

September 2004



**Friends of  
the Earth**

# Briefing

## Like a bad penny....

### Why Friends of the Earth opposes the Bexhill – Hastings Link Road

New bypasses around Hastings have already been rejected by the Government, but local councils in the area are unwilling to take 'no' for an answer, and have submitted another proposal for a road linking Bexhill and Hastings – the Hastings Western Bypass by another name. A Government decision on whether or not to fund this road will be made by the end of the year. This briefing explains why Friends of the Earth opposes the road.

Friends of the Earth is a member of the Hastings Alliance, a group of national and local non-governmental organisations formed in 2000 to oppose new roads and campaign for sustainable ways to help regenerate Hastings and Bexhill.

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## Background

In July 2001, the Government turned down two of the most controversial road proposals in the country – the Hastings Western and Eastern Bypasses. This followed the Access to Hastings multi-modal study, an extensive Government-funded study into the transport problems in the area. In rejecting the roads, the then Transport Minister John Spellar said *“the study did not build a convincing regeneration case for the bypasses – it concluded that although the bypasses could possibly help to regenerate employment in the area this would not necessarily help those most in need. There would be reduced congestion in some areas of the town but the position would get worse in others. Against these rather weak arguments we had to place the evidently severe implications for the environment”*<sup>1</sup>. Local councils were encouraged to come up with other ideas for the regeneration of Hastings and Bexhill.

A task force was set up by the councils in the area, with the South East England Development Agency. This put together a five point plan for the area, including a Bexhill-Hastings Link Road (BHLR).

The South Coast Multi-Modal Study, which reported in 2002, recommended that the proposed BHLR be taken forward as a local -rather than trunk- road scheme. The Government’s response in July 2003 was to ask East Sussex County Council to work closely with the statutory environmental bodies to develop the scheme in detail before further thought would be given to funding, thus raising the spectre of the bypasses being approved.

In early 2004, local councils consulted the public on potential routes for the BHLR. The preferred route was agreed in June, and a bid for funding was submitted to the Government by East Sussex CC at the end of July as part of its Local Transport Plan Annual Progress Report. The Government’s decision will be announced in mid December as part of the annual local transport funding announcement.

## The proposal

The proposed BHLR is 5.6 km long and is estimated to cost £47.1 million. It would run from the A259 in Bexhill to the B2092 Queensway in Hastings. Part of the route in Bexhill will be along the bed of an abandoned railway. The route passes within yards of the edge of the Combe Haven Site of Special Scientific Interest (SSSI), one of the nation’s most important wildlife sites and runs near the Marline Valley Woods SSSI. It would have a negative impact on nationally significant archaeological sites and on several listed buildings<sup>2</sup>

According to local councils, the BHLR is needed because it *“will enable housing and other developments in the Bexhill and Hastings area, bring much needed investment and economic activity. New jobs will be created and training opportunities increased. Improved transport links will allow the local road network to operate more effectively”*<sup>3</sup>.

## Why Friends of the Earth opposes the BHLR

### **It would have a huge environmental impact**

The environmental impact of the BHLR would be hugely negative. The route skirts the Combe Haven SSSI, in places only yards away from the designated site which is valuable for breeding and wintering birds, and has important populations of dragonflies and butterflies<sup>4</sup>. The BHLR would also have a huge impact on the wider Combe Haven valley which is *“probably the finest medium-sized valley in East Sussex outside the areas of outstanding natural beauty. It is set within a high quality landscape of historic and wildlife interest and contains peaceful and remote countryside.”*<sup>5</sup>

According to Rother District Council, another supporter of the scheme, *“the views looking north from Bexhill across the Combe Haven river are quite unspoilt and the landscape character is equal to the best of the High Weald Area of Outstanding Natural Beauty.”*<sup>6</sup>

The noise and visual intrusion of a new road will completely destroy the character of the area. There would also be run off from the road, as well as a risk of flooding the village of Crowhurst.

There would also be major impacts on local wildlife. East Sussex CC’s bid document states *“within the route corridor there are potential impacts on protected species. There is a high density of badgers, several species of bats have been reported and amphibians are widespread in the locality. There is probably also a large population of dormice.”*

The BHLR would bisect the Combe Haven valley forming a huge barrier, isolating these animals who depend on a wide range of foraging areas for food and shelter.

### **The economic case is not proven**

The economic justification for the BHLR is the same as for the already-rejected bypasses - to enable development of 1100 new houses and the 48,000m<sup>2</sup> North Bexhill Business Park on a greenfield site at Worsham Farm. The jobs this would provide are seen as essential for the regeneration of the area. However:

- a new business park location would not overcome the main problem of Hastings and Bexhill in terms of attracting investment: its peripherality within the South East
- there are doubts whether the jobs created would reflect the skills available in the local labour market, and particularly in the most deprived wards in Hastings.
- according to the Access to Hastings study, many of the new houses could be provided without the need for road-building

A report produced for the Task Force by consultants DTZ Piedad concluded that the bypasses were of peripheral importance: *“though helpful, they have a limited impact on regeneration”*<sup>7</sup>. DTZ Piedad pointed out that the area is always going to be peripheral in relation to the rest of the South East and advocated building on the strengths of existing economic activity such as manufacturing, tourism and retailing whilst developing a new economic base around the creative industries sector and other small service businesses.

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Research carried out for Friends of the Earth before the Government's decision to reject the bypasses in 2001 showed that a sustainable regeneration strategy and action plan for Hastings could create between 1,000 and 2,500 new jobs without the need for road-building by focusing on measures such as increasing skills in the local labour force and boosting tourism<sup>8</sup>.

Recent research by consultants Urban & Regional Policy concludes that the road could actually do more harm than good. In the long term it would encourage more traffic in the area and undermine efforts to regenerate the area as local businesses might shift from the town centre to the new site<sup>9</sup>.

### **It will increase pressure to build an Eastern Bypass**

Building the BHLR is likely to lead in future to calls for the Hastings Eastern Bypass, which was also turned down by the Government in 2001. The Access to Hastings Study concluded that, because of traffic impacts, *"it is neither practicable nor desirable to construct the Western Bypass in isolation"*<sup>10</sup>. The Eastern Bypass – or a variant of it – would cut through the High Weald Area of Outstanding Natural Beauty (AONB), one of Britain's finest landscapes. This would go against Government policy of *"a strong presumption against schemes that would significantly affect environmentally sensitive sites, or important species, habitats and landscapes"*<sup>11</sup>. AONBs and SSSIs are the country's highest landscape and biodiversity designations.

### **There has been inadequate consideration of non-road alternatives**

In the Government's response to the South Coast Multi-Modal Study it was stated that *"the Secretary of State endorses the recommendation of the study for the promotion of measures to reduce travel demand and encourage more sustainable travel choices and he looks to local authorities to take these forward"*<sup>12</sup>. However East Sussex CC's funding bid to the Government for the BHLR says that *"a non-road based solution to the existing problems was considered but rejected at an early stage"*<sup>13</sup>.

The Department for Transport has issued clear guidance to local councils preparing funding bids for major schemes such as the BHLR which says that *"the appraisal must include a detailed assessment of the scheme against alternative options that would as far as possible, broadly meet the same objectives. The testing of alternatives is not an add-on to the appraisal but an integral part of the process of determining the preferred option."*<sup>14</sup>

Section 9 of the East Sussex CC's bid document gives cursory information about non-roads based alternatives, but provides no substantiated reason why such alternatives could not alleviate the transport related problems identified. The main reason given for selecting the link road as the preferred option is because it had been previously considered as a vital component of the chosen regeneration strategy

Friends of the Earth believes that East Sussex CC and others have not sufficiently explored more cost effective and less damaging measures to reduce car usage and encourage modal shift. Money should not be spent on this costly road until more work is done to reduce car use and improve public transport, walking and cycling facilities.

### **The consultation was flawed**

Friends of the Earth believes that the Hastings / Bexhill Task Force consultation on the BHLR entitled 'Bexhill and Hastings Future Travel Options', carried out in early 2004, was deeply flawed:

- The only alternatives given were six different routes for the BHLR. It is clear from previous Government statements as well as comments from the statutory environment bodies such as English Nature and the Countryside Agency that four of the routes which pass through Combe Haven SSSI would never receive approval, which begs the question of why they were included in the consultation. There was no clear information about the environmental impact of each route and a quote from local MP Michael Foster on the front page of the consultation document implied strongly that there would be no damage. Mr Foster said that *"the link road will achieve most of what the bypass could have done in terms of economic expansion and regeneration, but without cost to the surrounding countryside."*
- The first paragraph of the leaflet stated, in bold capital letters, that doing nothing was not an option, implying that no link road was equivalent to doing nothing. There was no mention of alternative ways of dealing with transport issues in the area. Although respondents were able to tick a box saying they did not support the development of a new road, the leaflet concluded *"once local people have given us their views, we will select a preferred route"*, clearly indicating the limited scope of the consultation.

### **It won't solve traffic problems**

The new road does reduce traffic on the A259 but it also significantly increases traffic on many roads in north Hastings. It is clear that traffic will shift to other areas of Hastings creating new problems. Some of the roads which will receive extra traffic already suffer from high accident rates.

## **The alternatives**

Friends of the Earth believes that there are real alternatives to the BHLR. There is massive scope for improving transport related problems in the area as very little has been done to tackle this issue.

A package of measures should have been developed and fully appraised by the local councils. Such measures could include<sup>15</sup>:

- improving alternatives to the car in the form of better bus and rail services and better facilities for pedestrians and cyclists;
- the development of workplace and school travel plans;
- minor online improvements to the A259 to increase capacity;
- demand management measures such as workplace parking charges and other parking measures to encourage people to use non-car modes of travel;

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- consideration of road-user charging;

Friends of the Earth is confident that such a package of measures could alleviate the problems highlighted by the councils on the A259. We feel these would be more effective than building a new road and are likely to be better value for money. The Government should ensure that all these measures are explored before approving a new road that will be of high financial and environmental cost.

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## Notes

<sup>1</sup> Department of Transport, Local Government & the Regions Press Release 322 'Government announces transport package for Hastings but rejects bypasses' (12<sup>th</sup> July 2001)

<sup>2</sup> East Sussex CC Local Transport Plan Annual Progress Report 2004 Bexhill to Hastings Link Road Major Scheme Bid paragraph 4.3.1 (July 2004)

<sup>3</sup> East Sussex CC 'Bexhill and Hastings Future Travel Options' consultation document (February 2004)

<sup>4</sup> From English Nature SSSI citation

<sup>5</sup> Report to East Sussex County Council Cabinet, 'Bexhill & Hastings Link Road: Selection of Preferred Route' (8<sup>th</sup> June 2004),

<sup>6</sup> Rother District Local Plan, Initial Draft Deposit, para 3.86.

<sup>7</sup> DTZ Pidea 'Prosperity for Hastings'

<sup>8</sup> CAG consultants 'New jobs without new roads – sustainable regeneration in Hastings'

<sup>9</sup> Bexhill to Hastings Link Road – regeneration issues, Urban and Regional Policy, August 2004

<sup>10</sup> Access to Hastings study paragraph 8.56

<sup>11</sup> Department for Transport 'The Future of Transport: a network for 2030' executive summary

<sup>12</sup> Department for Transport 'Secretary of State's response to the South Coast Multi-Modal Study', July 2003

<sup>13</sup> East Sussex CC Local Transport Plan Annual Progress Report 2004 Bexhill to Hastings Link Road Major Scheme Bid Executive Summary

<sup>14</sup> Department for Transport 'Major Schemes in Local Transport Plans' paragraph 2.9.1 (April 2004)

<sup>15</sup> East Sussex Transport 2000 'A Sustainable Transport Strategy for Hastings/St. Leonards and Bexhill' (October 2003)