



**DR. CAROLINE LUCAS**

**Green Party Member of the European Parliament  
for the South East of the UK**

Caroline Lucas  
Office of Caroline Lucas MEP  
Hants, IoW, Surrey & West Sussex office  
82 St Thomas's Road  
Gosport  
PO12 4JX

Douglas Alexander  
Secretary of State for Transport  
Department for Transport

17 January 2007

Dear Minister,

**Re Undercliff Drive – highway re-alignment work – Compulsory Purchase Order 2006**

I am writing as a European Parliament member for the South-East of England constituency within which these works will fall.

I object to the CPO on the grounds that this £12.88m project is a waste of public funds as it is being built on an active landslide, and is only expected to last either 30 or 50 years, depending on which of the developer's documents you read. Attempts to stabilise the mudslip may damage habitats and species in the vicinity that covered by EU wildlife designations. Since a road of the standard proposed is not required at this location, the obvious course of action is to maintain the light access road and re-think the transport links for this area.

I would now like to expand on these points.

**The temporary nature of the scheme**

Professor J.N. Hutchinson, of Imperial College, University of London, is an expert on coastal instability, particularly the Undercliff, as acknowledged by Dr Robin McInness, the IoW council's Coastal Manager, in a recent guide on the subject for MPs. In the keynote paper for the 2002 International Conference on Instability - Planning and Management, Professor Hutchinson wrote: Page 58 Maintenance of the A3055 road:

**"These failures pose a difficult problem. Apart from that just mentioned, they all involve a 300m to 500m mudslide or translational slide complex leading to the coast, where coastal defence works are unacceptable on environmental grounds. If the normal practice of arresting coast erosion before drainage of the undertaking stabilisation works on the costal slopes is abandoned, extensive drainage of the later could win time, but at considerable cost. Eventually the road would be threatened again by the deterioration of these measures or by similar failures developing at new places. There is little scope for realigning the road further back on the Undercliff and**

**there will come a point, before long, where realignment of the road inland between Niton and St Lawrence becomes unavoidable."**

### **The damage to nature conservation if attempts are made to stabilise the road**

Natural England will object to the scheme if stabilisation is attempted as this excerpt from a letter from Dr Fojt of Natural England to a resident indicates:

**"We initially objected to this development ( Beauchamp By -pass, Undercliff Drive) on the grounds that**

**a) it included land drainage/ slope stabilisation proposals which had the potential to significantly impact on the nature conservation interest down slope of the development, by impeding landslide movements and**

**b) the impacts of this element of the proposal should be considered as an integral part of the wider Undercliff Drive Stabilisation scheme and therefore should be subject to a full Environmental Assessment.**

**"We withdrew our objection when the council agreed to only grant planning permission on the condition that the development did not include any land drainage/ slope stabilisation measures and would be considered as part of the wider scheme".**

Dated 11 July 2005.

Residents are very concerned that in order to protect an expensive, upgraded road, coastal defences may be considered in the future - despite the environmental considerations.

### **Inadequate assessment of the current proposal on nature conservation interests**

I am concerned at the methodology used in assessing the effect of the works, in particular, insufficient investigation into the impact on bat species, which are protected under the Habitats Directive. A bat survey was conducted, but the least work was done at the site with the most bats (in terms of range of species and numbers).

There is also a candidate Special Area for Conservation - South Wight Maritime - next to the works site and there has been little discussion of the impact of the works on this area.

### **Inadequate consideration of alternatives**

An assessment of the scheme (A3055 Undercliff Drive: Remediation Proposals - Government Appraisal Document, High-Point Rendel) was carried out against the UK government's five criteria for transport schemes (environmental impact, safety, economy, accessibility, and integration) as defined in the Government Methodology for Multi-Modal Studies. It shows a cursory examination of the alternatives. Only one alternative scheme is considered, namely an inland diversion including a bypass of Niton. No variants of this are considered e.g. an inland route without a Niton bypass.

This lack of examination of alternatives is significant given the presence of Habitat Directive species and habitats. The benefit-cost analysis tables at the end of the document have not even been completed for the alternatives.

### **Lack of economic justification and loss of amenity**

Much has been made within the HPR appraisal of the impact on tourist businesses of the closure of Undercliff Drive, yet no mention is made of the foot and mouth epidemic that broke out in February 2001, just two weeks before the landslide that closed Undercliff Drive. In January 2002, the UK was declared free of foot-and-mouth. Light vehicle access to Undercliff Drive was restored a few months later, so the two events coincide quite tightly. Foot-and-mouth disease caused tourism revenue across the country to plummet and before £12.88m is spent the influence of these two events on this area's tourism revenue needs to be separated.

There is a misleading impression given in the Environmental Statement that the inability of coaches to use the restored "light traffic-only" route has led to a loss of tourist income because it has required a re-routing of the "round-island" coach route. However, the residents who have contacted me say that businesses along the road were not regular coach stops anyway.

The attraction of this area for walkers and cyclists is that it is one of the few areas on the island that is heavily wooded. This gives it a distinctive character and ecology. Removal of woodland will result in a loss of amenity for island residents and visitors, particularly during the lengthy construction phase.

### **The legal status of the scheme**

I believe that it should not proceed while official investigations are continuing into procedural and legal aspects of the development of this project and the tendering process.

### **Further Shortcomings in the HPR appraisal document**

Para 2.3 No account is taken of the greenhouse gas emissions associated with the proposed pumped drainage of the Undercliff, which is the main stabilisation measure of the scheme. Likewise Table 7.3 does not take account of these emissions.

Para 3.1 It can be seen that the preferred scheme is not considered the safest option.

Table 4.1 See comments relating to para 1.2

Table 4.8 Preferred option is both longer and slower than option two, the inland diversion.

Para 4.3 If all traffic were to use the inland diversion, the design capacity of the route would not be exceeded.

Para 4.4.2 This states that a Niton bypass would have a serious effect on small business relying on passing trade, yet the option of omitting the bypass is not considered.

Table 4.10 It is not clear how these figures are derived.

Para 4.4.1

Emergency services: There is a clear contradiction with the results of table 4.8.

Education: This paragraph does not explain why delays in the school shuttle bus between Sandown and Ventnor are attributable to the situation at Undercliff Drive. The bus service from Ventnor to Whitwell and Niton is in any case via the inland route of option two.

Cycling and tourism: It is hard to see how cyclists will benefit from the resumption of heavy, through traffic using Undercliff Drive.

Public transport: There has been a connecting number 16 bus operating between St Lawrence and Shanklin railway station and calling at the botanical gardens.

Para 5.2 Option two would not necessarily result in severance at Undercliff Glen since lightweight repairs and maintenance of the road could be carried out as they have been in the past. This assessment takes an "all or nothing" approach.

#### Table 6.1

C1: The preferred scheme is considered likely to have a beneficial impact yet the woodland that will be removed screens the existing houses from people travelling by road or by sea. Removing the woodland will reduce a sense of isolation (see column two, worksheet 4.6).

There is no discussion of measures that could be taken to mitigate the impact of the inland route on countryside and wildlife. This comment also applies to C12.

C8: The preferred scheme is considered to have a neutral impact on protected species, yet it will involve the demolition of a prime bat roost, plus the other effects detailed in my earlier letter. There is never a guarantee that mitigation measures will succeed, yet the assessment assumes that this is a forgone conclusion. This comment also applies to worksheet 4.10.

C10. The preferred option will be undertaken in a SSSI, yet is judged to have a neutral effect.

C12: No account seems to be taken of measures that could mitigate the impact of the inland diversion route on landscape and wildlife.

U19. Some residents have said the St Lawrence spring, a source of public water, may be badly affected by pumping.

Tables 7.1-7.6 are supposed to contain a cost benefit analysis for the preferred route and the inland option, but hardly any figures have been supplied for option two the inland diversion route, making comparison impossible.

#### **Conclusion**

In light of the above, I would urge you not to authorise the CPOs.

Thank you for your time.

Yours sincerely,



Caroline Lucas MEP

