

Bexhill to Hastings Link Road

Chapter 1: Introduction

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1 Introduction

1.1 Context

1.1.1 This Environmental Statement has been prepared for the proposed Bexhill to Hastings Link Road (BHLR) promoted by East Sussex County Council (ESCC) in compliance with the requirements of the European Community Directive 85/337/EEC as amended by Directive 97/11/EC on, *The assessment of certain public and private projects on the environment* and the Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 1999.

1.1.2 The Environmental Statement reports the findings of the environmental impact assessment for the Scheme and forms part of a detailed planning application for the Scheme prepared by ESCC Transport and Environment Department. The following documents have been submitted to the Development, Minerals and Waste Group of ESCC in their capacity as the determining authority for the Scheme under Regulation 3 of the Town and Country Planning General Regulations 1992:

- Environmental Statement;
- Non-Technical Summary (NTS);
- Traffic and Transport Report;
- Regeneration Statement;
- Design and Access Statement;
- Project-level Sustainability Appraisal;
- Waste Management Strategy; and,
- Scheme Design Drawings and associated supporting information.

1.1.3 The Scheme does not require the preparation of an Appropriate Assessment under Regulation 48 of The Conservation (Natural Habitats &c) Regulations 1994 as it would be unlikely to have a significant effect upon a European Site either alone or in combination with other plans or projects.

1.2 Scheme

1.2.1 The justification for the Scheme is principally driven by the existing socio-economic, transportation and environmental problems in the area. It has been recognised for many years that serious improvements in public transport and road links are vital to the regeneration of Bexhill and Hastings. The Secretary of State for Transport rejected proposals for a Hastings and Bexhill bypass in 2001, although it was noted that there was the need for a substantial transport investment programme as an essential part of a wider investment programme for the area.

1.2.2 Indeed, the Secretary of State expressed the view at that time that *“We must look for alternative means to prevent the further decline of the area and to optimise its economic potential. Regeneration is an important priority for the Government – some wards in Hastings suffer from the most severe deprivation in England. But we do not believe the bypasses are the solution. A regeneration strategy for Hastings needs to be developed which shows clearly how transport and other measures may be implemented to ensure a sustainable economic future for the area. I have asked my officials to work closely with the South East England Development Agency and local partners on that.”*

1.2.3 In response to this a Task Force was set up and developed a Five Point Plan for the area which, amongst many other things, introduced the concept of a local link road to overcome the poor connections between Bexhill and Hastings.

1.2.4 ESCC, as part of the Task Force established under the direction of the South East England Development Agency (SEEDA) to bring together the regeneration strategy for the Bexhill and Hastings area, considers that a new link road is essential to relieve the capacity and congestion problems on the A259 arising from development pressures. Plans for a new Bexhill Hastings Link Road (BHLR) were drawn up in 2003 which would improve access to and within Hastings and Bexhill and open up the north Bexhill and Hastings area for development, boosting the local economy and promoting regeneration.

1.2.5 The Preferred Route Option for the Scheme would be 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 (the Bexhill Connection) would be located along the bed of an abandoned railway line to pass through the built up area of Bexhill and constructed to a standard single two lane carriageway standard. The remainder of the road would be constructed to 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.

1.3 Requirements for Environmental Impact Assessment

1.3.1 Environmental Impact Assessment (EIA) can be defined as an assessment of those consequences of a major project which affect the natural, built and social environment. The need for an EIA is derived from the European Community Directive 85/337/EEC as amended by Directive 97/11/EC on, *The assessment of certain public and private projects on the environment*. This Directive is implemented by the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 1999.

1.3.2 Major projects for which EIA may be required are listed in the Regulations as either Schedule 1 or Schedule 2 developments. Schedule 1

developments always require an EIA, whilst Schedule 2 projects only require an EIA if significant effects are likely to arise. The Regulations require that the planning authority determine whether the project is a 'relevant project' falling under either Schedule 1 or Schedule 2, and if the latter, whether the proposed development would have significant effects on the environment.

1.3.3 ESCC has determined that the Scheme is a 'relevant project' falling under Schedule 2 of the Regulations in that it is a road scheme that would exceed 1ha in size. The size and nature of the Scheme and its location close to both the Combe Haven SSSI and the Marline Valley Woods SSSI are such that there could be significant impacts on the environment. As such, an EIA needs to be carried out for the Scheme in order to accord with the requirements of the Directive and the Regulations.

1.3.4 The EIA Regulations require that the findings of the EIA be reported in the form of an Environmental Statement (ES). The purpose of the ES is to ensure that the likely impacts of a scheme on the environment, both positive and negative, are fully understood and taken into account before any decision is made to implement the scheme. This ES presents the assessment of the environmental impacts likely to result from the implementation and operation of the Scheme.

1.4 Consultation

1.4.1 The project team have been committed to effective communication and consultation during the development of the Scheme design and the preparation of the ES. A programme of consultation and communication has been employed to ensure that all interested parties are kept informed of the Scheme's progress, and that the design benefits from the inputs of individuals, groups and organisations outside of the project team.

1.4.2 The consultation noted the statutory consultation requirement placed on the Qualifying Authority under The Town and Country Planning (General Permitted Development) Order 1995 and ensured that all relevant listed consultees were involved in the design process. It also closely follows ESCC's consultation standards, contained within its Consultation Guidance Manual. These standards have been developed to ensure consistency of practice and quality and have been informed by good practice and, national and local thinking.

ESCC Consultation Standards

- **Purpose:** the objectives of the exercise will be clearly identified and stated. Overarching all purposes will be the need to ensure that consultation effectively links to or complements specific strategies, initiatives, aims and policies of the Council, and to the decision-making process.
- **Commitment:** there will be a commitment for the process from managers and Members who have ultimate decision making responsibilities. Plus a commitment to valuing people's contribution and feeding back to them.

- **Influence:** we will be open about the level of influence the consultation may have and the level of involvement offered (ranging from seeking views to deciding together).
- **Accessible and inclusive:** we will seek to identify and remove barriers to participation and encourage wider participation in line with our equalities policies.
- **Timely:** we will treat consultation as a process that takes time, and plan effectively to ensure that there is enough time for people to express their views and for those views to be taken into account.
- **Appropriate:** we will utilise the most appropriate qualitative and quantitative techniques to meet the project objectives and the needs of those consulted, thereby adopting a ‘horses for courses’, rather than a ‘one size fits all’ approach.
- **Resourced:** we will consider the range of human and financial resources needed, proportionate to the issue under consultation and conforming to the principles of Best Value.
- **Competent:** our consultation exercises will be conducted in a professional manner, gaining public confidence in our processes and findings and thereby promote and enhance the image of the authority. They will also adhere to the organisational or professional codes of conduct e.g. equalities or confidentiality issues.
- **Evaluate and learn:** we will evaluate the effectiveness of our exercises and share information across the authority via the Consultation Database and other communication tools, learning from our triumphs and weaknesses.
- **Co-ordinated:** we will seek to co-ordinate our activities whenever possible to minimise waste and consultation ‘fatigue’. The production of departmental consultation forward plans will assist in this process.

General Methodology

1.4.3 The approach to project consultations and communications has been as follows:

- Identify key project stakeholders and determine consultees;
- Select appropriate tools and techniques for consultation activities;
- Develop the project approach to external communications;
- Programme timetable of consultation and communication activities;
- Implement consultation and communication programme;
- Record information obtained through consultation activity and disseminate relevant data to team members who can act upon it; and,
- Review consultation and communication activities.

1.4.4 Specific consultation activities (including telephone conversations, meetings etc.) have generally been undertaken by topic specialists within the project team. With consultees that can add value to multiple areas of the Scheme, project team contact usually extends to more than one team

member, or is dealt with by the scheme promoter (ESCC) and disseminated to the relevant members of the team. Where applicable the key findings of these discussions are detailed elsewhere in the relevant chapters of this ES.

1.4.5 At key stages of the project development various approaches were used to provide project information to stakeholders, including the use of the media, the internet and the distribution of project publications.

Project Communications to Date

Selecting Possible Routes

1.4.6 The Secretary of State for Transport emphasised the need for the project to involve the Statutory Environmental Bodies (SEBs) at an early stage when he was commenting on the South Coast Multi-Modal Study (SoCoMMS) in 2003. At this time it was stated “*The Multi-Modal Study has recommended one local road to be taken forward: the Bexhill-Hastings Link Road. This scheme is part of the package of regeneration measures for Hastings which is being developed following our decisions on the Access to Hastings Multi-Modal Study announced in July 2001. The Secretary of State recognises that this road will have some impact on the environment. He is therefore asking East Sussex County Council to work closely with the Statutory Environmental Bodies in developing this scheme in more detail, in order to minimise the environmental impacts.*”

1.4.7 ESCC has involved the SEBs from an early stage in the project. The SEBs applicable to this project are English Heritage, The Environment Agency, English Nature and the Countryside Agency (the latter two now forming Natural England). Guidance was obtained from the SEBs during a number of meetings and site visits, with this guidance forming a key part in the development of the six different route options of 2004. Local Authorities, relevant Parish Councils and landowners were also involved at this time and their views sought over the different route options.

Choosing the Preferred Route Option

Choosing the Preferred Route Option - Consultation with the General Public

1.4.8 Public consultation was undertaken in February 2004 and was associated with the six Route Options (Red, Blue, Brown, Orange, Purple and Pink), described in Chapter 4 and shown in Figure 4.1 contained in Volume 3 of the ES.

1.4.9 This consultation was initiated by the distribution of a four page newsletter including a questionnaire to 65,000 local households in Bexhill, Hastings and Crowhurst. This publication provided details of the different route options, sought comments via the questionnaire, and publicised a mobile exhibition. There was also substantial media coverage of the Scheme at this time.

1.4.10 A total of 2,558 completed questionnaires were received by ESCC. This equates to a return rate of approximately 4%. These showed that of these respondents, 84% supported the principle of developing a link road. The Orange and Blue Routes were the most favoured options, with 37% of first choice votes recorded for the Orange Route and 24% for the Blue Route. When comparing the two routes it was considered that the Blue Route would have the least impact on the environment and the natural landscape. The remaining 39% of support for a link road was divided between the Red, Brown, Purple and Pink Routes in descending order of support. The Pink Route received the least support as people considered that it would not resolve the congestion problem on the A259 and also that it ran in close proximity to residential areas. The Red Route, at a proposed cost of £140million, was considered by a number to be too costly a scheme.

1.4.11 Approximately half of all respondents cited more investment in roads as a priority, followed by more investment in trains (21%), and buses (20%). 75% of respondents also supported the Highways Agency proposal for the A21 Baldslo Junction – Queensway Link Road.

1.4.12 A number of alternative options and specific issues were raised by the public at the public consultation. These included the potential of a route closer to the existing residential areas to minimise impact on the countryside and Adam's Farm and Upper Wilting Farm.

1.4.13 An independent consultation exercise was undertaken by an organisation within the village of Crowhurst. The responses received as part of this process did not affect the overall ranking of the individual routes. About 10% of these responses indicated opposition to the principle of a link road, with a number expressing concern about the potential increase in 'rat running' traffic with the Scheme, the impact of the road on flooding issues, and increasing noise and pollution locally within the village.

1.4.14 A mobile exhibition was held in a specially prepared trailer, and was taken to seven key locations in the Bexhill and Hastings area. Included in the exhibition was a model of the Combe Haven Valley with all six route options superimposed upon it. The project judged this exhibition to be a success, with more than 4,000 attendees. This allowed people an opportunity to find out more about the different route options and the motivating reasons behind ESCC's desire for the Scheme. Furthermore, it presented a valuable chance for people to discuss their hopes, concerns and expectations for the Scheme with the Council officers manning the exhibition. This latter situation created a large amount of useful information (recorded within a comments book and more questionnaires supplied and completed during the exhibitions) which helped inform the route choice and generate further understanding of the views of the local public.

Choosing the Preferred Route Option - Consultation with SEBs

1.4.15 Aside from assisting with the preparation of the six Route Options, formal responses were also received from the SEBs following the public consultation exercise. These responses are summarised below and the letters of response are presented in full in both the appendices of the *Major Scheme*

Bid: Bexhill to Hastings Link Road Report (July 2004) and the Bexhill to Hastings Link Road Environmental Impact Assessment Scoping Report (March 2006).

1.4.16 English Nature (now part of Natural England) considered that only the Red or Blue Route Options were potentially acceptable to them. These Routes would not sever the Combe Haven SSSI and would avoid the ancient woodlands and SNCIs. English Nature would not support the Pink, Orange, Purple or Brown Routes, should these options be pursued.

1.4.17 The Environment Agency stated that they would strongly object to any planning application for the Orange, Purple or Pink Route Options because of their impact upon the Combe Haven floodplain, SSSI, and Local Nature Reserve. They would also object to the Brown Route Option as it affected the SSSI and floodplain. They considered that as the Red and Blue Route Options would be set outside of the SSSI and would only cross short lengths of the floodplain, the environmental implications with respect to wetland habitat were likely to be less than the other options. The Agency raised a concern about the effect of any proposed route on the floodplain of any water course. In discussions with ESCC, it was agreed that the proposed minimum road level was acceptable at this stage of design and that a free span structure over main water courses would be adequate to cope with flood flows. The impact of floodwater storage capacity as a result of embankments would also need to be calculated and appropriate mitigation measures designed. Maintenance access would need to be provided for Environment Agency vehicles.

1.4.18 English Heritage considered that the Purple and Pink Route Options would have potentially serious impacts on the historic landscape character of the Combe Haven Valley and that both routes would be severely damaging to the natural environment. English Heritage noted that the Red Route Option would have a serious adverse impact upon the historic landscape and setting of listed buildings, and as the cost of this option was dramatically higher they considered that it was unlikely to be a realistic option. They suggested that whilst the impact of the Blue and Brown Route Options on the historic environment would be negative, there would be some prospect of mitigating the visual impact within the main valley, although the impact would remain significant. They considered that both these route options would also seriously impact upon the setting of Adam's Farm, and suggested that the opportunity for variation of the routes to provide some additional relief to the farm should be considered at the next stage of the design process.

1.4.19 The Countryside Agency's opinion was that the whole area between Bexhill and Hastings was attractive countryside and environmentally important, and that the Red Route Option appeared to offer the best opportunities to minimise the visual and noise impacts of the road upon the nearby designated landscape of national importance, despite it being the closest route to the AONB.

Choosing the Preferred Route Option - Consultation with Other Key Stakeholders

1.4.23 A number of other key stakeholders were consulted over the choice of the Preferred Route. These included the two directly affected Local Authorities (Hastings Borough Council and Rother District Council), as well as SEEDA, The Hastings and Bexhill Task Force and the Pebsham Countryside Park Steering Group. This consultation was progressed along a dialogue basis, ensuring that the consultees had an accurate and comprehensive knowledge of the route options, and that they were given an appropriate mechanism to express their opinions.

Developing the Scheme Design

1.4.20 Progressing the design to a level of detail required for submission as part of a planning application has necessitated consultation to be undertaken using a methodical and thorough approach. Technical consultation with interested organisations, groups and individuals formed a large part of this process, coupled with ongoing discussions with other stakeholders involving aspects of the more detailed Scheme design as it developed.

Scheme Design- Consultation with the General Public

1.4.21 With the proposals being one of the biggest transport improvement schemes in the Hastings and Bexhill areas in recent years, ESCC has employed several methods of keeping the local public informed with the progress and aspirations of the Scheme. These have included press releases to the Bexhill and Hastings Observers, a page within ESCC's website (containing downloadable Scheme plans and information), a phone number for people to call for further information, and the dissemination of a Scheme newsletter in August 2006 and the Non Technical Summary of this document in April 2007.

1.4.22 Although consultation activity at this stage of the project was more focused towards pre-identified key individuals and organisations, there remained some interaction with the wider public, both on an individual basis and where members of the public have been represented by an elected body.

1.4.23 The project team recognises that the Scheme has the potential to affect pedestrians, cyclists and non-motorised users of the areas immediately surrounding the Scheme, including within the Combe Haven Valley. For this reason a number of surveys of these users was undertaken, which included 336 interviews involving 596 people. This process and the results generated are discussed further within Chapter 15A: Pedestrians, Cyclists and Recreational Users.

Scheme Design - Consultation with Statutory Bodies

1.4.24 There have been a number of meetings with the Development, Minerals and Waste Group of ESCC, Hastings Borough Council, Rother District Council and the local parish councils which have resulted in changes to the design of the Scheme.

1.4.25 ESCC's close relationship with the SEBs continued on from the development of, and selection between, the route options. ESCC and members of the BHLR design and environment teams have been in regular contact with the SEBs, both collectively and on an individual basis.

1.4.26 There are a number of land owners that would be directly affected by the proposed route alignment or would be potentially affected by construction activities. The project team has been in close contact with these land owners and has worked on building consensus over the design, as well as investigating where measures can be incorporated into the design to compensate for the effects that the Scheme would be likely to have upon these individuals and organisations.

Scheme Design - Consultation with Other Key Stakeholders

1.4.27 The Scheme is the product of extensive, detailed and focused consultation upon many of its technical aspects undertaken by the relevant specialists within the project team. The chapters associated with assessing the environmental effects of the Scheme within this ES were prepared following consultation with the SEBs (as discussed above), whereas Chapter 15: Social and Community Effects has relied heavily upon consultation with other individuals and organisations as follows:

- Consultation with local community groups and resident associations;
- Consultation with ESCC, Hastings Borough Council, Rother District Council, Battle Town Council and local Parish Councils to understand local community issues;
- Consultation and workshops with businesses as part of the preparation of the Regeneration Statement; and,
- Consultation with recreation and utility groups and local authorities as part of the assessment of the impacts upon Non-Motorised Users and Public Rights of Way.

Design Amendments Resulting From Consultation

1.4.28 A wealth of information has been generated from the consultation activities of the project team to date. The Scheme translates the findings of the consultation into the design where practical. Chapter 3A: Scheme Information describes the refinements to the engineering and environmental design of the Scheme as a result of consultation and the iterative scheme design process.

Future Consultation

1.4.29 As part of the planning application for the Scheme, the Non Technical Summary (NTS) of the ES was sent to 65,000 households in the local area. The NTS provides a précis of the key findings of the EIA and provides a summary of the design of the Scheme. As the title suggests, the NTS is presented using non technical language that can be understood by the average member of the public.

1.4.30 ESCC would continue to engage in consultation activities to inform the development of the Scheme into the immediate future. A key role in the future consultation process would be undertaken by the Planning Authority who would receive and determine the planning application for the Scheme.

1.4.31 Following gaining planning consent, the Scheme would then be subject to a more detailed level of design leading up to its construction commencing in 2010. This more detailed design would include any

recommendations provided by the Planning Authority and other statutory consultees as part of the decision making process. Additionally at this stage, details surrounding the construction activities would be finalised.

1.4.32 In undertaking the above tasks there would be an ongoing need to consult on technical matters and with affected stakeholders in order to prepare for the construction phase of the Scheme. There would continue to be a commitment to project communications and consultation during the construction phase in order to give stakeholders advanced warning of works due to be undertaken.

Summary

1.4.33 An effective and comprehensive programme of project communications and consultation benefits all parties. The project team has been able to draw upon specialist and local knowledge from interest groups and local people in order to design a Scheme which is better suited to people's aspirations and is sensitive to their concerns. ESCC continues to place a heavy emphasis on keeping interested parties informed on the progress and development of the Scheme.

1.5 Scoping Report

1.5.1 The main purpose of EIA scoping studies is to ensure that an EIA for a development project focuses on the important issues and avoids those that are considered unlikely to be significant. The process provides the opportunity for statutory consultees to contribute to defining the future scope and methodology of the EIA and helps to ensure that the ES that is submitted to the approving authority is of sufficient quality to inform the decision making process.

1.5.2 In accordance with best practice, a scoping exercise was undertaken for the EIA culminating in the publication of the *Bexhill to Hastings Link Road Environmental Impact Assessment Scoping Report* (March 2006). A Scoping Opinion was published in July 2006 by ESCC as the planning authority in response to the findings and recommendations of the Scoping Report. Both these documents have been used to help inform the scope, content and methodology of the EIA and this ES.

1.5.3 Certain changes have been made to the structure of the ES from that originally outlined within the Scoping Report in order to place the assessment of certain impacts within more appropriate topic areas. The Land Use section has been retitled Agriculture and Forestry, with the sub-topic assessments relating to the demolition of private property, impacts upon community land and the implications of the Scheme upon development land now located within Chapter 15B: Social and Community Effects. The latter assessment also now covers both the impact of the Scheme upon land allocated for future development within the local development framework and land with the benefit of extant planning permission directly affected by the Scheme. The assessment of the impacts of the Scheme upon Public Rights of Way and recreation and utility users has been presented in Chapter 15A: Effects on

Pedestrians, Cyclists and Recreation Users rather than as part of the Travel and Transport Chapter as originally proposed within the Scoping Report.

1.5.4 The order of the Chapters of the ES has also been altered from that stated within the Scoping Report. The Travel and Transport Chapter has been brought towards the front of the document in recognition of the importance of this element of the assessment set in the context of the transportation nature of the Scheme.

1.5.5 All comments within the Scoping Opinion have been incorporated within the EIA process and the subsequent ES with the exception of the requirement to separate the initial assessment of the effects of the Scheme without mitigation from the assessment of the Scheme after mitigation. Whilst certain topic areas have necessarily followed this approach such as the impacts upon Cultural Heritage (including archaeological impacts) and impacts upon contaminated land, the majority of assessments have been made taking into consideration the effects of mitigation and compensation measures which have formed an inherent part of the design of the Scheme. Where appropriate, potential generic impacts in the absence of inherent mitigation have been outlined within the mitigation section of relevant chapters.

1.6 Structure of the Environmental Statement

1.6.1 The ES is published in three volumes as follows:

- Volume 1 (this volume) – a document containing the introduction, an outline of the Scheme proposals, a discrete chapter for each environmental topic examined and a summary of findings;
Volume 2 – a document containing detailed methodologies, data, calculations, schedules and specialists' reports in the form of technical appendices to Volume 1. For continuity, the arrangement of technical appendices follows the same format as the topics contained in Volume 1; and,
- Volume 3 – a document containing all plans and illustrations required for the ES.

1.6.2 A Non-Technical Summary (NTS) has also been produced in non-technical language summarising the principal aspects of the Scheme and its potential significant environmental effects. The NTS has been published as a stand-alone document.

1.7 Methodology for Environmental Impact Assessment

1.7.1 The EIA has been undertaken in compliance with the requirements of the European Community Directive 85/337/EEC as amended by Directive 97/11/EC on, *The assessment of certain public and private projects on the environment* and the Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 1999.

1.7.2 Although the Scheme is neither a trunk road nor a motorway, it was considered (and confirmed in the Scoping Report) that it was appropriate to use the Government's guidance for the preparation of Environmental Assessments of such roads in undertaking the EIA for the Scheme. This guidance is contained in the Highways Agency publication the Design Manual for Roads and Bridges (DMRB), Volume 11: Environmental Assessment (DoT, 1993 as amended). The DMRB describes environmental assessment and methods of assessing individual environmental topics.

1.7.3 The DMRB applies a three-stage approach to environmental assessment:

- Stage 1: requires sufficient assessment to identify the environmental advantages, disadvantages and constraints of broadly defined route corridors;
- Stage 2: provides comparative evaluation of the main scheme options within the chosen route corridor and leads to the selection of the preferred scheme; and,
- Stage 3: provides a detailed assessment of the preferred scheme, with the final report published as an ES.

1.7.4 The South Coast Multi-Modal Study (SoCoMMS) identified the need for a direct Link Road between Bexhill and Hastings. Subsequent appraisal work in accordance with Department for Transport (DfT) appraisal guidelines led to the selection of the Preferred Route Option.

1.7.5 This ES represents the Stage 3 Environmental Assessment of the Scheme. The background to the development of the Scheme and the decisions made in the selection of the Preferred Route Option are given in Chapter 4.

1.7.6 The methodology for the EIA of the Scheme has been based upon the Government's current guidance on Environmental Assessment as set out in DMRB Volume 11. The technical appraisal of the Preferred Route Option (equivalent to DMRB Stage 2) was undertaken using DfT Transport Analysis Guidance (WebTAG) incorporating previous guidance in the form of Guidance on the Methodology for Multi-Modal Studies (GOMMMS), Applying the Multi-Modal Approach to Appraisal to Highway Schemes and Major Scheme Appraisal in Local Transport Plans. The WebTAG approach varies in its scope and analysis from DMRB for some topics and has been used to supplement DMRB methodology for the EIA where appropriate

1.7.7 Similarly, other recognised best practice guidance has been used for specialist topic assessments to supplement the guidance contained in DMRB. For example, the Landscape and Visual Effects Chapter of the ES refers to the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) *Guidelines for Landscape and Visual Impact Assessment* (2002). Where supplementary guidance has been used, this is explained under the relevant environmental topic chapters in the ES.

1.7.8 In order to inform the decision making process, the Environmental Impact Assessment (England & Wales) Regulations 1999 require an ES to

report on those environmental effects that are considered to be significant. The two principal criteria determining significance are the sensitivity of the receptor and the magnitude of the impact. This EIA therefore combines the sensitivity to change of the various receptors with the assessment of the magnitude of the impact in question in order to predict the significance of the impacts upon the range of environmental topics outlined in the following section. Topic specific detailed methodologies are provided in the relevant chapters of Volume 1 of this ES.

1.7.9 Impacts can be both beneficial (or positive) and adverse (or negative) as well as neutral where there is no impact or where beneficial and adverse impacts balance. For the purposes of this assessment, impacts that have been assessed as being either moderately adverse or beneficial and above are considered to be significant in terms of the Regulations. Although slight adverse or beneficial, negligible and neutral impacts are not considered significant, they remain worthy of consideration throughout the decision making process and as such are also reported in the ES.

1.8 Scope of Assessment

1.8.1 The *Bexhill to Hastings Link Road Environmental Impact Assessment Scoping Report* (March 2006) identified a range of environmental topics requiring assessment as part of the EIA for the Scheme, together with the general and more topic specific methodologies proposed for the assessment. The Scoping Report was distributed by ESCC as the approving authority to Statutory Consultees and other key stakeholders for comment and agreement. The Scoping Opinion provided by ESCC following this consultation process identified minor amendments and issues raised by consultees which have been incorporated within the scope and methodology of the EIA for the Scheme as appropriate.

1.8.2 The scoping exercise identified a range of environmental topics and supporting chapters for inclusion within the ES. The order of the following topics and certain topic headings varies from those shown both in DMRB guidance and in the Scoping Report in response to the scheme specific requirements of the environmental assessment:

- Policy and Planning;
- Travel and Transport;
- Agriculture and Forestry;
- Geology and Soils;
- Water Quality and Drainage;
- Air Quality;
- Noise and Vibration;
- Nature Conservation and Biodiversity;
- Landscape and Visual Impacts (incorporating Townscape);
- Cultural Heritage;

- Effects on Pedestrians, Cyclists and Recreation Users;
- Social and Community Effects;
- Combined and Cumulative Effects; and,
- Conclusion.

1.8.3 Impacts associated with the construction phase of the Scheme have been assessed under each topic chapter and not in a separate chapter titled “Disruption due to Construction” as required by DMRB Vol. 11. This approach has enabled a more comprehensive assessment of construction impacts to be undertaken for each topic area.

1.8.4 The scope of the assessment of each topic area is identified within the relevant chapter of the ES and follows the outline scope as stated within the Scoping Report and the Scoping Opinion.

1.8.5 The traffic modelling and associated traffic forecasting data used for the assessment of the following topic areas has been based upon the ‘most likely’ scenario as defined within the Travel and Transport Chapter of the ES and the standalone Traffic and Transport Report submitted as part of the planning application for the Scheme:

- Travel and Transport;
- Water Quality and Drainage;
- Air Quality;
- Noise and Vibration;
- Landscape and Visual Impacts (incorporating Townscape);
- Cultural Heritage;
- Social and Community Effects; and,
- Combined and Cumulative Effects.

1.8.6 The ‘most likely’ scenario includes the Scheme, associated complementary traffic measures, projected housing and business development information supplied by ESCC and a development funded connection from the Scheme through to the A2036 Wrestwood Road which would serve the proposed North East Bexhill Development. It has further been assumed that a new bus route would be provided along the Scheme as part of planning obligation negotiations with prospective developers of the North East Bexhill Development.

1.8.7 Whilst the complementary traffic measures would need to be funded through the LTP funding process and not directly through the Scheme, they have necessarily been included within the highway network assumptions as they have been proposed in order to help ‘lock-in’ the traffic benefits of the Scheme and ensure that adverse impacts are appropriately mitigated.

1.8.8 The ‘most likely’ levels of housing and business developments are based on the South East Plan proposals and have been allocated to the

forecast years of 2010 and 2025 based on a pattern of development derived from commitments and allocations as of 2004.

1.8.9 The South East Plan also refers to further developments and these have been developed into a possible high growth set of housing and business assumptions. The main component in the High Growth level of development is the inclusion of approximately 1,000 houses and 48,000m² of commercial development within Rother. This level of residential development is implicit in the South East Plan provisions but its precise location is not yet set. The allocation of specific sites is a task for the district to undertake as part of the Local Development Framework process. The commercial element, whilst not explicitly identified in the draft South East Plan, represents what could be reasonably expected to follow the additional 1,000 houses to provide local employment opportunities and meet the objectives of the South East Plan's sub regional strategy for the Sussex Coast. Development at Bexhill could form one large development or a number of smaller sites over different areas such as west Bexhill, Little Common in Bexhill and Wilting Farm on the northwest edge of Hastings.

1.8.10 Until the South East Plan is adopted (currently anticipated in early 2008) there remains a degree of uncertainty over the final development requirement for the area, although the prospect of reduced requirement for the Bexhill Hastings area is considered highly unlikely.

1.8.11 The lack of certainty in the precise locations and level of this additional development together with its possible developer funded additional infrastructure requirements and implications leads to the conclusion that to presume a high growth scenario, reflecting a specific land allocation, would be premature and is not appropriate for use as a basis of the assessment within the ES. The precise locations and levels of this additional development, the associated infrastructure, and its economic and environmental effects may become more clear as the South East Plan and the Local Development Framework processes unfold over the next 9-18 months.

1.9 Topic Chapter Structure and Content

1.9.1 The majority of environmental topic chapters of the ES are broadly set out in accordance with the following structure:

- Introduction;
- Method of Assessment;
- Existing Conditions;
- Mitigation Strategy;
- Construction Impacts;
- Operational Impacts; and,
- Conclusions.

1.9.2 However, some chapters such as the Policy and Planning, Combined and Cumulative Effects and Conclusion chapters do not follow this standard

structure and are presented in a format more appropriate to the requirements of these specific assessments.

1.9.3 A general outline of the content of these sections is provided in the following paragraphs.

Introduction

1.9.4 Each chapter initially outlines the purpose of the relevant assessment within a brief introductory section.

Method of Assessment

1.9.5 This section sets out relevant existing legislation and emerging guidance and the legal and planning framework as applied to each topic. An overview of the planning policy is given in Chapter 5: Policy and Planning.

1.9.6 The spatial or geographical scope of each topic is then defined allowing for the assessment of indirect as well as direct impacts, together with off-site works such as spoil disposal, temporary construction sites and haul routes where relevant. On-going consultation with SEBs and other interested parties has been undertaken to ensure that the scope of the specific assessment remains focused upon ensuring that a robust and efficient assessment of potential environmental impacts is made.

1.9.7 An overview of the results of consultation with statutory consultees and key stakeholders in relation to the topic being assessed is then given, with copies of relevant correspondence provided in Volume 2 of the ES.

1.9.8 The section then sets out the basis of the relevant methodology adopted for the assessment and identifies the section of DMRB Volume 11 or WebTAG that has been followed together with any supplementary guidance used. Specific evaluation and significance criteria are given, with further detailed methodology provided in Volume 2 of the ES as appropriate.

1.9.9 The ‘without Scheme’ scenario is termed the Do Minimum (DM) and the ‘with Scheme’ situation as the Do Something (DS). For all topics assessments are made of the impacts with and without the Scheme in the Opening Year of 2010. In addition, certain topic areas, such as noise and landscape and visual impacts, comparisons are made with the Design Year of 2025 i.e. 15 years after the opening of the Scheme in accordance with DMRB guidance.

Existing Conditions

1.9.10 To establish baseline conditions for each of the environmental topics covered by the ES, a review of existing information has been undertaken in the form of literature research, desktop reviews of previous reports and studies and consultations. The Scoping Report and subsequent consultation with SEBs also identified additional surveys required to augment existing data which have largely been undertaken over the period 2005 to 2006.

1.9.11 This section also identifies the key topic specific resources such as user groups or physical resources that would be affected by the Scheme. Key data sources and surveys undertaken are then described and a description

and evaluation of the baseline situation made. Detailed information and technical appendices are provided within Volume 2 of the ES.

Mitigation Strategy

1.9.12 The majority of assessments have been made taking into consideration good environmental design and mitigation measures which have been incorporated into the proposals as part of the iterative design process adopted for the Scheme. This approach is recognised as best practice and is consistent with relevant guidance contained within DMRB Volume 11, Section, Part 3, Mitigation. However, certain chapters such as the assessment of contamination and archaeological impacts state mitigation measures that would be adopted during the construction phase of the Scheme and therefore assess impacts prior to mitigation and residual impacts after mitigation.

1.9.13 The environmental design is described in detail within Chapter 3A of the ES, with topic specific mitigation stated within the mitigation sections of each assessment chapter. A key element of the environmental design has been to provide compensation for the damage, severance or loss of habitats associated with the Scheme in addition to mitigation which aims to avoid, reduce or remedy adverse impacts. Consultation with SEBs and the Local Planning Authority has confirmed that compensatory habitats will need to be provided to offset adverse impacts at a ratio of 2:1 i.e. double the area affected. This level of compensatory measures has been incorporated within the land take requirements and environmental design of the Scheme and would be provided as part of the wider mitigation package for the Scheme.

Construction Impacts

1.9.14 A fundamental concept underlying the EIA process is the distinction between operational phase, often longer-term and permanent, impacts and construction phase impacts which tend to be of a more temporary and short-term nature. However, this distinction is not prescriptive and certain construction phase impacts can have a permanent impact such as damage to archaeological features as a result of the laying of temporary cables to service construction activities.

1.9.15 This section describes the construction phase impacts specific to the topic area being considered and ascertains their significance using DMRB and/or WebTAG methodology supplemented by other recognised best practice guidance as appropriate.

Operational Impacts

1.9.16 This section describes the operational impacts and their significance specific to the topic area being considered using appropriate methodologies described within the Method of Assessment section of each chapter.

Conclusions

1.9.17 At the end of each chapter a conclusion section is provided which summarises the balance of impacts for that specific topic area. These findings are brought forward into the final chapter of the ES, Chapter 17: Conclusion, which summarises the overall balance of environmental benefits and disbenefits associated with the Scheme.

Combined and Cumulative Impacts

1.9.18 This chapter brings together the principal findings of each of the topic chapters of the ES in order to identify and assess the combined and cumulative effects of the Scheme. Indirect or secondary impacts have been assessed within the relevant topic chapters of the ES.

1.9.19 The assessment of combined effects deals with the interrelationship between impacts associated with the Scheme i.e. where there are a number of different impacts upon a single receptor that together represent a significant effect. Matrices have been used to help identify interrelated impacts in order to demonstrate the overall effect upon individual receptors.

1.9.20 Cumulative effects result from incremental changes caused by other past, present and reasonably foreseeable actions (i.e. developments) together with the proposed project. An example would be the incremental noise generated from a number of separate developments. This section assesses the cumulative effects of the Scheme in the context of other potential transport related schemes and major developments within the area.

1.10 Availability of the Environmental Statement and Procedures for Comment

1.10.1 The ES will be deposited for inspection during opening hours at a number of locations detailed within the NTS. Copies of the ES can also be purchased from ESCC at the address below:

East Sussex County Council
County Hall
St Anne's Crescent
Lewes
East Sussex
BN7 1UE

1.10.2 The ES is priced as follows:

- NTS – free of charge
- Volumes 1 to 3 – a total charge of £189.50
- Alternatively a CD of the full ES may be obtained at a cost of £15

1.10.3 All interested parties are invited to comment upon the ES in writing to ESCC at the address above.