

BEXHILL TO HASTINGS LINK ROAD  
ENVIRONMENTAL IMPACT ASSESSMENT  
SCOPING OPINION

JULY 2006

This document has been prepared in response to the Scoping Report prepared by Mott MacDonald dated March 2006. Please read this Scoping Opinion in conjunction with the Scoping Report as comments refer to specific paragraphs within that report. Where comments do not relate to specific paragraphs, additional notes have been made.

The paragraph numbering referred to below relates to the paragraph numbering in the Scoping Report.

Paragraph No.	Comment
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## **1. Introduction**

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|-------|---|
| 1.3.1 | The Scoping Report states that the methodology will be based on the Design Manual for Roads and Bridges (DMRB) Vol 11. However the Environmental Impact Assessment (EIA) must be carried out in accordance with the EIA Regulations 1999 and the requirements of those regulations. The DMRB is a guidance tool only. |
| 1.5.2 | The section of Cultural Heritage should also assess impacts on Archaeology.   |

## **2. Scheme Information**

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|-------|--|
| 2.1.4 | The Environmental Statement (ES) should include detail on any alternative strategies considered and/or any independent studies undertaken.                                     |
| 2.2.1 | Reference should be made within the ES to the Regional Spatial Strategy.   |
| 2.3.1 | The ES should give more detail on the scheme description with particular regard to the width of carriageways.  |
| 2.4.1 | Reference should be made and detail given to the period of aftercare.  |
| 2.4.3 | The effect of flooding on existing farming practices must be considered. The ES should give more detail to describe the location of Pebsham Country Park and its significance. |
| 2.5.1 | The ES should provide detail on the non-road based solution considered and why it was rejected.  |
| 2.5.2 | The ES should explain the status of the ESCC Project Board and who it consists of.   |

The objectives of minimising impact on designated areas and the proposed Pebsham Country Park were not the only objectives. More detail is required in the ES on the objectives.

- 2.5.3 The ES should include information on why the red route was dismissed, including environmental as well as cost grounds.

### **3. Consultation**

- 3.1.1 The response rate of questionnaire replies is not given. The ES should include this. Also the ES should refer to the fact that Crowhurst residents consulted at a later date to other consultees and therefore had a shorter response time than others.
- 3.3.2 Consultation should also be undertaken with residents and businesses in the rural areas.
- 3.5 The ES should give proposed Programme details of the road scheme.

### **4. Policy and Planning**

- 4.1.5 Include:
- Water Framework Directive which includes the River Basin Management Plan for the region
  - Highways Agency 'Tackling Congestion by Influencing Travel Behaviour'
  - UK Biodiversity Action Plan

- 4.1.7 Include:
- Rother Local Plan
  - Cuckmere and Havens Flood Management Plan
  - Sussex Biodiversity Action Plan

Please note that the East Sussex and Brighton & Hove Waste Local Plan is now adopted.

- 4.1.8 The EIA should also reflect on recent published scientific conclusions regarding carbon emissions and impact on global warming.
- 4.1.10 The EIA should include planning history research and the effect of the scheme on any extant planning permissions.
- 4.1.11 The ES should document where this methodology is from. Scoping should include a summary of the likely extent of impact and mitigation potential.

## **5. Land Use**

- 5.1.5/5.1.6 It is considered that the assessment should be more detailed than a desk-top assessment owing to the extent of land affected.
- 5.1.7 On-site assessment is necessary to ensure accuracy of information.
- 5.1.8 Include informal village amenity land.
- 5.1.9/5.1.10 Assessment should be followed up by site visits.
- 5.1.15 Site visits are likely to be required.
- 5.1.17 Loss of predominantly lower quality grades of land is classed as minor adverse. The impact on individual farms should be considered as lower quality grades of land are still farmable.

## **6. Geology and Soils**

- 6.1.2 Potential for contamination during construction *and* operation should be considered. The ES should detail how the impact during the operational phase will be assessed.
- 6.1.10 This paragraph refers to small deposits of peat. These could be more extensive and a change in hydrology has the potential to affect land levels.
- 6.1.15 Rother District Council should also be consulted.
- 6.1.16 The ES should detail how the criteria has been developed and tested and to confirm if this if for construction *and* operation.
- 6.1.17 ES to detail where removed spoil to be deposited and how sustainable is it to remove spoil away from the site. The impact on biodiversity and hydrology should be assessed if spoil remains in-situ.

## **7. Water Quality and Drainage**

- 7.1.4 The EIA should consider the effects of changes when the river is in flood.
- 7.1.14 The ES should explain why water levels will not be affected. The siting of additional flood storage should be shown. The EIA should consider the associated impacts on habitats both directly and indirectly.

The ES should show how each of the recommendations are dealt with through mitigation.

- 7.1.18 Include source protection zones.
- 7.1.19 The water quality assessment should include both ground and surface water. Reference is made to possible modifications to the new drainage system to make nature conservation sites wetter. This should be assessed on a site by site basis and taking into account seasonality.

*Additional Notes:*

The Environment Agency noted that they have not seen the Flood Risk Assessment.

## **8. Air Quality**

- 8.1.3 The ES should explain why 200 metres is considered the zone for air quality impacts. Consideration of valley tunnelling and prevailing winds should be made. Ozone measurements should also be considered.
- 8.1.8 The existing conditions in the rural areas i.e. Crowhurst Parish and those areas within Rother District should be presented as part of the ES.
- 8.1.9 Please check locations 23 and 24 in Figure 5. Site 23 appears to be in Harley Shute Road and not at Pebsham. Hastings Borough Council are not aware of any monitoring site at Site 24 and state that it may be sensible to locate a tube site with continuous NO<sub>x</sub> monitor at the entrance to Bulverhythe Recreation Ground.
- 8.1.11 The traffic in the surrounding rural areas such as Crowhurst should be considered. If these are to be excluded the ES should explain why with reference to traffic figures in those areas.
- 8.1.14 The EIA needs to consider the potential impact of the urban section of road must also be addressed.

*Additional comments:*

The ES should also show predicted improvements in the area and also identify those areas where air quality is predicted to worsen. Include areas where there will be an increase in traffic as a consequence of the development.

The 2005 Air Quality Management Area report should be considered as part of the assessment.

## **9. Noise and Vibration**

9.1.3 Representative receivers should also include commercial premises.

9.1.8 The ES should give more information regarding how the baseline numbers were derived. The comparison of figures given is not correct.

The baseline should be for the Preferred Route and the scope should reflect rural area residents as well as Hastings/Bexhill residents.

9.1.9 There appears to be a lack of existing data as the report refers to further work to be carried out. The ES should clearly set out the existing data.

9.1.15 The ES should include data and assessment of rural inhabited areas.

### *Additional notes:*

Please justify the 300m catchment zone. The ES should consider noise levels at peak periods.

## **10. Nature conservation and Biodiversity**

10.1.1 Indirect effects beyond 500 metres of the road should be considered.

10.1.4 The ES must show the evidence basis regarding the statement that most of the habitats lost can be re-created on adjacent land. Assess the loss of any habitats that existed on the adjacent land.

Impacts on common species and habitats also affect the ecology of the area and how it contributes to the wider ecological network. The ES should detail how this can be minimised through mitigation.

10.1.6 Planning Policy Statement 9 must be included as a guidance document. The Transport and Biodiversity Group have published a good practice guide entitled 'Biodiversity Impact,

Biodiversity and Environmental Assessment: A Good Practice Guide for Road Schemes' (2000). In 2000 the Association of Local Government Ecologists published 'Developing Naturally', a handbook for incorporating the natural environment into planning and development. The above publications identify the information required to assess the ecological and biodiversity impacts of road schemes.

- 10.1.10 Owls are known to roost at Adams Farm.
- 10.1.14 The IEEM guidance has been updated since the publication of the Scoping Report and is now current from 2006.
- 10.1.16 A table of significance has not been included. This method of assessment is unclear. Areas of local importance appear to be referred to as low significance. Further explanation of the significance scales needs to be given.

*Additional comments:*

A zone of influence should be defined. It is recommended that an iterative process be followed with regards to understanding the ecological impact of the scheme, not just through a narrow corridor which follows the route of the road but through an understanding of the wider spatial context of the environment and the impacts the proposal may have on these.

The EIA should include identification of the biophysical changes likely to affect valued ecological resources and features and an assessment of whether these biophysical changes will give rise to a significant ecological impact, defined as an impact on the integrity of the site or ecosystem(s) and/or the conservation status of habitats or species, including cumulative impacts.

The assessment should include measures to avoid, reduce or compensate for any significant adverse impacts and the provision for monitoring and follow up to the implementation and success of mitigation measures and ecological outcomes.

The assessment should include detail on habitat enhancements including the opening of any existing culverts and lengthening of water courses.

The ES should state how the scheme is to benefit biodiversity beyond the protected species.

The effects on population and species movement should be monitored in the long term and the results will determine any further remedial works.

## **11. Landscape and Visual Effects**

- 11.1.6 The ES should explain in more detail the "Greenway".

- 11.1.8 PPG2 not relevant. Reference should be made to Planning Policy Statement 7 and the Rother Local Plan.
- 11.1.9 A character assessment should be included within the consideration of existing conditions.
- 11.1.10/  
11.1.11 SSSI is not a landscape designation.
- 11.1.14 Photomontages will form an essential part of this assessment. The location of photomontages are to be agreed with East Sussex County Council.
- 11.1.18 Assessment of changed situation along the A259 and the rural areas also relevant.
- Table 11.1 The ES should comment on whether this equates to WebTAG definitions of overall assessment score for landscape effects. Ensure consistency with the AST.
- 11.1.22 The relevance of the Egerton Stream to the Landscape and Visual mitigation measures requires further explanation in the ES.
- 11.1.23 As stated previously the SSSI's are not landscape designations.
- 11.1.24 Few short term benefits will be derived from screen planting owing to high sided vehicles.

*Additional comments:*

The ES should state whether there will be off-site landscaping. If so, where will this be located and how it will be managed.

The ES should include details of the monitoring of habitats and species in the SSSI's. Frequency and duration of monitored to be included.

## **12. Cultural Heritage**

- 12.1.6 The ES needs to cover the importance of the setting of buildings.
- 12.1.9 Also refer to the historic past of Crowhurst village.



- 12.1.10 The report refers to St Mary's chapel as a Scheduled Building, please confirm in the ES whether this a Scheduled Ancient Monument.
- 12.1.11 Check the status of the ancient woodlands, as Figure 3 refers to these as 'probable ancient woodlands'.
- 12.1.16 The proposed assessment methodology has not been given. The scoping report should highlight the methodology in order that it can be commented upon.

*Additional Notes:*

The setting of Listed Buildings should form part of the assessment.

The historic landscape character significance to the main body of Combe Haven, and not just the northern area, should be acknowledged in the ES.

### **13. Social and Community Effects**

- 13.1.1 The assessment must consider both urban and rural impacts. One of the key topics should be Severance. Impacts on existing rights of way should also be considered
- 13.1.3 Effects of severance on the local community should also be considered. Effects on the rural community needs to be addressed.
- 13.1.4 Impact on farm viability should also be considered.
- 13.1.6 The legislative framework should be given.
- 13.1.8 Existing conditions in the rural areas should also be considered.
- 13.1.9 The NHS trust will co-operate with any additional surveys required. Figures should be checked with them.

*Additional notes:*

Impacts on users of the "Greenway" bearing in mind the proximity of the road should be considered.

### **14. Travel and Transport**

- 14.1.1 Other impacts to consider include vehicle displacement onto other roads.
- 14.1.2 Reference should be made to Battle.

- 14.1.3 Care should be taken not to pre-judge the potential adverse effects on road users. The EIA should also consider the positive impacts, including new accessibility. Local concern has been raised regarding traffic from the Link Road seeking access to the centre of Hastings and St Leonards via the southern part of Queensway and Gillmans Hill.
- 14.1.7 The impact of severance caused by the new road should also be assessed.
- 14.1.8 Impacts on existing rights of way should be considered as part of the assessment.
- 14.1.9 The legislative framework should be stated.
- 14.1.10 Ensure all data used is as up-to-date as possible and state all dates of data collation as well as publication dates.
- 14.1.14 The existing conditions should also include existing areas used for cycling and walking.
- 14.1.16 Further detail needs to be given regarding when the surveys referred to will be agreed, who they will be agreed with and how this will be done.
- 14.1.18 Assessment should include consideration of overtaking valves.
- 14.1.26 The ES should state the mitigation measures that will be in place for the car traveller.

## **15. Cumulative Effects and Interaction with Other Schemes**

- 15.1.1 The assessment should include the impact of the North Bexhill (west) and (east) mixed use developments and other developments, on scheme design.

Consider whether there will be an impact on Crowhurst railway station.

### *Additional comments:*

The assessment should consider the increase in long and medium distance traffic on the A259 resulting from the provision of a faster route between Bexhill and Hastings, i.e. will this result in a renewal of pressure for a Hastings eastern bypass and realignment of the A259 to and beyond Rye.

More emphasis on the impacts on the wider network should be made. Quantify the increase in traffic and how this will be handled on the surrounding road network.

The assessment should address the linking of the route where it connects with Queensway to the A21.

The EIA should consider whether there will be a requirement for remedial measures along the B2093, The Ridge, regarding the likely increase in traffic.

Consider the effect of 'rat-running' through minor roads.

## **Appendix A**

Department for Transport guidance states using one impact ranking from WebTAG criteria. The AST presented states that some assessment rankings are for example 'slight to moderate'. Furthermore the Air Quality sub-objective assessment is not clear and needs further explanation.

## **General Comments**

The EIA should acknowledge the uncertainty regarding the prediction of environmental effects and recognise this uncertainty where it is likely.

The EIA needs to be clear that the full impacts are measured and separate identification is made of impacts *after* mitigation.