

I am reconfirming my previous objection (*shown below*) and giving further clarification to my objections to the stopping up order for Prince's Parade.

This objection is in reference to: **'RESPONSE THEME F - IMPACT ON SETTING OF RMC'**

First of all, I must object to the term 'several' being used when referring to great number of respondents who had previously objected to this point. Please refer to section 7.5 of the Buckles report, where in the case of Theme F; the word **'several'** is used to describe **175 respondents**.

This description also continues with other 'Themes' and my personal interpretation suggests it makes light of comments made by many hundreds of objectors for this road stopping up order application.

To continue; the stopping up order is not necessary and if allowed, will create a situation that will be at odds with FHDC's saved policy TM8 previously referred to in my original objection as below.

My expanded comments under Theme F – Impact on the setting of RMC are as follows:

1. Princes Parade is an historic and iconic road and **should** be incorporated within the redevelopment in its present alignment which mirrors the route of the scheduled ancient monument of the Royal Military Canal. (RMC)
2. The Scheduled Ancient Monument (RMC) is protected by Princes Parade in its current form and route*.
3. Princes Parade runs on the route of the original tramway, which was intended to be the route of the railway (later re-routed). The road and its straight orientation is part of Hythe's heritage. The merits of moving the road now fall short twice on the preservation of Hythe's and the District's heritage.
4. The new road will have a detrimental impact on the tranquil setting of the RMC and will disrupt many local people who use the peaceful canal path to walk and enjoy recreational time.
5. Moving the road will create increased car movements resulting in a detrimental impact on the environment of the RMC: birds, small mammals, reptiles, flora and fauna will suffer.
6. The additional car journeys from the Leisure centre and the housing will increase traffic at the Seabrook Road junction (Petrol Station).

There are greater merits in looking at alternative options that far outweigh the need for approving the stopping up order for this road. Traffic calming measures would easily create access to the new development from Princes Parade providing all the proposed uses can be served from the existing highway retaining a safer road alignment in its current iconic form.

***IMPORTANT NOTE:** We would further ask you to directly seek the advice of Historic England, who made very strong comments to object to the planning application (whilst not out for comment regarding the stopping up order, it still has relevance, and we are very disappointed that Buckles Report dismisses their comments in 'Merit' as outlined below)

Buckles Report extract 7.27:

Historic England were consulted on the planning application as to the impact of the development to the setting of the RMC. Their comments in a letter dated 26th October 2017 and the relevant extracts are set out below:

(i) "The RMC is not a normal transport canal but rather was an important part of the country's defences constructed in the early 19th century in response to a very real fear of invasion by Napoleon's army ... It was built to delay the advance of a landing force while the British army mustered inland";

(ii) "Amongst the factors that are critical to the ability to appreciate the significance of the RMC at this eastern end is the largely undeveloped nature of the land between the canal and the beach. The construction of the sea wall and coast road has affected the form of the beach, while the former use as a refuse tip has altered the topography in some areas. Even so, with the beach and the canal close to each other, it is easy for people to understand how the RMC would have formed a substantial obstacle to the progress of an invading French army";

(iii) "The impact of the proposed development would be to divorce the canal from the shore to a much greater degree than currently. Were the canal to become a linear feature between two substantially developed areas, appreciation of its historic role as a barrier would be undermined and with this the ability to understand its design as a fortification". [emphasis added]

Buckles continues with point 7.28

Noting the above comments of Historic England, and in particular given Princes Parade is already within the modern setting of the RMC (positioned between the canal and the beach), the Council contends that any impact to the setting of the RMC by the development is not a direct consequence of the road closure and diversion.

Therefore, this response theme does not diminish the Council's satisfaction of the 'merits test'.

Please note; I would most strongly argue that it does diminish the merits test as the replacement road required to service the new development and the Princes Parade diversion route will impact on the setting and create new harm to the Ancient Scheduled Monument

MY ORIGINAL OBJECTION FOR INFORMATION PURPOSES AS IT IS REFERRED TO ABOVE

THEME 'IMPACT TO RMC' - HIGHLIGHTED IN RED

PRINCES PARADE – CONSULTATION RESPONSE

Please find below comments on the plans for Princes Parade, Hythe. I regret that I could not make these online as I failed after several attempts to find a link to do so.

Comment: A new swimming pool would better serve the residents of Hythe as a rebuild on the existing site or on the Smiths Medical site which would bring greater benefit to a larger number by its location on this suitable site within a residential area.

Comment: In terms of demand for housing, the key objectives are to provide more affordable homes and these homes will be at the top end of the market and likely not purchased by local people, but as second homes for non-Shepway residents.

Objection: To the description of the site solely as a former municipal waste tip. The site was used as such by Folkestone Corporation/Shepway District Council due to total disregard of the Royal Military Canal in its setting, which Historic England state should be protected and against all costs

Objection to proposal in its entirety: to the overall scheme of development on Princes Parade supporting Historic England's view that this site should not be allocated for significant new development in the draft local plan, and that it should remain as largely open green space as per the last Local Plan inquiry and the decision by the Inspector.

Objection to proposal in its entirety: The undeveloped open land between the Royal Military Canal and the sea forms the setting to the scheduled monument and although this has seen some change it still makes a major contribution to understanding of the significance of the RMC as a fortification and to the experience of this monument.

Objection to proposal in its entirety: The road should not be realigned to be next to the canal as this changes the setting completely of the ancient schedule monument

Objection to the proposal in its entirety: The proposals are not in accordance with NPPF advice, specifically with reference to heritage assets and their settings. Under paragraph 129 the planning authority must assess the significance of the heritage asset affected by proposed development, including the contribution made by its setting. Paragraph 132 says that significance can be harmed by development within setting and that substantial harm should be wholly exceptional. Under paragraph 133 substantial harm must be demonstrated to be necessary at this site, and the existence of alternative sites for the leisure centre would make this difficult to prove here.

May I remind you of your saved policy TM8:

Princes Parade, Hythe

6.24 The Princes Parade site is an extensive area of open land next to the seafront at Seabrook, Hythe. The site includes the Royal Military Canal which is a scheduled ancient monument of national importance. It was designed as a long distance defensible fortification and communication system and there are no comparable works surviving elsewhere. For this reason, this site has potential for tourism uses which are closely related to the use of the canal but also due to its proximity to the sea. This site is also a suitable location to provide a local park, which would address the open space deficiency in Seabrook.

6.25 In order to preserve the open character of the site and to enhance the setting of the Canal, any use should be low key. Built development will only be acceptable where it is essential for the use, and should be limited in scale.

With the identification of many new sites in your Places and Policies and the opportunities which arise through the Garden Town at Otterpool Park, this land should not be earmarked for housing or leisure in view of its historic importance, leaving an important green lung between Sandgate and Hythe and one of the most important views in the district.

Yours

Viv Kenny

Resident: [REDACTED]