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Sent: 30 May 2021 22:51
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Subject: REF: NATTRAN/SE/S247/3254 - Princes Parade Stopping Up Order

**Ref: NATTRAN/SE/S247/3254 -
PRINCES PARADE STOPPING UP ORDER – CONTINUING OBJECTION**

This is to inform you that I wish to uphold my objection (submitted May 2018) to Folkestone and Hythe District Council's plan to 'stop up' and divert the highway at Princes Parade. FHDC's 'Response to Statutory Consultation' emailed to me on 10/5/21 in no way satisfies my concerns nor deals with all the issues that I raised.

There were always disadvantages and losses flowing directly from the stopping up and diversion of the road at Princes Parade. It was this that prompted hundreds of residents to submit objections back in 2018. Three years on, the disadvantages and losses emanating directly from the stopping up and diversion of the road have multiplied to the point where the distress, harm and inconvenience inflicted upon residents is beyond any possible justification. I would also like to protest at the inadequacy of FHDC's 'Response' where many of the issues raised by the public have simply been ignored. It is also the fact that - whether through incompetence or design - much of the data upon which FHDC's 'Response' dismisses residents' concerns and objections is several years out of date. A lot has happened in those three or four years, for example:

- Revisions to FHDC's plans for this site that exacerbate its adverse impact upon residents
- The building of a great many new houses and apartments in and around Seabrook and Hythe
- Covid 19

In upholding my original objection I would like to add the following comments:

1. Open green space replaced by drainage swale

The Council's 'Response' includes an Illustrative Masterplan (Appendix 1, p21) which shows a large, much-vaunted expanse of open, green space close to the site's western boundary. But this plan dates from 2017 and is years out of date. In 2019, the 'open green space' was replaced by a huge swale for the treatment and conveyance of surface water from the **re-located road** etc before being pumped into the Royal Military Canal. N.B. Surface water from the existing seafront road drains directly to the beach. (*See revised plan in FHDC Consultation on revised drainage scheme, June 2019 – Y17/1042/SH*). Seabrook was singled out in FHDC's Sustainability Appraisal of January 2018 as 'deficient in access to open space' with little opportunity for 'informal recreation'. The recent 'building boom' in and around Seabrook has increased the pressures. Further loss of natural, green, open space on account of the **re-alignment of the road** is a significant disadvantage and a loss.

2. Environment Agency Canal-side Buffer Zones reduced from 25m to 13.3m

To protect the watercourse wildlife the Environment Agency's initial requirement was for a buffer zone of at least 25 metres between the Royal Military Canal and the **re-located highway**. The narrowness of the development site did not allow for this and FHDC asked the

EA to reconsider. In a letter to FHDC dated 10 April 2018, the EA agreed a relaxation to 20 metres just in those places where 25 metres could not be achieved. A condition was drafted to cover that situation. But the diagram on page 195 of the ES Addendum (*FHDC Consultation on revised drainage scheme, Y17/1042/SH, June 2019*) shows that, for about 340 metres, the width of the canal-side buffer zone will be substantially less than the minimum of 20 metres specified in the EA's condition. At one point it is reduced to a mere 13.3 metres while averaging about 16 metres elsewhere – and this includes a non-habitable tow-path about 4 metres wide. Our native wildlife has never been under greater threat. The **re-location of the road** destroys the habitat it depends on for survival

3. Design South East's report of Nov 2016 excoriates FHDC's plan to re-locate the highway. Following an FOI request this report was eventually released to public view in July 2018. The public consultation on stopping up and diverting the highway concluded the previous month.

Design South East's report is extraordinarily critical of FHDC's plan to **relocate the road**. Among its criticisms are that it:

- is a very expensive move;
- creates as many problems as it solves including parking problems;
- does not respect the character of the site (vibrant sea-front and quiet canal area) by bringing a busy access and through road so close to the canal;
- dilutes the strength of the straight road and the straight canal, and brings an intrusive roadway close to a Scheduled Ancient Monument and to the series of trails and paths which run alongside it thus urbanizing a quiet, natural green space.

Why has FHDC completely ignored this independent report and its advice to abandon the plan to **re-align the road**?

4. Traffic analysis (2016) out of date

Since 2016 when the traffic analysis was done – even since the public's original objections were submitted in 2018 - there has been a 'building boom' in and around Seabrook. 1200 houses are under construction at Shorncliffe, and other developments involving hundreds of new houses and flats along busy, narrow Seabrook Road (A259) and adjoining roads already exacerbate escalating problems. The additional pollution, noise and congestion inflicted by the closure of Princes Parade would have significant environmental consequences and a grossly negative impact on the health and well-being of residents and primary school children, most notably in Seabrook

5. Risks etc if narrow, congested A259 is the only direct link between Hythe/Folkestone – issue ignored in FHDC's 'Response'

The physical dangers inherent in the diverted road itself have already been identified by Highways England. But FHDC's 'Response' fails to identify/acknowledge the equally serious risks and inconvenience to residents when the narrow, congested A259 becomes the only direct link between Hythe and Sandgate/Folkestone. When the A259 is closed for roadworks or blocked for some reason, the seafront road provides the only practical, alternative route for emergency vehicles and buses etc. If this alternative route disappears, lives could be lost. It is scandalous that FHDC's 'Response' does not address this issue.

6. Destruction of the beauty and significance of the Royal Military Canal


FHDC's flippant dismissal of public concern (and that of statutory consultees such as Historic England) about the devastating impact **the re-located highway** would have on the

beauty and significance of the Royal Military Canal and its setting has to be challenged. The RMC is the *only* military canal in the country and, as a Scheduled Ancient Monument, is of national as well as local importance. The 'historic openness' of PP is intrinsic to the Canal's significance. Should the plan to impose the **re-located highway** just metres from (and at a height above) this iconic and much treasured local asset ever materialise, the Canal's status as a Scheduled Ancient Monument and its beauty will be destroyed.

7. COVID 19

The natural, exquisitely peaceful surroundings of Princes Parade will be devastated by the intrusion of **the re-aligned road**. The opportunity to exercise, or simply 'get away from it all' in this unspoiled fragment of countryside close to home without the need to travel has, in the last 18 months or so, been vital to the physical and psychological well-being of the entire community. Even at the best of times the contribution of this tranquil, life-enhancing scrap of land to both the physical and mental health of residents is incalculable. During the months of lockdown and grief its value could not be overstated. The noise, pollution and dominance of **the realigned road** would destroy this entirely and cause great suffering to the local population in the process.

PLEASE THINK AGAIN ABOUT THIS. PLEASE DON'T LET IT HAPPEN

Dr Jean Baker,


26 May 2021