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**NORTH BEXHILL ACCESS ROAD – NBAR
PLANNING APPLICATION: RR/2015/2260/P
Comments from Campaign for Better Transport – East Sussex**

We formally **object** to the scheme described in the above planning application and set out our objections below.

The context:

NBAR/Queensway Gateway Road (QGR) are a subset of the BHLR project and all are claimed to be justified as meeting the regeneration and transport needs of Bexhill and Hastings. The towns have long been considered as one for the purposes of transport planning, though their separate histories and have sometimes stood in the way of a 'unitary approach' when it comes to planning an optimum transport future for the two. This situation has been accompanied by a resolute refusal by East Sussex County Council (ESCC) to consider and fully test the whole range of transport measures available to its strategic planners, and ultimately, has delayed development of sustainable modes over many years, and deprived the general travelling public of a high quality and comprehensive set of alternatives to the private car. No alternatives to the BHLR were ever properly considered simply because they weren't the prematurely chosen BHLR. Even complementary, as opposed to alternative measures were sidelined while the BHLR was obsessively pursued.

ESCC's own Local Transport Plan 1 (LTP1,2000) was informed by widespread and popular public consultation events. Sadly, these events happen no longer. That LTP was a relatively good one and included public transport measures seen as viable *without* a BHLR/bypasses.

It featured Glyne Gap station, a Quality Bus Corridor (QBP) from east Hastings to Little Common, and another for The Ridge. There was also reference to a reopening of St Leonards West Marina station, adjacent to the A259, and next to a development site (the Bathing Pool). These improvements, along with other measures, could have reduced the daily tide of traffic between Hastings and

Bexhill, 80% of which in peak hours is comprised of short car trips between the two towns. This would have been a corridor featuring sustainable modes, including pedestrian and cycle links of high quality and consequently, with other demand management measures, lower levels of traffic. The current barrage of new road schemes – including BNAR - will perpetuate and even increase the traffic volumes made up again of short car trips set to degrade the public realm of our towns and housing areas, and spread pollution. Short car trips are accepted as being the most easily transferred to alternative, sustainable modes of travel – where that exists.

We take issue with your definition of the 'growth corridor' as it appears in 10.2.4

The Growth Corridor – 'connects town centres and seafronts.....' .

This definition includes no information at all about the *nature of movement* on the corridor; that basic analysis is a key to solving any transport problem and understanding the relative effectiveness of the various measures that could follow from such an analysis. In other words, those sustainable transport measures that perform best along the corridor: what 'healthy choices' might be available.

That's critically important in defining the quality of life of those who must make journeys for whatever reason. The applicant has already chosen the through road connected to the A269 as the solution without considering other options of spatial planning. This leads to a safe assumption that the first mode of choice will be the car. If most trips are to be by car, the corridor will be a degraded environment for all – residents and travellers. 'Corridor' itself has no meaning beyond 'a spatial strip'; as far as the split between modes of transport available on the corridor after the road is constructed are concerned, the information is at best sketchy.

The inference is that the *primacy of the private car* will prevail, delivering a worsening quality of life for all. It dominates the mix of transport and relegates all other modes. It need not be like this.

From experience gained from the outputs of two major transport studies including Bexhill and Hastings (Access to Hastings Study, 2000; South Coast Study, 2002) which recommended demand management measures that have never appeared, we have low confidence in the true intention of current strategic transport planning when it comes to mounting a serious challenge to the drift towards greater 'car dependency'.

It has taken 15 years to get the proposed QBP route in any plan, let alone delivered, on the east – west route, and there's a continuing pretence that the 98 performs a Hastings – Bexhill link whereas for those journeys between the two towns, it features long detours via Pebsham which should have its own service. The NBAR will accelerate that dependency, undermine alternatives and accelerate their decline. As an example of the mess we're already in, independent journeys to school by primary school children have slumped from 86% in 1970 to 25% in 2013. In Germany the figure is currently 76%. This has major implications for childrens' health, with obesity now common even in the very young.

Public transport is potentially an important part of the transport mix. But, in terms of bus services, Sundays/evenings feature poor services if any. Glyne Gap Station was recommended for rejection by ESCC and Rother District after a report commissioned by them. The report had several important flaws and demonstrably failed to accurately describe the capacity of the network to accommodate more trains to serve that station. We commissioned a review of that report which came to very different conclusions. **(Report attached)**. The NBAR moves us towards a different 'car based' development model that will have many negative side effects including the inevitable but futile pleas for public transport to play a bigger role, while free at point of use roads, heavily subsidised, shackle attempts to fulfil that function.

The 'weaknesses in transport infrastructure...' as defined by SELEP (10.2.6) demand scrutiny. The following should be borne in mind:

An inherent need to rebalance transport away from the private car has not been met in the Bexhill/Hastings travel to work area and the imbalance will worsen following the opening of the BHLR, Queensway Gateway Road and the Bexhill Northern Access Road.

The **cumulative effects** of *all* these new roads should feature in the considerations given to each one of them. The BNAR application should not be considered alone because the traffic induction and re-assignment has implications for the whole Bexhill/Hastings Travel to Work Area.

Transport and land use planning have not been integrated: the current plan will disadvantage public transport and accelerate car ownership and usage, and this in turn will demand more land for the extra cars at both trip ends - and of course in terms of road space to accommodate traffic. BNAR will waste more land and change it into unproductive land.

Walking, cycling and public transport are more efficient in terms of land take and more supportive of local shops and services – meeting the need for accessibility for all (especially the elderly) and reducing the current trend of dispersal of activities and services driven by ever greater mobility: mobility as would be encouraged by the NBAR is the enemy of accessibility and reduces the attraction and perceived safety of walking and cycling.

The political climate has emboldened East Sussex local authorities to bid for schemes regardless of their predicted 'value for money' (vfm). The BHLR was funded even though it was rated by the Department for Transport as 'poor to medium' in terms of vfm. This misuse of large sums of capital expenditure increases the risk of future burdens on revenue budgets as 'healthy transport' measures (for instance) are relegated in favour of 'unhealthy' transport measures. The cost is picked up by the hard pressed NHS. We need 'more health for our money' and that would follow investment in non-car alternatives that would *not* require a BNAR.

The proposed **A21/A259 Growth Corridor corridor** (10.2.4 onwards) improvements are being made in a context of poor and diminishing bus services on the corridor; a failure to integrate the rail services with existing and potential bus services on the corridor; and evidence that businesses in Bexhill/Hastings will be open to predatory competition from stronger economies closer to the M25: it will be easier to shop by car at the Victoria Centre (T Wells) and Bluewater: hardly good for the retail sector of the coastal towns.

The Access to Hastings Multi Modal Study (2000) found that over 60% of the traffic entering the area on the A21 in the a.m. peak originated from south of Tunbridge Wells. This points again to the very long standing need, constantly ignored, to improve alternatives to the car in the Bexhill/Hastings 'travel to work area', at the same time benefiting the leisure and tourism market. In the light of this, *without* such an improvement in alternatives available, the LTP 3 (2016 – 21) objective of achieving 'Travel Behaviour Change' across the county will not be possible.

Following from the above, there were 287,000+ visitors to Bodiam Castle and Batemans National Trust properties, close to the A21 corridor. The busiest day, Sunday, features no buses to either from Bexhill, Hastings or anywhere else. This is true even on the Sundays which fall in a Bank Holiday weekend. As a result, there are large numbers of cars on unsuitable roads, with 4X4 vehicles in particular damaging verges over a wide area and reducing the quality of the visitor experience and intimidating for cyclists and walkers.

The primacy of the car will be confirmed further in the A21/A259 corridor if the BNAR goes ahead.

Importantly, the BNAR as presented in the application has **no business case** attached to it and consent would therefore be inappropriate.

10.2.7 The enormous jobs total quoted here should be subject to independent review before money is wasted. If the figures are founded on the basis of the methodology employed for the BHLR jobs total, then they are unreliable and consist only of a floorspace total square footage divided by workspace required per employee. That's unacceptably simplistic and was challenged by the Department for Transport who noted the exaggeration in relation to the bid for that scheme.

10.2.8/9 ESCC LTP 3: LTP 1 (2000) should be a starting model. In addition, bullet 2 refers to '*improving the efficiency of the transport network*'. Emphatically, walking, cycling and public transport should be included. In a district where pavement and bus stop parking are tolerated and habitual, and footways peter out with no pedestrian refuge, where bus stops carry no information and services do not exist in the evenings or on Sundays, there's much to be done before we even think about the promotion of car travel with schemes such as BNAR. Bexhill Hospital at Holliers Hill has one such 'petering out' of a footway and more than one dangerous pedestrian environment with deviations to safe routes poorly signed *and*, for a busy hospital, a poor bus service with damaged timetable displays. On my visit on the 3rd December, 2015, there was an appalling array of badly parked cars: unsurprising in the light of the poor bus service.

The status of alternatives to the car has improved marginally, with acknowledgement of their importance in transport planning documents. On the ground however, intimidation of pedestrians and cyclists is rife because the car is still 'King' and politicians are wary of upsetting motorists. However, the electorate – and crucially, politicians – must also be advocates for children and this should be reflected in decisions that improve, not worsen, their freedom and safety and encourage their independent travel choices. Refusing consent for BNAR would be a step towards protecting vulnerable road users and those in a traffic dominated environment.

10.2.10 The road network is said to be 'restricting economic growth'. We believe this statement is based on a questionnaire asking businesses if the road network restricts their business. It's an unscientific method of analysing problems and testing solutions,

and should carry very little weight. The statement should be omitted from any rubric associated with a planning application. In contrast to the wild claims of benefits to the economy that would follow the A21/259 improvements, the SACTRA report (Standing Advisory Committee on Trunk Road Appraisal, 1998), warns of new roads sucking wealth out of poorer (not necessarily poor) economically performing areas and into stronger economies at the other end of the road.

10.2.11 The references to further 'complementary measures' and 'cycling' are welcome, but the real energy (accompanied by very large sums of money) is focussed on the road schemes (major strategic infrastructure improvements). These will have predictable effects:

- they will determine the first choice of mode as the private car;
- they will relegate all other modes due to the (continuing) primacy given to the car;
- they will compromise the health of existing and future populations and create further health inequality to that which already endures;
- they will encourage inefficient use of land;
- they will degrade landscapes and interfere with ecosystems;
- they will impose burdens on revenue budgets for long periods into the future;
- they will deny populations a high quality urban environment and accessibility to tranquillity, beauty, rich habitats and opportunities for inspiration.

The mosaic of BHLR complementary measures that are possible are not presented as a 'complete picture' and so any consideration of alternatives to the car is impossible for the public to visualise. For instance:

- Where and how often will buses run – at what intervals?
- Will public transport replicate the current inadequate arrangements? What parking regimes will be operating?
- What continuity will apply to pedestrian and cycle routes?

The only measures that are presented as a clear future vision are the new roads. This is great news for the motor industry but not at all useful for those pursuing a high quality living environment that includes urban green spaces, far less domination of vehicles and a comprehensive set of 'excellent' alternative transport choices.

The committee also is presented with a very rosy and inaccurate description of bus services from Sidley to Eastbourne between Bexhill and Hastings (10.4.12). Stagecoach is the main operator:

the journey to Eastbourne takes 73 minutes; to Hastings – 53 minutes; to the Conquest Hospital - 79 minutes. 'There are many bus stops located along the A269 (Ninfield Road)' states the planning document; but no attractive services. You should ignore the comments in this paragraph as they are misleading and not borne out by even cursory examination.

Table 10.1 gives a summary of scenarios tested alongside which the NBAR will operate if built. In the light of the many uncertainties expressed above, we suggest that the Do Minimum (DM) scenarios, applied to a future where the BHLR complementary measures are operating, and the measures suggested (but uncertain) in LTP3 are in place, there are still many unexplored opportunities. These could boost the take-up of alternatives to the car but would be rendered difficult to exploit and be undermined by the BNAR, especially if connected to the A269.

Put simply, 'Do Minimum' can mean 'Do Quite a Lot' or 'Do Very Little. It varies greatly between local authorities. So DM *could* include:

- Seeking implementation of 'Workplace Parking Levy' to support alternatives within the travel to work area;
- Reviewing parking policy in Bexhill and Hastings town centres, and including supermarket parking;
- Introducing pedestrian and cycling priority at junctions where flows merit this or where pedestrian/cycling activity is suppressed (e.g. potential school routes or routes supporting other multiple journey purposes);
- Travel Planning – helping communities and business clusters plan trips and routine journeys without the car for some or all journeys;
- Negotiating ticket discounts on bus/rail from institutions' workforces or clusters of businesses on estates or at shopping centres;
- Providing a new station at Glyne Gap with integrated pedestrian/cycle/bus access, locking in the benefits of the BHLR before, as forecast by ESCC, traffic grows back;
- The station and rail services would also alleviate junction capacity problems at Glyne Gap, also allowing a period to further lock in the benefits with better pedestrian/cycle access. (A259/269 junction).

Does the planning committee know if any or all of these measures will be implemented?

In our view, as members of the planning committee, in these respects, you have too little information to enable you to determine this application.

Key information to inform any decision would include detailed description of all **demand management measures** available and intended to accompany any scheme. There are no details and 'demand management' is not mentioned anywhere in the application's Traffic and Transport report. Nor is it mentioned anywhere in the draft LTP3 Implementation Plan 2016-21. *Without* such measures, the Travel Behaviour Change objective of the LTP3 plans for Bexhill (and every other travel to work area in East Sussex) cannot be met. This is a serious omission, not least because it will reduce the 'value for money' of every single 'non-car' 'complementary' measure attached to all of the road schemes in Bexhill/Hastings. Public funds will therefore be wasted and quality of life blighted.

Webtag Transport Analysis Guidance – The Transport Appraisal Process (DfT 2014) indicates that approaches other than that which has led the applicant to promote the NBAR should be considered and 'demand management' is prominent as a key element in any approach:

*2.5.10 Problems should not be defined in a way that could bias the statement of objectives, which might then bias the development and selection of options. For example, stating that the problem of traffic congestion in a corridor is due to a lack of road capacity at peak times will inevitably focus attention on the provision of additional capacity. In contrast, starting out by stating that the problem that manifests itself is congestion and that the key driver is the existence of an excess of travel demand over available capacity should open up consideration of additional ways of addressing the problem and its drivers. In this example, provision of park and ride, bus lanes, changing parking availability and charges, could all be expected **to reduce the demand for road space**. (My emphasis)*

The application cites reducing traffic in Sidley as a beneficial effect leading to the invalid conclusion that the BNAR is the only measure that will achieve this. This is clearly an assertion and therefore should carry no weight.

2.8.2 It is important that as wide a range of options as possible should be considered, including all modes, infrastructure, regulation, pricing and other ways of influencing behaviour. Options should include measures that reduce or influence the need to travel, as well as those that involve capital spend.

Revenue options are likely to be of particular relevance in bringing about behavioural change and meeting the Government's climate change goal.

Other options have **not** been fully considered and where there are references to other modes (e.g. buses, pedestrian/cycling facilities) they are not described in detail or tested as potentially cheaper and more effective alternatives. In particular, **the extension of the NBAR to the A269 is potentially very damaging** to any prospect of successful implementation of measures supporting sustainable, healthy transport and a consequently less traffic dominated and higher quality development at BX3.

WebTAG recommendations have not been adhered to.

Such an approach adopting the above measures would allow a more cautious and sensible (in our view) **incremental approach** to development at BX3 that would not be dependent upon the proposed NBAR and would avoid irreversible damage to attractive countryside to the west. This western extension to the 'country avenue' has been a hasty and not well thought out or rehearsed element of the proposed NBAR. It has certainly caught out a lot of local residents who feel tricked and left out of scheme preparation and design. There are ethical considerations here.

The Environmental Statement contains detailed information on species, habitats, ecology, landscape elements, hydrology and as is normal, predicts the effects on these of the scheme and suggests mitigation measures. What it does not do is describe the loss of the setting within which a piece of countryside with all these attributes can be enjoyed. This is just as important for those who may never visit the site as for those who will.

The matter of **air quality** has received much attention with the revelation this year that over 50,000 people a year die prematurely due to respiratory conditions caused by vehicle emissions. There has been a second more recent revelation: that vehicle emissions have been significantly greater than admitted by motor manufacturers who have manipulated tests and data to enable false claims to be made in respect of their products.

The above suggests to us that assumptions around impacts on air quality and carbon emissions must be revised, and that this and all other road schemes should be required to pass tests administered only after appropriate recalibrations of the tests can be relied upon to produce reliable data. The false data produced to date applies to particulates, nitrous oxides and carbon.

The **Tree Survey** reveals that 31 mature oak trees (*quercus robur*) will be felled to make way for the BNAR if constructed. These are of a substantial size and of an average height of 15m (50 feet). This species is very important ecologically and is known to support at least 284 invertebrates which are food for birds, foxes and squirrels, and birds like the crow and jay eat the acorns*. It is a great shame that so many of these fine trees – the best for wildlife – are threatened. (*Kent County Council 'Trees from Seed' a schools guide).

Summary of objections:

1. **A21/259 Growth Corridor** geographically defined but inadequate analysis of the nature of traffic (origin/destination; opportunities to reduce traffic; effects of steady decline in non-car alternatives, lack of integration between bus/rail). This lack of an analytical approach will run the risk of selection of the wrong measures and preclude the consideration of better alternatives.
2. **Opportunities to develop alternatives** for very large numbers of short trips generated in the Bexhill/Hastings 'travel to work area' not explored. Few 'workplace travel plans' are operating even where they exist on paper.
3. **Cumulative negative effects** of the BHLR, Queensway Gateway Road and BNAR are not examined as such in terms of traffic impacts, air quality, local economies, air quality, ecology, landscape, noise, public realm impacts.
4. **There is no business case** in respect of this scheme.
5. **Health benefits** of delivering measures to encourage walking and cycling are acknowledged in policies but undermined by 'car based' developments.
6. **Transport and land use policies are not integrated**, reducing accessibility by increasing mobility
7. **Public transport** descriptions within the application documents are **inaccurate**.
8. **The link to the A269 Ninfield Road** will severely damage efforts to develop comprehensive alternatives to the private car, and lead to unintended consequences such as 'rat running'. The consequences of this later addition to the

Special Planning Document has not been fully described to residents and other interested parties

9. **Department for Transport WebTAG guidance** has not been followed. In particular, there is clearly an absence of the proper description and consideration of the range of 'demand management' measures available to the promoters of the scheme.
10. **Social equity** Residents (including children) of the new housing at BX3 along with employees of the businesses there will experience inferior choices as they close their front doors behind them on their way to work, school, shops or friends and leisure activities because this clearly 'car based' development will ensure that the car is the first mode of choice – those under 17 of course will have their freedoms curtailed, while those who cannot or who choose not to own a car will also suffer.
11. **Effects on 'Air Quality'** in terms of particulates, Nitrous Oxides and carbon emissions cannot be known by the planning committee because the current chaos in calibrating and measuring those emissions through falsification of data has not been resolved.

We urge the planning committee to **refuse** planning consent in the light of the many reservations expressed.

Derrick Coffee, County Officer, Campaign for Better Transport – East Sussex.