

The Rt Hon Justine Greening MP
Secretary of State for Transport
Department for Transport
Great Minster House
33 Horseferry Road
LONDON SW1P 4DR

09 March 2012

Dear Secretary of State,

We are writing to urge you not to give funding to the most environmentally harmful and least economically justifiable road scheme currently being proposed in England: the Bexhill–Hastings Link Road (BHLR).

We see this decision as a key test for Government – one that will determine whether its aspiration to be the ‘Greenest Government Ever’ is being overridden by a new drive to spend public money on infrastructure, no matter how damaging or ineffective it will be.

The BHLR would be both damaging and ineffective. Authorising it would shred the Department for Transport's and the Government's environmental credentials – but it would also be a poor use of public money even in its own terms and will not provide the sustainable regeneration Hastings needs.

In environmental terms, the BHLR would be devastating to the unique Combe Haven valley between Bexhill and Hastings. East Sussex County Council (ESCC) has itself described Combe Haven as “*probably the finest medium-sized valley in East Sussex, outside of Areas of Outstanding Natural Beauty.*”

Bisecting the valley, the road would destroy a vital area for nature and recreation, passing within metres of a Site of Special Scientific Interest and several Sites of Nature Conservation Importance. Noise, disruption of biodiversity and visual intrusion from the road would have a devastating effect on the valley, and mitigation measures have been shown to be unable to remedy these problems – making huge environmental damage caused by the road unavoidable.

Historically, Combe Haven is also unique and important, with historians still examining evidence that points to the principal battle site from the Norman invasion in 1066 being Crowhurst at the top

of the valley, rather than the accepted location at nearby Battle. If so, the likely landing site for the invasion would be Wilting Manor, which lies in the path of the BHLR. Both the risk register from the promoters and the DfT's own assessment of the BHLR acknowledge the "*risk of nationally important remains*", showing that whether or not the battle was fought within it, the valley is an historic landscape that should be preserved in all but exceptional circumstances.

With huge ecological and landscape consequences, and a high risk of the permanent loss of national heritage, the economic case for this road would need to be overwhelmingly strong for ministers to decide to fund this scheme. But the economic case is at best weak. The DfT's own analysis shows that the scheme's value for money is shaky: besides having one of the lowest benefit-cost ratios in the Development Pool, the negative non-monetised impacts are perhaps the highest. The DfT assessment carried out in December 2011 gave a benefit-cost ratio of just 1.6 and said: "*The risk of the scheme achieving low value for money is significant and will depend on judgments about the weight to attach to the environmental impacts and regeneration.*"

Finally, in contrast with promoters' claims, the road is not needed to deliver the strategic objectives of the County Council and other local authorities:

- The road and associated business park are not the best way of spending money to achieve regeneration of the local economy. This would be far better promoted by improving the area's strategic links with other towns and cities on the South coast and London, particularly with improved rail services.
- Work commissioned by local campaigners shows that claims of significant monetised wider benefits from the business park are purely speculative, take no account of whether the jobs would be additional for the economy as a whole, and collapse under any serious scrutiny.
- So far in Hastings, regeneration has been achieved largely in the town centre close to public transport links, and there are still many opportunities to continue with this strategy, providing quality new business space that would be more attractive to employers than an out-of-town site.
- The large units now proposed for the business park would mainly be attractive to retail warehouse operations. These would be likely to suck jobs out of the existing centres and it is this risk – rather than non-development of this site – that is the main danger to the regeneration gains that have already been made in the area.
- Local campaigners the Hastings Alliance have also shown that there are alternative ways of providing for the transport needs of new housing developments planned for the North-East Bexhill area, and that the Government and ESCC don't need to spend tens of millions of pounds on a large road scheme to deliver these homes.
- Lower cost road, rail and sustainable transport solutions have been put forward repeatedly by local campaigners and independent consultants for many years. However, ESCC has shown that it is far too wedded to this scheme to seriously consider a package of these alternatives and is now presenting the BHLR as the only option they will accept.

It is clear that a final rejection of funding for the BHLR is needed now to trigger new thinking from local authorities in the area, as well as a more strategic approach to regeneration that does not involve destroying the tranquility of a valley of huge importance to the local community and environment, and with significant national heritage value.

Please make the right decision this month and do not fund this proposal.

Yours sincerely,



Stephen Joseph
Chief Executive,
Campaign for Better
Transport



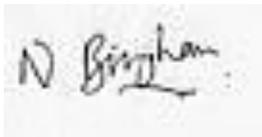
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Campaign to Protect
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Greenpeace UK



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Chairman, CPRE
Sussex Countryside
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cc Norman Baker MP, Parliamentary Under-Secretary of State for Transport