appearance and setting of heritage features, including conservation areas, listed buildings, ancient monuments, archaeological sites and other buildings and spaces of historical importance. The road works will harm the setting of the Adams Farmhouse listed building in conflict Policy GD 1 (viii) of the Rother Local Plan and Policy S1 (m) of the Structure Plan, albeit that over time, with the reestablishment of tree cover, this harm will reduce.

7.191 I am satisfied that the applicant has provided sufficient evidence to ensure that the Scheme protects features of historical and cultural importance and that there are sufficient safeguards and further design and archaeological works proposed to mitigate any adverse effects arising.

Noise and Vibration

7.192 RPG9 Policy Q6 requires that the local environment is improved through reduced incidents of noise pollution. Structure Plan Policies EN9 states that noisy activities will not be acceptable in remote and unspoiled landscapes. Similarly, Hastings Local Plan Policy DG4 also emphasises that planning permission will not be granted for proposals likely to result in unacceptable levels of noise, and that where practicable the Council will seek measures to attenuate noise.

7.193 PPG24 (Planning and Noise) states that noise is a material planning consideration in the determination of planning applications. Planning authorities are therefore directed to ensure that developments that would generate a high level of noise (such as roads) are located away from noise sensitive developments such as housing, schools and hospitals.

7.194 The requirement to assess the effects of traffic noise and vibration are outlined in DMRB– Traffic Noise and Vibration and WebTAG - Noise. In summary the scope of the assessment covers:

- Noise assessment of all properties and other relevant locations. Including a statement of ambient and predicted noise levels.
- A noise nuisance assessment.
- Explanation of the Noise Insulation Regulations, and indication of the number of properties likely to be eligible for statutory insulation.
- Where relevant – an assessment of traffic-induced vibration.

7.195 The ES acknowledges that road traffic noise effects on opening of the Scheme broadly fall into three categories; (i) those resulting from an off-line improvement where new carriageways would be constructed; (ii) those resulting from on-line works where the existing road would be widened without significant re-alignment. The noise effect would be from the increased traffic flow and traffic speed; and, (iii) those resulting from changes in traffic flow, composition and speed on the existing road network as a result of the construction of the Scheme.

7.196 Without the Scheme, it is predicted that that 3,067 residential properties would experience an increase in traffic noise by the year 2025 of 1 to 5dB LAeq, 18 hr. Predictions also suggest that 85 properties in Harley Shute Road would benefit from at least a 1 dB LAeq, 18 hr reduction without the Scheme.

7.197 With the Scheme the applicant's road traffic noise summary assessment shows that 1,655 dwellings would benefit from minimal decreases and 85 a slight decrease whereas 1,437 residential properties would be subject to increases in noise level of 3dB(A) or above, with 59 of these receiving a 15dB(A) or greater increase.

7.198 The Scheme would affect properties and open areas within several hundred metres of its alignment. The southern junction, the approach to the railway cutting and the railway cutting itself are within a developed area that consists predominantly of residential properties that abut existing roads and

currently receive high levels of traffic noise up to around 70dB LA10,18hr. Further along the route many of the dwellings have rear façades overlooking the railway cutting. Properties to the east of the cutting have front façades facing the London Road and receive traffic noise of around 69dB LA10, 18hr from that source but have the benefit of there being no direct traffic noise source to their western, rear façades. Existing traffic noise levels at these façades are around 49dB LA10, 18hr. It is acknowledged that the Scheme would increase traffic noise levels at these properties to up to 68dB LA10, 18hr.

7.199 Properties immediately to the north of the Ninfield Road Bridge, that do not have a significant source of traffic noise in the existing situation, would receive traffic noise levels of up to 70dB LA10,18hr. Where the route passes through the countryside and where noise levels are not currently dominated by traffic noise, it would introduce a new traffic noise source giving rise to noise levels, close to the proposed alignment, of around 55dB LA10, 18hr, which in some instances equates to a major increase in traffic noise level. The applicant has sought to limit the increase in traffic noise level in the rural areas by the design aim of limiting the level on the Greenway. As a result immediate traffic noise level increases due to the Scheme through the rural section would limit the affected area, up to approximately 1km from the new road. Beyond this distance traffic noise level changes would be minimal to indiscernible.

7.200 In the wider area which would be affected by traffic flow changes as a result of the Scheme, some existing roads, the A259 Coast Road, Hooe Road and Harley Shute Road for example, would benefit from a reduction in traffic growth over that which would be expected without the Scheme. Other roads, The Ridge and Queensway for example, would receive an increase in traffic noise as a result of the Scheme.

7.201 The applicant has carried out a preliminary assessment under the provisions of the Noise Insulation Regulations and has concluded that 18 properties may thus qualify for noise insulation work as a result of the Scheme. This would be confirmed once the detailed design of the Scheme has been completed.

7.202 Notwithstanding the applicant's own conclusions, the independent IEMA review has highlighted a number of matters which were considered to be outstanding including that; an assessment of night time noise impacts had not been undertaken and that the ES states that no significant night time noise impacts have been identified, but this should be placed in the context of no night time noise assessment being undertaken.

7.203 The Addendum ES, therefore, provides further detailed information to address these issues and has sought to evaluate the potential effects of construction works which may be necessarily undertaken during the evening or night. The applicant has also identified a range of control and mitigation options for construction noise impacts including: careful selection of plant, effective site management; engineering control; acoustic screening; restricted hours of working; and liaison with the local community. Options for engineering noise control include the adoption of appropriate construction processes and techniques, and these would be considered in further detail

prior to the start of construction as part of a Construction Environmental Management Plan.

7.204 The Addendum ES concludes that in the worst case assessment a total of 578 residential properties are potentially affected by construction noise levels at night above the adopted criteria. However, the duration of the night-time activities generating the noise levels predicted is in most cases likely to be limited, in many cases to a single weekend and possibly a single night.

7.205 There is potential for significant noise from construction activities during the construction of the proposals as well as from the use of the Link Road itself. Planning policy seeks to avoid noisy activities close to noise sensitive areas and promotes the application of measures where possible to attenuate potentially unacceptable levels of noise. It is apparent that there is potential for noise impacts arising 59 properties identified as receiving a 15dB(A) or greater increase in noise once the use of the roads is taken into account. A number of these properties would be eligible for noise insulation under the Noise Insulation Regulations in respect of Highway schemes.

7.206 Having regard to the applicant's assessment in the Environmental Statement and the current environmental conditions there will be an overall adverse noise impact to residential properties and the rural environment between Bexhill and Hastings. This conflicts with RPG Policy Q6 and Policy EN9 of the Structure Plan, Hastings Local Plan Policy DG4. However, it is considered that the application proposals provide mitigation (such as noise screening and bunding) to reduce those impacts to levels, when set against existing background levels that would be indiscernible in many situations. It is considered that overall the Scheme is acceptable subject to the imposition of conditions relating to noise and temporal construction activities and an appropriate undertaking to control constructional activities.

Air Quality

7.207 RPG9 Policy E7 and draft South East Plan Policy NRM9 encourage Local Authorities to maintain and where possible improve air quality. Hastings Local Plan Policy DG33 states that planning permission will not be granted for development that is likely to cause unacceptable air pollution.

7.208 PPS23 (Planning and Pollution Control) directs that the existing, and likely future air quality in an area, including areas where air quality is likely to be poor (including the consideration of cumulative impacts of a number of smaller developments on air quality, and the impact of development proposals in rural areas with low existing levels of background air pollution) should be a material consideration in the determination of planning applications.

7.209 The impacts arising from the Scheme have been assessed on the basis of construction dust (nuisance; soiling vegetation and human health); operational air quality (human health; protection of vegetation and critical loads); and greenhouse gases. In terms of the air quality impacts on the SSSI these are assessed separately above.

7.210 In summary, the potential impact from construction activities that generate dust was considered largely unlikely at locations greater than 150

metres distance from construction activities associated with the Scheme. All materials were assumed to travel by road for an average distance from the nearest sources of aggregate, sand and cement. In terms of the operational phase the study area for assessing road traffic emissions was limited to all links within the existing road network where the impact of the Scheme was considered significant, as defined by the road traffic model; and, for the advanced dispersion model: the likely area where significant impacts may occur was delineated by the proposed link road to the north and the west, the A259 from its junction with the link road to Hastings' West Marina thus including the Air Quality Management Area (AQMA) to the south, and the B2092 (Harley Shute Road, Crowhurst Road) to the East.

7.211 Traffic flows have been predicted to decrease on the majority of the links as a result of the Scheme, including in the AQMA and most of Hastings. In addition increases are expected on the axis of the proposed link road (A259, B2092, and A28) and in areas in Bexhill town centre and around the Hollington area.

7.212 Once the Scheme is in operation, changes in air quality are predicted to vary along the route, but overall these are expected to be slightly beneficial. Those properties that are likely to experience significant deterioration in NO₂ and PM₁₀ concentrations are near to links that would be constructed as part of the Scheme. The relief of traffic from the built-up areas would see an improvement in air quality in some of the more built up areas and therefore, the majority of properties would experience an improvement in air quality.

7.213 By 2025, traffic flows are predicted to increase significantly but the assessment does not indicate deterioration in air quality as a result. The appraisal also shows that there could be some deterioration in air quality with the Scheme in the areas where new roads are to be constructed. These results, indicating the improvement in local air quality by 2010 is slowed by 2025, are in line with the projected increase in journey time (i.e. congestion) over the same period.

7.214 In relation to the Hastings AQMA on Bexhill Road for particulate matter, the assessment indicates an improvement in air quality with the Scheme. The assessment indicates the magnitude of impact in terms of PM₁₀ is 'minor positive' and hence of moderately beneficial significance.

7.215 It is considered that the applicant has correctly assessed the effects of the development on air quality. However whilst the applicant's initial assessment was generally considered to be comprehensive, the findings lacked mitigation proposals and the assessment of effects with stated mitigation in place.

7.216 To address areas of concern the applicants Addendum to the ES sets out a range of mitigation measures to address potential air quality effects from the construction stage of the Scheme. During the operation stage, changes in air quality are predicted to vary along the route, but overall these are expected to be slightly beneficial, and therefore no mitigation measures are required. The measures provided at the construction stage are suitable for incorporation into a CEMP.

7.217 National, Regional and Local policy seeks to maintain and, where possible, improve air quality and more specifically poor air quality is a material consideration in the determination of planning applications. The applicant's assessment concludes that in 2010 there can be expected a general improvement in air quality throughout the urban area whilst also identifying two areas of adverse impact where there is a need to consider and develop appropriate mitigation measures. The applicant has subsequently set out such measures to address air quality effects.

7.218 It is considered that the proposed mitigation measures, including the provision and use of wheel-wash facilities near the construction site exits, the stockpiling of material and related controls secured through conditions and the CEMP will provide sufficient containment of this element of the work. Such conditions and the proposed undertaking, and mitigation measures, would ensure that the Scheme accords with the principles of Policy NRM9 of RPG9 and PPS23 as well as Hastings Local Plan Policy DG33 in relation to air quality.

Water Quality, Flood Risk and Drainage

7.219 In terms of flooding and drainage, RPG9 Policy INF1, Structure Plan Policy S1, Rother District Local Plan Policy DS1, Hastings Local Plan Policy DG26 emphasise that wherever possible, development should not be located within areas at risk of flooding, and should not increase the risk of flooding elsewhere. Where development is located in areas at risk of flooding, it must provide adequate means of mitigating and protection against flood risk. Developments generating run off are required by Rother Local Plan Policy GD1 and Hastings Local Plan Policy DG27 to provide adequate means for managing foul and surface water drainage.

7.220 In terms of maintaining and improving water quality, RPG9 Policy INF2 requires new development to minimise adverse impacts on water resources, on the quality, regime, and ecology of rivers, and on groundwater. Structure Plan Policy EN11 states that proposals which would have a significantly adverse effect on the quality and quantity of water resources will not be acceptable. Similarly, Rother District Local Plan Policy GD1 requires that development should not prejudice water quality, whilst Hastings Local Plan Policy DG33 emphasises that planning permission will not be granted for development which would be likely to cause unacceptable pollution of water. Draft South East Plan Policy NRM3 requires the avoidance of adverse effects of development on the water environment.

7.221 PPS25 (Development and Flood Risk) requires that the risk based sequential test is applied, whereby consideration is given to locating development only in areas of high flood risk (i.e. Flood Zone 3a) where suitable areas of lower risk (Flood Zones 1 & 2) cannot be identified. This assessment is only part of the overall planning appraisal as to whether a development is acceptable. Where essential infrastructure is proposed in a high flood risk area, it should be designed and constructed to remain operational and safe for users in times of flood. In terms of drainage, the effective disposal of surface water from development is a material planning

consideration. PPS25 requires new development to provide appropriate surface water drainage arrangements, to manage surface water and the impact of the natural water cycle on people and property. Surface water arising from a developed site should, as far as is practicable, be managed in a sustainable manner to mimic the surface water flows arising from the site prior to the proposed development.

7.222 In terms of water quality, PPS23 (Planning and Pollution Control) states that Planning Authorities must be satisfied that planning permission can be granted on land use grounds taking full account of environmental impacts.

7.223 The Environmental Statement sets out the existing water quality and drainage conditions of the Scheme's route. The ES sets out a list of potential impacts from construction and operation without mitigation (such as physical impacts and pollutant impact on fish and aquatic plants) and describes the stages during which attempts have been made to 'design out' potential environmental problems that may have led to the degradation of the water environment. The significance of impacts arising from the Scheme were assessed based on the sensitivity of the receptor (and any associated uses), and the magnitude of the predicted impacts.

7.224 The proposed solutions have sought to prevent adverse effects arising but where potential impacts have not been able to be prevented by design, additional mitigation measures to reduce the risk have been specified. Such measures have been proposed in consultation with Environment Agency and in accordance with current good practice for highway drainage design outlined in DMRB, references therein, and Construction Industry Research and Information Association (CIRIA) publications.

7.225 The Environment Agency reviewed the initial submission and raised a number of concerns on flood risk management and specifically in relation to the submission of an inadequate Flood Risk Assessment. However, subsequent to their review of the Addendum ES and Flood Risk Assessment the Environment Agency has confirmed that, subject to the imposition of standard conditions relating surface water attenuation and implementation of the submitted FRA, their initial objection on flood risk grounds is withdrawn.

7.226 In addition, the IEMA review identified a need for quantifiable explanations in the assessment of the magnitude of the predicted impact on flooding. The IEMA review emphasised the use of a range of return periods in the assessment of flooding. Accordingly, the applicant provided further details in the Addendum to the ES in respect of the sequential approach and the Exception Test and further information in the Flood Risk Assessment to demonstrate the application of the Sequential Test. In addition, the applicant has provided 'flood outlines' for the design event (100yr + 20%) for existing and post-road construction scenarios respectively and details of the proposed Sustainable Urban Drainage Systems (SUDS). The Addendum indicates that the three drainage techniques in relation to SUDS to be deployed as part of the Scheme are: are grass swales, retention ponds, and petrol interceptors.

7.227 In terms of flooding, the Addendum ES identifies that the residual risks of flooding from tidal breach, overtopping, and the extreme fluvial flood (1 in 1000 yr) sources are considered to be low.

7.228 Given the above and on the basis of the expert advice from the EA, I consider that in flood risk terms, the proposals accord with PPS 25, Structure Plan policies S1, Rother Local Plan Policy DS1 and Hastings Local Plan Policies DG26 and DG27, RPG Policy INF1 and draft South East Plan Policy NRM4.

Geology and Soils

7.229 RPG9 Policy E8 requires that the valuable characteristics of soil are protected. Rother District Local Plan Policy GD1 and Hastings Local Plan Policy DG34 require new development to properly address any suspected contamination, whilst Rother Local Plan Policy DS1 require development to avoid unstable land or provide appropriate remedial, preventative or precautionary measures to address potential instability.

7.230 PPS9 (Biodiversity and Geological Conservation) requires that decisions on planning applications should prevent harm to geological conservation interests. Where granting planning permission would result in significant harm to those interests, local planning authorities will need to be satisfied that the development cannot reasonably be located on any alternative sites that would result in less or no harm. In the absence of any such alternatives, local planning authorities should ensure that, before planning permission is granted, adequate mitigation measures are put in place. Where a planning decision would result in significant harm to geological interests which cannot be prevented or adequately mitigated against, appropriate compensation measures should be sought. If that significant harm cannot be prevented, adequately mitigated against, or compensated for, then planning permission should be refused.

7.231 In terms of soil quality, PPS7 (Sustainable Development in Rural Areas) directs that the protection of natural resources such as soil quality should be a consideration in the determination of planning applications.

7.232 The review of the applicant's initial submission highlighted a number of outstanding issues and matters that required further clarification. These included requests for further information relating to the historical land use of the Scheme, associated contamination potential and development of source - pathway - receptor conceptual models to identify potential pollution linkages. The need for further commentary on the absence of site specific ground investigation data was also highlighted. In addition, the further review undertaken by IEMA identified that the assessment of contamination on the site was the result of a desktop/walkover studies and that chemical analysis had not been undertaken to determine the significance of any contamination that may be present. IEMA required a reasoned justification for not undertaking the investigations to enable the information to be considered within the ES and whether the absence of such information leads to uncertainty relating to the contaminated land effects.

7.233 The applicant has since provided qualifying information to address the above issues and the various comments made by external organisations and consultees as summarised below.

7.234 The environmental assessments of the geological and soil conditions relating to the Scheme prepared by the applicant has been carried out in accordance with the requirements of the Design Manual for Roads and Bridges which includes:

- Identification of the baseline conditions, to record any potential sources of contamination through desktop surveys, site reconnaissance and preliminary ground investigation;
- Prediction of the changes to the baseline conditions as a result of the proposed Scheme;
- Identification of the mitigation measures required;
- Assessment of the residual construction impacts on soils and geology in the context of the proposed mitigation;
- Assessment of the residual operational impacts on soils and geology in the context of the proposed mitigation; and,
- Key findings.

7.235 In summary, the site is located in a predominantly rural area with no significant industrial history. The southern end of the Scheme has been mainly residential with localised areas of industrial activity including Corporation Yard and a former Coal Yard which has subsequently been used for small scale light industrial activities. The general area is divided by the former Crowhurst, Sidley and Bexhill Branch railway line which was operational from 1902 until the 1960s when it was dismantled.

7.236 The remaining part of the route traverses mainly agricultural land, including Glover's Farm and Adam's Farm, and crosses Combe Haven, Watermill Stream, Powdermill Stream, a number of drainage ditches, tracks and the London to Hastings main railway line at its eastern end. Little change is evident along the route from the earliest maps.

7.237 In addition to the historical maps, the applicant identified other potential sources of contamination from its own appraisal, site walkover and from information provided by the local authority. The applicant's review of contaminated land and associated risk assessment has been undertaken having regard the primary regulatory regime under which contaminated land is managed in the UK i.e. Part IIA of the Environmental Protection Act 1990 (EPA). The framework for the assessment of potential land contamination adopted was therefore based on current guidance documents regarding the implementation of Part IIA of the EPA and the assessment of potentially contaminated land.

7.238 A key element of undertaking the environmental risk assessment was the development of a conceptual model that describes the environmental features of the route options together with the expected interaction of potential contamination sources with the environment.

7.239 The environmental risk assessment concluded that the overall risk rating for the Bexhill urban section of the Scheme was 'medium' in so far as the site itself is not expected to be significantly contaminated through its previous uses although made ground throughout the dismantled railway

section may contain moderate levels of contamination. It is acknowledged that the surrounding land has been used for some small scale industrial activities which may have impacted the Scheme alignment as a result of contaminants migrating from activities which lie outside the boundaries of the Scheme. Further, the potential contamination sources which exist along the route are not considered to be unusual or complex. They are sources which are commonly found in urban and light industrial areas and contamination, if identified within the Scheme would be treated with mitigation measures or remediation techniques which are widely practised throughout the UK.

7.240 In so far as the rural section of the Scheme is concerned, the overall risk rating has been considered to be low. It is noted that the site is currently and has historically been open agricultural land and as such there are no known significant sources of contamination within the route alignment. The Link Road scheme also includes the formation of a borrow pit within Powdermill Valley adjacent to the Link Road to enable the best use of soils with there substitution and/or the achievement of a balanced scheme of overall cut and fill. Because of the uncertainties in this element of the proposal the final arrangement is the subject of a suggested condition.

7.241 Notwithstanding the above, a site investigation specifically to address the land contamination issues associated with the Scheme and to inform the Environmental Impact Assessment has not been undertaken by the applicant. This approach has been adopted for a number of reasons including; the desktop information and qualitative risk assessment indicates that land within the vicinity of the Scheme is not significantly contaminated and the proposed future use (a hard surfaced road) is not considered to be sensitive; the potential contamination sources which exist along the route are not considered to be unusual or complex; if contamination sources are identified within the Scheme then these could be treated with mitigation measures or remediation techniques which are widely practised throughout the UK; and it was considered that the overall findings of the ES would not have significantly differed if a site specific ground investigation had been undertaken specifically to inform the document.

7.242 In the context of the site and the proposed end use, the land contamination issues associated with the Scheme are unlikely to be significant. Indeed, potential sources of contamination are relatively localised and no potentially widespread sources of contamination have been identified. Subject to the inclusion of a condition to monitor and remove any contaminated material I consider that the impact on soils is acceptable. Accordingly the applicant has satisfactorily addressed the outstanding issues raised during the original review of the application and that the proposal accords with, Policy E8 of RPG9, and Local Plan Policies GD1 and DS1 of the Rother Local Plan and Policy DG34 of the Hastings Local Plan and the guidance in PPS9.

Agriculture

7.243 RPG9 Policy E5 requires that the region's existing woodland resources and the associated quality and character of the rural environment are protected from development.

7.244 At a local level, Rother District Local Plan Policies DS1 and GD1 require that proposals respect and protect the importance of the countryside, including its agriculture and ancient woodland, which should be protected from prejudicial development. Where development of agricultural land is unavoidable, development must first make use of poorer quality land. Hastings Local Plan Policy NC10 states that planning permission will not be granted where it would adversely affect an area of ancient woodland. Where a proposal does impact on a designation, the layout of development must be designed to minimise its impact on any woodland area.

7.245 Draft South East Plan Policy NRM7 sets out a number of objectives through which the value of the region's woodland will be protected and enhanced. Policy C4 encourages the protection and management of open countryside for agriculture and other purposes.

7.246 PPS7 (Sustainable Development in Rural Areas) emphasises the role of agriculture in maintaining and managing the countryside and most of our valued landscapes. In determining planning applications, the presence of best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), should be taken into account alongside other sustainability considerations (e.g. biodiversity; the quality and character of the landscape; its amenity value or heritage interest; accessibility to infrastructure, workforce and markets; maintaining viable communities; and the protection of natural resources, including soil quality) when determining planning applications. Where significant development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land (grades 3b, 4 and 5) in preference to that of a higher quality, except where this would be inconsistent with other sustainability considerations.

7.247 Little weight in agricultural terms should be given to the loss of agricultural land in grades 3b, 4 and 5, except in areas (such as uplands) where particular agricultural practices may themselves contribute in some special way to the quality and character of the environment or the local economy. If any undeveloped agricultural land needs to be developed, any adverse effects on the environment should be minimised. With regards to existing forestry areas, PPS7 directs that local planning authorities should have regard to the sustainable management of existing woods and forests and the continued steady expansion of woodland area to provide more benefits for society and the environment.

7.248 In the evaluation of the scheme proposals and its effects on agricultural land regard has been had to the requirements of Design Manuals for Roads and Bridges (DMRB) as well as WebTAG where it is recommended that the scope of the agricultural assessment should cover:

- The type of husbandry currently employed.

- The value and amount of agricultural land the scheme is likely to take. For land Graded 1, 2 or 3a the assessment should consider additional mitigation measures.
- Likely impacts of severance and boundary impacts for individual farm, and an assessment of their likely future viability.
- Likely impacts of major accommodation works for access, drainage etc.
- Assessment of any impacts on designated agricultural areas.

7.249 The applicant has undertaken two desktop studies in connection with the assessment of the Link Road. A desktop assessment of the entire study area was carried out in 2006 as well as an earlier desktop information assessment in 2004. The assessment of the impacts of the proposed scheme upon farm holdings considered the following key agricultural elements:

- The type of agricultural enterprises being carried out and the husbandry/management currently employed;
- Estimates of the amount of agricultural land from each holding that would be affected by the proposed Scheme including land taken directly by the Scheme and also land which would no longer be viable for agricultural use e.g. where severance makes it impossible to farm productively;
- The potential impacts of proposed accommodation works for access drainage and water supply; and,
- The potential impacts of the proposals on land currently within farm diversification and agri-environment schemes.

7.250 The applicant's assessment is based on the area of permanent loss of the best and most versatile land as described within PPS7 as land classified within the MAFF ALC System as Grades 1, 2 and 3a land. The emphasis in PPS7 is the need to create a sustainable countryside framework, with a consequent reduction in the importance to be attached to the loss of the best and most versatile land in the overall balance of all environmental and planning factors.

7.251 The applicant's assessment concluded that the implementation of the Scheme would lead to the maximum temporary loss of approximately 95.5ha of agricultural land. However, the construction programme would include the implementation of an environmental design where certain areas of land taken during the construction period would be reinstated to improved open grassland, open grassland for badger foraging and arable agricultural land uses. The reinstatement of these particular areas would lead to the reduction of 19.4ha in the total permanent loss of agricultural land quality within the Scheme. The permanent loss of land following the reinstatement of land at the end of the construction period is 76.1ha of which approximately 38.6ha Grade 2 and 3a best and most versatile land would be permanently lost.

7.252 The detailed appraisal of farm holdings have identified that would be seven farm holdings affected by the Scheme i.e. Glovers Farm; Buckholt Farm; Acton's Farm; Hillcroft Farm; Betz Land Holding and Decoy Farm. The

appraisal concluded that the most significant impacts during construction occur within the Glovers and Hillcroft farm holdings – 28.5 ha would be affected during the construction period at Glovers Farm and 26 ha at Hillcroft Farm. The conclusions of the assessment of impacts on agricultural land holdings are reasonable and are technically sound.

7.253 Whilst the Scheme would have an adverse impact on agricultural land along its route, the impact upon the best and most versatile land is approximately half of the overall area affected i.e. 38.6 ha. National and local policy advocates that where significant development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land (Grades 3b, 4 and 5) in preference to that of a higher quality. The applicant has as far as practicable sought to minimise the impact upon the best and most versatile land and has proposed a number of mitigation measures including the implementation of an environmental design where certain areas of land taken during the construction period would be reinstated to open grassland, open grassland for badger foraging and arable agricultural land uses. These areas would be reclaimed in accordance with a detailed soil handling and management strategy and implementing 'best practice' guidance in agricultural reclamation

7.254 In relation to farm holdings, it is accepted that the implementation of the Scheme would produce a number of different impacts on individual farm holdings. The applicant has proposed a range of mitigation measures including:

- Reinstatement of land following construction to reduce permanent land take
- Replacement of land taken from holding with suitable adjacent land
- Adjustment to construction programme to accommodate harvesting of crops wherever possible
- Maintenance of farm access points wherever possible or re-provision as soon as possible within the construction process
- Maintenance of essential services throughout construction period
- Implementation of best practice construction procedures to ensure that no cross-contamination between holdings occurs
- Applying best practice construction procedures to minimise impacts of dust and noise on crops and livestock and
- Reintegration of restored land into appropriate government scheme following consultation with Natural England.

7.255 In assessing the impact of the Scheme in agricultural and forestry terms, regard has been had to the impact upon farm holdings and the proposed mitigation measures set out by the applicant. I am also mindful that Government guidance contained within PPS7 '*sustainable development in rural areas*' and DEFRA support for stewardship schemes has reduced the weight attached to agricultural land quality enhancing the relative importance of a broader range of sustainability considerations. The policy framework at all

levels requires new development to respect and protect the importance of the countryside, protect existing woodland resources and take account of potential impact upon the best and most versatile agricultural land. As far as is practicable, the Scheme has sought to avoid the permanent loss of the best and most versatile land and that the proposed mitigation measures are appropriate in scale to the effects of the Scheme. Therefore, on balance, it is considered the Scheme accords with Policy E5 of RPG9 and does not fundamentally conflict with the tests of PPS7, meets Structure Plan Policy S1n) and Local Plan Policies (including Rother Local Plan Policies DS1 and GD1).

Recreation

7.256 RPG9 Policy T10 aims to achieve a rebalancing of the regional transport system through, amongst other things, the extent and quality of pedestrian and cycle routes. More specifically, in the rural areas, RPG9 Policy T3 seeks to provide a balanced provision for access and improve opportunities for cyclists and pedestrians between towns and villages.

7.257 Structure Plan Policy TR3 seeks to engender a greater awareness of the environmental and economic cost of car journeys, including encouraging walking and cycling. Policies TR4 and TR5 take this further, by seeking to improve access and facilities for pedestrians and cycling. Similarly, Rother District Local Plan Policy TR2 and Hastings Local Plan Policy DG2 seek to improve opportunities for walking and cycling in new developments.

7.258 Rother District Local Plan Policy BX 4 identifies land between Bexhill and St. Leonards, from Galley Hill in the south to the proposed Link Road to the north as allocated for a Countryside Park – the policy goes on to indicate that within the Countryside Park that proposals will only be acceptable where, amongst other matters, they are consistent with the establishment and maintenance of the area as a key recreational and amenity resource for Bexhill and Hastings and their wider catchment; and provide for the proper conservation and, where appropriate, management of the Site of Special Scientific Interest and the Site of Nature Conservation Importance within it.

7.259 Draft South East Plan Policy T2 sets out policies and proposals for mobility management and a rebalancing of the regional transport system towards non-car based modes..

7.260 PPG13 (Transport) emphasises the importance of promoting more sustainable modes of travel, including improved public transport provision, encouragement of walking and cycling and reduced dependency on the private car. It also emphasises the role of adequate and appropriate transport provision in ensuring easy access to jobs, shopping, leisure facilities and services through a safe, efficient and integrated transport system that supports a strong and prosperous economy.

7.261 The introduction of a new road through an area of countryside will cause the severance of existing access routes including public rights of way, agricultural access and affects on Environment Agency accesses to statutory watercourses. Many of the existing accesses, tracks and public rights of way follow higher ground on the flanks of the Combe Haven Valley but locally

descend to cross the valley floor. The waymarked 1066 country walk public footpath runs north to south along the base of the Powdermill Valley and across Combe Haven to Little Worsham Farm near Pebsham.

7.262 The area is popular with walkers and whilst there would be severance the provision of well designed bridges to divert routes to cross the new road should minimise the impacts. Whilst there would be some diversions of public rights of way this would be compensated for to some extent by the Greenway; at no point would non-motorised users be required to cross the new road at grade, either in the urban or rural sections of the Scheme. The Greenway would be of real benefit particularly if linked to new paths within the countryside park.

7.263 There will be impacts on Rights of Way in terms of their amenity, particularly during construction when earthmoving and bridge construction is taking place. These impacts will be transient to a certain extent and mitigated by the noise attenuation measures proposed as part of the road design. Additional permissive rights of way are also proposed for pedestrians, cyclists and horse riders at Adams Farm and other footway benefits to Crowhurst Road. With improve safety and accessibility for non motorists.

7.264 Rother Local Plan Policy BX 4 allocates land between Bexhill and St. Leonards as a Countryside Park. This area of land is of acknowledged importance to the surrounding communities. Not only will the Scheme relieve the access constraint on development of the Countryside Park, but certain design features of the Scheme, such as the Greenway and new habitats can be seen as a positive contribution to the Park. Overall the Scheme is considered to be beneficial to the recreational impacts and in accordance with the development plan policies meets RPG9 Policies T3 and T10, Policy DG2 of the Hastings Local Plan and Policy TR2 of the Rother Local Plan subject to conditions to ensure the provision of acceptable arrangements for Rights of Way during construction and well designed permanent crossing facilities. These matters are covered by suggested conditions.

Social and Commercial Effects

7.265 RPG9 Policy Q6 states that social considerations and infrastructure requirements need to be taken into account fully in development planning. Whilst Policy Q5 focuses on the regeneration of town centres to promote social inclusion. Similarly, Policy Q8 requires the more equitable and locally based provision of services in rural areas, including transport facilities.

7.266 Structure Plan Policy E1 sets out its approach to improving the area's economy and prosperity.

7.267 Rother Local Plan Policy DS1 requires new development to foster sustainable and socially inclusive communities, by supporting local services and helping to meet local needs. Specifically relating to Bexhill, Rother Local Plan Policy BX1 requires that proposals for development in Bexhill to contribute positively towards the development of Bexhill's residential, employment, shopping and service centre functions.

7.268 Policy S6 of the draft South East Plan aims to increase investment in physical and social infrastructure and secure co-ordination between development and essential infrastructure provision.

7.269 PPS1 (Delivering Sustainable Development) encourages the creation of socially inclusive communities, including suitable mixes of housing. Local authorities should therefore ensure that the impact of development on the social fabric of communities is considered and taken into account; seek to reduce social inequalities; address accessibility; take into account the needs of all the community; – deliver safe, healthy and attractive places to live; and support the promotion of health and well being. PPS1 also directs Local Authorities to ensure that infrastructure and services are provided to support new and existing economic development and identify opportunities for future investment to deliver economic objectives

7.270 The ES has assessed the impact of the Scheme on the basis of:

- Impact of the Scheme on local pedestrian severance caused by traffic conditions; and
- Impacts on accessibility to key employment areas, services and facilities; and
- Impact on residential amenity

7.271 The requirement to assess the loss of land used by the community has been considered in terms of Pedestrians, Cyclists, Equestrians and Community Effects. The key objectives and policies governing community and social effects of the Scheme are aimed at supporting access to jobs, services and decent, affordable housing. These policies underpin key themes aimed at tackling deprivation at a local level, promoting local economies, social and well-being, and closing the gap between the most deprived neighbourhoods and the national or regional average. Improving accessibility to a wider range of amenities, jobs and business and other opportunities contributes to achieving these goals.

7.272 Community severance is acknowledged as an important aspect as it is concerned with the role of roads as a 'barrier' between parts of a community, and the resulting distortion of journey patterns. The assessment of the effects of the Scheme were considered both for the construction period and for the opening year with the impacts on severance during the construction period based on the effects of construction traffic movement and on traffic management measures.

7.273 During the construction phase the applicant noted that the volume of construction traffic would be very low compared with the traffic flows using the network and would not exceed 10% of the daily traffic flows, the threshold for significance. In addition, Pedestrian crossing facilities at the Bexhill end of the Scheme would be maintained throughout the junction construction period. It was concluded that the overall temporary impact on severance was considered to be negligible. During the operational period of the Scheme, the impact on community severance is considered to be 'moderate beneficial'. Those areas subject to increases in severance – such as at A269 London Road (Chapel Path underpass) when in future students to and from Bexhill

High Schools accessing London Road would do so via a new underpass (details of which have been conditioned) which would replace the current at grade zebra crossing at Chapel Path – are offset by those areas where severance would be reduced, for example at A259 Belle Hill/ A269 London Road junction where the junction would be slightly larger, but the length of pedestrian walk journeys around the junction would not materially change. In addition, an all red traffic phase has been included in the junction design to allow for pedestrians to cross all arms without traffic.

7.274 As to the impact upon accessibility during the construction period, three road closures would impact on vehicular accessibility - the junction of Crowhurst Road west with Queensway; Woodsgate Park Bridge; and Ninfield Road Bridge – with the resultant accessibility impact considered to be 'slight adverse'. Accessibility elsewhere on the local road network is not expected to be significantly affected. During the operational period of the Scheme, the Scheme would provide significant relief to the congested A259 corridor between the two towns, particularly during peak periods, and would reduce journey times for general traffic between Bexhill and northern wards of Hastings by five minutes. The improvements in traffic conditions on the A259 at Glyne Gap, which is currently recognised as a bottleneck between the towns would offer opportunities for improved bus journey times on the A259 and improved bus reliability. The reductions in journey time give rise to increased opportunities and choice for residents (especially those from the more deprived wards) to travel to places of work, and for local businesses to make use of a larger pool of accessible labour and markets.

7.275 The design seeks to minimise the severance of pedestrians, utilising the former railway line within the urban section. With the provision of under and overbridges, and the inclusion of an underpass at the southern end, within the built up area, appropriate crossings for all road users are provided in new and existing locations so as not to compromise existing movements. Outside the urban area, the pedestrian/cycle routes affected are retained on similar alignments, but would be primarily for recreational users. The addition of the greenway between Hastings and Bexhill provides an important link both between the two towns and with existing Rights of way.

7.276 Access from Bexhill (including potential residents of north-east Bexhill) to the employment sites in the Churchfields/ Castleham Industrial Area, and between the more deprived Hollington ward in north-west Hastings to north and central Bexhill could also potentially be improved by improved bus services.

7.277 Regional accessibility would also be improved with the Scheme and journey times between towns also enhanced. The Scheme would also open up the new strategic employment and housing land in north-east Bexhill and allow some early smaller land releases for new employment premises and redevelopment of existing employment land in the town centres. The Scheme therefore provides access in three ways: that of providing the sole means of access into the new strategic employment and housing land at north-east Bexhill; by increasing the accessibility of new and existing employment sites for local communities including those from the more deprived wards and; by increasing the access to new markets and workforce for business.

7.278 Further details have also been provided in the Addendum ES which indicates that a number of properties would be affected (i.e. 13 commercial, 18 residential and 6 'other') in Bexhill to facilitate development of the Scheme and its proposed new junctions with A259 Belle Hill and A269 London Road. The applicant has noted that for the urban properties, there have been negotiations to purchase land and buildings using blight notices which have been served and accepted. Occupiers remaining in residence at the time of properties being required for the Link Road will be re-housed with the assistance of the District Council. In this way satisfactory alternative accommodation would be secured if that were the tenants' preference meeting potential needs for continued accommodation and ensuring the Human Rights are protected. The majority of these properties are already within East Sussex County Council ownership. In addition land from the Viking Fish Bar, Rother District Depot and a County Council nursery school would also be required for the Scheme.

7.279 There are also a small number of businesses with small labour forces that could be displaced though this has to be weighted against estimates that the proposed Scheme will potentially result in 1500 to 2000 jobs being created of which 950 are likely to go to local people living in deprived areas. For the rural properties there will be no displacement of owners, residents or employees unless the private individuals decide the alternative land being offered is not adequate - currently there is only one such property where this may potentially occur.

7.280 In considering the potential impact of the Scheme on residential areas, including the homes of families and individuals in the vicinity of the proposed Scheme and vehicular access routes, I have also had regard to the context of Article 1 of Protocol 1 and Article 8 (1) of Schedule 1 Part I to the Human Rights Act 1998. An assessment has been made of the likely environmental effects of the development and including those of visual impact and noise in relation to development plan policies which seeks to avoid unacceptable harm. The distance separation between the development and homes together with the controls proposed through conditions and an undertaking are considered to provide appropriate protection to local environmental conditions, if permitted. I am therefore of the opinion that this proposal does not impinge on human rights under the Human Rights Act 1998 subject to appropriate controls being in place to protect residential amenity.

7.281 Therefore on the basis of the ES and Addendum ES information submitted, the methodology used to determine the overall significance of community impacts is consistent with and based on recognised guidance and I am of the view that the overall net impact of the Scheme on the community could be considered to be beneficial. The Scheme will assist in the delivery of strategically important employment sites and satisfies the policies referred to above. There it is recognised that there are though some disbenefits in terms of impact on adjoining residential amenity.

7.282 Planning policy in relation to social and commercial considerations promotes new development that improves the economy and prosperity, tackles deprivation and exclusion and more locally contributes positively towards the development of Bexhill's residential, employment, shopping and

service centre functions. The Scheme is seen as a vital component in releasing new employment and housing land as well as fostering the regeneration of the wider area. The ES assesses the significance for both new severance and relief from existing severance. The Scheme will not have any pedestrian at-grade crossings and does not have existing communities adjacent to the Scheme, other than the Bexhill Connection section. However this section will be aligned along the former railway line where there are established crossing points, which are generally to remain in a newly constructed from.

7.283 The applicant has shown that the Scheme provides accessibility to new and existing employment sites for local communities and as such accords with policy in PPS1 at the national level which encourages the provision of new infrastructure to support new and existing economic development. The Scheme is compatible with the principles of draft South East Plan Policies S1 and S6 and conforms to Policies Q5, Q6 and Q8 of RPG9 and Policy E1 of the Structure Plan. At the local level, the Scheme will provide improved accessibility to Bexhill, the North East Bexhill Development Area and Hastings and in rural areas the relief of traffic would contribute to improvements in the pedestrian environment in Battle High Street and rural villages. I consider that the Scheme is consistent with Local Plan policies, including Rother Local Plan Policy DS1 and Policy BX1 which requires proposals for development in Bexhill to contribute positively towards the development of Bexhill's residential, employment, shopping and service centre functions.

Other Environmental Matters

7.284 Policy WLP11 of the Waste Local Plan requires development proposals to have regard to the need to minimise, re-use and recycle waste generated during construction. A Waste Management Statement has been submitted as part of the application, which provides some detail on the waste likely to arise from construction and measures to minimise and manage it. While the Statement goes some way in meeting the requirements of Policy WLP11, I consider that further detail is necessary to demonstrate that construction waste would be appropriately dealt with. Therefore, I am recommending a condition to require the submission of a fully detailed Waste Management Statement.

7.285 There have been some concerns about the likelihood of the Link Road being affected by fog or mist because of its proximity to the sea and the physical characteristics of Combe Haven. It is understood that there is no greater likelihood of the proposed road being affected in this way than others within the County.

7.286 The implementation of this permission will involve considerable additional staff resources to monitor the construction works, together with the implementation of agreed schemes, mitigation and compensation arrangements. As with other major developments it is appropriate that these additional costs are met by the developer and the undertaking should provide for this.

8 CONCLUSIONS AND REASONS FOR APPROVAL

8.1 The Bexhill to Hastings Link Road is a very significant planning application, which has generated a substantial amount of public interest and response from statutory consultees and raises a wide range of sensitive issues which requires judgments in respect of competing considerations.

8.2 Regeneration is an important priority for the Government and the Scheme has been recognised in this part of the County for a number of years as a key component in facilitating new development and regeneration in the local area. The Scheme has been considered to be a key component in facilitating new development and regeneration in the local area.

8.3 I am satisfied that in broad regeneration and economic terms the Link Road provides clear benefits and will deliver development and employment opportunities in this area and will not result in material conflict with prevailing regeneration policies. It is considered that the Scheme is consistent with RPG policies RE1, RE3, RE5, Q1, Q4 and Q5 in so far as the Scheme will support economic growth and sustainable patterns of development in the area and Policy RE7 which identifies the Link Road as being located within the Sussex Coast and Towns Priority Area for Economic Regeneration. The Scheme also accords with Policies E1 and EN26 of the Structure Plan and Rother Local Plan policies BX1 and BX2, Hastings Local Plan policies and Policies SCT1 and SCT2 of the draft South East Plan in so far as the Scheme will facilitate the long term growth and regeneration of the area.

8.4 With regards to the wider sustainability of the Scheme, the application proposals have set out proposed mitigation and enhancement measures. The Scheme has incorporated a range of responses to climate change, but it is proposed that there is provision of an undertaking to incorporate a package of measures on construction and operation with any net effect becoming a commitment in the Council's climate change strategy. As such, the Scheme can be considered to be acceptable in relation to PPS1.

8.5 In terms of the transport and traffic aspects of the Scheme the layout and circulation arrangements are satisfactory and subject to the identified improvements proposed as part of the Scheme to improve the flow of traffic in the area being implemented I consider that the scheme meets national, regional and local transport and traffic objectives, relevant Transport and Traffic policies and that the scheme offers 'major beneficial' impacts in terms of travel and transport in accordance with the assessment.

8.6 The Scheme accords with RPG9 Policy T1 in upgrading the transportation system and Policy T17 which identifies the Bexhill to Hastings Link Road as a Priority for Investment, together with Policy T5 which identifies the A259 as a Regional Spoke (the role for which should be supported and

developed in order to improve journey reliability). Policy T8 of the draft South East Plan also supports the role of Regional Spokes. The Link Road is also consistent with Structure Plan Policy TR1 which seeks to, inter alia, improve local Trunk Roads and Policy TR40 which emphasises the need for economic regeneration and outlines the role which transport can play in this process, and Rother District and Hastings Local Plan Local Plan policies (TR1 and TR2) which seek to improve the local transport system; to improve identified Trunk Roads (including the A259), support the role which transport can play in economic regeneration and advocate the promotion of more sustainable development travel choices.

8.7 Policies in the Structure Plan and in the Rother and Hastings Local Plans require that development conserves and enhances the distinctive character and quality of the local landscape, respect existing areas of tranquillity and remoteness, considers local topography and protects established local views. Having regard to the landscape assessment of the Scheme, it is not considered that the submitted material demonstrates that the Bexhill Hastings Link Road fully meets these aims and objectives and it conflicts with Policy EN1 of the Structure Plan and partly conflicts with Policies GD1 and DS1 of the Rother Local Plan.

8.8 In assessing the Scheme solely against the interests of acknowledged landscape importance referred to above, the Scheme does not fully accord with the overarching objectives of the prevailing landscape policy framework and will adversely impact upon the landscape and visual character of the area.

8.9 The introduction of the Link Road into this locality does have both general and specific biodiversity impacts. Most of those impacts on SSSI's and Ancient Woodland have been contained by the careful alignment of the link road through this sensitive tract of countryside. If it can be concluded that there is a pressing need for the Link Road, and that there is no less damaging route, the proposals can be considered an acceptable departure from RPG9 Policy E2. The direct impact on the Marline Valley Woods SSSI is relatively minor and this, together with other impacts of the scheme have, subject to an undertaking, been specifically mitigated and compensated to ensure that there will be no overall net loss; furthermore it is expected that in the longer term an enhancement should be achieved consistent with RPG9 Policy E1, Structure Plan Policy EN17, Rother District Local Plan Policy DS1 and Hastings Local Plan Policies NC2, NC3 and NC6. In these terms through mitigation, compensation and the provision of broadly equivalent habitats the requirements of Structure Plan Policies EN18 and EN20, Hastings Local Plan Policy NC8, Rother District Local Plan Policy GD1 and Draft South East Plan Policy NRM5 are adhered to. Species protected under the Wildlife and Countryside Act 1981 will be safeguarded through the mitigation and compensation measures and the CEMP. On this basis the specific duties

under CROW and The Natural Environment and Rural Communities Act 2006 are considered to have been met.

8.10 In townscape terms whilst there are some concerns over the engineering solutions that are sometimes adopted in the proposals, I consider that, on balance, the Scheme does not sufficiently propose such discordant structures as to warrant a refusal in terms of the townscape policies at national, regional and local level. However, it would be imperative for the conditions to be attached to any permission to ensure that appropriately designed solutions are constructed. On this basis the Scheme accords with the guiding principles of Policy BE1 and Policy Q2 of RPG9 which seeks to raise the quality of life in urban areas through significant improvement to the urban environment; Structure Plan policies EN1 and EN26 which require the wider built environment to be conserved or enhanced and Policies GD1 of the Rother Local Plan and DG1 of the Hastings Local Plan which seek to contribute to the townscape and have regard to the form and setting of the town.

8.11 The prevailing cultural heritage policy framework seeks to protect the character, appearance and setting of heritage features and listed buildings and where archaeological remains are affected then there should be a presumption in favour of their physical preservation. It is considered that the demolition of the railway bridges is acceptable and that the loss of outbuildings at Adams Farmhouse will not affect the character or setting of the listed building and their removal is therefore considered acceptable. The applicant has confirmed that the impact upon Adam's Farmhouse has arisen from the need for the route of the Link Road and conforms with RPG9 Policy E1, Draft South East Plan Policy BE6 requires new development to protect the character, appearance and setting of heritage features, including conservation areas, listed buildings, ancient monuments, archaeological sites and other buildings and spaces of historical importance. The road works will harm the setting of the Adams Farmhouse listed building in conflict Policy GD 1 (viii) of the Rother Local Plan and Policy S1 (m) of the Structure Plan, albeit that over time, with the reestablishment of tree cover, this harm will reduce.

8.12 Having regard to the applicant's assessment in the Environmental Statement and the current environmental conditions there will be an overall adverse noise impact to residential properties and the rural environment between Bexhill and Hastings. This conflicts with RPG 9 Policy Q6 and Policy EN9 of the Structure Plan and Hastings Local Plan Policy DG4. However, it is considered that the application proposals provide mitigation (such as noise screening and bunding) to reduce those impacts to levels, when set against existing background levels that would be indiscernible. I therefore consider that overall the Scheme to be acceptable subject to the imposition of conditions relating to noise and temporal construction activities and an appropriate undertaking to control construction activities.

8.13 With regards to air quality, I consider that the proposed mitigation measures for construction impacts can be ensured through the preparation of a CEMP and the imposition of appropriate safeguarding conditions. Such conditions, and mitigation measures, would ensure that the Scheme accords with the principles of RPG9, Policy NRM9 of the draft South East Plan, PPS23 as well as Hastings Local Plan Policy DG33 in relation to air quality.

8.14 In terms of flooding, the Addendum ES identifies that the residual risks of flooding from tidal breach, overtopping, and the extreme fluvial flood (1 in 1000 yr) sources are considered to be low. Given the above and on the basis of the expert advice from the EA, I consider that in flood risk terms, the proposals accord with PPS 25, Structure Plan policies S1, Rother Local Plan Policy DS1 and Hastings Local Plan Policies DG26 and DG27, RPG Policy INF1 and draft South East Plan Policy NRM4.

8.15 In the context of the site and the proposed end use, the land contamination issues associated with the Scheme are unlikely to be significant. Indeed, potential sources of contamination are relatively localised and no potentially widespread sources of contamination have been identified. Subject to the inclusion of a condition to monitor and remove any contaminated material I consider that the impact on soils is acceptable. Accordingly the applicant has satisfactorily addressed the outstanding issues raised during the original review of the application and that the proposal accords with, Policy E8 of RPG9, and Local Plan Policies GD1 and DS1 of the Rother Local Plan and Policy DG34 of the Hastings Local Plan and the guidance in PPS9.

8.16 In assessing the impact of the Scheme in agricultural and forestry terms, I have had regard to the impact upon farm holdings and the proposed mitigation measures set out by the applicant. I am also mindful that Government guidance contained within PPS7 '*sustainable development in rural areas*' and DEFRA support for stewardship schemes has reduced the weight attached to agricultural land quality enhancing the relative importance of a broader range of sustainability considerations. The policy framework at all levels requires new development to respect and protect the importance of the countryside, protect existing woodland resources and take account of potential impact upon the best and most versatile agricultural land. I am satisfied that, as far as is practicable, the Scheme has sought to avoid the permanent loss of the best and most versatile land and that the proposed mitigation measures are appropriate in scale to the effects of the Scheme. Therefore, on balance, it is considered the Scheme accords with Policy E5 of RPG9 and does not fundamentally conflict with the tests of PPS7, meets Structure Plan Policy S1n) and Local Plan Policies (including Rother Local Plan Policies DS1 and GD1).

8.17 In terms of the effects of the Scheme upon recreational matters, Rother Local Plan Policy BX 4 allocates land between Bexhill and St. Leonards as a Countryside Park. This area of land is of acknowledged importance to the surrounding communities. Not only will the Scheme relieve the access constraint on development of the Countryside Park, but certain design features of the Scheme, such as the Greenway and new habitats can be seen as a positive contribution to the Park. Overall the Scheme is considered to be beneficial to the recreational impacts and in accordance with the development plan policies meets RPG9 Policies T3 and T10, Policy DG2 of the Hastings Local Plan and Policy TR2 of the Rother Local Plan subject to conditions to ensure the provision of acceptable arrangements for Rights of Way during construction and well designed permanent crossing facilities. These matters are covered by suggested conditions.

8.18 The applicant has shown that the Scheme provides accessibility to new and existing employment sites for local communities and as such accords with policy in PPS1 at the national level which encourages the provision of new infrastructure to support new and existing economic development. The Scheme is compatible with the principles of draft South East Plan Policies S1 and S6 and conforms to Policies Q5, Q6 and Q8 of RPG9 and Policy E1 of the Structure Plan. At the local level, the Scheme will provide improved accessibility to Bexhill, the North East Bexhill Development Area and Hastings and in rural areas the relief of traffic would contribute to improvements in the pedestrian environment in Battle High Street and rural villages. I consider that the Scheme is consistent with Local Plan policies, including Rother Local Plan Policy DS1 and Policy BX1 which requires proposals for development in Bexhill to contribute positively towards the development of Bexhill's residential, employment, shopping and service centre functions.

8.19 The need for a Scheme to address the multitude of issues identified throughout this report and in the Applicant's supporting information is reflected at the Sub-Regional level where the Bexhill to Hastings Link Road is identified as a Priority transport scheme. Notwithstanding this support, the Scheme needs to be considered against the prevailing policy framework at national, regional and local level and needs to be judged against any disbenefits arising whilst taking into account proposed mitigation measures and other enhancements proposed.

8.20 Members will need to have regard to the overall balance of benefits and disbenefits identified herein and balance the wider regeneration case that the Scheme presents.

8.21 In local terms there is an identified urgent need to provide transport and infrastructure improvements to assist the regeneration of the area – in particular the Scheme has been designed to address the local context whilst avoiding, as far as is practicable, encroachment on statutory environmental designations. The Scheme's route has been derived through a detailed

optioneering exercise (both route options and public transport improvement schemes) and it is considered that the Scheme will deliver significant transport benefits to the area whilst providing essential traffic congestion relief along the A259. The Scheme is therefore, considered to accord in transport planning terms with national government guidance in PPG13, regional policy guidance RPG9, the draft South East Plan and relevant regional and local plan traffic and transport policies.

8.22 The application is also strongly supported by regional and local regeneration and economic drivers for the area and fully complies with key regeneration and economic objectives providing access to North East Bexhill. The Scheme will therefore make a significant contribution to delivering local and wider regeneration and economic benefits and will help drive employment growth in Bexhill and Hastings. The Scheme complies with PPS1 principles and Structure Plan policies which seek to encourage development that will help promote and support the regeneration and further development of Bexhill and Hastings as major centres for employment and local plan policies which identify the Link Road as a key component in delivering development opportunities in the area.

8.23 At the regional level a key objective is to achieve and to maintain sustainable development in the region. The Sustainability Appraisal, that accompanies the application, summarises the implications of the Scheme when set against the sustainability policy at national, regional and local levels and acknowledges the impact of the Scheme in terms of greenhouse gases and perceived unsustainability of a car-based solution to existing problems. I have concluded that with CO₂ emissions some contribution to reduction can be achieved through an undertaking to manage emissions from the construction and operation of the Scheme and taking into account that any net effect will be catered for in the County Council's climate change strategy, I consider that the Scheme would, on balance, be an acceptable departure to planning policy on sustainability.

8.24 In formulating the following recommendation, I have examined all the regeneration and economic benefits arising from the Scheme, environmental considerations and the potential impacts from construction activity that are considered to be material to this proposal. This has included reviewing the applicants planning application, all the submitted environmental information (including the Addendum Environmental Statement and Additional Supporting Information) and the comments from consultees and members of the public. I consider all material issues have been addressed in the ES.

8.25 I have balanced the landscape and visual disbenefits against the other benefits that the Scheme would bring and consequently I do not consider that the Scheme would result in such significant environmental effects that cannot be mitigated or compensated for, including the inclusion of appropriate conditions and a proposed undertaking. In accordance with section 38 of the

Planning and Compulsory Purchase Act 2004 the decision on this application should be taken in accordance with the development plan unless material considerations indicate otherwise.

8.26 I consider the balance of argument, in this instance, supports the approval of the Link Road. There are clear significant economic and regeneration benefits which taking into account the balance of need for this Scheme (including its identification as a sub-regional priority) outweigh the disbenefits of this site.

8.27 In considering this development the potential impact on residential areas, including the homes of families and individuals in the vicinity of the proposed development and vehicular access routes, have been considered in the context of Article 1 of Protocol 1 and Article 8 (1) of Schedule 1 Part I to the Human Rights Act 1998. An assessment has been made of the likely environmental effects of the Scheme and including those of visual impact and noise in relation to development plan policies which seeks to avoid unacceptable harm. The distance separation between the Scheme and homes together with the controls proposed through conditions and 'undertakings' are considered to provide appropriate protection to local environmental conditions, if permitted. I am of the opinion that this proposal does not impinge on Human Rights under the Act subject to appropriate controls being in place to protect residential amenity.

8.28 The overall benefits and the pressing need for the link road within the plan area are acceptable reasons why the Planning Committee should be minded to approve the application, and whilst being contrary to some development plan policies the Scheme should be considered an acceptable departure. In weighing up the various considerations, I recommend that planning permission be granted subject to the Secretary of State not calling in the application for her determination and subject to and undertaking and the imposition of controlling conditions.

9 RECOMMENDATION

To recommend to the Planning Committee to approve application RR/2474/CC (EIA) subject to the completion of the following procedure and to authorise the Head of Planning;

- a) to refer the application to the Secretary of State as being contrary to certain provisions of the development plan.
- b) Upon receiving confirmation from the Secretary of State that she does not wish to call-in the application, to secure, in conjunction with the Director of Law and Personnel a satisfactory undertaking covering all the following matters:
 - 1) Proposals for the preparation and approval of a Construction Environmental Management Plan (CEMP) to be agreed before any works commence, to include detailed arrangements of the following; maintenance and management of all the landscaping areas; surface water collection arrangements; ecological mitigation and compensation areas; an archaeological/cultural heritage programme of works within the boundaries of the application site; Oil and chemical storage arrangements; Dust emissions and noise control; a travel plan; buffer zone to watercourses, sediment runoff containment during construction disturbance works, especially in and around water bodies; any diversion of watercourse flows to protect the water quality; measures to minimise any harm to protected species; proposals to site material stockpiles away from watercourses and control sediment runoff from material stockpiles and the provision for any runoff that may require settlement facilities; Discharge from dewatering work; Discharge from toilet facilities for mobile offices or compounds, and Pollution from construction vehicles: working hours and lighting details ; Monitoring of carbon dioxide emissions and the provision of a package of measures that reduces greenhouse gas emissions in construction – any net effect will become a commitment to be catered for under the County Council's climate change strategy. The development shall be carried out in strict accordance with the CEMP and any amendments that may be formally agreed in writing by the Head of Planning.
 - 2) Proposals for the preparation and approval of an Operational Environmental Management Plan (OEMP) to be agreed before the opening of the road which includes the detailed arrangements for the maintenance, management and monitoring of all the landscaping areas, woodland management, surface water collection arrangements and ecological mitigation, including those provided beneath the over bridges where the establishment of invasive plant species is to be avoided, and compensation areas within the boundaries of the application site, including new and existing habitats, embracing rotational management of habitats including over a 3-4 year cycle for shallow reed bed type habitats, and a 5-10 year cycle for ditches, all to be secured for the lifetime of the road, the monitoring of carbon dioxide emissions and the provision of a package of measures that reduces

greenhouse gas emissions in operation – any net effect will become a commitment to be catered for under the County Council's climate change strategy. The development shall be carried out in strict accordance with the OEMP and any amendments that may be formally agreed in writing by the Head of Planning.

- 3) Proposals for an appropriate package of offsite road works and public transport improvements to be implemented within an agreed timetable. This shall be, linked to the emerging Hastings and Bexhill Local Area Transportation Strategy (HBLATS) and the Highway Agency notification of an improved Baldslow junction to the A21, to mitigate the effects of traffic impacts from the link Road and secure related improvements in bus services particularly along the A259. The package shall aim to improve the management of traffic along The Ridge, and improvements across the wider highway network comprising of, as appropriate, the signalisation of junctions and junction improvements, traffic calming measures and enhanced arrangements for pedestrians, cyclists and public transport. All such works are to be implemented within the agreed timetable.
- 4) Proposals to acquire an additional area of compensatory habitat to Marline Valley Woods SSSI, including the area outlined in red (Area A) on Figure 2 of the Marline Valley Woods SSSI–proposed compensation woodland options-revision P1 dated September 2008. Provision shall be made for its long term management and this should be agreed with the Head of Planning. This can be achieved either by a commitment to manage the site by the County Council, or, if appropriate, the provision for the transfer and management of the compensatory habitat land by an appropriate reasonable organisation, (which has first been approved by the Head of Planning) including its management as part of the Local Nature Reserve and Site of Special Scientific Interest, before the opening of the Link Road. Within 12 months of its first acquisition the management of the land shall be commenced in accordance with a plan agreed with County Planning Authority prior to the commencement of works. The plan shall show all tree planting, fencing, ditching and any other associated operations being proposed. A sum sufficient to cover the annual maintenance of the compensatory habitat shall be provided to any appropriate organisation before the Link Road opens for its ongoing management, or such arrangement for delivery as may be agreed with the Head of Planning.
- 5) The existing brick built Adams Farm Barn shown on drawing Figure Aa – Potential Replacement Roost Locations for Adam's Farm Barn revision P1 shall be relocated to the position shown on drawing Figure 1–Potential Replacement Roost Locations for Adam's Farm Barn revision P1 to provide a suitable continuing bat roost, as early as possible, and before the opening of the road. Prior to being dismantled detailed elevation and reconstruction plans shall be prepared and submitted for the approval to the County Planning Authority. The barn shall be re-erected in accordance with the approved reconstruction plans.

- 6) To enable the monitoring of the development by the County Planning Authority, District and Borough Planning Authorities and Environmental Health Departments an appropriate sum shall be provided before the commencement of any development for these specific needs which will be agreed in writing with the Head of Planning. The sum shall be calculated on the basis of providing for the additional staff time for the officers to monitor the implementation of the Bexhill Hastings Link Road. The sum shall be paid in full to the Head of Planning, Transport and Environment and shall be used solely for these purposes, including the monitoring of the works by the County Council's environmental teams to ensure compliance with conditions and schemes.
- c) Upon completion of a satisfactory undertaking covering the matters in items 1 to 6 above to authorise the Head of Planning, in conjunction with the Director of Law and Personnel to grant planning permission and agree conditions along the lines of those below for application RR/2474/CC (EIA) and to advertise the decision in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations.
- d) That the application be referred back to this Committee if the undertaking is not secured within nine months of the receipt of any decision letter by the Secretary of State not to 'call in' the application.

10. SCHEDULE OF PROPOSED CONDITIONS

Time Limit

1. The development hereby permitted shall be commenced before the expiration of five years from the date of this permission.

Reason: To comply with section 91b) of the Town and Country Planning Act 1990, and to allow an appropriate time for land acquisition to take place and for the required schemes and details to be prepared and submitted.

Approved plans

2. The development hereby approved shall be carried out in accordance with the following plans (save in respect of those elements shown for illustrative or indicative purposes only) subject to any minor amendments as may be agreed in writing with the Head of Planning;

208-31-01 Location Plan
208-31-02 Planning application area
208-31-03 Overall scheme layout
208-31-05 Preliminary scheme layout 1 of 2
208-31-06 Preliminary scheme layout 2 of 2
208-31-11 Environmental design

208-31-12 Environmental design
208-31-13 Environmental design
208-31-14 Environmental design

Reason: For the avoidance of doubt and to enable the County Planning Authority to control and regulate the development and to comply with Policy S1 of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Illustrative Plans

3. This permission does not approve the details shown on the following illustrative plans accompanying the application.
Fig 208/31/33 Rev 0 Typical rural overbridge elevation.
Fig 208/31/34 Rev 0 Typical rural underbridge elevation
Fig 208/31/35 Rev 0 Railway crossing
Fig 208/31/36 Rev 0 Typical Greenway overbridge elevation
Fig 208/31/32 Rev 0 Typical urban overbridge elevation
Fig 208/31/31 Rev 0 Chapel Path underbridge.

Reason: For the avoidance of doubt and to enable the County Planning Authority to control and regulate the development and to comply with Policy S1 of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Phasing

4. No development shall take place until a scheme of phasing has been submitted and approved in writing by the Head of Planning, indicating the defined phasing arrangements for the proposed construction of the Link Road. The road construction and related works shall be implemented in accordance with the phasing plan unless otherwise agreed in writing by the Head of Planning.

Reason: For the avoidance of doubt and in the interests of the rural and residential amenity of the area in accordance with Policies S1 and EN1 of the East Sussex and Brighton & Hove Structure Plan 1991-2011

Design of Bridges

5. Notwithstanding the details already submitted, no development shall commence, except mitigation and compensation works and archaeological evaluation, until details of the design and materials for the construction of the railway crossing and all under-bridges and over-bridges, including railings, parapets, surface finishes, fencing together with the reuse of any materials salvaged from the demolished existing railway bridges, have been submitted to and approved in writing by the Head of Planning. Bridge structures over water shall include a clear span, with abutments set back from the watercourse on both banks to provide a bank width of 2 metres beneath the bridge, and a soft bank

solution beneath the bridges with shade tolerant planting, as outlined in the submitted Figure 3 Indicative sketch of soft bank engineering solution Revision A dated September 2008. The bridges shall be carried out in accordance with the approved details unless otherwise agreed in writing by the Head of Planning.

Reason: For the avoidance of doubt and in the interests of visual amenity and usability in accordance with Policy EN1 of the East Sussex and Brighton & Hove Structure Plan 1991-2011. The use of clear-spanning bridges will maintain the river corridor and allow the movement of both the river and associated wildlife, minimising the loss of connectivity of habitats within this landscape, in accordance with Policy EN17 of the East Sussex and Brighton & Hove Structure Plan 1991-2011, Article 10 of the Habitats Directive, and PPS9.

Detailed schemes

6. No development, except mitigation and compensation works and archaeological evaluation, shall take place until the following detailed schemes have been submitted for the approval of the County Planning Authority of the following;
 - Details of the design and appearance of the section of the road scheme between Belle Hill at chainage 0.00 and chainage 510 at Woodsgate Park, including levels sections, and construction details of the road, Chapel Path underpass, surface water drainage, road signage, street furniture, existing and proposed landscape features and street lighting.
 - Details and specification for the retaining walls north of Ninfield Road overbridge.

Reason: In the interests of visual amenity and townscape quality of this part of Bexhill in accordance with Policy EN1 of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Protection of animals

7. Development shall not commence until details of a scheme for the free passage and/or protection of animals by means of highway underpasses, bridges and any other means has been submitted to and approved in writing by the Head of Planning and the link road shall not be brought into public use until the approved scheme has been fully implemented unless otherwise agreed in writing by the Head of Planning.

Reason: To maintain appropriate access for animals in accordance with Policies S1 and EN17 of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Provision of Greenway and Rights of Way Links

8. The Link road shall not be brought into use until the Greenway and associated connections to the adjoining Rights of Way and permissive footways have been completed in full accordance with the approved details unless otherwise agreed in writing by the Head of Planning.

Reason: To ensure the provision of improved walking, cycling and horse riding facilities linked to the existing network of Rights of Way and permissive footpaths in accordance with Policies TR3; TR4 and TR5 of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Temporary construction works.

9. No development shall take place within each phase of the development until a means of vehicular construction access has been formed from a public highway in accordance with a scheme which has first been submitted to and approved in writing by the Head of Planning. The scheme shall include the location of all temporary site construction compounds and fences for all parts of the link road and access points to the public highway. The compounds and any temporary associated works shall be removed and the land restored to its previous condition within 6 months of the link road opening for public use unless otherwise agreed in writing by the Head of Planning.

Reason: In the interests of highway safety and to comply with Policy S1 (d) of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Wheel wash facilities

10. Development shall not commence until details of wheel washing facilities have been submitted to and approved in writing by the Head of Planning. The approved details shall be implemented in full before the commencement of development and the facilities shall be maintained in working order during the construction period and shall be used by any vehicle carrying mud, dust or other debris on its wheels before leaving the site. No vehicle associated with the development shall leave the site carrying mud, dust or debris on the wheels unless otherwise agreed in writing by the Head of Planning.

Reason: In the interests of highway safety and the amenity of the locality and to comply with Policy S1 (d) of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Construction hours

11. A scheme of the working hours during the construction stage linked to the phased construction of the road shall be submitted prior to the commencement of development for the written approval of the Head of Planning. Unless alternative times are specifically agreed construction

activities associated with the development hereby permitted shall not be carried out other than between the hours of 7.00am and 19.00 on Mondays to Fridays inclusive and 7.00 and 13.00 on Saturdays and not at any time on Sundays, Bank and Public Holidays.

Reason: To safeguard the rural and residential amenities in the vicinity of the site, and to comply with Policy S1 (b) of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Construction noise levels

12. During the construction of the Bexhill Hastings Link Road noise limits between the hours of 07.00 and 19.00 Monday to Friday and 07.00 and 13.00 Saturday (inclusive) shall not exceed 75 dBLAeq, 12 hr (façade) at any residential boundary unless otherwise agreed in writing by the Head of Service-Planning.

Reason: To safeguard the rural and residential amenities in the vicinity of the site, and to comply with Policy S1 (b) of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Details of boundary walls and fences

13. No development shall commence, except mitigation and compensation works and archaeological evaluation before detailed plans, indicating the positions, design, materials and type of boundary walls and fences and other means of enclosure to be erected within the site, have been submitted to and approved in writing by the Head of Planning. The walls, fences and means of enclosure shall be constructed in accordance with the approved plans before the link road is brought into use and shall thereafter be retained unless otherwise agreed in writing by the Head of Planning.

Reason: To ensure the appropriate appearance of the development in the area in accordance with Policies S1 and EN1 of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Landscape Details

14. Before the commencement of each phase of the development, plans and full details of both hard and soft landscaping works, substantially in accordance with the details shown on planting plans 208:3:21; 208:3:22; 208:3:23; 208:3:24; 208:3:25; 208:3:26 and 208:3:27 dated April 2007, shall have been submitted to and approved in writing by the Head of Service-Planning. These details shall include:

Hard Landscaping

- Proposed finished contour levels at 0.5 metre vertical intervals covering all areas from back to the highway verge to undisturbed landform.
- Maximum and minimum crest heights and gradients to land form changes.
 - Means of enclosure
 - Car parking layouts
 - Other vehicle and pedestrian access and circulation areas
 - Hard surfacing materials
 - Minor artefacts and structures (e.g. furniture, play equipment, etc)
- Proposed and existing functional services above and below ground (e.g. drainage power, communications cables, pipelines etc indicating lines, manholes, supports etc.)
- Retained historic landscape features
- Proposals for restoration, where appropriate

Soft Landscaping

- Plans to a scale of 1:500 confirming detailed vegetation clearance and tree retention proposals throughout the route, to establish appropriate protection and clear boundaries on the ground, supported by detailed arboriculture recommendations for all tree surgery. All in accordance with BS 5837, 2005, Trees in Relation to Construction and BS 3998, Tree Work.
- Contour plans to a 1:500 scale indicating the levels of all the engineered landforms at 500mm intervals incorporating the Greenway, and the interface between the proposed landforms and noise attenuation fencing
 - Planting plans
 - Written specifications (including cultivation and other operations associated with plant and grass establishment
 - Schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate
 - Implementation and maintenance programme

Reason: To integrate the development effectively into the surrounding environment and to comply with Policies S1 and EN1 of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Implementation of Landscaping

15. All hard and soft landscape works shall be carried out in accordance with the approved details and a constructed survey plan with contours at no more than 0.5metre vertical intervals to show the finished landform shall be submitted to the Head of Planning within three months of all land grading works having been completed with topsoil finishes. The works shall be carried out prior to the occupation of any part of the

development or in accordance with the programme agreed with the Head of Planning.

Reason: To integrate the development effectively into the surrounding environment and to comply with Policies S1 and EN1 of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Tree protection

16. In this condition `retained trees` means an existing tree which is to be retained in accordance with the approved plans and particulars and paragraphs (a) and (b) below shall have effect until the expiration of five years from the completion of the development.

(a) No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the prior written approval of the Head of Planning. Any topping or lopping approved shall be carried out in accordance with British Standard 3998 (Tree Work).

(b) If any retained tree is removed, uprooted or destroyed, becomes seriously damaged or diseased or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Head of Planning.

(c) The erection of fencing for the protection of any retained tree shall be undertaken in accordance with the approved plans and to British Standard 5837 (Trees in relation to construction) before any equipment, machinery or materials are brought on to the site for the purposes of the development and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition, nor any fires lit, and the ground levels within those areas shall not be altered, nor shall any excavation be made, or operations carried out without the prior written consent of the Head of Planning.

Reason: For the protection of species and in the interests of visual amenity and to comply with Policies S1 (b) & (f) and EN1 of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Archaeological Work

17 For each phase permitted under condition 4, no development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with detailed written schemes of investigation for each phase, which has been submitted to and approved in writing by Head of Planning. The programmes of archaeological works shall include the proposals in the Environmental Statement and subsequent addenda, evaluation and mitigation fieldwork, post-excavation analysis, reporting and any post-development monitoring,

and shall be carried out as approved in writing by the Head of Planning, unless otherwise agreed in writing by the Head of Planning.

A written record of any archaeological works undertaken shall be submitted to the Head of Planning within 3 months of the completion of any archaeological investigation unless otherwise agreed in writing by the Head of Planning.

Reason: In order to ensure that satisfactory arrangements are made to either preserve in situ or by record any archaeological remains on the site, in accordance with Policy S1 (j) of the East Sussex and Brighton & Hove Structure Plan 1991-2011 and government policy with regard to archaeology and cultural heritage set out in PPG15 and 16.

18. Bat survey

No development shall take place until a bat survey has been undertaken of the environs of the Glovers Farm complex. If evidence is found that bats are roosting within this location, details of any necessary appropriate mitigation, including a timescale, or compensation shall be submitted for approval, in writing, to the Head of Planning. The approved scheme shall be implemented within an agreed timescale to the satisfaction of the Head of Planning.

Reason: To ensure that the ecological mitigation and compensation arrangements comply with Policies S1, EN11 and EN20 East Sussex and Brighton & Hove Structure Plan. 1991 – 2011.

Waste minimisation

- 19 No works shall commence on site, except mitigation, compensation works and archaeological evaluation, until a detailed strategy and method statement, for securing and demonstrating that the amount of construction waste resulting from the development has been reduced to smallest amount possible, has been submitted to and approved in writing by the Head of Planning. The statement shall include details of the extent to which waste materials arising from the demolition and construction activities will be reused on site and demonstrating that maximum use is being made of these materials. If such reuse on site is not practicable, then details shall be given of the extent to which the waste material will be disposed of for reuse, recycling, composting or other method in accordance with the best practicable environmental option. All waste materials from the demolition and construction associated with the development shall be reused, recycled and dealt with in accordance with the approved strategy and method statement.

Reason: To minimise the amount of construction waste to be removed from site for final disposal in accordance with Policy WLP11 of the East Sussex and Brighton and Hove Waste Local Plan 2006.

Maintenance of Rights of Way

20. Development shall not commence until details of the temporary measures to maintain designated and permissive Rights of Way that are affected by the construction work have been submitted to and approved in writing by the Head of Planning. All permanent crossing arrangements for Rights of Way shall be implemented before the road is open to the public unless otherwise agreed in writing by the Head of Planning.

Reason: To secure an appropriate access in the interests of the amenity of the locality and to comply with Policy TR4 (f) of the East Sussex and Brighton and Hove Structure Plan 1991-2011.

Noise control

21. No works shall commence on site, except mitigation, compensation works and archaeological evaluation, until full details of the noise attenuation arrangements to reduce traffic noise from the Link Road, have been submitted to and approved in writing by the Head of Planning. The scheme confirms the road surface type to be used and shall show the design and height of all proposed noise barriers and the level of attenuation to be achieved. The full scheme shall be implemented before the road is open to the public in full accordance with the details approved unless otherwise agreed in writing by the Head of Planning.

Reason: In the interests of residential and rural amenity of the area and to comply with Policy S1(s) of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Prevention of pollution

22. Any fuel, oil lubricant and other potential pollutants shall be handled on the site in such a manner as to prevent the pollution of any watercourse or aquifer. For any liquid other than water, this shall include storage in suitable tanks and containers which shall be housed in an area surrounded by bunded walls of sufficient height and construction so as to contain the equivalent of 110% of the total contents of all containers and associated pipework. The floor and walls of the bunded areas shall be impervious to both oil and water. The pipes should vent downwards into the bund.

Reason: To prevent pollution to land and water and to comply with Policy S1 (g) and EN11 of the East Sussex and Brighton & Hove Structure Plan. 1991 – 2011.

Mitigation and habitat creation scheme

23. Development shall not commence until there has been submitted to and approved in writing by the Head of Planning a detailed scheme, to

include the proposals in the Environmental Statement and subsequent addenda, for mitigation and compensatory habitat creation/restoration (including connectivity between habitats) and these works shall be carried out as approved. The details of the scheme shall include:

- a) A clear statement of the purpose, aims and objectives for the scheme.
- b) A review of the site's ecological potential and any constraints.
- c) Description of mitigation, habitats and species appropriate for the site.
- d) Selection of appropriate strategies for mitigation measures and creating/restoring habitats or enhancing species populations.
- e) Selection of specific techniques and practices for establishing vegetation.
- f) Sources of native provenance (local if possible) habitat materials (e.g. plant stock) or species individuals.
- g) Method statement for site preparation and establishment of target features.
- h) Extent and location of proposed works.
- i) Links to the habitat management plan.
- j) The personnel responsible for the work
- k) Timing of the works.
- l) Links to the ecological monitoring scheme.
- m) Disposal of wastes arising from the works.

All mitigation and habitat creation/restoration works shall be carried out in accordance with the approved details, unless otherwise approved in writing by the Head of Planning

Reason: To ensure that the ecological mitigation and compensation arrangements comply with Policies S1, EN11 and EN20 East Sussex and Brighton & Hove Structure Plan. 1991 – 2011: To provide compensation and mitigation for the impact of the development on the Combe Haven Valley environment where it has a potentially severe impact on its ecological value. To meet Government policy in Planning Policy Statement 9 – “Biodiversity & Geological Conservation” (PPS9) recognising that this proposal has the potential for significant detrimental ecological effects, notably with regard to the loss of wetland habitats and connectivity of landscape and habitats. To provide two-for-one compensatory habitat and enhancements to existing habitats and to implement proposals as soon as possible in order to allow for the movement of flora and fauna during construction, and the establishment of new habitats.

Habitat management plan

24. Development shall not commence until there has been submitted to and approved in writing by the Head of Service-Planning a habitat management plan for the application area and all mitigation and

compensation features both during construction and then during the operation of the development for the lifetime of the road. The plan shall include:

- a) A clear statement of the purpose, aims and objectives of management.
- b) Description and evaluation of the features to be managed.
- c) Ecological trends and constraints on site that may influence management.
- d) Appropriate management options for the achieving aims and objectives.
- e) Prescriptions for management actions.
- f) A work schedule to include a five year project register, an annual work plan and the means by which the plan will be rolled forward annually.
- g) Personnel responsible for implementation of the plan.
- h) Links to the ecological monitoring scheme and remedial/contingency measures that may be triggered by the monitoring.

The plan shall be carried out as approved, unless amended in accordance with the written agreement of the Head of Planning.

Reason: To ensure that the ecological mitigation and compensation arrangements comply with Policies S1, EN11 and EN20 East Sussex and Brighton & Hove Structure Plan. 1991 – 2011

Ecological monitoring scheme

25. Development shall not commence until there has been submitted to and approved in writing by the Head of Planning a scheme of monitoring to show the actual effects of the scheme on the ecology of the area both during construction and then during the operation of the development for the lifetime of the road. The scheme shall include:
 - a) A clear statement of the purposes, aims and objectives for monitoring.
 - b) Details and justification for selection of baseline data and any changes or thresholds that, if occurring or reached, will trigger remedial measures.
 - c) Details of positive conservation targets along with any associated performance standards or success criteria that will indicate that targets have been reached.
 - d) Details of the parameters that are to be monitored along with any appropriate “indicators” for monitoring.
 - e) Methods for sampling and analysis, including the timetable and locations for field sampling.
 - f) Submission of a report on the monitoring to the County Planning Authority and at quarterly intervals from the commencement of construction works until the end of the seven year contract maintenance period and thereafter annually, or as otherwise

approved in writing by the Head of Planning, including a report on actual or anticipated changes in communities or populations, the reasons for the changes and any remedial measures considered to be necessary to modify the changes.

- g) Procedures to be put in place to enable the monitoring reports to be considered by the County Planning Authority in consultation with the developer.

Should the County Planning Authority consider that additional or different ecological remedial measures are necessary as a result of considering the monitoring report and any consultation responses under the arrangements above they shall give written notice to the developer. Within one month of receiving such written notice from the Planning Authority the developers shall submit a scheme of remedial measures which shall include the further mitigation and/or changes to any approved mitigation schemes and/or changes to working practices and a programme of implementation for the approval of the County Planning Authority. The approved remedial measures shall be implemented in accordance with the approved scheme and programme unless otherwise approved in writing by the County Planning Authority.

Reason: To ensure that the ecological mitigation arrangements comply with Policies S1, EN11 and EN20 of the East Sussex and Brighton & Hove Structure Plan 1991 – 2011.

Surface water drainage

26. Development shall not commence, except mitigation, compensation works and archaeological evaluation, until a detailed surface water drainage scheme for the site, based as far as practicable on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the Head of Planning. The scheme shall substantially be in accordance with the submitted drawings figures 2a; 2b; 2d; 2C dated September 2008 and be implemented in accordance with the approved details prior to the completion of the development.

Reason: To prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the system in accordance with Policy S1 (g) of the East Sussex and Brighton & Hove Structure Plan 1991-2011 and Policy DG27 of the Hastings Local Plan 2004.

Flood risk

27. The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) April 2008, Bexhill to Hastings Link Road, and the following mitigation measures detailed within the FRA:

1. Limiting the surface water run-off generated by the 1 in 100 year critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.
2. Provision of compensatory flood storage on / or in the vicinity of the site to a 1 in 100 year standard.
3. Identification and provision of safe route(s) into and out of the site to an appropriate safe haven.
4. Confirmation of the opening up of any culverts across the site.

Reason: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site, that compensatory storage of flood water is provided along with the safe access and egress from and to all parts of the site where there is a flood risk, in accordance with Policy S1 (h) of the East Sussex and Brighton & Hove Structure Plan 1991-2011 and Policy DG27 of the Hastings Local Plan 2004.

Contaminated ground

28. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the County Planning Authority. An investigation and risk assessment must be undertaken, and where remediation is necessary a remediation scheme must be prepared, which is subject to the approval in writing of the Head of Planning. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the County Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with Policy S1(b) and S1(g) of East Sussex and Brighton & Hove Structure Plan 1991-2011.

Provision of a borrow pit

29. Prior to the use of the borrow pit a scheme of working and restoration of the land proposed as a borrow pit [shown on the submitted plan Drawing No 208.31.13 shall be submitted for the approval to the Head of Planning. Such scheme shall show:
 - (a) the extent of the proposed phased working;
 - (b) the stages and direction of working, including any benching;
 - (c) details of the slopes and finished profiles to be created on the pit faces to facilitate the stability of adjacent land and the restoration of the site
 - (d) details of location, height and species of the specific planting to be undertaken and/or existing planting to be maintained;

(e) details of the location of any deposit of top soils and sub soils arising from the extraction operations, including a scaled plan at 1:500 showing the depth of the deposit at 5m contour intervals

(f) the stages by which the site will be restored to agricultural or wildlife amenity use; and

(g) the materials to be used and methods to be adopted for restoring the site.

The approved scheme shall be implemented in full, unless a variation has been agreed in writing by the Head of Planning.

Reason: To enable the County Planning Authority to regulate and control the use of the site in compliance with Policy WLP35 of the East Sussex and Brighton & Hove Waste Local Plan 2006.

Telephone contact

30. Development shall not commence until details of a scheme for the provision of a telephone contact for dealing with complaints from members of the public about matters, associated with the development, have been submitted to and approved in writing by the Head of Planning. The scheme shall be operated during the hours when any work or activity in connection with that development is taking place. The scheme shall include details of the arrangements for recording and responding to complaints. The approved scheme shall be implemented in full in accordance with the approved details.

Reason: To secure the monitoring of the development in the interests of the amenity of the locality and to comply with Policy S1 (b) of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

Notice of complaints

31. Notice in writing of any complaint made by a member of the public about any matter associated with the development shall be given to the Head of Planning no later than the next working day after the complaint was received. The notice shall include a description of the complaint, the name and address of the person making the complaint, and within three further days, the action proposed as a result, unless otherwise agreed in writing by the Head of Planning.

Reason: To secure the monitoring of the development in the interests of the amenity of the locality and to comply with East Sussex and Brighton & Hove Structure Plan 1991-2011 Policies S1 (b) and S1 (s).

Removal of Permitted Development rights

32. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking and re-enacting that Order with or without modification), including schedule 2,

Parts 12 and 13), no signage, lighting of the carriageway, the construction of vehicle lay-bys or parking areas beside the road shall be constructed (other than as expressly authorised by this permission) unless otherwise agreed in writing by the Head of Planning.

Reason: To enable the County Planning Authority to control and regulate the development of the land and in the interests of highway safety and to comply with Policy S1(d) of the East Sussex and Brighton & Hove Structure Plan 1991-2011.

INFORMATIVES

1. Under the terms of the Water Resources Act 1991, and the Agency Byelaws, the prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of Coombe Haven, Watermill Stream, Powdermill Stream and Decoy Stream, that are designated as 'main rivers'. The erection of flow control structures or any culverting of a watercourse requires the prior written approval of the Environment Agency under s.23 of the Land Drainage Act 1991 or s.109 of the Water Resources Act 1991. The Environment Agency resists culverting on nature conservation and other grounds and consent for such works will not normally be granted except for access crossings.
2. Under the terms of the Water Resources Act 1991, written approval of the Environment Agency is required for any discharge of sewage or trade effluent into controlled waters, and may be required for any discharge of sewage or trade effluent from buildings or fixed plant into or onto the ground or into waters which are not controlled waters. Such approval may be withheld. (Controlled waters include rivers, streams, underground waters, reservoirs, estuaries and coastal waters).
3. Any facilities for the storage of chemicals or oils shall be sited on impervious bases and surrounded by impervious bund walls, details of which shall be submitted to the Head of Planning for approval in writing. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. If there is multiple tankage, the compound should be at least equivalent to 110% of the capacity of the largest tank, or 25% of the total combined capacity of the interconnected tanks whichever is the greatest. All filling points, vents, gauges and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund.
4. It is expected that the written schemes of archaeological investigation will confirm the actions to be taken as set out in the Environmental Statement/Addendum and accord with the relevant portions of the East

Sussex County Council document Recommend Standard Conditions for Archaeological Fieldwork, Recording and Post-Excavation work in East Sussex (version 4 dated 24th April 2008). The applicant shall ensure that finance is readily available to enable to fully fund archaeological investigation costs for this scheme, including the costs to the archaeological contractor to carry out the programme of works; the costs to an archaeological consultant or contractor to manage the archaeological works, collate material etc, which are estimated to be £220,000 for evaluation; and, if required, £1million for mitigation excavations etc and £1.5 to £2million for the potential excavation of well-preserved waterlogged site.

5. The land contamination section of the EIA is acceptable and should be protective of groundwater during development. Land contamination reports that are submitted during the detailed application stage should be carried out in line with CLR11 and Planning Policy Statement No. 23 – “Planning and Pollution Control” (PPS 23).The drainage plans for protection of controlled waters should include pollution control valves to protect the receiving water in the event of a spill onto the road.
6. The applicant is reminded of the need to obtain licences under the Wildlife and Countryside Act 1981 and of the provisions within Section 1 where it is an offence to take damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this act. Trees, scrub, reeds or substantial ditch side vegetation are likely to contain nesting birds at least between 1 March and 31 July. Vegetation of one or more of the above types is present on the application site and should be assumed to contain nesting birds between the above dates unless survey has shown it is absolutely certain that nesting birds are not present.
7. The applicant shall establish a Local Liaison Committee prior to the commencement of the works until at least 12 months after the completion of all works, with representatives of the local community, the applicant, County Planning Authority, and other public bodies to meet at regular intervals to monitor the development and ensure that a clear information pathway and liaison mechanism is provided.

TONY COOK

Head of Planning Service

Case Officer: Peter Earl, Tel 01273 482650

Local Members: Councillors Gubby, Gadd, Field, Wilson, Scott and Ensor

Background Documents

Submitted planning application, supporting statement and accompanying Environmental Statement together with non-technical summary.

Addendum to EA and Supplementary Nature Conservation Report and Information.(Oct 2008).

Case File RR/2474/CC(EIA)

Rother District Local Plan

Hastings Local Plan

East Sussex and Brighton & Hove Structure Plan.1999

Regional Planning Guidance for the South East RPG 9

The Draft South East Plan

East Sussex and Brighton & Hove Waste Local Plan 2006

East Sussex and Brighton & Hove Minerals Local Plan1999

Rother District Council 'Consultation on strategy directions' 2008.

Letters of representation and consultation responses.

SoCoMMS reports

Hastings Strategy Development Plan.

SEEDA Hastings and Bexhill Five Point Plan (DTZ Pieda 2002).

SEEDA Prosperity for Hastings and Bexhill Report (DTZ Pieda 2001)

PPS1 Delivering Sustainable Development. (2005)

PPS7 Sustainable development in Rural Areas

PPS 9 Biodiversity and Geological Conservation.()

PPS 10 Planning for Sustainable Waste management.(July 2005)

PPG 13 Transport (March 2001)

PPG 14 Development on Unstable land. (April 1990)

PPG15 (Planning and the Historic Environment)

PPG16 (Archaeology and Planning) `

PPG 17 Planning for Open Space, Sport and Recreation (July 02)

PPS 23 Planning and Pollution Control (November 2004)

PPG 24 Planning and Noise (November 2004)

PPS 25 Development and Flood Risk (December 2006)

PPS 1–Planning and Climate Change-supplement to PPS 1 (Dec 2007)

Climate Change Strategic Framework (2007)

Climate change Bill (2007)

Design Manual for Roads and Bridges.

IEMA report

East Sussex and Brighton & Hove Supplementary Planning Document –
Construction and Demolition Waste – March 2006

Countryside and Rights of Way Act 2000

Human Rights Act 1998

East Sussex County Council
BHLR Comments Database

Analysis Of Comments Received

Heading	Sub	Comment	No. of Representations	Response
A Procedural Aspects				
	1	Proposal should be called in for review/public inquiry by the Secretary of State, because cost has grown	40	The recommendation is for the proposal to be referred to the Secretary of State for decision whether she calls in the application. If this is declined the County Council has the powers to determine the application.
	2	Refuse scheme or ask for independent inspector to hear evidence at public inquiry, rather than determine the scheme yourself	41	The recommendation is for the proposal to be referred to the Secretary of State for decision whether she calls in the application. If this is declined the County Council has the powers to determine the application.
AA Support (Letters of Support Only)				
	1	Strongly support the Link Road proposal	66	Noted
	2	This is one of the most important infrastructure schemes currently in the South East Region	8	Noted
	4	The road and the ensuing employment development will assist the implementation of the Regional Economic Strategy for the Coastal South East sub region. Reference Priority 4 : ensuring sufficient employment land; Priority 7 : improving connectivity along the south coast; Action 8.1 transport for smart growth considers this scheme a priority	2	Noted
	6	Without the link road some key targets of the Community Strategy will be unachievable, including better bus connectivity and improved journey time. Other important effects could be a reduction in road accidents and a faster and more direct link to local services following possible changes at the Hastings Conquest Hospital	7	Noted
	7	The A259 connecting the two towns is simply insufficient for the traffic needing to commute. Encouraged by results of traffic models in past years that the traffic on the A259 (Bexhill Road) would be reduced by at least a third	7	Noted
	8	Reduction in traffic flows on the A259 will facilitate improved public transport facilities on the route	5	Noted
	10	Support in principle subject to concerns regarding forecast traffic congestion at junctions on the A259 west of Belle Hill, particularly at Little Common roundabout and the B2095 Lamb	1	Noted

Inn		
11	Support in principle subject to ESCC being committed to the future Local Transport Plan funding for delivery of the proposed complementary measures identified with the scheme	2 Noted
12	Reduction in traffic flows on the A259 will allow air quality problems on the route to be addressed	7 Noted
15	Concur with mitigation proposed for impacts on historic structures and to reduce impacts on historic landscape character	1 Noted

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Heading	Sub	Comment	No. of Representations	Response
	16	Environmental Impact Assessment concludes that the single carriageway Link Road will have an overall minor to moderate impact at scheme opening reducing to a negligible impact after 15 years. Even a moderate impact would be far outweighed by the regeneration benefits that the scheme will bring to Hastings and Bexhill	3	Noted
	17	Link Road is an important component to the successful delivery of the Community Strategy and the regeneration of the area. It will assist in achieving a number of the key targets; specifically the housing targets through the release of land. It will increase business use land with the potential for new jobs	5	Noted
	18	It is more crucial than ever for the future prosperity of the area that this road is built. It would contribute enormously to the regeneration of this area and encourage inward investment	14	Noted
	19	Regeneration of the Hastings area, the most deprived in Sussex, can only be truly effective if the transport infrastructure is in place to meet the needs of businesses, residents and commuters	11	Noted
	20	Link Road is an essential element of package of regeneration measures being implemented in the Hastings and Bexhill areas. Without it the potential to tackle current problems of deprivation will be severely restricted	3	Noted
	21	The impact of a new transport route and improvement along an existing one will enhance regional transport accessibility along the South Coast Corridor and greatly assist Hastings function as a Regional Hub	6	Noted
	22	It will open up employment land of sub-regional significance at North Bexhill, capable of generating up to 2000 jobs, with good access from Bexhill and from some of the deprived wards in Hastings. There are no other sites in Hastings or Bexhill capable of accommodating this scale of employment uses. Without the Link Road, North Bexhill cannot happen. Loss of employment opportunities on this scale would have serious impacts on the regeneration of the area, and could lead to a number of local firms relocating elsewhere	5	Noted
	23	The scheme is important to the delivery of a number of	7	Noted

regeneration projects including a strategic employment site at North Bexhill

24 Reduction in traffic flows on the A259 will facilitate development of key regeneration sites such as west Marina, and provide greater accessibility to important local projects such as Pebsham Countryside Park 2 Noted

25 Link Road will ease congestion on A259, improving journey times and further reducing the severance between Hastings and Bexhill. Traffic congestion and poor transport infrastructure is often cited as a major restraint to economic development. Link Road will provide a new transport link and 18 Noted

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Heading	Sub	Comment	No. of Representations	Response
		facilitate the improvement of an existing one		
26		Businesses say that better transport improvements east-west along the coast are vital for the future health of the local economy. Traffic congestion has a negative impact on business. Improvements in the transport infrastructure are needed to retain existing businesses	4	Noted
27		A new link road would open up access to much needed space for new business parks in the area. It would facilitate access to areas for residential developments and help address the lack of affordable housing for the local workforce	10	Noted
29		Not proceeding with the Link Road would not only lose opportunities (X12 to X17) but would significantly damage business confidence in the area. Market interest in the area would be reduced and private sector funding would be more difficult to attract, resulting in slowing down or loss of other complementary projects, particularly in the town centre	2	Noted
30		Non-road options have been offered but are simply not realistic	7	Noted
31		Improvements to public transport (ie railway) are not achievable due to the layout and local infrastructure of the railway. Basically, the signalling, the junctions, the low speed limits on the line mean that putting extra trains and extra stations on line between Hastings and Bexhill are extremely unlikely in the near future	4	Noted
32		Hastings Alliance are a large group of people who have not had regard to the wider interest of the community.	3	Noted
33		This road is the best and only sensible solution in this day and age to the current problems of the A259 Bexhill to Hastings	9	Noted
34		We are not talking about a 60 mile motorway with 8 lanes going through the countryside for no reason, we are talking about a single carriageway road 3 miles long which is to relieve a dirty, over congested, dangerous Bexhill Road	2	Noted
35		It upgrades the local road network allowing for the increased number of houses, industrial estate and retail parks	3	Noted

36	Its vital for 5 point plan	3	Noted
37	Proposed road design achieves right balance between servicing its transport purposes and sensitively fitting within its surrounding environment	10	Noted
38	It will improve the long term health of local people	11	Noted
39	Local facilities in Bexhill area (college, shopping etc) will be much more easily accessible without adding to road traffic	1	Noted
40	It relieves congestion on A259	11	Noted

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Heading	Sub	Comment	No. of Representations	Response
	41	Reduce large quantities of CO2 at a time when we must reduce causes of climate change	1	Noted
B Consultation And Community Involvement				
	1	Public consultation was short and inadequate being referred to Committee.	27	Consultation periods are set by Government regulations and the time period has been adequate prior to
	2	Short consultation period has limited our capacity to respond being referred to Committee.	7	Consultation periods are set by Government regulations and the time period has been adequate prior to
	3	Disappointed that ESCC did not extend the consultation being referred to Committee. period beyond the minimum 42 days	2	Consultation periods are set by Government regulations and the time period has been adequate prior to
	4	Difficulty in obtaining or accessing documentation has limited capacity to respond	3	Documents were made available in a large number of locations and on the internet.
	6	Public consultation flawed as alternatives to a road scheme were not explored/offered	11	Planning application must be determined on its merits.
	7	County Council have failed the people of East Sussex as they have not controlled this road risk properly	3	Planning application must be determined on its merits.
C Planning Policy				
	1	Government Policy – conflicts with PPS1 on biodiversity.	3	Government advice is taken into account in the consideration of the application
	2	Government Policy – conflicts with PPS1/draft PPS1 supplement on climate change.	5	Government advice is taken into account in the consideration of this application
	3	Government Policy – conflicts with PPS9 on delivering biodiversity benefits	288	Government advice is taken into account in the consideration of this application
	4	Government Policy – conflicts with PPS9 and Circular 6/2005 on SSSIs	2	Government advice is taken into account in the consideration of this application
	5	Government Policy – conflicts with PPS7 on landscape and listed buildings	6	Government advice is taken into account in the consideration of this application
	6	Government Policy – conflicts with PPG13 on sustainable transport and	7	Government advice is taken into account in the consideration of this application
	7	Government Policy – conflicts with PPG15 on listed buildings	3	Government advice is taken into account in the consideration of this application
	8	Government Policy – conflicts with PPG16 on archaeological assessment process	2	Government advice is taken into account in the consideration of this application
	11	Government Policy – conflicts with PPG24 on noise	2	Government advice is taken into account in the consideration of this application
	12	Government Policy – conflicts with PPS25 on flood risk	3	Government advice is taken into account in the consideration of this application

- 13 Government Policy – conflicts with sustainable transport policies
- 14 Government Policy – conflicts with climate change policies
- 15 Government Policy – conflicts generally
- 16 Government Policy – requirement to seek measures to promote habitats and
- 17 Government Policy – compliance with CROW Act not possible unless 'do minimum' scenario carried out for SSSI and surrounding area, and subjectivity of mitigation

- 59 Government advice is taken into account in the consideration of this application
- 1,151 Government advice is taken into account in the consideration of this application
- 264 Government advice is taken into account in the consideration of this application
- 4 Government advice is taken into account in the consideration of this application
- 1 Government Policy and CROW Act taken into account in the consideration of this application.

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Heading	Sub	Comment	No. of Representations	Response
		measures acknowledged		
	18	Government Policy – conflict with UK Strategy for Sustainable Development, UK Government’s Indicators for Sustainable Development, UK Forestry Standard, UK Forest Partnership for Action, Biodiversity Strategy for England on loss of ancient woodland	13	Government advice is taken into account in the consideration of this application
	21	Ineffective cooperation between ESCC and statutory environmental bodies in developing the scheme is contrary to the requirements of the Secretary of State’s response to the SoCoMMS	1	SEB’s consulted on application and comments taken into account.
	22	Draft South East Plan – conflict with Policies CC1, CC2 and CC3	1,091	Development Plan policies taken into account in the consultation and the application.
	23	Draft South East plan – conflict with Policies T1 and T5	1	Development Plan policies taken into account in the consultation and the application.
	24	Draft South East Plan – conflict with Policy NRM4	1	Development Plan policies taken into account in the consultation and the application.
	25	East Sussex & Brighton & Hove Structure Plan – conflict with Policies EN7 and EN20 on inadequate mitigation	4	Development Plan policies taken into account in the consultation and the application.
	26	East Sussex County Council policies for protection of listed buildings and agriculture and prevention of development in open countryside worthless	3	Development Plan policies taken into account in the consultation and the application.
	27	Link Road not a proposal of Structure Plan, Hastings Borough Local Plan or Rother District Local Plan	4	Development Plan policies taken into account in the consultation and the application.
	30	Government Policy - requires ESCC to fully explore all possible alternatives before it proposes such a damaging road scheme and not convinced that it has done so	295	Alternatives considered as part of this proposal and as part of the Multi-Modal Study (MSS) programme.
D Sustainability And Climate Change				
	1	Proposals are not sustainable development within the Environmental government guidance in	37	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).
	2	Proposal to build road that will lead to 30000 more vehicle movements in area free from traffic is not sustainable government guidance in development	7	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).
	3	Not sustainable at time when weight is being given to climate within the Environmental	49	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions

change and reduction in car travel
government guidance in

4 Scheme will not achieve sustainable use of land
within the Environmental
government guidance in

5 If development cannot go ahead without the road, then the
within the Environmental
development itself is unsustainable
government guidance in

6 Road would lead to more car based development contrary to
within the Environmental
concept of sustainable development
government guidance in

Statement. The consideration of the information is necessary against development plan policies and
Planning Policy Statement 1 (PPS1).

6 The application is accompanied by a Sustainability Appraisal together with an assessment of emissions
Statement. The consideration of the information is necessary against development plan policies and
Planning Policy Statement 1 (PPS1).

2 The application is accompanied by a Sustainability Appraisal together with an assessment of emissions
Statement. The consideration of the information is necessary against development plan policies and
Planning Policy Statement 1 (PPS1).

13 The application is accompanied by a Sustainability Appraisal together with an assessment of emissions
Statement. The consideration of the information is necessary against development plan policies and
Planning Policy Statement 1 (PPS1).

Heading	Sub	Comment	No. of Representations	Response
	7	More sustainable development patterns that would flow from within the Environmental a non-road based strategy have not been discussed government guidance in	7	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).
	8	Package of sustainable transport measures would significantly reduce CO2 emissions across the two towns at fraction of the cost	3	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).
	9	Impact of scheme on climate change with increased CO2 emissions within the Environmental government guidance in	49	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).
	10	Scheme should be reassessed in light of Government climate change targets within the Environmental government guidance in	2	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).
	11	Will bring increased carbon emissions and aggravate climate change just when need to act has been accepted within the Environmental government guidance in	300	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).
	12	Planning decisions taken now are critical because CO2 must peak within next 8 years if we are to avoid a catastrophe within the Environmental government guidance in	1	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).
	13	Moral imperative to act now; we are last generation who can make a difference with climate change within the Environmental government guidance in	16	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).
	14	Amount of CO2 produced will contribute towards Britain failing to meet its obligations to reduce CO2 emissions by 60% by 2050 within the Environmental government guidance in	2	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).

16 Road will encourage more people to drive increasing CO2 within the Environmental levels government guidance in

17 Will increase instead of reducing CO2 emissions within the Environmental government guidance in

18 Will add nearly 6000 tonnes of CO2 to atmosphere each year within the Environmental government guidance in

19 Will add nearly 6000 tonnes of CO2 to atmosphere each year within the Environmental without taking into account emissions from development government guidance in associated with the road

20 ESCC's forecast savings by the Council of 5778 tonnes of CO2 each year will be more than wiped out by annual government guidance in increase for the road

21 In construction phase 38,100 tonnes of CO2 will be emitted within the Environmental government guidance in

23 For local authority roads currently proposed in England, Link within the Environmental Road is second worst for impact on CO2 emissions government guidance in

24 Scheme which costs £89m should bring decrease in CO2 within the Environmental emissions, not increase government guidance in
02 December 2008

8 The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).

21 The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).

186 The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).

2 The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).

6 The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).

4 The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).

7 The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).

3 The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and

Heading	Sub	Comment	No. of Representations	Response
				Planning Policy Statement 1 (PPS1).
	26	Link road leads to global warming within the Environmental government guidance in	5	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).
	27	Oil reserves are diminishing and will make the road pointless within the Environmental government guidance in	10	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Planning Policy Statement 1 (PPS1).
E AONB (Area of Outstanding Natural Beauty)				
	1	The High Weald AoNB around Crowhurst will be badly to the ES. The relevant affected by noise and the visual scar of the new road alignment has avoided direct Views from the AONB are bunding, noise fencing and locations In the AONB. There	18	The potential impacts on the AONB are described in the Environmental Statement (ES) and the addendum chapters are, Landscape and Visual impacts, Chapter 13 and Noise and Vibration Chapter 11. The impact on the AONB, the boundary of which at its closest point is 480m from the centre line of the road. over 1km away from the nearest part of the scheme. The mitigation measures, including road alignment, planting will further reduce the potential impacts on the AONB. The road itself will not be visible from will be glimpses of the tops of the vehicles moving along the road from locations within the AONB.
	2	Scheme would destroy character of one of the most and key landscape beautiful valleys in East Sussex, close to the High Weald side valleys of the AoNB character and quality, which Local planning has which would be retained area is excluded and disbenefit of the scheme	211	Impacts are described in detail in the ES, as above. The alignment has avoided direct impact on the AONB features such as ancient woodland and significant hedges or tree belts. By necessity the route will cross the Combe Haven but does avoid severance of the main Combe Haven Valley. Clearly the valley has a distinguishes it from other valleys in the county, one of which is its close proximity to large urban areas. recognised this in a balanced planned manner by allocating it as a Countryside Park, the northern part of as natural as possible, within the context of planned development. Most of the County is AONB but this therefore should not be considered of the same national value as valleys within the AONBs. This is a which has to be taken into account in the overall decision of the proposal.
F SSSI's (Sites of Special Scientific Interest)				

1 Negative effect on the two SSSI sites and associated designed largely to species, including protected and migratory species impacts on the amenity the road scheme on a

2 Very close to road so SSSI cannot be said to be receiving designed largely to "highest level of protection" as required by PPS1 impacts on the amenity the road scheme on a

3 Actual and potential indirect impacts on the SSSIs have not designed largely to been adequately addressed (including noise and visual impacts on the amenity disturbance, severance of the SSSI from floodplain the road scheme on a grassland and fen)

4 Inadequate mitigation for species using habitats within the affected wildlife habitats. SSSI

5 Absence of mitigation for noise and visual disturbance on designed largely to breeding birds in SSSIs impacts on the amenity the road scheme on a

6 Significant impact on SSSI as impact on biodiversity up to designed largely to about 1 km from road impacts on the amenity the road scheme on a

99 Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis.

7 Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis.

2 Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis.

1 Environmental Statement and supplementary information has provided mitigation and compensation for

1 Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis.

1 Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis.

Heading	Sub	Comment	No. of Representations	Response
	9	Effect of nitrogen deposition on SSSIs not adequately assessed	2	Refer to clause 7.4 in the Design and Access Statement
	11	Potential impact to SSSI not adequately assessed or mitigated designed largely to for impacts on the amenity the road scheme on a	9	Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis.
	13	Potential noise disturbance to nationally important significant designed largely to populations of breeding bird species and wintering birds impacts on the amenity the road scheme on a	2	Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis.
	15	Effect of significant increase in nitric acid deposition on sensitive grassland and reed bed habitats	5	Refer to clause 7.4 in the Design and Access Statement
	21	Proximity of road to sensitive habitats of SSSI designed largely to impacts on the amenity the road scheme on a	2	Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis.
	23	Inadequate assessment and mitigation designed largely to impacts on the amenity the road scheme on a	2	Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis.
	26	Direct loss of 0.4 ha of semi-natural ancient woodland designed largely to wildlife habitat contiguous with SSSI impacts on the amenity the road scheme on a affected by the	21	Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis. There is a small area at the southern tip of the Marline Woods which would be

30 Greater ecological effect of severance of SSSI from designed largely to adjacent farmland during construction than suggested impacts on the amenity the road scheme on a

31 Unacceptable damage to Combe Haven SSSI and Marline designed largely to Woods SSSI impacts on the amenity the road scheme on a

G Lnrns And Sncis (Local Nature Reserves and Sites of Nature Conservation Interest)

- 1 Substantial Negative impacts on several LNRs and SNCIs, the SNCIs or LNRs. important for scientific and historical value and as breathing spaces between Hastings and Bexhill
- 2 Negative impact on matrix of SNCIs the SNCIs or LNRs.

H Combe Haven Valley (Specific impacts upon)

- 1 Road will dissect Combe Haven Valley, a picturesque area alignment has avoided direct criss-crossed by footpaths and a haven for wildlife necessity the route will cross valley has a character urban areas. Local northern part of which would but this area is This is a disbenefit of are dealt with in 02 December 2008

construction of the railway over bridge. Compensation is proposed.

- 1 Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis.
- 323 Impacts on nature conservation are covered in detail in Chapter 12 of the ES. The route alignment has been avoid direct impact on the SSSI. The noise and visual mitigation for the road is designed to address potential of the Combe Haven Valley including the wildlife habitats. Compensation habitat is to be provided as part of two for one habitat area basis.
- 348 Impacts on nature conservation are covered in detail in Chapter 12 of the ES. There are no direct impacts on
- 2 Impacts on nature conservation are covered in detail in Chapter 12 of the ES. There are no direct impacts on
- 32 Impacts on the landscape of the valley are described in detail in the ES, Chapter 13, as above. The impact on key landscape features such as ancient woodland and significant hedges or tree belts. By the side valleys of the Combe Haven but does avoid severance of the main Combe Haven Valley. Clearly the and quality, which distinguishes it from other valleys in the county, one of which is its close proximity to large planning has recognised this in a balanced planned manner by allocating it as a Countryside Park, the be retained as natural as possible, within the context of planned development. Most of the County is AONB excluded and therefore should not be considered of the same national value as valleys within the AONBs. the scheme which has to be taken into account in the overall decision of the proposal. Impacts on recreation

Heading	Sub	Comment	No. of Representations	Response
				Chapter 15A, Effects on Pedestrians, cyclists and Recreational Users. They are also covered in the Design and the Addendums to these documents.
	2	Road will run through and irrevocably scar Combe Haven alignment has avoided direct Valley necessity the route will cross valley has a character urban areas. Local northern part of which would but this area is This is a disbenefit of	275	Impacts on the landscape of the valley are described in detail in the ES, Chapter 13, as above. The impact on key landscape features such as ancient woodland and significant hedges or tree belts. By the side valleys of the Combe Haven but does avoid severance of the main Combe Haven Valley. Clearly the and quality, which distinguishes it from other valleys in the county, one of which is its close proximity to large planning has recognised this in a balanced planned manner by allocating it as a Countryside Park, the be retained as natural as possible, within the context of planned development. Most of the County is AONB excluded and therefore should not be considered of the same national value as valleys within the AONBs. the scheme which has to be taken into account in the overall decision of the proposal.
	3	Despite integration into the landscape the road will still be a alignment has avoided direct scar across 'the finest medium sized valley outside the High necessity the route will cross Weald AONB' (ESCC) valley has a character urban areas. Local northern part of which would but this area is This is a disbenefit of	3	Impacts on the landscape of the valley are described in detail in the ES, Chapter 13, as above. The impact on key landscape features such as ancient woodland and significant hedges or tree belts. By the side valleys of the Combe Haven but does avoid severance of the main Combe Haven Valley. Clearly the and quality, which distinguishes it from other valleys in the county, one of which is its close proximity to large planning has recognised this in a balanced planned manner by allocating it as a Countryside Park, the be retained as natural as possible, within the context of planned development. Most of the County is AONB excluded and therefore should not be considered of the same national value as valleys within the AONBs. the scheme which has to be taken into account in the overall decision of the proposal.
	4	Whole character of the valley will be irretrievably damaged alignment has avoided direct by the construction of a road - even with screening and necessity the route will cross noise barriers the look and feel of the valley will be altered valley has a character	7	Impacts on the landscape of the valley are described in detail in the ES, Chapter 13, as above. The impact on key landscape features such as ancient woodland and significant hedges or tree belts. By the side valleys of the Combe Haven but does avoid severance of the main Combe Haven Valley. Clearly the and quality, which distinguishes it from other valleys in the county, one of which is its close proximity to large

urban areas. Local
northern part of which would
but this area is
This is a disbenefit of

5 Multi Modal Study concluded that a road in the Combe Haven alignment has avoided direct
Valley would have a 'large negative impact' not ESCC
necessity the route will cross
conclusion that there would only be a 'slight to moderate'
valley has a character
impact
urban areas. Local
northern part of which would
but this area is
This is a disbenefit of
is in the absence of
package.

7 Combe Haven valley is a leisure and tourist asset which alignment has avoided direct
should be preserved and enhanced as part of a green tourist
necessity the route will cross
strategy
valley has a character
urban areas. Local
northern part of which would
but this area is
This is a disbenefit of

8 Enormous impact on valley which gives Crowhurst its

planning has recognised this in a balanced planned manner by allocating it as a Countryside Park, the
be retained as natural as possible, within the context of planned development. Most of the County is AONB
excluded and therefore should not be considered of the same national value as valleys within the AONBs.
the scheme which has to be taken into account in the overall decision of the proposal.

12 Impacts on the landscape of the valley are described in detail in the ES, Chapter 13, as above. The
impact on key landscape features such as ancient woodland and significant hedges or tree belts. By
the side valleys of the Combe Haven but does avoid severance of the main Combe Haven Valley. Clearly the
and quality, which distinguishes it from other valleys in the county, one of which is its close proximity to large
planning has recognised this in a balanced planned manner by allocating it as a Countryside Park, the
be retained as natural as possible, within the context of planned development. Most of the County is AONB
excluded and therefore should not be considered of the same national value as valleys within the AONBs.
the scheme which has to be taken into account in the overall decision of the proposal. Large negative impact
adequate mitigation and compensation. The proposed BHLR has a very extensive mitigation/compensation

4 Impacts on the landscape of the valley are described in detail in the ES, Chapter 13, as above. The
impact on key landscape features such as ancient woodland and significant hedges or tree belts. By
the side valleys of the Combe Haven but does avoid severance of the main Combe Haven Valley. Clearly the
and quality, which distinguishes it from other valleys in the county, one of which is its close proximity to large
planning has recognised this in a balanced planned manner by allocating it as a Countryside Park, the
be retained as natural as possible, within the context of planned development. Most of the County is AONB
excluded and therefore should not be considered of the same national value as valleys within the AONBs.
the scheme which has to be taken into account in the overall decision of the proposal.

5 Impacts on the landscape of the valley are described in detail in the ES, Chapter 13, as above. The

alignment has avoided direct
character and protects it from noise and bustle of the urban
necessity the route will cross
landscape
valley has a character
urban areas. Local
northern part of which would
but this area is

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impact on key landscape features such as ancient woodland and significant hedges or tree belts. By
the side valleys of the Combe Haven but does avoid severance of the main Combe Haven Valley. Clearly the
and quality, which distinguishes it from other valleys in the county, one of which is its close proximity to large
planning has recognised this in a balanced planned manner by allocating it as a Countryside Park, the
be retained as natural as possible, within the context of planned development. Most of the County is AONB

Heading	Sub	Comment	No. of Representations	Response
		This is a disbenefit of		excluded and therefore should not be considered of the same national value as valleys within the AONBs.
				the scheme which has to be taken into account in the overall decision of the proposal.
	10	The ecological functioning of the valley and its contribution to route alignment has been the wider ecological network have not been investigated designed to address and are not addressed through mitigation habitat is to be provided as	2	Impacts on nature conservation are covered in detail in Chapter 12 of the ES and the Addendum ES. The designed to avoid direct impact on the Combe Haven SSSI. The noise and visual mitigation for the road is potential impacts on the amenity of the Combe Haven Valley including the wildlife habitats. Compensation part of the road scheme on a two for one habitat area basis.
	11	Mitigation strategy for wildlife fails to recognise the route alignment has been ecological functioning of the valley as a whole and the designed to address damage that fragmentation and disturbance will result in habitat is to be provided as	3	Impacts on nature conservation are covered in detail in Chapter 12 of the ES and the Addendum ES. The designed to avoid direct impact on the Combe Haven SSSI. The noise and visual mitigation for the road is potential impacts on the amenity of the Combe Haven Valley including the wildlife habitats. Compensation part of the road scheme on a two for one habitat area basis.
	12	Greatest impact on valley will be noise, light intrusion from Noise and Vibration. The thousands of cars, and a lowering of the quality of air that are covered in Chapter we breathe	17	The noise impacts on the valley are to be mitigated as described in the ES, and addendum, Chapter 11, impact of car lights is covered in the visual impact assessment of Chapter 13 of the ES. Air quality impacts 10 of the ES.
	13	By introducing 30000 vehicles a day where there is currently Visual impacts. Noise is no traffic at all, will needlessly sacrifice Combe Haven This has been minimised valley, a tranquil and beautiful asset on the edge of Hastings fencing, extensive and Bexhill	2	The issue of remoteness and tranquillity and impacts on these are covered in Chapter 13 Landscape and dealt with in Chapter 11 of the ES. There will be an impact on both remoteness and tranquillity in the valley. by the road alignment around the north of the valley, rather than cutting across the middle, the use of noise mounding and associated planting.
	14	Traffic noise is likely to ruin the tranquillity of the Combe Visual impacts. Noise is Haven valley This has been minimised fencing, extensive	5	The issue of remoteness and tranquillity and impacts on these are covered in Chapter 13 Landscape and dealt with in Chapter 11 of the ES. There will be an impact on both remoteness and tranquillity in the valley. by the road alignment around the north of the valley, rather than cutting across the middle, the use of noise mounding and associated planting.
	15	Combe Haven valley is a very tranquil place, a scarce Visual impacts. Noise is resource in the South East (map) This has been minimised	2	The issue of remoteness and tranquillity and impacts on these are covered in Chapter 13 Landscape and dealt with in Chapter 11 of the ES. There will be an impact on both remoteness and tranquillity in the valley.

fencing, extensive

16 Will destroy tranquillity and naturalness of Combe Haven
Visual impacts. Noise is
valley
This has been minimised

fencing, extensive

17 Road would open up possibility of ribbon development in
Visual impacts. Noise is
tranquil and beautiful Combe Haven valley
This has been minimised

fencing, extensive

and the evolving Local

including the proposed

18 Environmental damage from the enabled development will be
substantial and will further impact on the Combe Haven valley

19 It is not possible to adequately mitigate against cumulative
impacts of severance, disturbance and pollution on the valley
as a whole

20 Not possible to adequately mitigate against cumulative
impacts of severance, disturbance and pollution on the valley
as a whole

21 Fundamental change in the landscape and functioning of the
valley will not be adequately mitigated by habitat creation and
management

by the road alignment around the north of the valley, rather than cutting across the middle, the use of noise
mounding and associated planting.

15 The issue of remoteness and tranquillity and impacts on these are covered in Chapter 13 Landscape and
dealt with in Chapter 11 of the ES. There will be an impact on both remoteness and tranquillity in the valley.
by the road alignment around the north of the valley, rather than cutting across the middle, the use of noise
mounding and associated planting.

1 The issue of remoteness and tranquillity and impacts on these are covered in Chapter 13 Landscape and
dealt with in Chapter 11 of the ES. There will be an impact on both remoteness and tranquillity in the valley.
by the road alignment around the north of the valley, rather than cutting across the middle, the use of noise
mounding and associated planting. The proposed development is in the adopted Rother District Local Plan
Development Framework. There will continue to be planning controls that would preclude this scenario,
Pebsham Countryside Park.

7 There will continue to be planning controls.

4 There will continue to be planning controls.

4 There will continue to be planning controls

1 There will continue to be planning controls

Heading	Sub	Comment	No. of Representations	Response
Visual impacts.	22	The tranquillity of Combe Haven valley and the surrounding countryside would be destroyed with high-speed traffic noise. This has been minimised	282	The issue of remoteness and tranquillity and impacts on these are covered in Chapter 13 Landscape and dealt with in Chapter 11 of the ES. There will be an impact on both remoteness and tranquillity in the valley. by the road alignment around the north of the valley, rather than cutting across the middle, the use of noise mounding and associated planting.
		fencing, extensive		
Visual impacts.	23	The Combe Haven valley will be desecrated. Noise is	12	The issue of remoteness and tranquillity and impacts on these are covered in Chapter 13 Landscape and dealt with in Chapter 11 of the ES. There will be an impact on both remoteness and tranquillity in the valley. by the road alignment around the north of the valley, rather than cutting across the middle, the use of noise mounding and associated planting.
		This has been minimised		
		fencing, extensive		
Visual impacts.	24	The Link Road will damage, for ever, the beauty of the Combe Haven valley, which is a unique and unspoilt landscape providing recreation and relaxation for residents	75	The issue of remoteness and tranquillity and impacts on these are covered in Chapter 13 Landscape and dealt with in Chapter 11 of the ES. There will be an impact on both remoteness and tranquillity in the valley. by the road alignment around the north of the valley, rather than cutting across the middle, the use of noise mounding and associated planting.
		This has been minimised		
		fencing, extensive		
Visual impacts.	25	The link road will be built at nature's expense. Noise is	30	The issue of remoteness and tranquillity and impacts on these are covered in Chapter 13 Landscape and dealt with in Chapter 11 of the ES. There will be an impact on both remoteness and tranquillity in the valley. by the road alignment around the north of the valley, rather than cutting across the middle, the use of noise mounding and associated planting.
		This has been minimised		
		fencing, extensive		
Visual impacts.	26	Apart from the designated sites there will be damage. Noise is	2	The issue of remoteness and tranquillity and impacts on these are covered in Chapter 13 Landscape and dealt with in Chapter 11 of the ES. There will be an impact on both remoteness and tranquillity in the valley. by the road alignment around the north of the valley, rather than cutting across the middle, the use of noise mounding and associated planting.
		This has been minimised		
		fencing, extensive		
I Travel And Transport				
	1	Strongly opposed to any increase in road capacity or new road scheme that will increase traffic on the A259 and A28 between Hastings and Ashford	15	Small increases are predicted, but well within the capacity of both roads.
	2	Any road that would connect the A259 west of Bexhill Town	7	Small increases are predicted, but well within the capacity of both roads.

Centre with Queensway and The Ridge would be likely to increase traffic on the A28 and A259 east of Hastings

- 3 Road will create pressure for the Hastings Eastern Bypass eastern bypass.
and thereby pressure for road building between Hastings and Ashford
- 4 Consequential upgrading of the A259 east of Hastings (such as building bypasses) is not possible without serious damage to the remarkable landscape of the Brede Valley, the settings of Rye and Winchelsea, and the stretch of Romney Marsh between Rye and Brenzett
- 5 That one section of new road in the Bexhill - Hastings area constraints of the planning
can lead to another is demonstrated by the County Council's admission that the link road could eventually be extended to cover the full route of the original bypass. (quote)
- 6 Construction of road would lead to pressure for new roads to the trunk road.
east of Hastings, contrary to recommendations in SoCoMMS
- 7 The Link Road would add to traffic problems by increasing that the benefits of
road capacity between Bexhill and Hastings and thus generate (induce) a significant amount of new traffic
- 8 Scheme will not contribute to a reduction in traffic in the flows and others

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- 9 The BHLR is intended as a better link between Bexhill and Hastings. There are no proposals for a Hastings
- 1 There are no proposals for substantial upgrading of the A259 east of Hastings although safety improvements as part of the Highways Agency's A259 Route Management Strategy.
- 5 Whilst there are no such proposals at the present time, any future application would be subject to the system that existed at the time it was promoted.
- 2 Small increases in traffic flow east of Hastings are unlikely to create the need for further major improvements
- 225 The Traffic Forecasting Report concluded that the scheme was robust against the effects induced traffic. i.e. the scheme would outweigh any potential disbenefits caused by the effects of induced traffic.
- 21 There will be a redistribution of traffic across the network with some areas experiencing increased traffic

Heading	Sub	Comment	No. of Representations	Response
	9	At present the total volume of traffic, particularly at peak hours, is restricted by the limited road capacity on the A259 between Harley Shute Road and Glyne Gap. Releasing this constraint would increase car trips between Hastings and Bexhill (and beyond). This is shown by the increase in CO2 that the Link Road would generate	3	There will be a substantial improvement in air quality in the A259 Bexhill Road Air Quality Management area.
	10	At its eastern end it will simply move traffic to another bottleneck along The Ridge north of Hastings, and there is nothing in the current proposals to address this	25	The Highways Agency's proposed A21 Baldslow scheme and the complementary measures to be brought Hastings and Bexhill Local Local Transport Strategy (HBLATS) will address these issues.
	11	The link road would have a harmful effect on Hastings. It will experience	293	There would be a redistribution of traffic within the area as traffic finds more appropriate routes. Some routes increased flows while others will experience a decrease.
	12	The Ridge contains the hospital and two school sites and the road. The BHLR was diagnosed as at full capacity during the Public Inquiry While schools along The into the bypasses eleven years ago. The effects on these areas do not square with the government's promotion of safer routes to school and to improve safety and security through the transport system	25	While there would be increased traffic flows on The Ridge, it is predicted to be within the practical capacity of is a much smaller scale, local road carrying less traffic than was being predicted for the A259 bypasses. Ridge will experience increased traffic, others elsewhere in Hastings will experience reduced flows.
	13	Congestion on some roads will get worse as a result of the scheme	52	There would be a redistribution of traffic within the area as traffic finds more appropriate routes. Some routes increased flows while others will experience a decrease.
	14	Road will reduce traffic on A259 for a time but will displace be investment in a traffic onto roads in north Hastings. Current feeder roads will redistribution. be unable to cope and further resources will be needed to rectify this	9	It has always been acknowledged that there would be a redistribution of traffic and that there would need to package of measures through the Local Transport Plan (LTP) to address any unwanted effects of the
	15	Whilst the Link Road will relieve some congestion on the that the benefits of A259 at first, induced traffic will create further problems	7	The Traffic Forecasting Report concluded that the scheme was robust against the effects induced traffic. i.e. the scheme would outweigh any potential disbenefits caused by the effects of induced traffic.

16 Congestion will increase elsewhere due to inducement that the benefits of

17 Road fails to address problems of rising traffic levels and will that the benefits of lead to more traffic in Hastings and Bexhill than if it were not built at all

18 Very little has been done by the councils to restrain traffic parking below the level which has led to congestion getting worse over the years continues to be an area.

19 Would follow much of the route of the injected Western and will have a smaller bypass replicating its negative impact on the Wishing Tree BHLR. Consequently area but without the dubious benefits of the Eastern Bypass to funnel traffic away from residential roads

20 A 'stand alone' western Bypass was discredited as a and will have a smaller possibility at the Public inquiry in 1996. It offered nothing more than a transference of traffic from the A259 to other, even more residential areas

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26 The Traffic Forecasting Report concluded that the scheme was robust against the effects induced traffic. i.e. the scheme would outweigh any potential disbenefits caused by the effects of induced traffic.

8 The Traffic Forecasting Report concluded that the scheme was robust against the effects induced traffic. i.e. the scheme would outweigh any potential disbenefits caused by the effects of induced traffic.

2 There have been a number of initiatives implemented over the years, such as parking controls, provision of of demand for new development, reallocation of roadspace for more sustainable modes and others. There ongoing programme to introduce such measures as part of a coherent strategy for the Bexhill and Hastings

2 The BHLR is a much more local and smaller scale road than the previously proposed A259 improvements impact. The previous proposals included a link through the Wishing Tree area, which is not the case with the the amount of extra traffic in this area will be reduced.

6 The BHLR is a much more local and smaller scale road than the previously proposed A259 Western Bypass and different effects.

Heading	Sub	Comment	No. of Representations	Response
	21	Views of the Highways Agency on the A259 west of Bexhill scheme. Town centre to be considered; in particular Little Common roundabout	1	The BHLR has been developed in liaison with the Highways Agency, which has raised no objections to the
	22	Claimed that new road will remove 54% of traffic from the proposed BHLR. Glyne Gap. Much of this traffic is local, going to and from Hastings, and is unlikely to use the new road	3	It is correct that there is a substantial proportion of local traffic on the A259 that will not transfer to the
	23	Traffic on A259 is overwhelmingly local (most of it generated traffic relief to many improved and where by Glyne Gap) so what is supposed benefit of the proposal? Either traffic will continue to use the A259 or it will transfer to the new road, bringing even greater congestion to other already over-used residential areas, principally the Wishing Tree and The Ridge areas	20	The traffic will use both routes as outlined in the traffic and transport chapter of the ES, bringing substantial areas, in particular the A259 Bexhill Road where the air quality in the Air Quality Management Area will be buses would then be able to run effective, punctual services.
	24	90-95% of traffic is local or visiting and therefore wanting to come into Hastings	2	The proposed BHLR will facilitate better access to Hastings.
	25	No evidence for claim that Link Road will reduce the over 5000 traffic movements per day in Crowhurst Village	8	The Traffic Forecasting Report clearly predicts substantial reductions in traffic flows through Crowhurst.
	26	It is dangerous to assume that a Link Road so close to Crowhurst will have a positive impact on traffic through the village	9	The Traffic Forecasting Report clearly predicts substantial reductions in traffic flows through Crowhurst.
	27	What happens if the Link Road draws more cars to Crowhurst Railway bridge Crowhurst as local people try to access the Link Road on the Queensway junction? What happens if traffic on the Link Road is slow, then people trying to join it at Queensway may decide to use the 'rat run' through Crowhurst?	18	There is no evidence to suggest that this would happen. The proposed introduction of traffic control at would further deter traffic from routing through Crowhurst.
	28	In the construction phase of the road (400 - 500 days), there closed to all non will be over 120,000 extra vehicle movements in Crowhurst village	2	Traffic through the village will be greatly reduced during the construction phase as Crowhurst Road will be construction traffic except residents and buses
	29	Car usage will be further increased by the siting of best opportunity to settlement in association with the road and outside the towns	3	Siting the new development close to the new road and adjacent to the developed area of Bexhill gives the introduce effective public transport and other more sustainable alternatives to the private car.

30 Scheme includes 2000 additional jobs, 48000 square metres of business floor space and 2600 homes. The extra traffic generated will outweigh any relief provided by the road.

31 Limited demand for travel suggested by Stagecoach stating requirement of the new that they do not want to run a commercial bus service on the part of the development.
new road

32 Complementary measures around the wider Hastings and Bexhill area through the Local Transport Plan programme should address any issues which may arise from increased traffic flow on a small number of roads in Hastings, including The Ridge and Gillsman's Hill

33 Essential that the Baldslow Junction scheme is constructed the flow of traffic in parallel with the Link Road
Highways Agency and is

5 The extra traffic is built into the traffic forecasts, which still show substantial relief to the A259 and other

1 Discussions are on-going with Stagecoach to introduce services along the BHLR. It will also be a development in NE Bexhill to introduce effective bus services using the BHLR as well as infrastructure as

1 These will be brought forward through the emerging Hastings and Bexhill Local Area Transport Strategy.

2 Whilst the BHLR will function adequately in isolation, the inclusion of the A21 Baldslow scheme will improve through the area of Junction Road/A21/A28 and The Ridge. This new link is being developed by the anticipated that development will commence in 2013/14.

Heading	Sub	Comment	No. of Representations	Response
	34	Desirability and prospect of A21 link to Baldslow to be considered the flow of traffic Highways Agency and is	10	Whilst the BHLR will function adequately in isolation, the inclusion of the A21 Baldslow scheme will improve through the area of Junction Road/A21/A28 and The Ridge. This new link is being developed by the anticipated to be complete in 2011/12.
	35	Only car users will benefit from a new road and that will be Bexhill Road, amongst substantial facilities for short-lived, as traffic overall is predicted to increase by 14% with the road, do that the new road will simply fill up over time, as all new roads do	14	Bus priority measures will be built into the BHLR and the substantial relief that will be afforded to the A259 others, will enable better services to be run on the existing route. The BHLR scheme will also incorporate pedestrians, cyclists and equestrians and it is only part of a wider transport strategy.
	36	The road scheme, at best, may remove traffic from one the A259 Bexhill residential area on the A259, but only to dump it into another measures that will help residential area, which holds three schools and which is composed of roads entirely unsuitable for the volume of traffic which will arise	359	While some areas will experience increased traffic flows, other areas will experience traffic relief, in particular Road Air Quality Management Area. It also enables the introduction of more effective bus services and other to reduce the reliance on the private car.
	37	This is not a long term solution to the problem on the A259, the BHLR is initially just a redistribution of the congestion	66	Measures will be implemented on the relieved A259 to "lock-in" the benefits to public transport accrued when opened.
	38	Hastings Crematorium is located on The Ridge and this generates very slow moving traffic at frequent intervals throughout the day	3	This is unlikely to have a significant impact on the operation of The Ridge.
	39	Increased congestion affects emergency vehicles on The Ridge emergency route	19	The situation will be carefully monitored and appropriate measures will be introduced if necessary.
	40	Access has not been given enough consideration, access at application and its each end doesn't appear safe. What's going to happen in Bexhill? A slip road? A roundabout	10	There are full details of the proposed junctions at either end of the BHLR contained within the planning accompanying documents such as the Design and Access Statement.
	41	Increase in traffic and traffic related problems between Traffic and Transport Bexhill and Hastings	19	The proposed BHLR will greatly reduce the traffic related problems between Bexhill and Hastings. The chapter of the ES gives details.
	42	By-pass and motorway is the more preferable option considered that these	7	Whilst the bypasses may have had certain advantages over the current scheme, the then Secretary of State were outweighed by disadvantages that the current scheme and associated initiatives seeks to address.
	43	Ruin the pleasant towns of Bexhill and Hastings and St Leonards	2	The proposed scheme will have some advantages to Bexhill and Hastings.
	44	The Highway Authorities haven't given clear unequivocal	3	The Highways Agency and Highway Authority support the principle of the BHLR.

support/commitment to the scheme

45 Reduced travel times will be only a few minutes and are life of the scheme. therefore insignificant in real terms over the year of average journeys - significantly distorted view of transport benefits

J Agriculture And Forestry

1 Disagree that impact on woodland would be "minor positive" minimised by the route alignment (ES) mitigation. Land will be

2 Unacceptable loss of 0.4 hectares of ancient woodland Chapters 12 and 13. The woodland. Large areas 2:1

3 Not possible to mitigate loss of ancient woodland minimised by the route alignment mitigation. Land will be

4 Would result in direct loss of 0.4 hectares of woodland and minimised by the route alignment damage at least four other areas of woodland mitigation. Land will be

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2 Small reductions in travel times for the individual accrue into significant benefits across the population for the

1 Noted, these impacts are covered in the ES in Chapters 12 and 13. The loss of woodland has been which attempts to avoid significant trees and woodland. Large areas of woodland will be planted as provided as compensation for habitat loss at a ratio of 2:1

16 Refer to section 8 of the Design and Access Statement. Noted, these impacts are covered in the ES in loss of woodland has been minimised by the route alignment which attempts to avoid significant trees and of woodland will be planted as mitigation Land will be provided as compensation for habitat loss at a ratio of

16 Noted, these impacts are covered in the ES in Chapters 12 and 13. The loss of woodland has been which attempts to avoid significant trees and woodland. Large areas of woodland will be planted as provided as compensation for habitat loss at a ratio of 2:1

37 Noted, these impacts are covered in the ES in Chapters 12 and 13. The loss of woodland has been which attempts to avoid significant trees and woodland. Large areas of woodland will be planted as provided as compensation for habitat loss at a ratio of 2:1

Heading	Sub	Comment	No. of Representations	Response
	5	Strongly object whilst any woodland remains in the route of minimised by the route alignment the road mitigation. Land will be	2	Noted, these impacts are covered in the ES in Chapters 12 and 13. The loss of woodland has been which attempts to avoid significant trees and woodland. Large areas of woodland will be planted as provided as compensation for habitat loss at a ratio of 2:1
	6	Proposed Greenfield development in association with road areas will ensure that will bring further loss of woodland of any proposed	4	The proposed development is in the adopted Rother District Local Plan. The detailed design briefs for these significant landscape features such as semi-natural ancient woodland and other woodland is retained as part development.
	7	Woodland sites will retain their ancient characteristics if they minimised by the route alignment remain unthreatened mitigation. Land will be	2	Noted, these impacts are covered in the ES in Chapters 12 and 13. The loss of woodland has been which attempts to avoid significant trees and woodland. Large areas of woodland will be planted as provided as compensation for habitat loss at a ratio of 2:1
	10	Would result in the loss of ancient woodland minimised by the route alignment mitigation. Land will be	345	Noted, these impacts are covered in the ES in Chapters 12 and 13. The loss of woodland has been which attempts to avoid significant trees and woodland. Large areas of woodland will be planted as provided as compensation for habitat loss at a ratio of 2:1
	11	Opening the eastern edge of Bexhill for residential areas will ensure that development will result in further damage and loss of ancient of any proposed woodland	298	The proposed development is in the adopted Rother District Local Plan. The detailed design briefs for these significant landscape features such as semi-natural ancient woodland and other woodland is retained as part development.
	12	The road would negatively impact and in some cases land directly affected by destroy over 26 hectares of best farmland in area	20	Agricultural impacts are dealt with in Chapter 7 of the ES and the impact on the most versatile Agricultural the scheme needs to be assessed in the light of government guidance in PPS7.
K Geology And Soils				
	1	Potential for land subsidence considered a detailed	1	The potential for these impacts are covered in the Environmental Statement, but to much extent can be engineering aspect.
L Water Quality, Watercourses And Drainage				
	3	Scheme will have adverse effect in construction and surveyed for flora and fauna in operation on important biodiversity resource of rivers, will prevent run off by	3	The quality of water in the ditches and in the Combe Haven has deteriorated since the area was last the mid 1990s. This has had an adverse effect on the flora in ditches and reed beds. Mitigation of the road

watercourses, ditches and floodplain
where swales will not

improve water quality.

Environment Agency will

6 Despite claims, there will undoubtedly be an impact on the
surveyed for flora and fauna in
water quality of ditches, which will impact on flora and fauna
will prevent run off by

where swales will not

improve water quality.

Environment Agency will

13 Proposals will impact on water levels at Filsham Reedbed
scheme and should

14 No prediction of the potentially considerable effects on water
Environment Agency will
levels downstream of works

18 The new wetland area to be created as mitigation for the
the new water body
severance on the Powdermill Valley will be receiving polluted
habitats. The

run off from the road and will not replace the habitat found
in a stream

19 Structures will have significant impacts on water bodies,
dealt with as outlined
habitats and wildlife through the use of salt in winter, the
lay-bys.

flow of pollutants from the surface of the road, and the
dumping of rubbish, garden waste, etc

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the provision of sustainable drainage systems including swales where possible and pollution interceptors,
work due to road gradients. It is anticipated that the proposed mitigation and compensation measures will
Management of the water levels in the ditches will be improved as part of the compensation work. The
monitor water quality and control any potential impacts during construction and operation.

1 The quality of water in the ditches and in the Combe Haven has deteriorated since the area was last
the mid 1990s. This has had an adverse effect on the flora in ditches and reed beds. Mitigation of the road
the provision of sustainable drainage systems including swales where possible and pollution interceptors,
work due to road gradients. It is anticipated that the proposed mitigation and compensation measures will
Management of the water levels in the ditches will be improved as part of the compensation work. The
monitor water quality and control any potential impacts during construction and operation.

2 The comments above apply to water quality and levels in the reed beds. These will not be affected by the
improve with the development and future management objectives of the countryside park.

1 Management of the water levels in the ditches will be improved as part of the compensation work. The
monitor water quality and control any potential impacts during construction and operation.

1 As above Sustainable Drainage systems will include filtration reed beds and swales to prevent pollution of
with road run off. Maintenance and management of stream channels and ditches will improve these potential
Powdermill Stream will not be affected by road run off.

1 The design of the structures has been done to Environment Agency requirements and road runoff will be
above. There will be little scope for dumping on the road edges as there would be no access side roads or

Heading	Sub	Comment	No. of Representations	Response
	20	Notwithstanding the mitigation measures out; lined in the ES, dealt with as outlined concerned about residual run-off from the road and fuel spillage, and the potential impacts on sensitive grassland and reed bed habitats	2	The design of the structures has been done to Environment Agency requirements and road runoff will be above. There will be little scope for dumping on the road edges as there would be no access side roads or
	23	Clarification needed of how proposed drains as mitigation for water runoff. runoff in construction phase has been considered with regard to storm/flooding events	1	The application is accompanied by a Flood Risk Assessment together with proposals to handle surface
	24	Impact on the quality of water dealt with as outlined lay-bys.	3	The design of the structures has been done to Environment Agency requirements and road runoff will be above. There will be little scope for dumping on the road edges as there would be no access side roads or
	25	Impact on Combe Haven flood plain is dangerously not related to flooding unacceptable and building underground flood water storage tanks (at immense unquantified cost) is not a fool proof alternative to allowing the valley to flood naturally and effectively	1	The storage tanks are to be provided in the urban area only to relieve flooding of the Egerton Stream and are in the Combe Haven Valley.
M Air Quality				
	1	Nitrogen oxide levels along the line of the road will increase with deposits of nitric acid being "significant. This has the potential to cause damage to adjacent ecosystems" (ES). The ecosystems being damaged are the ones the current route is trying to save	5	Refer to clause 7.4 in the Design and Access Statement
	2	The predicted 26000 vehicles using the road daily will raise levels of nitrogen oxides resulting in a significant increase in nitric acid deposition	3	Refer to clause 7.4 in the Design and Access Statement
	3	Significant deleterious effects on air quality	18	The Environmental Statement describes the air quality impacts and mitigation arrangements.
N Noise And Vibration				
	1	Vehicle speed monitoring would reduce noise but no speed limit has been specified	4	Speed limits would be in accordance with national speed limits for the category of road.
	2	Noise barriers could be provided but these would add to the barriers has been kept to visual intrusion of the road use 'Green Screens'	2	Speed limits would be in accordance with national speed limits for the category of road. The use of noise a minimum in the rural areas, where extensive mounding is to be used to reduce noise impacts. The scope to

landscape.

3 High level of noise introduced to very sensitive environmental areas from construction and operation and no mitigation was to reduce the proposed mitigation aims was to reduce the above

4 Noise impacts appear to be significant in the rural section in particular. The tranquil nature of the whole area will be destroyed mitigation aims was to reduce the above

5 Traffic noise is likely to ruin the tranquillity of Crowhurst village on the valley are to be mitigation aims was to reduce the above

6 The number of cars on the road is likely to be 16000 on the day of opening and this number will increase. East Sussex expects an increase of 31.8% in vehicle miles travelled by 2025. Increase in noise levels is associated with sleeplessness, irritability, and ultimately ill health

and other less intrusive types of noise barrier will be investigated where these are prominent in the local

11 Speed limits would be in accordance with national speed limits for the category of road. The noise impacts mitigated as described in the ES, and addendum, Chapter 11, Noise and Vibration. One of the main 50db noise level in the rural area. Impact on tranquillity is referred to in impacts on Combe Haven Valley

13 Speed limits would be in accordance with national speed limits for the category of road. The noise impacts mitigated as described in the ES, and addendum, Chapter 11, Noise and Vibration. One of the main 50db noise level in the rural area. Impact on tranquillity is referred to in impacts on Combe Haven Valley

9 Speed limits would be in accordance with national speed limits for the category of road. The noise impacts mitigated as described in the ES, and addendum, Chapter 11, Noise and Vibration. One of the main 50db noise level in the rural area. Impact on tranquillity is referred to in impacts on Combe Haven Valley

5 Speed limits would be in accordance with national speed limits for the category of road.

Heading	Sub	Comment	No. of Representations	Response
	7	The methodology for controlling the impact of noise resulting from the proposed road is unclear and appears poorly considered	3	Speed limits would be in accordance with national speed limits for the category of road.
O Nature Conservation, Wildlife And Biodiversity				
	1	Does not demonstrate innovation in mitigation and a commitment to enhance biodiversity, required by development of this nature and scale	3	The compensation and mitigation measures are assessed against the relevant development plan policies considerations.
	2	Mitigation strategy fails to address significance of ecologically valuable and priority UK BAP habitats, causing disruption of ecological networks, and habitat isolation and fragmentation Further measures will be provision for dormice. the detailed design.	3	Refer to Part 7 of the Design and Access Statement. Extensive surveys have been carried out of potential which may be affected by the scheme. All designated wildlife areas have been avoided apart from a small of Marline Woods SSSI. All other semi natural habitats have been avoided where possible. The additional land acquisition addresses the need to create networks and prevent fragmentation of habitats. put in to allow free movement of mammals across the road in the form of badger and amphibian tunnels and Further measures, such as providing nets to guide bats over the road, are also being researched as part of
	3	Loss and disruption of ecologically valuable and UK BAP habitat without adequate mitigation	2	The compensation and mitigation measures are assessed against the relevant development plan policies considerations.
	4	Potential impact on protected species not adequately assessed or mitigated for Further measures will be provision for dormice. the detailed design.	5	Refer to Part 7 of the Design and Access Statement. Extensive surveys have been carried out of potential which may be affected by the scheme. All designated wildlife areas have been avoided apart from a small of Marline Woods SSSI. All other semi natural habitats have been avoided where possible. The additional land acquisition addresses the need to create networks and prevent fragmentation of habitats. put in to allow free movement of mammals across the road in the form of badger and amphibian tunnels and Further measures, such as providing nets to guide bats over the road, are also being researched as part of
	6	Proposed ecological mitigation is inadequate and is not supported by sufficient evidence to guarantee a successful	3	Refer to Part 7 of the Design and Access Statement. Extensive surveys have been carried out of potential which may be affected by the scheme. All designated wildlife areas have been avoided apart from a small

area at the southern end
outcome
compensation measures and

Further measures will be

provision for dormice.

the detailed design.

7 Several impacts on nature conservation and biodiversity are considered unknown in the ES and not addressed. Therefore cannot be mitigated

8 Mitigation strategy is in part described as aspirational and management of the offers little evidence that it will be successful monitoring of these habitats

9 Mitigation and compensation strategy focuses on individual Part 7. issues and sites but fails to address landscape ecology and the functional aspects of the ecological network in the area

10 Mitigation should not take place on habitats required by key habitat. The landscape species or habitats valuable to wildlife; nor should habitat be compensation will not be created alongside the road the road will provide

close to the road and even

12 Feasibility of mitigation options must be demonstrated

13 ES conclusion that "slight adverse and therefore not significant" overall impact of scheme on nature conservation and biodiversity interest is wrong

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of Marline Woods SSSI. All other semi natural habitats have been avoided where possible. The

additional land acquisition addresses the need to create networks and prevent fragmentation of habitats.

put in to allow free movement of mammals across the road in the form of badger and amphibian tunnels and

Further measures, such as providing nets to guide bats over the road, are also being researched as part of

1 We would need more specific information on which aspects have not been addressed.

2 A management plan for wildlife compensation habitats will be a requirement of the planning application. The compensation habitats areas would be secured as part of the management plan. There will be ongoing as part of the management plan.

1 Ecological networks have been considered in developing the Wildlife Design, Design and Access Statement,

1 The landscape mitigation for the road should not be confused with the compensation land being provided as mitigation of bunding, planting and flood relief will not directly impact on existing habitats. Land provided for physically affected by the scheme but will be managed to improve the habitat. The land provided to mitigate potential habitats as added value to the wildlife compensation measures. Many species will thrive happily on the road verges.

1 Refer to the ES and Design and Access Statement.

5 Noted.

Heading	Sub	Comment	No. of Representations	Response
	15	Effects on habitats by roads extend up to 1km from road and other national centre point	3	The compensation and mitigation measures are assessed against the relevant development plan policies considerations.
	18	Long term management of habitats needs to be addressed planning application.	2	A management plan for all mitigation and compensation landscape areas can be conditioned as part of the
	19	Biodiversity will be adversely affected because a man-made designated habitats. By running matrix of habitats bisected by a busy main road will not and Filsham Reed necessarily support the same suite of species will ensure continuity	5	The mitigation measures associated with the road have attempted to minimise fragmentation of the across the north of the valley, habitats within the valley will not be fragmented notably the Combe Haven SSI Beds. The EA requirement to provide bridges, with clear spans across water bodies, instead of causeways of habitats across the wetland areas.
	20	Not enough account taken of impacts of bisecting a wildlife designated habitats. By running corridor and the ensuing fragmentation that will occur and Filsham Reed will ensure continuity	1	The mitigation measures associated with the road have attempted to minimise fragmentation of the across the north of the valley, habitats within the valley will not be fragmented notably the Combe Haven SSI Beds. The EA requirement to provide bridges, with clear spans across water bodies, instead of causeways of habitats across the wetland areas.
	23	Scheme will result in severance of existing and newly designated habitats. By running created wetlands, and a watercourse from Combe Haven and Filsham Reed SSSI and other wetland habitats. This will prevent migration will ensure continuity and transfer of species and alter the ecological function of the whole valley	1	The mitigation measures associated with the road have attempted to minimise fragmentation of the across the north of the valley, habitats within the valley will not be fragmented notably the Combe Haven SSI Beds. The EA requirement to provide bridges, with clear spans across water bodies, instead of causeways of habitats across the wetland areas.
	24	The impacts of severance of wildlife areas cannot be designated habitats. By running mitigated with the proposed road design. Proposed wildlife and Filsham Reed corridors are inadequate will ensure continuity	2	The mitigation measures associated with the road have attempted to minimise fragmentation of the across the north of the valley, habitats within the valley will not be fragmented notably the Combe Haven SSI Beds. The EA requirement to provide bridges, with clear spans across water bodies, instead of causeways of habitats across the wetland areas.
	25	Concern about mitigation for loss of wet grassland and fen semi-natural habitats have habitats and their severance from floodplain habitats valleys. The severance issues	1	Designated wetland habitats have been largely avoided by the road alignment, impact on non- designated been minimised. Extensive new wetland is to be created in the Combe Haven and Powdermill Stream relating to wetland is addressed above.

30 Scheme will result in severance of habitats and loss of key designated habitats. By running ecological network features and Filsham Reed will ensure continuity

32 Scheme will lead to fragmentation and habitat loss that will designated habitats. By running disrupt the ecological functioning of the area as part of the and Filsham Reed wider ecological network. This will impact on the movement will ensure continuity of species, including protected species

35 Loss of wildlife habitat through damage to at least four Access Statement and blocks of woodland Nature at the time of for lost habitats. The

36 Loss of wildlife habitat through damage to the ancient semi natural woodland close to the Marline Valley Woods SSSI

38 Will affect other blocks of woodland (than ancient woodland) compensate for loss of trees which high biodiversity

46 Loss of semi natural habitats adjacent to woodland has habitats and species adverse impact on species which require different habitats area at the southern end in close proximity. Those that survive are becoming isolated; compensation measures and Chapel Wood, Park Wood and Buckholt Farm SNCI will be Further measures will be particularly affected by this during construction and provision for dormice. operation of the scheme the detailed design.

1 The mitigation measures associated with the road have attempted to minimise fragmentation of the across the north of the valley, habitats within the valley will not be fragmented notably the Combe Haven SSI Beds. The EA requirement to provide bridges, with clear spans across water bodies, instead of causeways of habitats across the wetland areas.

7 The mitigation measures associated with the road have attempted to minimise fragmentation of the across the north of the valley, habitats within the valley will not be fragmented notably the Combe Haven SSI Beds. The EA requirement to provide bridges, with clear spans across water bodies, instead of causeways of habitats across the wetland areas.

18 These issues are dealt with in Chapter 11 of the ES and Addendum. Also refer to Part 7 of The Design and Addendum. The compensation measures have been designed in consultation with Natural England (English design.) The compensation land areas have been provided at a ratio of 2 :1 habitat land area to compensate mitigation and compensation landscape areas are unusually extensive for a scheme of this scale.

2 A small area of the Marline Woods will be lost and compensation woodland provided.

30 Woodland areas have been avoided as far as possible. Large areas of new woodland planting will and woodland.

1 Refer to Part 7 of the Design and Access Statement. Extensive surveys have been carried out of potential which may be affected by the scheme. All designated wildlife areas have been avoided apart from a small of Marline Woods SSSI. All other semi natural habitats have been avoided where possible. The additional land acquisition addresses the need to create networks and prevent fragmentation of habitats. put in to allow free movement of mammals across the road in the form of badger and amphibian tunnels and Further measures, such as providing nets to guide bats over the road, are also being researched as part of

Heading	Sub	Comment	No. of Representations	Response
	47	Noise and light intrusion will have large effect on species in mitigated by the presence of the woodlands	1	The route will not be lit apart from at the junctions at Queensway and Belle Hill. Car headlights will be noise fencing and bunding along the length of the road. This is assessed in Chapter 13, noise is assessed in
Chapter 11				
	48	Any surface water run off, water pollution and alterations to local hydrology of the streams which create the ghyll woodland habitat in Churchwood complex and Marline Valley SSSI will have a major adverse effect on the wildlife	1	There is no evidence that Marline Valley or Churchwood will be affected by changes in water quality or flow. remote from the impacts of the road and run off will be dealt with as outlined in section L above.
These areas are				
	51	There is no mitigation to address the effect of noise on and other national animal and bird species	2	The compensation and mitigation measures are assessed against the relevant development plan policies considerations.
	54	No mitigation is proposed to address current declines in and ongoing management breeding lapwing, redshank and snipe further improve management.	1	The compensation and mitigation measures are not species specific. However the general habitat creation should improve wetland habitats for breeding birds generally. The development of the countryside park will conditions for breeding birds by addressing long term management in the valley and also visitor
	55	There are no specific mitigation measures for the loss in and ongoing management skylark habitat and the potential effect on breeding further improve management.	1	The compensation and mitigation measures are not species specific. However the general habitat creation should improve wetland habitats for breeding birds generally. The development of the countryside park will conditions for breeding birds by addressing long term management in the valley and also visitor
	59	The construction impacts will have a greater impact on bird species than suggested	3	This issue is examined in the Environmental Statement.
	65	Impact of artificial lighting on bats is underestimated	1	There is limited illumination of the road, restricted to a part of the urban sections.
to reduce the	67	Severity of impact on bats from severance of foraging and commuting lines not assessed; doubts about proposed mitigation	1	Mitigation for bats is part of the detailed design to be conditioned. The use of net fences is to be considered severance impact of hedges. Bat boxes are to be provided on the structures.
	70	Assessments of dormice are inadequate, unclear and that licences for contradictory in ES (details)	2	Further detailed work may need to be carried out with regard to dormice. There is no evidence to suggest translocation of species would not be issued.
	71	EPS mitigation licence unlikely to be issued for dormice that licences for	2	Further detailed work may need to be carried out with regard to dormice. There is no evidence to suggest translocation of species would not be issued.

P Landscape And Visual Effects

1 Scheme will not achieve protection of important landscapes above. The alignment and

2 Landscape impacts are likely to be more strongly negative than described in ES

3 Road traverses a high quality landscape

4 Countryside Agency doubts that adverse impact on landscape of Blue Route is "slight to moderate" are still an issue

5 Importance of high design standards in ensuring that Link Road presents a 'welcoming' approach to Bexhill

6 It will affect the visual appearance of Hastings Road are distant and limited

parts of Hastings,

7 The South has suffered from development of all kinds, being access to local services.

within reach of London, protection of green space not cars identified as being necessary for is needed areas of the rural county

Q Cultural Heritage

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5 No designated landscape will be directly affected. There will be negligible impacts on the AONB, see E

mitigation measures have been designed to minimise impact on the Combe Haven Valley, see H above.

3 Noted

2 Refer to E and H above.

1 Landscape impacts are detailed in Chapter 13 of the ES and the Addendum to this.

1 Acknowledged and this is detailed in the Design and Access Statement and Addendum to this.

1 There will be no significant visual impacts on the town of Hastings. Views to the road from Harley Shute to glimpses. Detailed visual impacts are described in Chapter 13 of the ES. The scheme will reduce traffic in notably the sea front conservation area.

2 The scheme will open up opportunities for sustainable development close to the centre of Sidley with good The proposed development North of Bexhill is in the Rother District Local Plan. The road has been the economic regeneration of the areas of Bexhill and Hastings. This will help to protect the more sensitive from dispersed development.

Heading	Sub	Comment	No. of Representations	Response
	2	Will there be a detailed archaeological survey of this historic includes Field Walking, Desk landscape, particularly the area around Wilting? Investigation has been made not to carry this This will be carried out	1	Refer to Chapter 14 of the Environmental Statement. A full Stage 1 survey has been carried out. This top studies and a LiDAR survey and geoarchaeology studies. Geophysical mapping and a Written Scheme prepared to inform Stage 2. Stage 2 will involve trenching along the line of the route. A client decision was work out prior to the planning submission. This was to avoid disruption to working farms and local residents. prior to construction.
	4	Planning permission should not be determined until further includes Field Walking, Desk archaeological investigation has been undertaken (over and Investigation has been above that in the ES) made not to carry this This will be carried out	2	Refer to Chapter 14 of the Environmental Statement. A full Stage 1 survey has been carried out. This top studies and a LiDAR survey and geoarchaeology studies. Geophysical mapping and a Written Scheme prepared to inform Stage 2. Stage 2 will involve trenching along the line of the route. A client decision was work out prior to the planning submission. This was to avoid disruption to working farms and local residents. prior to construction.
	6	Planning permission should not be determined until various addressed. unresolved issues relating to the evaluation of cultural heritage and mitigation of impacts on it are clarified	2	The County Archaeologist and English Heritage are satisfied that unresolved issues have now been
	7	Cannot be confident that all or most significant impacts on process. A mitigation archaeology can be mitigated because of inadequate archaeological understanding of archaeological resource	1	The Stage 1 assessment goes a long way to identifying potential issues. The Stage 2 will further inform this strategy will be developed to address this. A risk register will be produced to inform the applicant of potential constraints to progress of the works.
	8	Cumulative impacts on heritage appear to be important and potential impacts on any understand that further work is required to assess the impacts on an Archaeologically Sensitive Area	1	There will be no direct impacts on an ASA. The above site analysis at Stages 1 and 2 will address the sensitive areas.
	17	Cultural heritage (archaeological sites, hedgerows, historical The old railway bridges structures) would be directly and negatively impacted full impacts and	15	The impact on significant features is described in detail in the ES. There will be a loss of sections of hedges. will be lost in the urban area. The setting of some listed buildings will be affected, notably Adam's Farm. The proposed mitigation are described in full in the ES.
	18	9 Listed buildings will be affected The old railway bridges full impacts and	6	The impact on significant features is described in detail in the ES. There will be a loss of sections of hedges. will be lost in the urban area. The setting of some listed buildings will be affected, notably Adam's Farm. The

S Social And Community Effects

- 1 EIA should include reference to consequences of building currently not a particular road through a fog pocket. Understand previous similar route was rejected for this reason
- 2 Would have greater and more destructive impact on Wishing Tree residential area than previously proposed bypass Wishing Tree area as a scheme in its entirety
- 3 Will have a severe detrimental effect on the village of minor visual and other Crowhurst and its quality of life
- 4 Proposed greenfield development in association with the Worsham Ridge. There is no road may lead to Crowhurst becoming an adjunct of Hastings and Bexhill and the character of the area altered forever
- 5 Proximity of road to residential gardens planting. It will also
- 6 Negative impact on health of local people, increased risk of conditions such as asthma
- 7 Long term impact of light pollution, maintenance and access junction with and traffic incidents on local people
- 8 Negative impact on property prices

proposed mitigation are described in full in the ES.

- 19 Fog is not considered to be a particular issue. Many roads throughout the area experience fog, but there is incidence of fog related accidents.
- 2 The impact on the residential area of Wishing Tree will be much reduced when compared with the impact of proposed Bexhill and Hastings bypasses as this is a much smaller scale local road and does not use the main access into Hastings town centre.
- 20 There will be no direct impacts on Crowhurst. The area will experience a reduction in traffic and therefore benefits.
- 10 The future development of the Countryside Park will prevent the spread of development north of the current proposal as described.
- 9 The road will be close to residential gardens in the urban area. This will be mitigated with noise fencing and remove an area which is at present not managed and is subject to fly tipping.
- 12 The air quality impacts have been considered particularly in terms of the improvements in Bexhill Road
- 20 Light pollution will be insignificant as the road will not be lit apart from the urban junction at Belle Hill and the Queensway.
- 6 This is not a planning consideration.

Heading	Sub	Comment	No. of Representations	Response
	9	Proposed roads will neither serve the intended needs of this extensive consultation with deprived of roads area nor keep surrounding populace happy	15	The road has been developed as an integral part of the Five Point Plan regeneration strategy following the local populace.
	10	Proposed road is dangerous, Queensway's proposed designed and checked to junction has already claimed lives & it will again traffic speeds on the	16	Queensway's proposed junction cannot have already claimed lives, but the road and junctions have been conform to appropriate highway safety standards. The introduction of the junction will also tend to reduce southern section of Queensway and improve safety.
	12	What are the benefits	5	The benefits are detailed throughout the ES and its supporting documents.
T Flood Risk				
	1	It is absolute folly to build the road on a flood plain the Environment	30	Adequate flood mitigation measures have been incorporated into the scheme which have been agreed with Agency and are detailed in chapter 9 of the ES.
	2	Despite engineering and other technical solutions, unwise to the Environment build a new road through a valley known to flood and which may happen more frequently	34	Adequate flood mitigation measures have been incorporated into the scheme which have been agreed with Agency and are detailed in chapter 9 of the ES.
	3	The Flood Risk Assessment (FRA) is inadequate	5	The Flood Risk Assessment has been agreed by the Environment Agency.
	4	FRA does not comply with the requirements of PPS25 and other government guidance. Information has not been submitted as part of the planning application or FRA on evidence that the sequential test has been applied; evidence that the exception test (if required) has been applied; flood outlines, prior and post development and calculations; details of the proposed drainage systems (SuDs) and calculations; the residual risks of flooding	1	The Flood Risk Assessment has been agreed by the Environment Agency.
	5	The lower parts of Crowhurst village have been vulnerable separate matters. to flooding and the planning document states that "the flooding in Crowhurst. Environment Agency will not reject the Link Road even if improve the flooding Crowhurst cannot be protected." measures that could be	16	Since the implementation of the Link Road will not impact on the incidence of flooding in Crowhurst, they are Consequently the Environment Agency sees no need to object to the Link Road on the grounds that there is Nonetheless, the County Council did examine whether it was possible to implement measures that would situation in Crowhurst as part of the Link Road scheme, but it proved difficult to identify appropriate justifiably implemented.
U Combined /cumulative Effects				
	1	Benefits of scheme are far outweighed by its effects on the ES. The route	14	The overall assessment of impacts on the countryside were assessed as slight adverse in the conclusion to

countryside
route in terms of impact on

2 Do not accept that social and economic case for scheme the ES. The route outweighs the enormous environmental damage that will result route in terms of impact on

3 Not in public interest for Council to support a scheme, with the ES. The route questionable economic and transport benefits and many environmental disbenefits route in terms of impact on

4 Government turned down previous proposals for Hastings and carved across the Western and valley was dismissed Eastern Bypasses in 2001 because of weak regeneration and traffic relief arguments compared to severe environmental implications

5 Choose less expensive alternative which has benefit of regeneration benefits, even if improving the infrastructure was looked at economic performance of Hastings without diminishing the assumptions were tested in countryside setting in which it is enclosed would be required.

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alignment avoids designated landscapes and is tested to be the most cost effective and least damaging the environment.

13 The overall assessment of impacts on the countryside were assessed as slight adverse in the conclusion to alignment avoids designated landscapes and is tested to be the most cost effective and least damaging the environment.

9 The overall assessment of impacts on the countryside were assessed as slight adverse in the conclusion to alignment avoids designated landscapes and is tested to be the most cost effective and least damaging the environment.

2 The alignment of the Western bypass would have severed the valley, been impossible to mitigate visually middle of the SSSI . The bypass road would also have been a dual carriageway. The route option across the for these reasons.

1 Access to Hastings concluded that without the bypasses there would not be potential for substantial all the other measures were implemented. This identified need for substantial investment in transport as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road

Heading	Sub	Comment	No. of Representations	Response
	6	Environmental damage caused by the scheme is unacceptable the ES. The route route in terms of impact on	61	The overall assessment of impacts on the countryside were assessed as slight adverse in the conclusion to alignment avoids designated landscapes and is tested to be the most cost effective and least damaging the environment.
	7	ESCC must be satisfied that the proposal is the most appropriate scheme for a link road between Bexhill and Hastings to deliver regional and sub-regional social and economic regeneration, housing and infrastructure objectives, in line with Policies SCT1, SCT2, SCT6, SCT7, SCT9 and CC5 of the draft South East Plan	1	The application will be considered against the development plan policies for the area including those in the can now be given substantial weight in development control terms.
	9	Impacts have been looked at in a wide study area so outweigh the negative impacts in the immediate vicinity of the road are 'cancelled out' by benefits to residents in other areas	1	The benefits of traffic reduction in other areas has been assessed for completeness but is not considered to environmental impacts in the valley.
	11	Cumulative impacts of the road and associated development that the benefits of should be assessed as part of the application	1	The Traffic Forecasting Report concluded that the scheme was robust against the effects induced traffic. i.e. the scheme would outweigh any potential disbenefits caused by the effects of induced traffic.
	13	Not possible to adequately mitigate against the environmental damage this scheme will result in	3	Refer to the ES for all mitigation.
	16	Large proportion of mitigation dependent on HLESS whose budget is already squeezed. So already inadequate mitigation will not necessarily be applied in full, and therefore even less likely to offset high level of environmental damage from the scheme	2	The nature and scope of any necessary mitigation is determined against the impacts of the development.
	18	Concern that there will be future pressures to extend the Rother developed area out towards the line of the new road, engulfing more countryside	24	The future development of the countryside park will be important in countering these pressures. This is not Local Plan.
	19	The environmental impact of the road (and its associated development) on Combe Haven would be unacceptable in terms of landscape, heritage, wildlife, water quality, noise and pollution	1,399	Refer to the ES and Design and Access Statement and Addenda.
V Local Economy, Regeneration And Associated Development				
	1	The scheme is not a necessary condition for economic regeneration benefits, even if growth in the area	22	Access to Hastings concluded that without the bypasses there would not be potential for substantial all the other measures were implemented. This identified need for substantial investment in transport

infrastructure was looked at
assumptions were tested in
would be required.

2 Scheme is not essential for regeneration and to service the
regeneration benefits, even if
proposed development north of Bexhill
infrastructure was looked at
assumptions were tested in
would be required. More
Agency have indicated
through Bexhill until

3 Link Road is irrelevant to, and would be likely to jeopardise,
regeneration benefits, even if
economic regeneration of the area
infrastructure was looked at
assumptions were tested in
would be required.

4 The approach to economic regeneration focuses on growing
regeneration benefits, even if
the existing manufacturing base and building on knowledge
infrastructure was looked at
based industries and tourism. Regenerating the environment
assumptions were tested in
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as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's
the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road

18 Access to Hastings concluded that without the bypasses there would not be potential for substantial
all the other measures were implemented. This identified need for substantial investment in transport
as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's
the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road
road capacity is required to accommodate the traffic generation from the new development. The Highways
that they would be minded to refuse any new development that would have an impact on the A259 trunk road
the link road or similar had been implemented.

31 Access to Hastings concluded that without the bypasses there would not be potential for substantial
all the other measures were implemented. This identified need for substantial investment in transport
as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's
the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road

6 Access to Hastings concluded that without the bypasses there would not be potential for substantial
all the other measures were implemented. This identified need for substantial investment in transport
as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's

Heading	Sub	Comment	No. of Representations	Response
		and enhancing the quality of life are critical to success. The road and associated business park are irrelevant or highly damaging to this vision. Any short term gain from development would be dwarfed by longer term increases in traffic and car dependency		the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road
	5	Hastings should build on strengths of its 'environmental regeneration benefits, even if economy'; this would be undermined by Link Road infrastructure was looked at assumptions were tested in would be required.	1	Access to Hastings concluded that without the bypasses there would not be potential for substantial all the other measures were implemented. This identified need for substantial investment in transport as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road
	6	Wealth generated from more locally based 'environmental regeneration benefits, even if economy' and sustainable transport strategy would be more infrastructure was looked at likely to stay in the area and strengthen local economy assumptions were tested in would be required.	4	Access to Hastings concluded that without the bypasses there would not be potential for substantial all the other measures were implemented. This identified need for substantial investment in transport as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road
	7	Regeneration should be linked to a low carbon economy within the Environmental government guidance in Planning	2	The application is accompanied by a Sustainability Appraisal together with an assessment of emissions Statement. The consideration of the information is necessary against development plan policies and Policy Statement 1 (PPS1).
	8	Scheme could undermine the "Five Point Plan" for the area	1	The scheme is part of the Five Point Plan.
	9	Road is not required to service proposed housing and regeneration benefits, even if industrial development areas in north Bexhill infrastructure was looked at assumptions were tested in would be required. More Agency have indicated through Bexhill until	8	Access to Hastings concluded that without the bypasses there would not be potential for substantial all the other measures were implemented. This identified need for substantial investment in transport as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road road capacity is required to accommodate the traffic generation from the new development. The Highways that they would be minded to refuse any new development that would have an impact on the A259 trunk road

10 More modest development proposal could be serviced with Highways Agency have shorter roads linked to the existing network in Bexhill; with a trunk road through package of smarter choice measures planned in to being developed and development road capacity.

11 Government's consultants do not agree with the number of favourable conditions for it to jobs to be created by the new business park development

12 Will the necessary inward investment for the business park favourable conditions for it to happen?

13 Government's consultants note that the new business park favourable conditions for it to may well attract businesses from business parks in Hastings

14 Business sites would not attract inward investment but favourable conditions for it to would be occupied by relocations from firms in town, thus increasing journey to work and weakening town centre economies

16 Any new job creation from business parks opened up by the favourable conditions for it to road is likely to be at the expense of jobs created in the centres of Hastings, St. Leonards and Bexhill

17 Once the greenfield land has been "opened up", other favourable conditions for it to business and leisure activities can relocate to outside the towns, lessening chances of a successful revival of the deprived town centres of Hastings and St. Leonards, contrary to government policy

the link road or similar had been implemented.

1 More road capacity is required to accommodate the traffic generation from the new development. The indicated that they would be minded to refuse any new development that would have an impact on the A259 Bexhill until the link road or similar had been implemented. A programme of Smarter Choice measures is implemented. The overall impact of the Smarter Choice measures is limited leaving a need for additional

6 The necessary inward investment cannot be guaranteed; all that can be done is to create the most occur. The Five Point Plan regeneration package sets out the strategy for that to occur.

1 The necessary inward investment cannot be guaranteed; all that can be done is to create the most occur. The Five Point Plan regeneration package sets out the strategy for that to occur.

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11 The necessary inward investment cannot be guaranteed; all that can be done is to create the most occur. The Five Point Plan regeneration package sets out the strategy for that to occur.

Heading	Sub	Comment	No. of Representations	Response
	18	There is land suitable for local business expansion other than the business park in north Bexhill	2	North Bexhill was determined as the most suitable location through the Rother Local Plan process including a public inquiry.
	19	There are more attractive locations for inward investment including a public inquiry. than the business park in north Bexhill	2	North Bexhill was determined as the most appropriate location through the Rother Local Plan process
	20	Link Road would not make area more accessible to wider UK road linking the two towns. locally.	3	The BHLR will not make Bexhill and Hastings significantly more accessible to the wider UK as it is a local road linking the two towns. It will relieve a bottleneck on the strategic road network that will make the two towns more accessible
	21	Concerned that part of planning application for the road this application, would mean about 1100 homes and a 48000m2 business park of the link road to	11	Whilst the BHLR would help create the necessary conditions for additional development they are not part of although the likely traffic impacts of those developments have been assessed and built into the assessment ensure that they can be accommodated.
	22	Access to Hastings Multi Modal study found that 80% of the constructed since then that proposed housing could be delivered without the Link Road to refuse any new had been implemented.	1	Access to Hastings might have been correct at that time, but substantial new developments have been have used up the capacity on the network. The Highways Agency have indicated that they would be minded development that would have an impact on the A259 trunk road through Bexhill until the link road or similar
	23	Ample capacity for planned housing provision without the constructed since then that road to refuse any new had been implemented	3	Access to Hastings might have been correct at that time, but substantial new developments have been have used up the capacity on the network. The Highways Agency have indicated that they would be minded development that would have an impact on the A259 trunk road through Bexhill until the link road or similar
	24	5000 empty properties in Hastings undermine rationale for only 1745 properties scheme, especially as Link Road is proposed to assist in enable a satisfactory creation of more housing land were not the case,	6	It is not known where the figure of 5000 empty properties in Hastings came from. The latest estimate shows empty or 4.4% of the stock. It is generally recognised that at least 3% of the stock should be empty to turnover of properties. On that basis, the current proportion empty in Hastings is about right. Even if that however, the requirement for the new housing is over and above the existing housing stock.
	25	Any new road will undermine much needed public transport which currently prevents improvements seen as vital to the area's regeneration programme of	5	The new road will facilitate the provision of better bus services by relieving the congestion on the A259, reliable services from being run. In addition, there will be bus priority measures built into the new road and a

potential new station

26 Low car ownership but high car usage in Hastings and St. Leonards suggests opportunity for development of programme of sustainable transport in support of local economy potential new station

27 The claimed economic benefits for the road have not been demonstrated and regeneration within the towns may actually suffer being developed and road capacity. The conditions for it to occur.

28 Link road will increase congestion. Planners should publish regeneration benefits, even if details of estimated queuing time lengths and volumes for link infrastructure was looked at road traffic, so how much congestion will be introduced assumptions were tested in locally and how much longer local trips will take would be required.

29 It will put local farms out of business current government

W Transport Alternatives

1 The Link Road will simply shift traffic congestion and air Management Area and enable pollution around Hastings; it does not address existing transport problems

2 Scheme will not address current transport problems Management Area and enables

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complimentary measures including additional bus infrastructure. The new road will also facilitate access to a at Wilting Farm.

2 The new road will facilitate the provision of better bus services by relieving the congestion on the A259, reliable services from being run. In addition, there will be bus priority measures built into the new road and a complimentary measures including additional bus infrastructure. The new road will also facilitate access to a at Wilting Farm.

1,561 More road capacity is required to accommodate the traffic generation from the new development. The indicated that they would be minded to refuse any new development that would have an impact on the A259 Bexhill until the link road or similar had been implemented. A programme of Smarter Choice measures is implemented. The overall impact of the Smarter Choice measures is limited leaving a need for additional necessary inward investment cannot be guaranteed; all that can be done is to create the most favourable The Five Point Plan regeneration package sets out the strategy for that to occur.

3 Access to Hastings concluded that without the bypasses there would not be potential for substantial all the other measures were implemented. This identified need for substantial investment in transport as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road

6 The impacts on agricultural enterprises would be considered in relation to development plan policies and guidance.

1,107 The Link Road will relieve the A259 reducing levels of pollution in the A259 Bexhill Road Air Quality the introduction of more effective public transport services

80 The Link Road will relieve the A259 reducing levels of pollution in the A259 Bexhill Road Air Quality the introduction of more effective public transport services

Heading	Sub	Comment	No. of Representations	Response
	3	Scheme sends out wrong messages about behaviour by effective bus services encouraging and promoting more car use and undermining investment in alternative transport modes	32	The Link Road is part of a wider package of transport measures and is essential to allow the introduction of between Bexhill and Hastings.
	4	Justification for the scheme is flawed and transport concluded that the road management alternatives to the road have not been adequately investigated	17	The scheme was developed following a series of transport studies that examined all modes and which would still be necessary as part of a wider regeneration package for the Bexhill and Hastings area.
	5	Alternative methods of transport management have not been concluded that the road adequately investigated	45	The scheme was developed following a series of transport studies that examined all modes and which would still be necessary as part of a wider regeneration package for the Bexhill and Hastings area.
	6	ESCC has never thoroughly assessed package of alternative concluded that the road measures to compare with the option of a Link Road in accordance with government guidance in GOMMS and in WebTAG	1	The scheme was developed following a series of transport studies that examined all modes and which would still be necessary as part of a wider regeneration package for the Bexhill and Hastings area.
	7	ESCC has not seriously considered alternative ideas for concluded that the road traffic management between Bexhill and Hastings	7	The scheme was developed following a series of transport studies that examined all modes and which would still be necessary as part of a wider regeneration package for the Bexhill and Hastings area.
	8	ESCC has promoted new road building as the only alternative the Hastings and to traffic management	4	The road will be developed in conjunction with a package of traffic management and other measures through Bexhill Local Area Transport Strategy.
	9	Cancel expensive scheme and fully appraise alternative there remains a residual recommendation that the BHLR options; on-line improvements to A259 to provide bus priority measures; car parking control and pricing measures; TravelSmart and other smarter choices measures; seafront shared path for walking and cycling; improved rail services and new satiations; Bexhill and Hastings as Sustainable Travel Demonstration Towns	5	The alternatives have been examined as part of earlier studies, but even after implementing such measures need for additional highway capacity between Bexhill and Hastings, hence the Secretary of State's scheme be progressed.
	10	What has happened to options other than road building example, effective bus published in Access to Hastings study and SoCoMMS priority and improved reports? Control and reduction of traffic by traffic management and car sharing schemes; improved bus services; 'metro' service; reinstatement of Polegate-	1	These are being pursued, but not all the proposals can be justified or delivered at the current time. For services cannot be implemented along the A259 until the Link road is implemented, but elsewhere, bus services (resulting in increasing patronage) have been implemented.

Pevensey rail chord; improvements to Hastings-Ashford rail route

11 Alternatives were not thoroughly examined in the SoCoMMS the form of the link in 2002 or in ESCC's Hastings Strategy Development Plan

12 Assessment of alternatives only as far as these could work the form of the link alongside the road

13 Road appears as 'given' as part of economic strategy, regeneration benefits, even if without adequate justification, and then alternatives are infrastructure was looked at looked at in that light assumptions were tested in would be required.

14 As Link Road became a 'given' alternatives could never regeneration benefits, even if have been properly examined infrastructure was looked at assumptions were tested in would be required.

18 Full range of alternatives must be properly assessed before concluded that the road the grant of planning permission

2 Sufficient work was undertaken in these studies to draw the conclusion that additional road infrastructure in road was required.

1 Sufficient work was undertaken in these studies to draw the conclusion that additional road infrastructure in road was required.

2 Access to Hastings concluded that without the bypasses there would not be potential for substantial all the other measures were implemented. This identified need for substantial investment in transport as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road

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29 The scheme was developed following a series of transport studies that examined all modes and which would still be necessary as part of a wider regeneration package for the Bexhill and Hastings area.

Heading	Sub	Comment	No. of Representations	Response
	19	The route is very similar to the route rejected by the Secretary of State for Transport on landscape and other grounds in 1990. The landscape where it would be built is even more attractive and valuable than it was in 1990. The alternative routes south of the Combe Haven have been rejected as unacceptable in terms of impact on landscape and nature conservation. The application should be withdrawn and other solutions to the needs of the Bexhill-Hastings area adopted	2	The previous proposals were for a much larger scheme which would have had a significantly greater impact with the current proposals.
	20	East Sussex County Council should support a shift towards the use of sustainable modes of transport rather than the construction of a major new road in an environmentally sensitive area	216	In line with Government policy, the County Council supports a shift towards the use of sustainable modes, roads will still be required to address some transport problems.
	21	Building more roads is not the most sustainable way of managing traffic. Improving existing networks and encouraging public transport is far more preferable	69	In line with Government policy, the County Council supports a shift towards the use of sustainable modes, roads will still be required to address some transport problems.
	22	Alternatives will not progress while authorities and business progress reports. push for more road based access to towns	7	Alternatives continue to be developed and progressed as evidenced in the Local Transport Plan and its
Transport Strategy	23	Strongly suggest development of a joint transport strategy by ESCC, HBC and RDC covering all of Bexhill and Hastings, to identify measures to increase proportion of travel by sustainable means and reduce travel	1	The Link Road proposals have always been developed in that context. A new Hastings and Bexhill Local (HBLATS) is currently being prepared.
	24	Has any serious attempt been made to produce an alternative transport strategy for Hastings and Bexhill?	3	Both Access to Hastings and SoCoMMS examined alternative strategies for the Bexhill and Hastings area.
	26	Incentives must be in place for people to want to leave their cars at home	1	Appropriate measures to encourage people not to use their cars unnecessarily will be further developed
	35	Interesting to assess what non car-based alternatives could be delivered for £89.3m	2	A specific assessment of what non car-based alternatives could be delivered for £89.3m has not been
	36	ESCC could take much more practical economic measures regeneration benefits, even if that would negate the supposed need for a new bypass infrastructure was looked at	1	Access to Hastings concluded that without the bypasses there would not be potential for substantial all the other measures were implemented. This identified need for substantial investment in transport

assumptions were tested in
would be required.

37 ESCC could encourage workplaces and schools to develop through HBLATS.

sustainable travel plans; demand management measures such as workplace parking charges and other parking measures; improve public transport ; better facilities for pedestrians and cyclists; investigate minor improvements to the A259

38 Alternative measures would alleviate congestion problems concluded that the road

on the A259 at lower financial and environmental cost

39 Construction of new road would divert traffic away from forecasting report.

coastal road and be likely to undermine market for rail

40 Road would divert potential customers from an improved forecasting report.

coastal trail service

41 Rail companies will be unwilling to invest in stations and more forecasting report.

frequent services when local authorities are promoting more developments which encourage road based transport

as part of an overall regeneration strategy by the Hastings and Bexhill Task Force. The Task Force's the SoCoMMS, which tested options with and without a new road, and it was concluded that the link road

2 There is already a substantial programme of investment in these areas, which will be further developed

8 The scheme was developed following a series of transport studies that examined all modes and which would still be necessary as part of a wider regeneration package for the Bexhill and Hastings area.

2 The construction of the new road will have a negligible impact on rail patronage as detailed in traffic

5 The construction of the new road will have a negligible impact on rail patronage as detailed in traffic

1 The construction of the new road will have a negligible impact on rail patronage as detailed in traffic

Heading	Sub	Comment	No. of Representations	Response
	42	Should be much greater investment in local and through rail industry to that end.	42	The County Council is seeking greater investment in rail services and is actively negotiating with the rail services
	43	Schemes to improve Hastings/Gatwick/Victoria service and industry to that end.	2	The County Council is seeking greater investment in rail services and is actively negotiating with the rail the Ashford line could help to shift journeys away from cars and reduce carbon emissions
	44	With promotion, increased frequency and new stations, industry to that end.	7	The County Council is seeking greater investment in rail services and is actively negotiating with the rail existing rail line is viable alternative for a significant number of journeys
	45	Superior public transport systems such as Light/Ultra Light existing rail and bus	4	Previous studies have concluded that there is a need for improved public transport, but more focused around Rail must be treated with as much importance as road infrastructure with enhanced service provision.
	46	Has tram been examined? existing rail and bus	4	Previous studies have concluded that there is a need for improved public transport, but more focused around infrastructure with enhanced service provision.
	47	Investing improvements in walking and cycling as a "greenway" which is alternatives to Link Road can only be a win-win situation Connect 2 project for a cycle	10	There will continue to be investment in walking and cycling improvements. The Link Road proposals include a high quality route for pedestrians, cyclist and equestrians running roughly parallel to the road. The link along the seafront between Bexhill and Hastings is another example.
	49	More attention should be paid to cycling especially Glyne Gap a "greenway" which is coastal route Connect 2 project for a cycle	8	There will continue to be investment in walking and cycling improvements. The Link Road proposals include a high quality route for pedestrians, cyclist and equestrians running roughly parallel to the road. The link along the seafront between Bexhill and Hastings is another example.
	50	Why have ESCC not committed funds to the proposed implemented in 2011.	5	Funding has been committed, the scheme is being progressed and it is anticipated that it will be seafront path for walking and cycling?
	52	Access to Hastings Multi modal study said that 590 houses constructed since then that could be built at Worsham Farm with no new road provision, to refuse any new and up to 1660 with simple link to Bexhill town centre had been implemented.	1	Access to Hastings might have been correct at that time, but substantial new developments have been have used up the capacity on the network. The Highways Agency have indicated that they would be minded development that would have an impact on the A259 trunk road through Bexhill until the link road or similar

53 There have been no serious attempts to produce a multi modal studies. comprehensive and sustainable transport strategy for Hastings and Bexhill

54 Non-road options have never been offered as choices to the public as possible alternatives to the road concluded that the road

55 Claim that the Link Road is essential for housing development constructed since then that at north Bexhill is wrong - 1500 homes could be built without to refuse any new it had been implemented.

56 Those who cannot afford to run a car, or who try not to be along the A259 car dependent, will see no benefit whatever from this road but will instead lose the opportunity to have the real improvement in quality of life which public transport could bring

57 Provision for cyclists in this area is negligible. Improved and a "greenway" which is more cycle lanes might encourage others to take up cycling Connect 2 project for a cycle for short journeys in line with government policies

58 A Bexhill-Hastings link road already exists and is perfectly inadequate for local traffic between the two towns alignment (and

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1,103 Sustainable transport strategies for the area have evolved over the years as detailed in TPPs, LTPs and HBLATS will be the latest version building on what has gone before.

1,098 The scheme was developed following a series of transport studies that examined all modes and which would still be necessary as part of a wider regeneration package for the Bexhill and Hastings area.

1,088 Access to Hastings might have been correct at that time, but substantial new developments have been had been implemented. The Highways Agency have indicated that they would be minded development that would have an impact on the A259 trunk road through Bexhill until the link road or similar

5 The provision of the link road will provide real opportunities to improve public transport provision, particularly corridor, that would not otherwise exist.

4 There will continue to be investment in walking and cycling improvements. The Link Road proposals include a high quality route for pedestrians, cyclist and equestrians running roughly parallel to the road. The link along the seafront between Bexhill and Hastings is another example.

4 If this comment refers to the existing A259, then the daily levels of congestion quite clearly demonstrate the as an effective link between the two towns. If it refers to other routes, then they are longer, of substandard consequently more dangerous) and will have impacts on villages and the AONB.

6 Budget will be higher than £89m because of additional element for contingencies. mitigation requirements

7 Cost of the scheme has grown exponentially over the past compensatory landtake, three years

8 Scheme does not represent value for money Council to submit to supported by the

9 Extremely concerned at the estimated cost of the scheme Council to submit to and how it can offer value for money supported by the

10 The cost benefit ratio needs further investigation before a Council to submit to planning decision supported by the

15 At £89m project is likely to be an expensive way of Council to submit to exacerbating the problem. supported by the

16 Expenditure not justified compared to how money could be Council to submit to spent elsewhere supported by the

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increased construction inflation costs and extra inflation costs due to the increased delivery timescale.

1 All the necessary mitigation has been incorporated into the scheme and the scheme budget include an

7 The cost of the scheme has increased for a variety of reasons including changes to the design, increased increased construction inflation costs and extra inflation costs due to the increased delivery timescale.

31 Due to cost increases and changes to the scheme, a revised business case is being prepared by the County the DfT, but the scheme still remains good value for money with a Benefit Cost Ratio of 3.7 and is strongly Regional Assembly.

23 Due to cost increases and changes to the scheme, a revised business case is being prepared by the County the DfT, but the scheme still remains good value for money with a Benefit Cost Ratio of 3.7 and is strongly Regional Assembly.

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Heading	Sub	Comment	No. of Representations	Response
				Regional Assembly.
	17	Scheme is not good use of taxpayers' money Council to submit to supported by the	22	Due to cost increases and changes to the scheme, a revised business case is being prepared by the County the DfT, but the scheme still remains good value for money with a Benefit Cost Ratio of 3.7 and is strongly supported by the Regional Assembly.
	18	Government requirement to seek developer contributions to acceptability and viability of the road creates great uncertainty would need to contribute	1	Whilst it is a requirement to seek developer contributions, that has to be set within the context of the development and what else the development needs to contribute towards. For example, the development to sustainable transport, schools, etc.
	19	Developer contributions would be better targeted and offer acceptability and viability of the better value if channelled to sustainable non- road based would need to contribute strategy	3	Whilst it is a requirement to seek developer contributions, that has to be set within the context of the development and what else the development needs to contribute towards. For example, the development to sustainable transport, schools, etc.
	20	In context of South East £89m is extremely expensive for a Council to submit to 'link road' of 3.4 miles which primarily addresses local issues supported by the	3	Due to cost increases and changes to the scheme, a revised business case is being prepared by the County the DfT, but the scheme still remains good value for money with a Benefit Cost Ratio of 3.7 and is strongly supported by the Regional Assembly.
	21	If £47m for this road were released it would be bring Council to submit to forward other schemes in the region, particularly as supported by the Hindhead scheme has taken a large proportion of the funding allocation	2	Due to cost increases and changes to the scheme, a revised business case is being prepared by the County the DfT, but the scheme still remains good value for money with a Benefit Cost Ratio of 3.7 and is strongly supported by the Regional Assembly.
	22	Money could be better spent on smaller schemes across Council to submit to South East which focus on reducing the economic footprint, supported by the causing behavioural change away from a car-based system, and retaining tranquillity and green character of one of diminishing number of rural areas which separate communities along an already over developed coast	7	Due to cost increases and changes to the scheme, a revised business case is being prepared by the County the DfT, but the scheme still remains good value for money with a Benefit Cost Ratio of 3.7 and is strongly supported by the Regional Assembly.
	23	Cost of the road has nearly doubled already and has not Council to submit to been fully compared with other schemes for addressing supported by the	1,356	Due to cost increases and changes to the scheme, a revised business case is being prepared by the County the DfT, but the scheme still remains good value for money with a Benefit Cost Ratio of 3.7 and is strongly supported by the

transport issues in the area - which are likely to be more cost effective

24 The estimated £89m cost (£42m more than originally Council to submit to approved) will take valuable funds away from other supported by the schemes across the region

25 The staggering £89m to be spent on this road could be so Council to submit to much better spent, most obviously, since this money will supported by the come from funding for improving South East transport services, on improving public transport, by far the most pressing need in our area

Z Other

1 EDF Energy have underground cables in the area; contact be affected by the required

8 Water service covers may require changing in relation to minor changes in ground levels, particularly at Belle Hill junction

15 I strongly object

16 No hospital signs are plotted on the plan

17 6 weeks has not been sufficient to adequately examine Committee.

Environmental Assessment and concerned that there are

02 December 2008

Regional Assembly.

1,084 Due to cost increases and changes to the scheme, a revised business case is being prepared by the County the DfT, but the scheme still remains good value for money with a Benefit Cost Ratio of 3.7 and is strongly Regional Assembly.

249 Due to cost increases and changes to the scheme, a revised business case is being prepared by the County the DfT, but the scheme still remains good value for money with a Benefit Cost Ratio of 3.7 and is strongly Regional Assembly.

2 All the statutory undertakers have been contacted to establish the location of their plant and whether it would scheme.

1 All service covers will be adjusted as necessary during the construction of the scheme.

215 Objection noted.

1 The location of hospital signs will be determined at the detailed design stage.

1 There has been a considerable time period for consultation and before the report being presented to

Heading	Sub	Comment	No. of Representations	Response
	some deficiencies			

Appendix 2 List of abbreviations in report

AONB	Area of Outstanding Natural Beauty
AQMP	Air Quality Management Plan
BCR	Benefit Cost Ratio
BHLR	Bexhill Hastings Link Road
BOATs	Byeways Open to All Traffic
DETR	Department for Transport and the Regions
DfT web tag	The Department for Transport's Transport Analysis Guidance
DMRB	Design Manual for Roads and Bridges
EA	Environment Agency
ES	Environmental Statement
ESCC	East Sussex County Council
FPP	Hastings and Bexhill Five Point Plan
GOMMS	Guidance on the Methodology for Multi-Modal Studies
HA	Highway Agency
HBLATS	Hastings Bexhill Local Area Transport Strategy
HSDP	Hastings Strategic Development Plan
IEMA	Institute of Environmental Management and Assessment
LAA	Local Area Agreement
LIDAR	Light Detection and Ranging
LINSIG	Detailed Traffic Signalled Junction and Design Modelling
LTP	Local Transport Plan
NEBD	North East Bexhill Development
RA	Regeneration area
RS	Regeneration Statement
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SATURN	Simulation and Assignment of Traffic in Urban Road Networks
SEB	Statutory Environmental Bodies
SEEDA	South East England Development Agency
SNCI	Site of Nature Conservation Importance
SoCoMMS	South Coast Multi Modal Study
SOSt	Secretary of State for Transport
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage
TAG	Transport Analysis Guidance