

# Sussex Wildlife Trust

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Peter Earl  
Team Manager, Planning Development Control

Your ref: RR/22474/CC(EIA)

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

13 November 2008

Dear Mr Earl

## **Bexhill Hastings Link Road Planning Application Addendum to Environmental Statement**

Thank you for advising us about further documents related to the above planning application.

Sussex Wildlife Trust maintains a **strong objection** to this planning application on the grounds of environmental damage and therefore the unsustainability of the proposed scheme.

Our main criticism of the approach to ecological studies is that a holistic assessment would clearly show the damaging nature of this proposal to the whole valley and its ecological and hydrological functioning. This has still not been acknowledged or addressed.

Even when considering the impact on the Sites of Special Scientific Interest the whole site is not assessed, instead individual issues are picked apart in an attempt to mitigate without assessing the resulting and indirect effects on other features, or again ecological functioning.

The long term effects of disturbance and pollution will affect the whole valley, if not directly within the zone of influence then indirectly, potentially altering species assemblages and interactions, functioning etc.

We still do not have clarity or confidence in the mitigation plans proposed but believe that it is vital that long term monitoring programmes are established along with contingency planning. Without this the mitigation scheme may be implemented regardless of its success or failure.

Whilst Natural England have agreed to withdraw their objection in the light of habitat creation outside the zone of influence in part to compensate for NOx concentration increases, we are not sure what mitigation is being proposed in respect of areas outside the SSSIs that are to experience increases. This highlights the emphasis on individual measures to compensate for damage to the SSSIs rather than the ecological landscape affected by this proposal.

## *Taking Care of Sussex*

President: David Streeter MBE  
Chairman: Patrick Berry  
Chief Executive: Tony Whitbread

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With regard to the proposed habitat compensation woodland - section 4 of the Supplementary Nature Conservation Report we are disillusioned that once again we have not been involved in plans which could affect our nature reserve, Marline Valley SSSI. This compensation habitat is being suggested because it is now acknowledged that the SSSI will be damaged by this scheme.

The habitat compensation plan suggests the creation of 6.7Ha of habitat in 'Site A'. The table in section 4.9.2 suggests that the proposed site is barely this size in its entirety and already supports ecologically important habitats. Indeed, according to the table less than 2.8Ha of the site is considered to be of 'low' ecological value. There is currently 2.5Ha of ancient woodland on the site so this is not habitat creation as suggested by the report, merely the intention to manage existing woodland. Natural England describes ancient woodland as irreplaceable so it is surprising that the compensation scheme is not even meeting the 2:1 ratio suggested.

We are concerned that any work in this area has the potential to impact on the streams that currently feed the ghyll in the SSSI and that valuable hedgerows may be compromised by habitat creation on adjoining land.

There are several issues that have been raised by the statutory environmental bodies that appear to remain unresolved. An example is the 2m buffer zones proposed alongside watercourses that have been considered insufficient by the Environment Agency. It appears that bridge design is not being amended to accommodate this as the negative impacts on biodiversity are 'balanced' against landscape factors.

The tranquillity of the valley will be lost and for some species of bird this will result in reduced breeding success in addition to habitat loss, pollution, danger of traffic collisions etc. This has not and can not be mitigated; an example of why the applicant's method of presenting documents and negotiating mitigation has made it difficult to assess the whole scheme. It would be useful to see a non-technical summary of the current Environmental Statement with full mitigation plan as it currently stands.

In conclusion, the addendum to the Environmental Statement has not altered our view that this scheme is environmentally damaging and cannot be adequately mitigated in this respect. We would expect to see a clear evaluation of the cumulative impacts and potential effects on the whole valley and its ecological functioning, along with an assessment of the development that will be delivered as a result of this road.

Yours sincerely

Janyis Watson  
Head of Conservation