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Resubmitted with additional comments associated with transport, (T1 p 7) and air quality (DM6 p. 10)

11th November, 2015.

Dear Sir/Madam

Planning Application: HS/FA/14/00832

On behalf of the Campaign for Better Transport – East Sussex, we would like to **object** to the Planning Application for the Queensway Gateway Road on the grounds described below and the questionable rationale demonstrated.

Env Statement – Section 6

POLICY T3: Sustainable Transport

The Council will work with East Sussex County Council using the Local Transport Plan 3 policy framework and other partners to achieve a more sustainable transport future for Hastings. Particular priority will be given to:

- *improving bus routes, through support for the provision and improvement of bus priority lanes and junction approaches, services and passenger facilities*
- *supporting the provision of new and enhanced cycle routes in the town, and in particular, supporting the implementation of the strategic cycle network as identified on the key diagram and the Policies Map*
- *improving walking routes for pedestrians*
- *ensuring that new development is located close to existing public transport provision where possible*
- *requiring developers to consider the needs of pedestrians and cyclists in developments and deliver appropriate measures*
- *improving the safety of the highway network*
- *improving air quality and the environment generally*
- *examining the potential for adopting other “smarter choices” measures, including workplace and school travel plans; travel awareness campaigns, car clubs/car sharing schemes, teleworking and home shopping*

Transport Assessments maybe required for development schemes depending on the potential impact on the road network.

Uncertainties around adherence to policy T3

Formal removal of the bus lane originally intended at the Queensway/BHLR junction may impact negatively on the operation and development of bus services to/from the site through impedance of bus movement.

Progression of the pedestrian/cycle ‘Greenway’ network in Hastings is, we understand, currently lacking a designated project manager so there are doubts as to the ultimate nature and existence of facilities for walkers and cyclists.

The other aspirations expressed in the policy are all undermined by the increased ‘car dependency’ that will follow the huge capacity expansion of the

local road network to the detriment of all alternatives to the car (See comments on TR6/7).

POLICY TR6 - Location of New Development states: *Planning permission for retail, industrial, commercial and community development will not be granted unless the land is close to a frequent bus or other bus or public transport service and/or is conveniently accessible by cycle or foot. Alternatively, or additionally, the Council may seek to enter into a Section 106 Agreement with the developer for, or to ensure by condition, the preparation of a Green Travel Plan.*

Uncertainties around adherence to policy above

The future of the bus network is fragile and uncertain, with East Sussex County Council currently engaged in cutting supported services. With current road proposals with total investment in the region of £160m in the Bexhill/Hastings travel to work area set to induce increases in the car mode share, accompanied by great uncertainty, too few incentives for take-up of alternative modes and limited demand management measures implemented, policy objectives in TR7 will not be realised.

The operation of 'green travel plans' (gtp) in Hastings has been at best minimal. They may be adopted by employers/institutions but the key question is around implementation – in the 8 years between 2002 and 2010, none were operating in spite of a strong 'business sign-up'. With this poor record, recruiting the prospect of a 'gtp' in support of this planning application is therefore of no certain consequence.

POLICY TR7 –Accessibility goes on to require that; *All major new development or development generating significant trips should make appropriate provision in its design and facilities for pedestrians (including mobility impaired), cyclists and public transport - and provide for the mitigation of any adverse impact the development may have on the transport network*

Lack of policy fit with the above policy

The edge of town location of the proposed road and associated development would make it difficult to serve by 'sustainable modes' of transport so that securing mitigation objectives in terms of minimising traffic impacts through increased mode share of alternatives would be hampered by the relative attractiveness of the car. Those without a car would be disadvantaged, thus introducing a problem around social equity. There is demonstrably a high 'fear and intimidation' factor for pedestrians (See below under 8.6.12, p4).

6.2.10 The NPPF considers the promotion of sustainable transport and is clear that: *Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas (Paragraph 29).*

For reasons given above, the desire and need for balance (lines 4/5 of the extract from the National Planning Policy Framework above) will be frustrated if the planning application now being considered is approved. The culture,

location and political will are all lacking. High car usage is not compatible with health improvement.

Policy NC10 – Ancient Woodland provides that *Planning permission will not be granted for development that would adversely affect areas of ancient woodland shown on the Proposals Map. The layout of any development encroaching into, or close to, such woodland must take account of the designation and be designed so as to minimise the impact upon it. The Council may impose conditions on any planning permission and/or seek to enter into legal agreement(s) to secure the protection, enhancement and management of ancient woodland affected, directly or indirectly, by development proposals*

Unacceptable risk to ancient woodland not in accordance with policy.

Policy EN3 Nature Conservation and Improvement of Diversity

The town's biodiversity and geological resources will be protected and enhanced. Priority will be given to: g) protecting woodland, particularly ancient woodland and veteran trees

Policy NC6 Sites of Nature Conservation Importance

notes that Development proposals within or adjacent to Sites of Nature Conservation Importance will not be permitted unless there is a local need which outweighs any harm to the nature conservation interest. The Council may attach conditions to any planning permission and/or may seek to enter into agreement(s) to minimise the harm and/or secure the protection, enhancement and management of the nature conservation interest.

Proposals not in compliance with above policies.

The proximity of the woodland in question to a large population raises the conservation and amenity value of the wood; the proximity of the development places it and its setting at risk of degradation. A high 'education' value can be attached to the wood.

POLICY EN6: Local Wildlife Sites (LWS)

Development proposals within or adjacent to Local Wildlife Sites (LWS) will only be permitted where there is a local need which outweighs any harm to the nature conservation interest. The Council may attach conditions to any planning permission and/or may seek to enter into agreement(s) to minimise the harm and/or secure the protection, enhancement and management of the nature conservation interest.

6.4.37 The Review of Local Wildlife Sites and Ni 197 (Improved Local Biodiversity) conducted in 2009 indicates Hollington Valley as a LWS (H14 on the plan above). This area extends to 12Ha and is considered to be of High Value. (**See Appendix B1**).

Proposals not in line with policies EN6 Local Wildlife Sites/L1

Landscape Character

The species rich grassland habitat on the northern edge of Hastings has become increasingly rare through loss to development and the proposed development would lead to further loss and degradation, e.g. through the inevitable pressure for large areas of car parking.

The development would adversely affect this SNCI, while culverting of Hollington Stream (2.4.5) would also remove any value from the stream habitat.

Policy L1 - Landscape Character

Planning permission will not be granted for development which would substantially compromise the distinctive landscape setting of the town, particularly the landscape structure

of gills, woods and open spaces, and the relationship and clear division between the unspoilt coastline of the Country Park and surrounding countryside and the built-up area.

The development would irreversibly damage a local amenity
Loss and fragmentation of this varied area and its transformation into a disintegrated urban landscape would be to the detriment of the quality of life of those living nearby. Noise, light, vibration and fragmentation of habitats are all negative effects identified in English Nature Report 626 'Going, going, gone...the cumulative impact of development on biodiversity in England'. The development would amplify these negative effects.

Env Statement – Section 8

Construction Phase.

8.5.7

Earthworks - 3,100 two way vehicle trips: in terms of environmental impact, it would be important to know the distance of the 3,100 lorry trips, the destination and also the impact of the deposition of the loads carried on the local environment. I cannot see information on this point but if present, through greater clarity, it would inform all parties to their advantage.

Fear and Intimidation

8.6.12

The descriptor of 'great' in connection with 'fear and intimidation' experienced on the A21/A2100 Ridge West and the B2098 Queensway is cause for concern. What remedial action will be taken? And what are the relative traffic figures for the 'Do Minimum' and 'Do Something' scenarios?

Transport Assessment

2.1 NPPF Section 4 States

'Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.'

Overall traffic levels in Hastings 'travel to work area' are predicted to rise following construction of the BHLR (aside from the contentious Highways Agency predictions for traffic growth). The cumulative effects of the current application (if successful) along with traffic induced by BHLR and the Bexhill Gateway Road will accelerate traffic growth. Uncertainties over levels of bus services that will demonstrably lag behind the BHLR make predictions of mode share impossible and aspirations irrelevant.

The bus map produced as Appendix 4 does not help at all as there are no details of frequencies and some of the routes are under threat of cuts. Future options of getting around the Hastings/Bexhill area have been further reduced by the removal of Glyne Gap station from forward plans at local (Rother District) and county levels.

The above scenario reduces the value of conclusions that could otherwise have been drawn from the Transport Assessment and highlights the risk that apart from being damaging or at best irrelevant to prospects of a positive future for the town, the development is in the wrong place at the wrong time.

ESCC LTP3

At 2.2 states an intention to: *Deliver a package of complementary measures to the BHLR to enhance the positive impacts of the scheme.*

This objective should also address the **negative** impacts of the scheme which are significant and demonstrable and accepted by all who have engaged in the processes whereby the BHLR is being delivered.

There is great uncertainty over the nature and extent of the complementary measures although they will clearly lag (possibly years) behind the BHLR in terms of delivery. Thus, the 'car habit' will become firmly established well ahead of whatever sustainable transport alternatives eventually appear: the primacy of the car will be further confirmed. This is truly bad practice. It will reduce the attractiveness of all alternatives; delay take-up; and reduce their value for (public) money. It will disadvantage households in poverty and reduce the health benefits that health professionals all agree would accrue from active lifestyles that accompany use of all non-car modes. The location of the business park alongside the new road would be a mistake.

For the above reasons the location, far from enhancing the positive aspects of the BHLR, amplifies the negative impacts. It is not appropriate to recruit the above LTP objective in support of the new road and associated development.

In addition, the proposals cannot be said to support Objective 6 of the Planning Strategy:

'Objective 6 of the Planning Strategy seeks the provision of an efficient and effective transport system which will be achieved through a number of measures including:

6e) supporting development which reduces the need to travel, especially by car'.

Employment Opportunities?

The claims made in association with the new road as regards jobs created do not stand up to scrutiny since they are based on unsafe assumptions:

7.3.7 The SEP identifies the Hastings-Bexhill corridor as a strategically important location for growth, and specifically highlights the employment potential of sites around Queensway The development of QGW will provide access to two employment sites in this corridor, totalling 5.88 ha with an indicative capacity to accommodate over 1,305 gross jobs.

Unlocking the land for employment purposes is one thing: filling it with employees is another. It seems as though the new jobs predicted to follow the development associated with the new road have been calculated on the basis of how many employees would fit in if all floorspace is occupied. **This seems**

a very weak basis on which to predicate a £15m road project. *Further jobs are predicted through a multiplier effect assuming workers occupying the new premises will spend locally. Unlike town centre workers whose multiplier effect is much more valuable because of their ability to pop out at lunchtime and spend locally in multiple stores to meet different needs, Queensway gateway workers will perhaps go to Sainsbury's or drive off somewhere, causing more unnecessary traffic.*

Aside from doubts expressed above, the numbers of jobs seem to vary. In para 7.3.7 of the Environmental Statement, the (misleading) figure is 1,305. In para 7.6.5 it is 643 (Net Full Time Equivalent – NFE). This gives a very different impression but overall, a prediction of jobs created on the basis above is more of an assertion than a robust estimate:

7.6.5 Estimated economic impact from operational effects is therefore 857 gross FTE jobs (643 net additional direct FTE jobs). In addition, the new jobs will generate downstream employment effects through the indirect and induced effects of additional wages and supply-chain impacts (multiplier effects). Allowing for a prudent multiplier of 1.4, the overall operational employment effect is estimated to be in the order of 900 net additional FTE jobs.

The predictions of jobs appear to be based on the same assumptions using the same formula as that applied to those supposed to follow the Bexhill to Hastings Link Road. The square footage of space is calculated and then the numbers of employees who could be fitted into the premises is totted up and hey presto! There's the predicted number of new jobs.....

In addition, the existence of unfilled business accommodation on nearby sites (as well in Hastings/St Leonards Town centres where multiplier effects would be many times more effective) suggests that there are real risks that the new road and associated development are superfluous and wrong.

Transport Assessment.

Comment on the Baldslow Link Road:

1.3 East Sussex County Council's (ESCC) modelling showed that, despite significant local benefits, construction of the BLR would not be vital to the operation of the BHLR in its early years of operation, but would become increasingly important in response to predicted traffic growth thereafter. Following the Spending Review in October 2010, the BLR scheme, under development by the HA, was cancelled.

This suggests that there is unquestioning adherence to the predictions of traffic growth. This is unfortunate for the following reasons:

Background traffic growth is flat. Developments such as the new road, BHLR and associated development, may well accelerate it because the developments will be car based while under exploitation of alternative, sustainable modes and resolute refusal to give these primacy to redress growing dependence on the car has been the order of the decade in Hastings/Bexhill. This unsustainable situation can be reversed and refusal of this planning application would help to achieve that. There are growing

pressures with supporting evidence bases calling for reductions in the carbon footprint of any developments. Tackling traffic growth through providing additional capacity has not worked in the past. The history of the Department for Transport's predictions of traffic growth have been shown to be grossly overestimated and therefore should not be used by ESCC to plan unnecessary and damaging road schemes.

2.3 deals with Policy T1: Strategic Road and Rail Schemes

"The Council will seek the earliest possible implementation of the following road and rail schemes that will reduce peripherality and support the regeneration of Hastings:

- *Bexhill - Hastings Link Road*
- *Wider improvements to the A21 and A259 corridor (...)"*

There is no mention of Glyne Gap station – of significance and present in former regeneration strategies - as it would have been situated at Ravenside shopping/leisure centre which generates significant amounts of traffic on the A259 arising from the needs of visitors and employees: the new FE college is close by – theoretically, students and staff would be beneficiaries of the station. It would lie in Rother District but would improve travel choice and road conditions between the two towns to their mutual benefit. Rother has now removed the station from forward planning documents but Hastings Borough Council was sadly silent on the proposal to remove it: This could have been challenged. The two councils worked as one in pursuit of the Link Road however. Notably, the siting of Sussex Coast College near Ore station has resulted in an annual figure of 92,000 extra rail trips. Policy T1 ignores the potential of rail in the mosaic of sustainable transport interventions that should make up the 'complementary' transport provision for Hastings and Bexhill (and their 'travel to work area') referred to by ESCC, the Transport Authority.

Bexhill and Hastings – Cumulative Effect of New Road Schemes:

Both major government funded studies (Access to Hastings Multi-Modal Study; South Coast Corridor Multi-Modal Study) saw Hastings and Bexhill as being inextricably linked in terms of transport needs and solutions. This relationship is well illustrated by the accepted statistic showing that over 80% of traffic moving east on the A259 at Glyne Gap in the morning peak is travelling from Bexhill to Hastings. When considering the case for the Queensway Gateway Road, the cumulative effects of induced and displaced traffic over the area attributable to the BHLR, North Bexhill Gateway Road, and the North Bexhill Access Road – including impacts on air quality – should be examined.

3.3.4

Delays at junctions appear to worsen with the scheme:

The DM (**without the new road**) scenarios give cumulative totals (I think) of delays as follows:

2016

7.2 13m 31s

7.3 10m 57s
2028
7.4 17m 28s
7.5 22m 14s

The DS (**with the new road**) scenarios:

2016
7.6 16m 28s
7.7 23m 48s
2028
7.8 24m 55s
7.9 49m 25s

Future delays:

8.6.14 **Driver Delay** – The assessment indicates that the assessed local junctions on the strategic network are predicted to perform poorly either without the proposed QGW or with the proposed QGW in 2016 and 2028. The results for the ‘Do-Minimum’ scenario indicate that, with the exception of B2092 Queensway/Napier Road in the AM peak, all junctions are predicted to be above capacity as indicated by having RFC values above the acceptable threshold of 0.85.

What ‘benefit cost ratio’ would this scheme attract? Not a success story and maybe inviting a large question mark over the whole concept of the scheme, while flagging up the need for a serious commitment to the whole suite of demand management measures available but not taken up, most of which perform very well in terms of ‘value for money’ but which also depend on a supportive ‘land use’ policy. The proposed scheme is flawed in this respect.

Comments on the Objectives Set out in Table 4.1

Comments follow the sequence of the ‘boxed’ descriptions of objectives, strategies and measures on pages 19, 20, 21 and 22, and their justification.

19.

The delivery of the objectives highlighted will evidently be impeded as evidenced by the junction time delays quoted above. That means increased congestion.

The ‘improvement of access to jobs, services and leisure’ objective can only be properly served if there is a choice of mode as part of the ‘connectivity’ sub-objective. There’s a very high risk that the choice won’t be there.

Facilitating a choice of mode is more difficult in ‘edge of town’ locations such as those opened up by the QGR. A bus alternative is hinted at in Appendix 4 but this data is of very limited value when frequencies are not described and the fragility of services as witnessed by the current round of potential bus cuts is not taken into account.

Delivering a **package of complementary measures** to the BHLR to enhance

the positive impacts of the scheme 300 feet up on the edge of town will be difficult for the following reasons:

The cycle route networks have gradients to cope with. This will deter cycling as a mode to some degree.

The overall traffic increases that will follow the new roads will undermine any bus market and make walking and cycling less pleasant and more dangerous. Public transport in any case is ignored as a strategic component in this planning application and is currently stagnant or being dismantled. The measures complementary to the BHLR are still vague ten years after planning began so expectations of high quality development and facilitation of **'sustainable, healthy modes'** are advisedly very low.

Workplace Travel Plans (WTPs) have been available for adoption by employers/groups of employers for well over a decade but implementation in Hastings/Bexhill has been very low indeed. Between 2002 and 2009, despite businesses and ESCC 'signing up' to the principle of WTPs during the South Coast Multi-Modal Study process, none were operating at the end of that period. A case of 'words, not deeds'.

Pursuing "strategic road improvements to deliver sustainable growth in East Sussex" is an oxymoron when pursuit of high quality sustainable and healthy modes of transport have been so resolutely ignored in Bexhill and Hastings for a decade and a half.

A higher frequency bus service on the A21 corridor* together with feeder bus services to Battle and the villages served by the Charing Cross – Hastings railway line could be part of a mosaic of interventions that negate the need for major road construction. Unfortunately, as here, the usual pattern seems to be to indulge in a bidding culture for major funding for – in this case a big road project – and then to offer a few 'bolted on' green modes that may never get built in any case and describe them as 'complementary', avoiding at all costs any suggestion that they might be considered as a viable alternative. One other piece in the mosaic might have been Glyne Gap station (Ravenside). (See page 7)

The above would fit with A21 corridor interventions and would fit with:

'Policy T1 – Strategic Road and Rail Schemes':

'Wider improvements to the A21 and A259 corridor (...)

*An earlier study – the Access to Hastings Multi-Modal Study, 2000, found that most traffic accessing Hastings in the morning peak originated from south of Tunbridge Wells. The bus offer on this corridor has steadily declined and cuts are proposed from next Spring. That's worse than inertia: it's bordering on vandalism.

Conceptually, **Policy T1** should include 'the bus'. It hardly features at all.

8.2.13. Policy LRA7

The Transport Assessment gives little substantive information on existing bus

services or public transport aspirations. It does so in respect of traffic behaviour. That is an inconsistency that should be addressed.

The expectations of delivering 'Travel Plan' objectives must be tempered by the reality of few examples ever being implemented.

There should be mention of the failure in implementation of the Ridge Quality Bus Partnership (QBP) route (Proposed in LTP 1, 2000). The A259 Ore – West Bexhill QBP was also abandoned at the same time.

The **National Planning Policy Framework (NPPF)** has at its heart '***a presumption in favour of sustainable development', described as 'a golden thread running through plan-making and decision-taking'***.

In our view, the planning proposals have no such 'golden characteristic' and planning permission should be refused.

Additional substantive matter relating to Policy DM6:

We are not satisfied that the matter of air pollution arising from traffic generated by the operation of the Queensway Gateway Road has been taken into account, or assessed with cumulative impacts of all the new road schemes in Hastings and Bexhill which are closely linked in terms of day to day transport.

We are also unaware of the adoption by the relevant local authorities of any strategy available to them to protect populations from the negative effects of air pollution caused by vehicle derived particulate emissions or emissions of nitrous oxides. We are also unaware of the existence of possible appropriate measures that would be available to the local authorities on occasions where air quality is 'moderate to poor' on the Department for Environment, Food and Agriculture (DEFRA) scale. DEFRA is currently consulting local authorities on their (LAs) proposals to deal with air pollution, currently estimated to be responsible for over 50,000* premature deaths per year. This planning application should in part be determined in the context of Hastings Borough Council's strategy to safeguard air quality through supporting measures but does not do so.

We believe that all assumptions around vehicle emissions taken into account when calculating the environmental and health impacts of the Queensway Gateway Road – along with all other car dependent and vehicle traffic generating developments – can't now be safe due to the huge scale of fraudulent emissions testing across the motor trade.

Sincerely

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

*Public Health England.