

Proof of Evidence of Mark Fitch BSc (Hons) MCIHT

Highways and Transport Planning Matters

S247 Stopping Up Order Public Inquiry

Princes Parade, Hythe

Sweco UK Limited
3rd Floor Eldon House
2 Eldon Street
London, EC2M 7LS
+44 20 3002 1210

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Prepared For: Folkestone and Hythe District Council

1 Qualifications and Experience

- 1.1.1. My name is Mark Fitch. I am a Technical Director in the Transport Planning division of Sweco. Sweco is a multi-disciplinary engineering consultancy, with offices throughout the UK and Northern Europe. I am a member of the Chartered Institute of Highways and Transportation (CIHT).
- 1.1.2. I have over 20 years' experience in transport planning, engineering, advising private and public sector clients on the transport, highways and access aspects of a development and regeneration projects. I have led the Transport Planning team in London since its opening 6 years ago.
- 1.1.3. My principal areas of experience are the preparation of Transport Assessments (TA), developing transport and access strategies for large scale development, and traffic engineering aspects of site development. I am familiar with the Site and the surrounding area. MLM Consulting Engineers Ltd produced the TA (Aug 2017) and, since then, MLM have become part of Sweco UK.
- 1.1.4. My experience in transport planning for major new developments includes accessibility planning for all people including those with disabilities, analysis of car parking requirements, design of highways proposals for planning, commission of and responses to Road Safety Audits, and overseeing detailed highway design post approval.
- 1.1.5. The evidence which I have prepared and provide for this appeal is true and has been prepared in accordance with professional guidelines and I confirm that the opinions expressed are my true and professional opinions.
- 1.1.6. I have read the 2018 objections and as many of the 2021 objections as possible prior to completing this proof and have addressed the comments made. If I have not addressed an issue it is because I do not believe it is relevant to this inquiry or because it is not sufficiently material or significant to justify consideration.

2 Background

- 2.1.1. The planning permission for the land at Princes Parade Promenade, Princes Parade, Hythe (“the Site”) granted by the Folkstone & Hythe District Council (“Council”) in its capacity as local planning authority on 18th July 2019 consents a mixed-use development comprised of:
- A. An outline application for up to 150 residential dwellings; up to 1,270sqm of commercial uses including hotel use, retail uses, and/or restaurant/café use; hard and soft landscaped open spaces including children’s play facilities; surface parking for vehicles and bicycles; alterations to existing vehicular and pedestrian access and highway layout; site levelling and groundworks; and all necessary supporting infrastructure and services; and*
- B. A full application for a 2,961sqm leisure centre including associated parking; open spaces; and children’s play facility.*
- 2.1.2. In order for the planning permission to be implemented, the stopping-up and diversion of the existing alignment of Princes Parade is necessary. As such, an application under Section 247 (S247) of the Town and Country Planning Act 1990 (“T&CPA”) was prepared and submitted by the Council. This has attracted unresolved objections which has led to the Secretary of State to call a Public Inquiry.
- 2.1.3. Specific to the S247 Application, the planning approval increases the open space area of the promenade, and allows development to be constructed on what is now highway land, through the realignment of Princes Parade to the north side of the development.
- 2.1.4. I provide expert evidence on Highways, Transport Planning and Traffic matters relating to the objections to the stopping up and diversion order which is the subject of the S247 Public Inquiry. My evidence will be focussed on addressing the ‘merits’ case for the S247 Order and addressing the objections made.
- 2.1.5. The objections are summarised in the Response to Statutory Consultation, Buckles, May 2021 (“the Buckles Report”, CD66). The objections are grouped into themes and I will be responding to the following in my Proof of Evidence:
- (c) loss of seafront parking (raised by 59 respondents);
- (d) loss of seafront highway amenity (raised by 148 respondents);
- (e) reduced accessibility to the seafront, including for people with disabilities and ease of access and convenience for users of the beach (raised by 55 respondents);
- (i) adverse traffic impact (raised by 136 respondents);
- 2.1.6. I also consider and respond to objections raised by the Save Princes Parade Campaign group in response to the Buckles Report, and in their Statement of Case dated 28 September 2021, and other objections received to the diversion order since 2018, including on highway safety. In terms of the key elements identified by the

Inspector in his note of the pre-inquiry meeting, I address the effects on seafront parking, seafront highway amenity, disabled access to the seafront, and traffic flows. I have borne in mind what the Inspector said in that note that issues for the inquiry should be clearly related to the proposed order and not to the Development itself, and that it is the effect of the order on the highway right that is for discussion not matters related to construction under the planning permission, such as drainage and street lighting. I have considered when preparing this proof of evidence what can be said to be the effects of the order, rather than the planning permission.

- 2.1.7. My evidence deals with the impacts of the stopping up and diversion only, as opposed to the impacts of other elements of the Development which are already permitted under the planning permission. The new road itself can be constructed to access the Development as a result of the planning permission granted. I understand from Council officers that it is proposed that the new road is constructed by the Council's contractors as part of the overall Development under the planning permission. Agreements will be made between the Council as developer and Kent County Council under Section 38 (S38) of the Highways Act 1980 for the new highway, and Section 278 (S278) of the Highways Act 1980 for changes to the existing highway where the new highway 'ties in' to the existing. In my experience this is usual practice for the delivery of developments which incorporate new roads. In practice roads on development sites like this are almost always constructed by the developer and not by the highway authority.
- 2.1.8. The consequences of the S247 stopping up and diversion order are the use of this new road for existing traffic on Princes Parade due to the diversion of the highways rights over the new road and the removal of highways rights on Princes Parade as shown on the S247 order plan. The removal of highways rights on Princes Parade will enable the Development and in particular the new wider promenade to be constructed. The stopping up and diversion will move the traffic from the existing Princes Parade on to the new road, although pedestrians and cyclists could use the widened promenade on much the same line. The stopping up and diversion will mean that the use of the existing Princes Parade as a highway, including for parking, will cease. Replacement facilities for parking are being provided, in addition to the new road. Princes Parade will remain at the western end of the Site and is not being stopped up and diverted in that location.
- 2.1.9. It is my understanding that any comments on the broader impact and merits of the consented Development, including the new road's construction and traffic accessing the Development via the new road, are not relevant to the S247 Application. I understand that these matters cannot be considered by the Secretary of State for Transport in his decision and that the merits on the planning permission cannot be reopened. This has been confirmed by the Inspector in his note of the pre-inquiry meeting held on 21 September 2021:
- "It is the 'right' that is for discussion, not the construction. Therefore, surface water drainage, street lighting etc are not relevant considerations for the Inquiry."*
- 2.1.10. Nonetheless, where significant or potentially relevant objections have been received I have responded to them so that the Inspector has information available to address

them. I have addressed issues raised to date by the Save Princes Parade Campaign group, including in their Statement of Case dated 28 September 2021, including some which I do not consider relevant to this inquiry, because they have formally been raised by the main objector following the pre-inquiry meeting.

2.1.11. In the following chapter I describe the transport networks surrounding the Site and the proposed Development.

3 Planning Application Documents

- 3.1.1. Planning permission (Y17/1042/SH) was granted following reports issued as part of the planning application, and follow up consultation. Key documents are:
- Environmental Statement (ES) Technical Annex 8, Aug 2017 (CD18);
 - Environmental Statement – Additional Information and Clarification, Appendix 08, Feb 2018 (CD27); and
 - Planning, Design and Access Statement, 2017 (CD7).
- 3.1.2. I consider these documents are still valid. The only change that has occurred on the local streets since the documents were produced is the implementation of Pay and Display car parking and the introduction of some short lengths of double yellow lines. This change has actually reduced parking demand on the existing Princes Parade I understand, as would be expected, which makes the design decisions and conclusions on the basis of which planning permission was granted even more robust.
- 3.1.3. Traffic growth, using the industry standard TEMPro, was applied from 2016 to 2018 and through to 2023, to provide a future scenario test. This covers population growth in the area and includes for new developments in the Local Plan that were due to be built out, including Martello Lakes. Key committed developments were also included namely (from TA Aug 2017) Olivia Court, the 22-flat residential development to the east of the site (which was recently completed at the time of the TA); the 75-dwelling Imperial Green development to the west of the site at the rear of the Hythe Imperial Hotel; and the Shorcliffe Garrison development of 1200 homes, a primary school, nursery and other community facilities to the north of the site.
- 3.1.4. This approach, testing a future year that is yet to be, means the traffic impact analysis in the TA is still relevant.
- 3.1.5. I also refer to letters and emails received from KCC, the highway authority, as part of the pre and post application consultation and their consequent approval of the analysis and Development proposals as relates to highways and transport impacts.
- Letter from Tony Jenson KCC dated 11.04.18 (CD48);
 - Decision Notice dated 18.07.2019 (CD2);
 - Officer's Report to the Planning Committee dated 16.08.2018 (CD3);
 - Emails from Tony Jenson KCC (CD 48, 49 and 50).

4 Description of the Site and Surrounding Transport Networks

4.1. Site and Surrounding Area

- 4.1.1. The Site is located to the east of Hythe town centre. To the north the Site is bounded by the Royal Military Canal (a scheduled ancient monument and local wildlife site), to the west by a golf course. To the south the Site is bounded by a shingle beach. In the north-eastern corner of the Site lies the Seapoint Canoe Centre beyond which lies Olivia Court – a residential block comprising of 22 flats.
- 4.1.2. The Site has previously been used as a refuse site, however, it is now overgrown with scrub. Located in the north-east corner of the Site is the Seapoint pay and display car park (approximately 23 unmarked spaces), which is accessed via a simple priority junction from Princes Parade.
- 4.1.3. The Seapoint Canoe Centre, which is accessed from the Seapoint car park, is currently housed in a temporary building and a planning application for a permanent structure was submitted in 2014 (Planning application: Y14/1248/SH). Permission was granted in 2015, however no construction work has begun on-site.

4.2. Walking and Cycling Network

- 4.2.1. There are several statutory public rights of way in the vicinity of the Site:
- HB83 (Bridleway) runs through the north of the Site adjacent to the southern bank of the Royal Military Canal.
 - HB56 (Footpath) runs along the north bank of the Royal Military Canal.
 - HB65 (Bridleway) runs along the north bank of the Royal Military Canal approximately 10m north of footpath HB56.
- 4.2.2. Permissive use of the promenade is allowed and National Cycle Route 2 (Dover to Cornwall) runs though the Site along the promenade. This route is not a public right of way but provides a primarily off road cycle route to Hythe to the West and Folkestone via Sandgate to the East. A traffic free route exists all the way to Folkestone via the seafront path.
- 4.2.3. There are two footpath bridges crossing the canal adjacent to the Site, one at the western boundary and another 540m to the east of the first bridge (approximately in the middle of the Site). These crossings over the canal provide footpath links to Seabrook Road (A259) from the promenade and beach.
- 4.2.4. Princes Parade has a footway on the north side of the carriageway. The promenade runs south of the road. There are currently no formal crossing facilities along Princes Parade, however there are periodic gaps in the splash wall that runs along the southern side of the carriageway allowing pedestrians to access the promenade.
- 4.2.5. Footways run along both sides of Seabrook Road (A259). A signal crossing is located near the junction with Horn Street. Bus services are available on Seabrook Road

providing frequent services to Hythe and Folkestone, and further afield to Canterbury and Dover.

4.3. Local Highway Network

- 4.3.1. Princes Parade runs through the south of the Site adjacent to the seafront and promenade. The road is approximately 7.5m wide including the car parking spaces, so provides just 5.5m for moving traffic. There is a 40mph speed limit along the main section of the road and a 30mph limit at the junctions of the connecting roads at each end. There are double yellow lines along the northern side of the carriageway. On the southern side of the carriageway there are seasonal Pay and Display controls operating between the hours of 8am – 6pm, from 1st April to 30th September. There are double yellow lines at gaps in the splash wall for access, adjacent to the Twiss Road car park to the west of the Site and on the one-way circulatory system to the east of the Site near the junction with Seabrook Road (A259). In peak periods of utilisation, parking on the southern side of the carriageway can create difficulties with two-way traffic passing close by, given how narrow the carriageway is and the proximity of the road to the sea splash wall which makes it impossible to exit a car from that side. At the time of the TA (CD18), instead of Pay and Display controls parking on the southern side of Princes Parade was unrestricted, with no double yellow lines at the gaps in the splash wall for access.
- 4.3.2. An automatic traffic counter (ATC) survey was undertaken on the section of Princes Parade that runs through the Site over a 7 day period commencing Wednesday 07th September 2016. The ATC survey recorded traffic flow volumes, vehicle categories and speeds. During the AM peak hour (08:00-09:00), the average weekday traffic volume in the eastbound and westbound direction was 161 and 173 vehicles respectively. During the PM peak hour (17:00-18:00), the corresponding traffic volume in the eastbound and westbound direction was 175 and 216 vehicles respectively. The westbound 85th percentile speed across the 7-day survey period was 48.3mph and the eastbound 85th percentile speed was 45.6mph. On the basis of site observations, I consider the ATC survey data to remain representative of the use of Princes Parade today.
- 4.3.3. The Pay and Display parking in the area is detailed in **Table 4.1**. Due to the implementation of Pay and Display controls and double yellow lines at gaps in the splash wall, the length of carriageway available for parking has been reduced since the TA was written. The original parking capacity at the time of the TA and the capacity today are both shown in **Table 4.1**.

TABLE 4.1 – EXISTING PARKING PROVISION IN VICINITY OF SITE

Princes Parade (Section that runs through the Site).	At time of planning application: Approximately 187 on street spaces. Now: 172 spaces due to implementation of defined parking bays and double yellow lines at gaps in splash wall.
Princes Parade (Section adjacent to golf course, to the west of Site).	At time of planning application: Approximately 160 on-street spaces. Now: 142 spaces.
Seapoint Car Park	At time of planning application: Regular Bays: 21, Disabled Bays: 2 Now: no change
Twiss Fort Car Park	At time of planning application: Regular Bays: 20, Disabled Bays: 2 Now: no change
Battery Point Car Park	At time of planning application: Regular Bays: 27, Disabled Bay: 2, Kiosk Bay: 1 Now: no change

4.3.4. A plan of the existing car parking arrangements is provided in drawing 6520244-SWE-ZZ-XX-SK-TP-0001-P01 in **Appendix A**.

4.4. Development

4.4.1. The planning permission granted by the Council in its capacity as local planning authority on 18th July 2019 (CD2), consents a mixed-use Development (planning reference Y17/1042/SH) comprised of:

- a) An outline application for up to 150 residential dwellings; up to 1,270sqm of commercial uses including hotel use, retail uses, and/or restaurant/café use; hard and soft landscaped open spaces including children’s play facilities; surface parking for vehicles and bicycles; alterations to existing vehicular and pedestrian access and highway layout; Site levelling and groundworks; and all necessary supporting infrastructure and services; and
- b) A full application for a 2,961sqm leisure centre including associated parking; open spaces; children’s play facility; and the realignment of Princes Parade in this location including associated parking, traffic calming.

4.4.2. The planning permission includes provision of an 11m wide promenade providing significant improvements to pedestrians and cyclists along nearly 1 km of the seafront.

4.4.3. The construction of part of the new road is approved around the leisure centre in the detailed element of the hybrid planning permission, as this provides the leisure centre access. The position of the new road is set out in several key documents that were part of the approved detailed planning application including the TA (CD18), pages 135 and 137 of the PDAS (CD7), and the detailed approved plans (listed in condition 4, CD 88,89 and 90) where the road is shown as part of the detailed application.

4.4.4. The position of the new road is also shown on the plans for the outline planning permission listed in condition 6, including the Access and Circulation Plan and the Land Use Plan, and on the drawings in the Design Code in Section 5 of the PDAS (pages 92, 98 and 102) (CD7). I have checked with the design team for the

Development, including colleagues at Sweco, and can confirm that the detailed design for the outline element of the planning permission including the new road is being worked up in line with those plans, and the reserved matters application will be made to reflect that. The suggestion made by objectors that the Council might not construct the new road as shown on the detailed and outline planning permission drawings, and the plan for the stopping up and diversion order, is incorrect. There is in my view no prospect of the route or location of the new road changing.

- 4.4.5. The planning permission involves the construction of the new road and the realignment of Princes Parade from its current position adjacent to the promenade, towards the Royal Military Canal and on to the new road, in order for example to reduce the impact of vehicles on the seafront and allow the construction of the widened promenade.
- 4.4.6. The diverted Princes Parade will retain its use as an access to local properties and businesses and a distributor linking the east of Hythe to the A259. Kent County Council have requested that the design of the realigned road should follow Kent Design Guidance for Local Distributor Roads. The speed limit will be reduced from 40mph to 30mph on the section of road through the Site as a result of the increased pedestrian/cycle activity and new access points formed as a result of the Development.
- 4.4.7. The new road will be traffic calmed to encourage low vehicle speeds. The curves of the new road will help self-enforce the lower speed limit and raised tables will be installed at pedestrian crossing points.
- 4.4.8. It is important to note that the construction of the new road is authorised by the planning permission, and the stopping up and diversion order does not authorise that. The order simply moves the highway right from the current Princes Parade land to the new road. The proposed Development will be accessed from the new road via simple priority junctions, including access to the sluice valve for the Royal Military Canal.
- 4.4.9. Footways of 1.8m width will be provided along the southern side of the new road on the eastern half of the Site and on both sides of the new road in the west of the Site. The bridleway HB83 that runs along the south bank of the Royal Military Canal will be unaffected by the road realignment.
- 4.4.10. Parking for the leisure centre will be provided in two dedicated car parks situated on either side of the proposed building. Coach Parking is to be provided in an on-street bay on the new road.
- 4.4.11. Public parking has been incorporated into the design of the Site, with 43 spaces accommodated in formalised parallel on-street bays along sections of the new road adjacent to the linear park connecting the two main open spaces. In addition a 62 space car park will be located in the south-west corner of the Site alongside the western open space. In addition to these spaces, informal on-street parking will remain on the section of Princes Parade in the south-west and south-east corners of the Site which will not be realigned. A plan of the proposed car parking arrangements is provided in drawing 6520244-SWE-ZZ-XX-SK-TP-0002-P02 in **Appendix B**.

- 4.4.12. The new road will run through the current location of Seapoint car park (23 spaces). This car park will be reprovided, as part of the proposed eastern leisure centre car park, providing public parking for those wishing to access the eastern end of the Royal Military Canal and the Seapoint Canoe Centre.
- 4.4.13. The Officer's Report to the Planning Committee (16.08.2018) (CD03) explains how the Development will increase demand on the pedestrian and cycle network. The Officer's Report also explains how the Development will provide significant enhancements to the quality of the pedestrian and cycle network as a consequence of the widened traffic free promenade, the reduction in the speed limit from 40mph to 30mph on the new road together with traffic-calming features, and formal pedestrian crossings to provide better links between the proposed Development and the RMC (paragraph 8.170).
- 4.4.14. The Officer's Report (CD03) explains that *"KCC Highways and Transportation have assessed the proposal and the supporting information and found that sufficient parking is proposed to accommodate the existing demand and the future demand from the proposed development, whilst all junctions and roads will still operate within their capacity parameters when accounting for the development, cumulative impact from local schemes and traffic growth, with no significant detrimental effect upon road users"* (paragraph 8.171).
- 4.4.15. In addition, at paragraph 8.172, the Officer's Report (CD03) states: *"Subject to the requirements of KCC Highways and Transportation with regard to a road restraint risk assessment process (RRRAP), a street lighting plan, a construction management plan and other standard highway conditions, including one to control the palette of materials, it is considered that there are no detrimental highway considerations associated with the development and the proposal will result in qualitative improvements to existing pedestrian and cycle routes, in accordance with NPPF paragraphs 17 and 32, saved policies TR5, TR6, TR11 and TR12 of the Shepway District Local Plan Review, and Shepway Core Strategy Local Plan policies DSD, SS1 and SS3.*
- 4.4.16. This is important background to the reasons for approval of the Development.

5 Impacts of the Stopping Up and Diversion Order

- 5.1.1. In this section I aim to identify for the Inspector what the impacts of the stopping up and diversion order are. It is important that the difference is borne in mind between:
- a) the new road as a physical entity (which is being constructed under the planning permission);
 - b) the highway rights on Princes Parade which are being stopped up and diverted; and
 - c) the highway function performed by the current Princes Parade and which would be performed by the new road once the highway rights from Princes Parade are diverted over the new road.
- 5.1.2. As mentioned previously, the construction of the new road is authorised by the planning permission and the stopping up and diversion order does not authorise that; it simply moves the highway right from the current Princes Parade land to the new road. The highway function for the exercise of this right would be performed after the stopping up and diversion order by the new road, which is better and safer for this function than the existing Princes Parade.
- 5.1.3. As a result of the highway rights being diverted, the traffic from the existing Princes Parade would use the new road, leading to significantly more traffic using the new road. This is a direct effect of the stopping up and diversion order. In a future 2023 scenario (as assessed in the TA), over the course of an average weekday, three quarters of traffic using the new road will be as a result of the diversion. These proportions are the same or similar in the peak periods, with three quarters of the traffic that will use the new road in the morning peak, and two thirds in the evening peak, as a result of the diversion order.
- 5.1.4. I understand, as the Inspector made clear at the pre-inquiry meeting, that matters related to the construction of the new road are not for this inquiry as they have been authorised under the planning permission. Given the arguments raised by the Save Princes Parade Campaign group in their Statement of Case dated 28 September 2021, I have nonetheless considered whether it could possibly be argued that the design and construction of the new road is different because the existing Princes Parade highway is going to be diverted over the new road.
- 5.1.5. This question is considered below under headings reflecting the key design parameters of a highway:
- a) **Lighting:** Raised tables are required for the Development as a speed restraint measure, to ensure compliance with the 30mph zone that is required due to the nature of the new road serving the Development, with pedestrian usage and approved access points. This was raised in the Stage 1 Road Safety Audit (Appendix C, CD27). The physical raised features also provide the pedestrian crossing points and must be lit. Kent County Council, as highway authority, confirmed this requirement (Letter 11.04.18, from Tony Jenson KCC, CD48). This will be the case with or without the stopping up and diversion order. KCC

advised that their view is that the road would need to be lit throughout so drivers do not experience areas of light and dark as they drive along (email 03.05.18 from Tony Jenson KCC, CD99). The design of the road and associated lighting and traffic calming is being developed and is a Pre Commencement Condition. The Lighting Impact Assessment (Environmental Statement - Technical Annex 9 – Lighting, CD19) shows the lighting required through the site (Appendix 2). Section 8 summarises how the concerns regarding ecological impacts of the lighting can be mitigated: *“To minimise the physiological and ecological impact of the development lighting scheme on the bat foraging habitats/foraging bats and nature designations careful consideration will not only be given to the direction and level of lighting, but careful consideration will also be given to the choice of lamp sources to be utilised throughout the design of the scheme”*. Lighting is a subject that is considered further in the proof of Richard Andrews. It is important to note again that the street lighting is required as a result of the approved Development, not the stopping up order and diversion order and that the lighting of the new road would not be any different if the Princes Parade highway was not being diverted over it.

- b) Carriageway Depth: The 2 key factors that influence carriageway depth are the number of HGVs and the soil conditions (measured by the CBR value). The existing soil conditions require a certain depth of construction which would not change regardless of the volume of traffic that would use the road. This depth of construction is suitable for a major road suitable for HGVs. It is notable that in this instance there is an existing width restriction on Princes Parade of 6'6" (1.98 m) that effectively bans HGVs (vehicles over 7.5T) except for access. There are no proposals to remove this ban from the unimproved sections of Princes Parade. Therefore, the volume of HGVs will continue to be minimal and well within the highway construction design, whether the new road is a through road or just an access road. The carriageway depth of the new road would not be any different if the Princes Parade highway was not being diverted over it.
- c) Carriageway width: The new road has been designed at a width whereby it is better and safer than the existing Princes Parade, allowing two vehicles to pass comfortably and the proposed parallel parking bays to be safely accessed. The new road will not be so wide as to encourage vehicle speeds greater than 30mph, the design speed. The amount of traffic on the new road will not affect the carriageway widths proposed. The carriageway width of the new road would not be any different if the Princes Parade highway was not being diverted over it.
- d) There is no effect on the new road's highway drainage required as a result of the stopping up and diversion order, as there is no change to highway design in any other respect. The drainage for the new road would not be any different if the Princes Parade highway was not being diverted over it.
- e) There are no effects on the need for any retaining walls/structures, or the height of the road, or the “street furniture”, to pick up on the phrases used by the Save Princes Parade Campaign group in their Statement of Case dated 28 September 2021, as a result of the stopping up and diversion order.

5.1.6. In summary, there are no differences in the design or construction of the new road which could be argued to be a consequence of the stopping up and diversion order for Princes Parade, reflecting the design submitted as part of the approved planning permission. The design and construction of the new road, and its physical elements, would not be any different if the Princes Parade highway was not being diverted over it. I am confident that there is no argument that the new road is physically any different as a result of the proposed stopping up and diversion. This design is being taken forward to detailed design for submission as part of a pre-commencement planning condition.

6 Response to Public Objections

6.1.1. The objections to the S247 Order are summarised in the Response to Statutory Consultation, Buckles, dated May 2021 (CD66). The Objections are grouped into themes, which also reflect the key elements of the merits test identified by the Inspector in his note of the pre-inquiry meeting. In this Proof of Evidence I will be responding in turn to the following issues:

- Loss of seafront parking (raised by 59 respondents);
- Loss of seafront highway amenity (raised by 148 respondents);
- Reduced accessibility to the seafront, including for people with disabilities (raised by 55 respondents); and
- Adverse traffic impact (raised by 136 respondents).

6.1.2. I deal with each of these main themes of objection in turn first. Further objections from the Save Princes Parade Campaign Group and other objectors are considered at the end of this section, where they have not been addressed under the main themes.

6.2. Loss of Seafront Parking

6.2.1. This objection theme alleges that the closure and diversion of Princes Parade will result in the loss of parking adjacent to the seafront. The impact on seafront parking should be viewed in the context of the wider parking changes across the Site approved as part of the Development because the new parking will be in existence following the stopping up and diversion of Princes Parade. The Development incorporates better quality replacement parking provided as mitigation for that lost due to the closure of Princes Parade. The Buckles Report (CD66) recognised that there would be some loss of seafront parking as a direct consequence of the order but said that it was not significant (paragraph 7.18) and I agree with this conclusion.

6.2.2. As part of the TA (paragraph 2.12, CD18) undertaken to support the planning application for the Development at Princes Parade, parking surveys were undertaken on Saturday 23rd July 2016 between the hours of 11:00 and 15:00. The day was a hot and sunny one at the beginning of the school summer holidays, with the recorded temperature reaching 26°C. These conditions were representative of a maximum use scenario for parking facilities in the vicinity of the Site given the attraction of the beach, before the introduction of Pay and Display parking on Princes Parade. The parking survey results show a peak of 100 cars parked on the section of Princes Parade that runs through the Site at 2pm. It should be noted that, at the time of the survey, parking along Princes Parade was free, however Pay and Display charges have since been introduced which mean that the survey was conservative as far as the current position is concerned.

6.2.3. The results of the car parking surveys are shown in Appendix 5 of the TA (CD18). At the busiest time at 2pm, 277 car parking spaces were in use along the seafront from and including Twiss Fort car park to Battery Point car park.

- 6.2.4. I understand, and as is started in objection letters relating to this stopping up inquiry, that due to the introduction of Pay and Display parking on Princes Parade some visitors are now choosing to park on local roads that are still free such as Seabrook Road, Twiss Road and South Road, rather than on Princes Parade or the car parks namely Seapoint Car Park, Twiss Fort Car Park or Battery Point Car Park which are also Pay and Display. Therefore, the number of cars parking on Princes Parade and in the car parks is likely to be less today than recorded in the 2016 surveys. Using the 2016 surveys as the basis for considering parking effects is therefore more robust and conservative than was the case before the Pay and Display parking on Princes Parade was introduced.
- 6.2.5. Parking for the Leisure Centre has been proposed at a rate of 1 space per 27.5m² of ground floor area with a total of 108 parking spaces to be provided. This was required by KCC Highways during Transport Assessment scoping discussions, as set out in paragraph 5.15 of the TA (CD18) and agreed in the letter of 11.04.18 from Tony Jenson of KCC (CD48).
- 6.2.6. Car parking use over the week has been reviewed. Car park use was surveyed at the Oxted Leisure Centre, Surrey (Oxted Baseline Parking Study, Feb 2017, Systra for Surrey County Council), as shown in **Figure 6.1** (weekday survey) and **Figure 6.2** (Saturday survey). The study is available at:
<https://www.oxtedlimpsfieldresidents.co.uk/uploads/documents/parkingstudy.pdf>

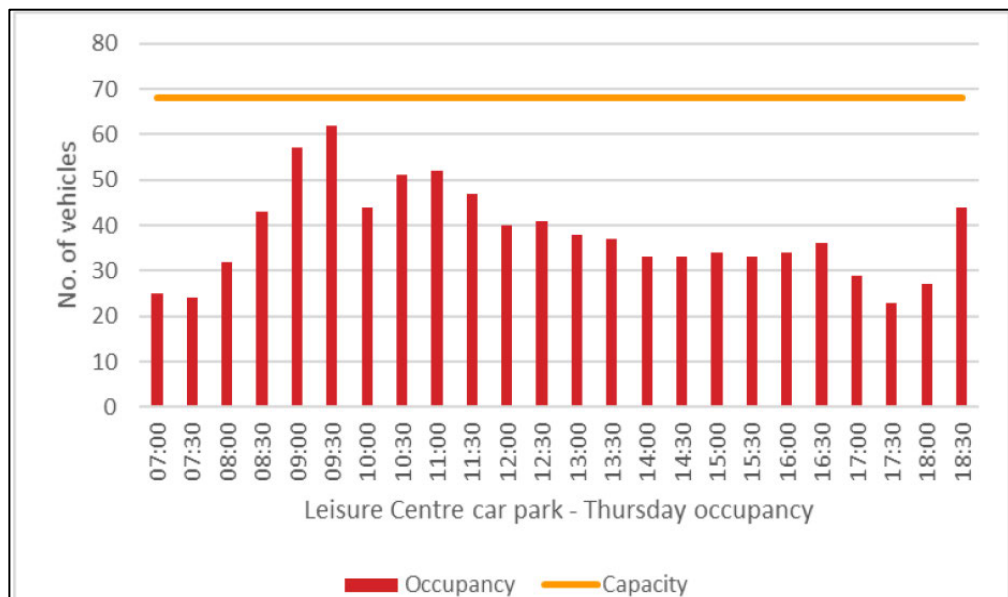


Figure 6.1 – Car parking surveys at Oxted Leisure Centre- Weekday.

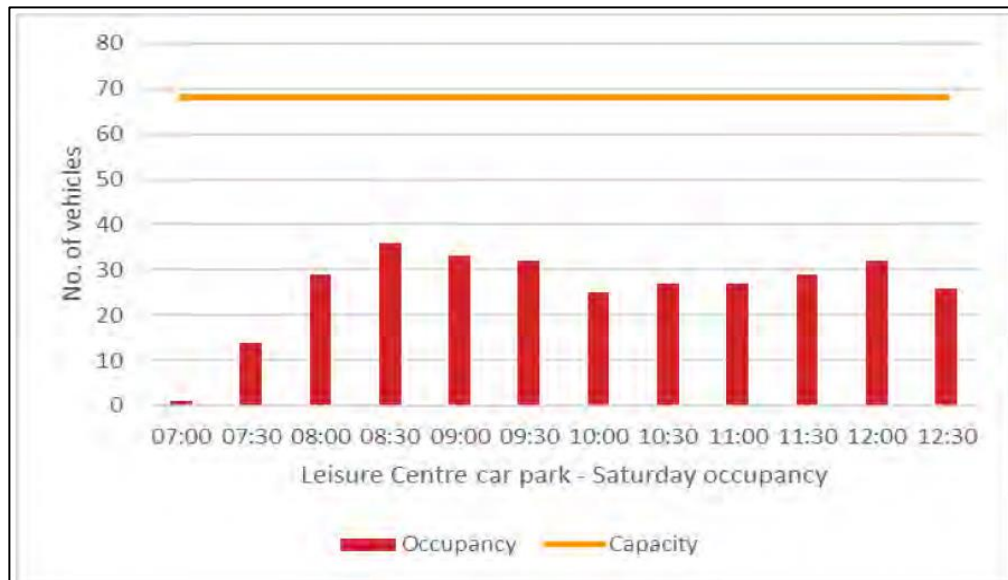


Figure 6.2 – Car parking surveys at Oxted Leisure Centre- Saturday.

- 6.2.7. As shown, car parking use is typically higher on a Weekday morning (9:30 am) and evening (6:30) than on a Saturday.
- 6.2.8. A study at South Woodham Ferrers, Essex also shows car park usage at a Leisure Centre (Parking Occupancy & Car Park User Questionnaire Report, Oct 2019, South Woodham Ferrers Town Council). The report is available here: https://www.southwoodhamferrerstc.gov.uk/_UserFiles/Files/Neighbourhood%20Plan/SWF%20Car%20Parking%20Study%20.pdf
- 6.2.9. The results of the two studies are set out in **Figure 6.3**.



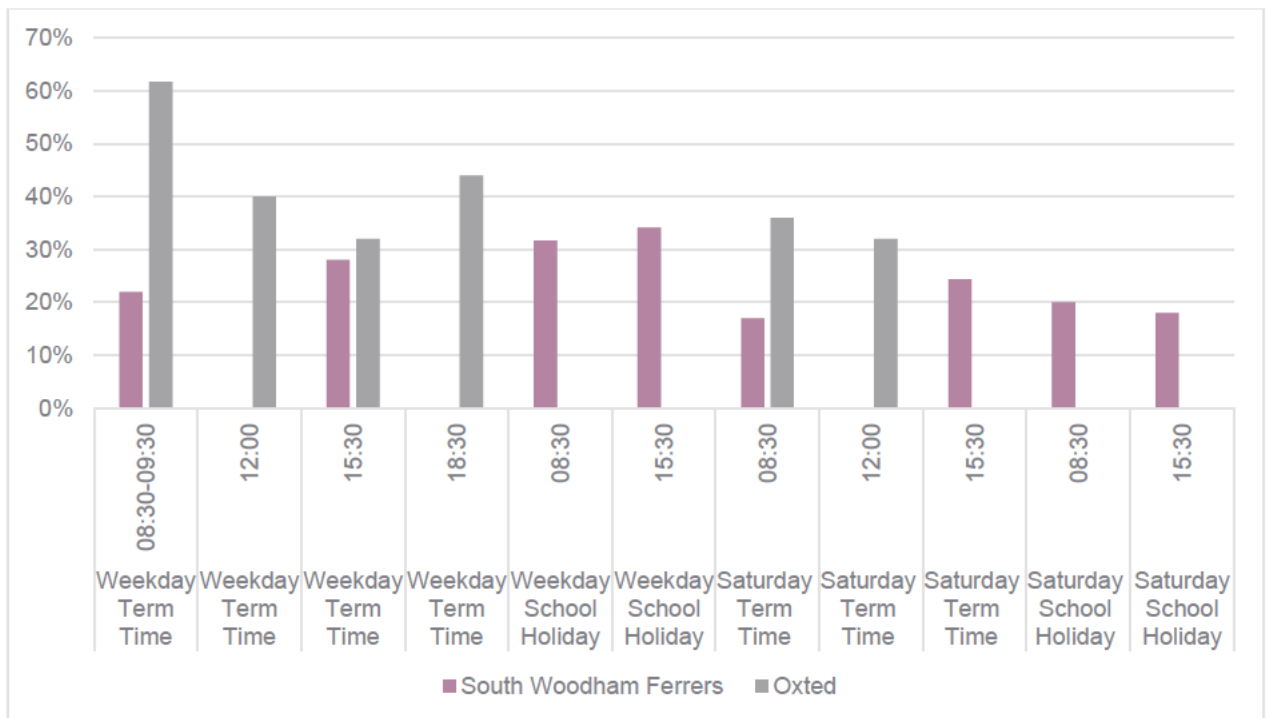


Figure 6.3 – Summary of car parking survey results at Oxted Leisure Centre and South Woodham Ferrers Leisure Centre

- 6.2.10. As shown in **Figure 6.3**, parking demand is less at both Leisure Centres on a Saturday than a weekday.
- 6.2.11. As agreed with KCC and the local planning authority, and set out in the TA (CD18) paragraph 2.12, the busiest time for visitors to the sea is the weekend and surveys were required to be undertaken on a Saturday. The Leisure Centre car parking can accommodate its own parking demand at the busiest times, as required by and set out in KCC car parking standards, to which the approved Development complies. The busiest time will be weekday evenings. As shown in the car parking studies at Oxted and South Woodham Ferrers, more car parking spaces are likely to be available on a Saturday than a weekday, which can then be used by visitors to the seaside, in addition to the other parking provision.
- 6.2.12. The Development has been designed so that the maximum parking demand by visitors observed during the surveys can be accommodated (without needing to use any of the Leisure Centre car parking). There will be 43 bays in formalised parallel on-street bays along sections of the new road adjacent to the linear park connecting the two main open spaces. A 69 space car park will be located in the south-west corner of the Site alongside the western open space. In addition to these spaces, informal on-street parking will remain on the section of Princes Parade in the south-west corner of the Site which will not be realigned, with space for approximately 24 cars (assuming 6m per vehicle) and on the section of Princes Parade to the east of the Site adjacent

to Olivia Court, with space for approximately 7 cars (assuming 6m per vehicle). Of note is that Seapoint car park (23 spaces) will be entirely reprovided, despite not being full at the time of the surveys (max occupancy of 6), and will have a traffic free walk route to the Promenade. A summary of the existing and proposed parking arrangements on Princes Parade are provided in **Table 6.1**. All parking is currently Pay and Display.

- 6.2.13. Some new small sections of double yellow lines have been installed since the survey was undertaken in 2016, which reduce existing capacity by approximately 33 spaces.

TABLE 6.1 – EXISTING AND PROPOSED PUBLIC PARKING ARRANGEMENTS

Location	Existing Provision	Proposed Provision*
Leisure Centre	N/A	108 space on-Site car park including 5 disabled bays
Princes Parade east of the golf course, (including section that runs through the Site).	Approximately 172 on street spaces, of which 100 were surveyed as in use on a typical hot summer's day.	43 on-street spaces on the new road with all spaces 2.7m wide so suitable for disabled users + 69 space car park to the west of the Development including 7 disabled bays + approximately 31 spaces on sections of Princes Parade unimpacted by the diversion.
Princes Parade (Section adjacent to golf course, to the west of Site).	Approximately 142 on-street spaces (of which 122 were surveyed as in use on a typical hot summer's day).	Approximately 142 on-street spaces. (No Change)
Seapoint Car Park	Regular Bays: 21, Disabled Bays: 2	Regular Bays: 21, Disabled Bays: 2 (replaced in on-Site car park)
Twiss Fort Car Park	Regular Bays: 20, Disabled Bays: 2	Regular Bays: 20, Disabled Bays: 2 (No Change)
Battery Point Car Park	Regular Bays: 27, Disabled Bay: 2, Kiosk Bay: 1	Regular Bays: 27, Disabled Bay: 2, Kiosk Bay: 1 (No Change)
TOTAL PUBLIC PARKING SPACES **	389 (inc 6 Disabled Spaces)	467 (inc 18 disabled spaces and 43 on-street spaces that are wide enough for use by people with mobility needs including disabled).

*Excludes Car Parking for the proposed residential and commercial Development – subject of a Reserved Matters Application and will be in a separate car park and in accordance with KCC policy.

** Excludes Kiosk Bay in Battery Point Car Park.

- 6.2.14. A plan of the proposed, replacement and retained car parking is provided in drawing 6520244-SWE-ZZ-XX-SK-TP-0002-P02 in **Appendix B**.
- 6.2.15. There will be 274 public parking spaces within the Development and adjacent to Olivia Court, with a total of 467 along the entire length of Princes Parade and the Twiss Fort and Battery Point car parks which will be easily and directly accessible to the seafront,

the RMC and the enhanced promenade and open spaces. Parking for all surveyed cars parked at a period of very high demand (before Pay and Display meters were introduced and so on a conservative basis) is being replaced. In fact excluding the Leisure Centre car park, 359 public spaces will be available along the seafront from and including Twiss Fort car park to Battery Point car park. These spaces will provide parking to accommodate 277 recorded cars in the survey. This would equate to parking capacity of 77%.

- 6.2.16. It is also worth noting that, overall, there will be more public parking than currently, as the Leisure Centre parking is also available for public use and, as discussed, peak use at the Leisure Centre is likely to be at a different time to the peak use for the seafront.
- 6.2.17. Therefore the Development will provide more than sufficient parking to accommodate peak demand and the new car trips likely to be generated by the Leisure Centre.
- 6.2.18. When considering the issue of the loss of seafront parking it must be noted that:
 - a) Kent County Council (KCC) as Local Highway Authority, concluded that sufficient parking was being provided (committee report at para 8.171 – CD3 and letter 11.04.18, from Tony Jenson KCC, CD48).
 - b) The diversion of Princes Parade only concerns a small section of it. Parking adjacent to the seafront will remain on the section of Princes Parade to the west, both within the Site and to the west of the Site.
 - c) The Seapoint Car Park will be relocated closer to the seafront to the south side of Princes Parade, with improved access to the sea front compared to today.
 - d) The details of the residential and commercial aspects of the Development will be subject to a reserved matters planning application, however it is clear that there would be good permeability through the Site to access the seafront from the new road and relocated parking, with traffic free footpaths provided. On the basis of the proposals for this development zone (Transport Assessment, Appendix 2, CD18), people would be required to walk an approximate maximum distance of 125m to reach the promenade from any of the relocated on-street parking bays.
 - e) The existing parking arrangements can be difficult to use for some users due to the need to park up against the splash wall, which can make it impossible to exit the car from that side. For those unable to climb over the splash wall to access the promenade, they must walk along the carriageway to find a break in the splash wall. The existing on-street parking may also require drivers to parallel park which some may find difficult. The need to parallel park may also hold up through traffic whilst drivers manoeuvre into position. The new car park at the west end of the Site, with predominantly perpendicular parking bays, would provide a much easier parking arrangement away from the live carriageway. The relocation of some parking to the proposed car park in the west of the Site also provides an opportunity for people to park away from the live carriageway with space to unload safely from their vehicles. This is a highway safety benefit to relocating parking to an off-street car park, as it reduces the risk of car doors opening into a live traffic lane and people needing

to step into the live traffic lane to exit the vehicles. A personal injury accident was recorded in 2017 involving a vehicle traveling along Princes Parade colliding with the open door of a parked vehicle. Further details on the updated accident records on Princes Parade for the time elapsed since the TA was written are given in Section 6.3 of this Proof of Evidence. The improved safety of off-street parking is of particular benefit for families with young children, or people needing to unload equipment for use on the beach (e.g. for fishing).

- f) For those with equipment, such as anglers, who wish to continue to park adjacent to the splash wall, 173 parking spaces along the length of Princes Parade will remain as existing. However, the relocated Seapoint car park will conveniently provide off-street parking adjacent to the promenade and the proposed western car park will conveniently provide off-street parking very close to the beach, to the north of the un-diverted section of carriageway. In summary the new car parking will be more, not less, convenient, usable and safe than the existing on-street parking on Princes Parade.
- g) In 2017 a personal injury accident was recorded where a vehicle performing a U-turn collided with a motorcycle traveling along the Princes Parade (see Section 6.3 of this Proof of Evidence for further details). Although it is not clear why the vehicle was performing a U-turn, the current nature of a long-stretch of on-street parking can mean it is tempting for drivers to perform such a manoeuvre to return to the same direction from which they arrived. The provision of off-street car parks makes it safer and more convenient for vehicles to exit to the direction from which they arrived.
- h) The parking bays on the new road provide convenient parking for those wishing to visit the canal.
- i) It is not safe to assume that, if Princes Parade is not stopped up and diverted as a result of the current S247 application, then the parking will simply continue to be available on Princes Parade. This Site is allocated for development in the Local Plan (CD108) and planning permission has been granted which creates a precedent. Parking can be removed or restricted even if the highway is not stopped up, as happened with the introduction of the Pay and Display on Princes Parade.

Conclusion

6.2.19. The impact of the stopping up and diversion order on parking will be positive for visitors to the beachfront and the RMC. Whilst some preferred spaces will be removed, overall provision will improve with much better design and more public spaces overall. All spaces recorded as in use on Princes Parade, plus all of the Seapoint Canoe Centre Car Park, will be re-provided. Good access to the beachfront and RMC will be provided with short walk safe walking routes. People's experience of parking will be improved. Spaces will be safer to use than the existing car parking spaces on Princes Parade where drivers and passengers have to exit into the live carriageway and walk along to a gap in the seawall. The sea wall will be repositioned at the back of the new 11m wide promenade removing this obstacle in the future.

6.3. Loss of Seafront Highway Amenity

- 6.3.1. This objection theme relates to objectors' concerns that the closure and diversion of Princes Parade will result in a loss of seafront highway amenity. The Buckles Report accepted that there might be a loss of enjoyment for some users from driving on the seafront road when it is diverted as a direct consequence of the order, but concluded that this loss would not be a significant issue (paragraph 7.21, CD66). I agree with this.
- 6.3.2. The diversion relates to an 871m section of Princes Parade out of a total approximate length of 2,100m (about 40%). The remaining length of Princes Parade will remain unchanged, where people can continue to experience the seafront amenity as they currently do if they want to, and if they can do so safely.
- 6.3.3. Design Manual for Roads and Bridges (DMRB) LA 107 on Landscape and Visual Effects is part of National Highways' suite of documents that define the requirements for every aspect of our road infrastructure. DMRB is not mandatory guidance for local roads (as opposed to National Highways trunk roads) but it can and often is used as guidance elsewhere. DMRB LA 107 sets out criteria for the visual assessment of road schemes. In Table 3.41, transient views from scenic roads are listed to be of moderate visual sensitivity whereas views by users of main roads are of low visual sensitivity. In its role as a local distributor road, Princes Parade forms part of a key route between Seabrook and Hythe and the views by car drivers or passengers using the road for this purpose would be assessed as being of low sensitivity. By contrast, only a small proportion of the drivers using Princes Parade would have chosen to do so as a scenic route because of its views, but even then they would be classified by DMRB LA 107 as of only moderate sensitivity in visual terms. Views by users of nationally important recreational trails are considered by DMRB LA 107 to be of high visual sensitivity. Sea views for users of the promenade (which forms part of National Cycle Route 2) will be unaffected by the diversion of Princes Parade. In fact, with a wider promenade with seating and more space, it will be easier for pedestrians and cyclists to enjoy these views, and the car-free environment will be more pleasant to enjoy. Therefore, the stopping up and diversion order is in accordance with the importance noted in DMRB LA 107, prioritising the views afforded to pedestrians and cyclists over those enjoyed by car drivers and passengers, notwithstanding that the majority of Princes Parade is unaffected by the proposed order.
- 6.3.4. Pedestrians using the footway on the northern side of Princes Parade do so with their view impeded by passing and parked cars and this view will be improved on the area on Princes Parade affected by the proposed order as the majority of it will become part of the widened promenade.
- 6.3.5. The essential purpose of a highway, and the statutory duty upon a highway authority, is to provide a means of passage and the right to pass and repass 'without let or hindrance', not visual amenity, as set out in English Common Law. The ability to enjoy seafront views from a highway is at most only an incidental function of the highway. In light of the purpose of the highway and the need for drivers to watch the road, the amenity point is not one that carries much weight. Drivers who are using Princes Parade as an alternative to the A259 are not doing so for the amenity and

view, they are doing so to get from A to B as quickly as possible (most often in excess of the speed limit).

6.3.6. My view is also that drivers have a duty to keep their eyes on the road, and drive with due care and attention, so any disadvantage in terms of the amenity of the seafront road is of minimal importance. This is of particular importance where the road is narrow, vehicles are speeding and people are getting out of cars into the carriageway, as happens on Princes Parade at the moment. The record of accidents is considered later in my proof and impatient driving on a road that is too narrow is a cause of several accidents. Parked cars often obscure the view of the sea anyway, further reducing the importance of this amenity for people in cars. These are all issues with the existing Princes Parade.

6.4. Reduced Accessibility to the Seafront including for People with Disabilities, ease of access and convenience for users of the beach.

6.4.1. This objection theme relates to objectors’ concerns that the closure and diversion of Princes Parade will reduce accessibility to the seafront especially for people with disabilities and other specific needs. The Buckles Report recognised that a direct consequence of the order might be the loss of some people’s preferred parking locations on the seafront road, but explained that this would not be significant when judged in context (paragraph 7.24). I agree with this position.

6.4.2. The stopping up order concerns an 871m section of Princes Parade which has a total approximate length overall of 2,100m. The remaining length of Princes Parade (approx. 60%) will remain unchanged, where people will be able to park adjacent to the seafront. The public will be able to continue to drive and park against the seafront for the remainder of Princes Parade (for which there will be approximately 142 parking spaces – 160 at the time of the planning application).

6.4.3. The existing parking arrangements on Princes Parade can be difficult to use for some users due to the need to park up against the splash wall, which can make it impossible to exit the car from the passenger side. For those unable to climb over the splash wall to access the promenade, they must walk along the carriageway to find a break in the splash wall. The relocation of some parking to the proposed car parks in the west and centre of the Site provides an opportunity for people to park away from the live carriageway, with space to exit safely from their vehicles. The replacement spaces are designed to be in compliance with the Government Document Inclusive Mobility (DfT, December 2005), which sets out the guidelines to provide good access for disabled people. The car parks and the Development have due regard to duties under the Equality Act 2010.

6.4.4. As stated in the introduction to Inclusive Mobility: “designs that satisfy (disabled people’s) requirements also meet the needs of many other people. Those who are travelling with small children or are carrying luggage or heavy shopping will all benefit from an accessible environment, as will people with temporary mobility problems (e.g. a leg in plaster) and many older people. Thus, the overall objective of this guide is to provide inclusive design and through that achieve social inclusion”.

- 6.4.5. Inclusive Mobility sets out the design of parking spaces, the widths of footways, and walking distances (in this case from a safe place to park) amongst other important design considerations. Parallel parking bays for those with impaired mobility should be a minimum of 2.7m wide with access onto a footway with a dropped kerb, whereas the current bays on Princes Parade are 2m wide with a sea wall against one side (so everyone has to get out into the carriageway). The Princes Parade carriageway, at 5.5m wide, means cars pass close by the parked cars providing no safety for people exiting cars, a situation which is much worse for those with disability or movement issues, young children or those with heavy or bulky items they are unloading.
- 6.4.6. In contrast, the new public parking provision will have at least 18 formal blue badge disabled parking spaces for those with accessibility needs (7 in the Leisure Centre/replacement Seapoint car park, 7 in the new car park in the west of the Development. This is set out in Table 5.1. Currently there are 6 (2 each in the Seapoint, Twiss Fort and Battery Point car parks, so an increase of at least 12 suitable safe spaces for people with accessibility needs over the existing situation. This does not cover parking for the hotel/restaurant part of the Development, which will be the subject of a reserved matters application, so yet further disabled parking is going to be provided as part of the Development.
- 6.4.7. The realignment of the road also allows 43 parking spaces to be provided towards the Royal Military Canal, providing easier access for people with disabilities and particular parking needs (such as children, kit for the beach, fishing kit). These spaces are all at least 2.7m wide with access onto a footway with a dropped kerb, which will be much easier for all people to use than the current on-street parking on Princes Parade. These spaces are still just a maximum of c.125m walking distance from the seafront, with footways and safe crossing points provided. This will be an easy, convenient, and obvious, walk, not problematic even for people with kit or movement problems. As stated in Inclusive Mobility, walking distances were researched in some detail in the late 1980s and, based on the findings from these studies, **Table 6.2** shows the recommended distances.

TABLE 6.2: RECOMMENDED MAXIMUM DISTANCE LIMIT WITHOUT A REST FOR DIFFERENT IMPAIRMENTS.

Impaired group	Recommended distance limit without a rest
Wheelchair users	150m
Visually impaired	150m
Mobility impaired using stick	50m
Mobility impaired without walking aid	100m

- 6.4.8. It is noted that these figures are average measures; there is a lot of variation between individuals. Nonetheless, it is clear that the 43 wider spaces parallel to the new road would be of additional use to many people, including wheelchair users. Seating is provided within the Development and in the section of widened promenade so the distances that can be covered would increase with use of these vital rest points, which are not as frequently available today.
- 6.4.9. Mobility impaired people need seating at reasonably frequent intervals. In commonly used pedestrian areas, and transport interchanges and stations, seats should be

provided at intervals of no more 50 metres (Inclusive Mobility, 2005, paragraph 3.4). Whilst some seating is provided on the existing promenade adjacent to Princes Parade, on the section that will be improved under the proposed order spaces are often greater than 50m. The stopping up and diversion order will allow the provision of many more seating opportunities on the widened and improved promenade for those with mobility issues to enjoy the seafront.

- 6.4.10. Access for all people to the RMC will be improved, particularly those with mobility issues. Better footways and access from safer, more convenient, more plentiful car parking will be provided.
- 6.4.11. In relation to accessibility and ease of use, creating attractive, healthy places which people can enjoy is hugely important.
- 6.4.12. The Officer’s Report to the Planning Committee (16.08.2018, CD03) states (paragraph 8.170) that *“the proposal will, if permitted, offer significant enhancements to the quality of the existing pedestrian and cycle network as a consequence of the widened promenade”*. The ability to deliver the widened promenade is a direct consequence of the stopping up and diversion order.
- 6.4.13. The Healthy Streets Design Check for England (published in September 2021) is a tool for measuring existing streets and proposed designs for how healthy they are. It can be used by designers and engineers to assess their work, and produces a score out of 100.
- 6.4.14. This tool has been developed for the Department for Transport to support practitioners across England to apply new national LTN 1/20 guidance and is available **here**: <https://www.healthystreets.com/what-is-healthy-streets>. The 10 Healthy Streets indicators are:
 - 1. Everyone feels welcome
 - 2. Our streets need to be easy to cross for everyone - Making streets easier to cross is important to encourage more walking and to connect communities.
 - 3. Shade and shelter
 - 4. Places to stop and rest - A lack of resting places can limit mobility for certain groups of people.
 - 5. Not too noisy -Reducing the noise impacts of traffic will directly benefit health and improve the ambience of our streets.
 - 6. People choose to walk, cycle and use public transport
 - 7. People feel safe - The whole community should feel comfortable and safe on our streets at all times. People should not feel worried about road danger.
 - 8. Things to see and do - Street environments need to be visually appealing to people walking and cycling

- 9. People feel relaxed - The tool also refers to the fact that more people will walk or cycle if our streets are not dominated by motor traffic, and if pavements and cycle paths are not overcrowded, dirty or in disrepair
- 10. Clean air - Improving air quality delivers benefits for everyone and reduces unfair health inequalities.

6.4.15. The stopping up order will allow the new 11m wide promenade to provide significant improvements to all of the indicators listed above for the seafront in this location. These are important benefits of the stopping up and diversion order in regard to accessibility and ease of use. In terms of the main issue identified by the Inspector – disabled access to the seafront – by allowing the creation of the widened and improved promenade, the stopping up and diversion order will lead to a massive improvement. The same would apply to pedestrians and cyclists. The quality and usability of the parking provision for disabled people accessing the seafront will also be much improved. The same would apply to others with potential accessibility issues, such as families with children.

6.4.16. In summary, the proposals will more than reprove the lost parking and with a better quality of car parking designed to modern standards appropriate to an inclusive society. In addition, the wider promenade that the stopping up and diversion order allows will provide many more facilities to rest and enjoy the seafront, and rest before moving on further than perhaps some people can today. The wider promenade will be safer, creating a greater space between cyclists and pedestrians, improving comfort for all users and giving those with mobility issues more confidence. Of equal importance, pedestrians will no longer spend time within or crossing the live carriageway of Princes Parade.

6.5. Adverse traffic impact (raised by 136 respondents)

6.5.1. This objection theme relates to the alleged traffic impact, especially on the A259, as a result of the closure and diversion of Princes Parade. Objectors say in particular that there could be congestion issues on the A259 due to proposed traffic calming on Princes Parade, including the reduction of the speed limit from 40mph to 30mph along the diverted section. The Buckles Report explained that there would be no adverse traffic impact as a direct consequence of the stopping up and diversion order (paragraph 7.40, CD66) and I agree with that conclusion.

6.5.2. Princes Parade will continue to act as an alternative road link between Folkestone and Hythe once it has been diverted. The realigned carriageway has been designed to meet Kent County Council Highway’s Design Guidance for Local Distributor Roads with a 6.75m carriageway width so that the new road is capable of functioning as a relief road for the A259, as set out in paragraph 5.6 of the TA (CD18). Currently, the on-street parking on the existing Princes Parade creates difficulties with two-way traffic passing on the main carriageway. Parking on the realigned section of Princes Parade will be provided in dedicated on-street bays set back from the carriageway. This will allow a constant road width to be maintained contributing to uninterrupted traffic flow. The traffic calming measures proposed contribute towards adherence to the speed limit and creating a safer environment for non-motorised users of the

highway network. In short the new road will be wider, safer and easier to drive along than the existing road and only marginally longer, so there is no reason people would be dissuaded from using it when compared to the current Princes Parade.

- 6.5.3. General Arrangement Drawings have been provided to the inquiry (CD 88, 89 and 90). These are not final drawings and will be part of a set of detailed drawings issued to satisfy a pre-commencement planning condition. Design work and liaison with KCC as part of the S38 and S278 agreements process is ongoing, including aspects such as traffic calming features. The Additional Information & Clarification Feb 2018 Appendix 08 – Transportation (CD27) shows additional measures including chicanes which may be included in the final design.
- 6.5.4. As part of the planning application for the Development, a TA (CD18) was undertaken by MLM Consulting Engineers Ltd (now part of Sweco), which reviewed the off-site traffic impact of the Development. This included the additional traffic from the Development and the realignment of Princes Parade, so it assesses more than just the impact of the diversion which is being considered by this inquiry and is thus conservative in this respect. The methodology of the TA was agreed with Kent County Council as Local Highway Authority. Junction Capacity Assessments were undertaken at the following junctions along the A259:
- Princes Parade In/ Battery Point/ Seabrook Road (A259), ghosted right priority junction.
 - Princes Parade Out/ Seabrook Road, priority junction.
 - Twiss Road/ Seabrook Road/ Bell Inn Road, crossroad priority junction.
 - East Street/ Prospect Road / High Street/ Station Road, roundabout.
- 6.5.5. I agree with and adopt the findings of the TA (CD18) which was the basis of the positive recommendation to the planning authority FHDC by the highway authority KCC. I know of no reason why the TA is not still relevant.
- 6.5.6. The junctions were modelled for a 2023 + Committed Development + Development scenario for the network peak hours of 08:00 – 09:00 and 17:00 – 18:00. All junctions were shown to operate sufficiently within desired capacity parameters and therefore no off-site highway works were required by KCC Highways. Background traffic growth was factored into the junction capacity modelling using the industry standard Trip End Model Presentation Program, TEMPro, which for the area of Folkestone and Hythe is based on the Shepway Housing Information Audit 2014, which includes the Martello Lakes (Nickolls Quarry) development in the west of Hythe. This approach was agreed with KCC (Letter 11.04.18, from Tony Jenson KCC, CD48).
- 6.5.7. Some objections include an accusation that not all traffic is included in the traffic modelling. This is incorrect as both individual approved committed developments and traffic growth resulting from development allocated in the FHDC Local Plan have been included in the traffic modelling undertaken in the TA and approved.

- 6.5.8. At the pre-inquiry meeting, Cllr Rory Love (KCC) referred to potential traffic impacts on a variety of junctions including Portland Road, the junction at the Romney, Hythe and Dymchurch Light Railway (A259 Littlestone Rd/Dymchurch Rd), Stade St with Prospect Road (A259) junction, Twiss Road with the A259 junction, and the East Street/Prospect Rd/Station Rd roundabout. The potential traffic impacts of the new Development were discussed at length with KCC in pre-application discussions and both the scope and impact were agreed (Letter 11.04.18, from Tony Jenson KCC, CD48). It is also important to separate the traffic impacts of the new Development and the traffic impacts of the stopping up and diversion order.
- 6.5.9. The former is not relevant to this public inquiry as the Development has been approved. The question is what are the direct traffic impacts of the stopping up and diversion order on the local highway network alone. The highway will be diverted over the new road. The new road will provide a wider, improved carriageway compared to Princes Parade, where currently two cars can struggle to pass if a car is not parked well in or if a van or larger car is parked in the bays. There is no reason why traffic that is using Princes Parade would not use the new road. KCC as the highway authority have never suggested that there would be a diversion of traffic. I do not consider that there would be any. In my professional opinion the stopping up and diversion order will not cause adverse impacts on the junctions Cllr Love identifies.
- 6.5.10. There would be a small additional distance to drive on the new road of 37m as a result of the new road alignment. Travelling at 30mph, the total distance of the new road from the point it deviates from the existing alignment to the point it re-joins, is 930 metres. The distance between the same points on the existing Princes Parade carriageway is 893 metres. At 30 mph on the new road it will take 70 seconds to travel this distance. At 40 mph on the existing Princes Parade it will take 50 seconds, which is a best case where it is not necessary to stop or slow to let a car pass on a narrow section of Princes Parade or to allow a car or passenger to get in or out of a space.
- 6.5.11. In my view it is highly unlikely that anyone who currently uses this route would choose a wholly different route to save 20 seconds. This difference can be lost at a traffic signal or waiting to get out of a junction. For those who 'rat run' it is perceived not actual time that is important and the free flowing new road, even at 30mph and with traffic calming features, will continue to be more attractive than the traffic lights and roundabout on the A259.
- 6.5.12. It should be noted that it is possible that a 30mph speed limit is brought in on Princes Parade. If that were the case, the journey on the current alignment would take 67 seconds, so just 3 second less than the new road.
- 6.5.13. In terms of traffic flow, as a result of the stopping up and diversion order, the number of cars that would use the new road in a future year of 2023 are shown in **Table 6.3**.

TABLE 6.3 – OBSERVED AND FUTURE TRAFFIC FLOWS (SOURCE: APPROVED TRANSPORT ASSESSMENT)

Scenario	Two-Way Traffic	
	AM Peak (08:00 – 09:00)	PM Peak (17:00 – 18:00)
2016 Observed	334	391
2023 Baseline	365	428
2023 Baseline + Development	491	625

- 6.5.14. According to DMRB Volume 5 Section 1 Part 3 Traffic Capacity of Urban Roads the capacity of an unobstructed carriageway of the nature of Princes Parade (UAP3) is 900 to 1110 vehicles per hour (depending on available carriageway width – the new road will be wider than the existing and the carriageway is generally 6.75m compared to 5.5m). The differences in traffic flow, as a result of the Development traffic or as a result of the diversion, would be minimal relative to the overall capacity. This document reference is provided to give an indication to the Inspector of how much capacity a single carriageway road has, although it should be noted this document is no longer current guidance.
- 6.5.15. Some three quarters of the traffic that will use the new road in the morning peak, and two thirds in the evening peak, is as a result of the diversion order, and the approved new road has been designed to more than adequately cope with that, and the total flow including the Development.
- 6.5.16. Traffic impacts as a result of the approved Development, as distinct from the stopping up and diversion order itself but including the realignment of Princes Parade, are assessed in the TA Section 6 (CD18) including at the following junctions:
- Princes Parade In/ Battery Point/ Seabrook Road (A259), ghosted right priority junction.
 - Princes Parade Out/ Seabrook Road, priority junction.
 - Twiss Road/ Seabrook Road/ Bell Inn Road, crossroad priority junction
 - East Street/ Prospect Road / High Street/ Station Road, roundabout.
- 6.5.17. KCC reviewed and accepted the analysis presented, in the letter from Tony Jenson at KCC dated 11.04.18 (CD48).
- 6.5.18. A point of objection is that the stopping up and diversion order will increase road safety risks on the A259. It is important to be clear that as there are no changes to traffic flow on the A259 as a result of the stopping up order, as opposed to the approved Development, this is not correct. The TA (CD18) considered the increases in traffic resulting from the new Development and, as was agreed by KCC as the local highway authority, no increased safety risks would occur as a result of the approved Development, which of course included the realigned Princes Parade.

6.5.19. In summary, there would be no adverse traffic impact on the local highway network, including the A259, as a result of the stopping up and diversion order. Traffic will not divert as a result of the position of the new road and the maximum 20 second extra journey time it will entail. The approved new road has been designed to more than adequately cope with the traffic that will result from the stopping up and diversion order and the total flow including the Development.

7 Other Objections

7.1.1. In this section I address other topics raised by the Save Princes Parade Campaign group and other objectors that have not been covered in my proof so far.

7.2. Objections of Save Princes Parade Campaign Group

7.2.1. I have reviewed the June 2021 document “Comments by the Save Princes Parade Campaign on the Council’s response to the Objections to the Stopping up of Princes Parade” (CD67) and respond to the points made as they relate to highways and transport and the merit test in turn.

7.2.2. The first page includes a reproduction of the comments made by Design South East, who commented on the road alignment in 2016. They state: *“There is currently on-street parking along Princes Parade and this would have to be moved to the north of the Site with visitors then walking through the residential closes. There would be problems of parking enforcement in the residential areas as visitors would want to get closer to the beach”*.

7.2.3. These comments were made in 2016. The design continued to evolve subsequent to these comments until the planning application documents were issued in August 2017. Early designs included pockets of public parking and green spaces. Following pre-application consultation, with KCC in particular (email 24.11.16 – Tony Jenson, KCC, CD101), the design, reflected in the approved scheme, consolidated the replacement public car parking in a new beachside car park to the west of the Site and high quality on-street car parking on the new road. As shown in Figures 3.3a and 3.3b of the PDAS (Tibbalds, Aug 2017, CD7), safe, segregated pedestrian routes through the Site from the on-street car parking have been included, along with crossing points. There is no need to walk through ‘residential closes’. In regards to parking on residential streets, controlling vehicle access to the residential car parks would be simple. Barriers, bollards, Automatic Number Plate Recognition (ANPR) or permit based control with fines imposed, or a combination of any of these, could be implemented. This area of the Site will be the subject of a pre-commencement condition and detailed design work for that is advanced but is still ongoing.

7.2.4. The volume and location of replacement car parking is questioned on page 2 and onto page 3 of the comments by the Save Princes Parade Campaign. The volume of spaces has been dealt with previously in my proof and I am satisfied that more than sufficient publicly accessible car parking will be provided, as are KCC as the highway authority when directing that they have no objection to the planning application (email of 11th April 2018 (CD48)). The objection to the location of the car parking spaces is that currently the spaces are evenly distributed whereas with the stopping up and diversion order they will not be. Whilst the location of the car parking spaces will change, it is not true to say that the locations will not accommodate demand. Recorded demand for car parking in this area, on a Saturday in the height of summer, was just 76% (Appendix 5 of the TA, CD18). The survey was also undertaken before Pay and Display parking charges were brought in, which has led to a reduction in demand I understand, as would be expected. Public parking is located to the east of the Site, replacing existing higher car parking demand for the beach in this part of the

Site, along with providing for demand generated by the Seapoint Canoe Centre and providing additional parking for the Leisure Centre. As set out previously in this proof, demand at leisure centres is typically highest on weekday evenings, not at weekends, so additional spaces will be available for visitors to the beach.

- 7.2.5. With the stopping up and diversion order, demand for beach side parking is likely to be higher at the western end of the widened traffic free promenade, where the 69 space proposed western car park is located. The on street spaces on the new road will provide additional capacity in the middle of the Site, serving the beach via the dedicated landscaped footpaths through the Site. These on-street spaces would also provide improved access to the RMC.
- 7.2.6. Highway safety has been raised on page 3, with an objection by the campaign group based on the requirement in the Stage 1 Road Safety Audit undertaken in January 2018 for mitigation of a potential issue (CD27). The Stage 1 Road Safety Audit (RSA) was of the new road anticipating its use for the diverted Princes Parade traffic. The objection from Save Princes Parade relates to the risk of vehicles leaving the carriageway and entering the RMC. The Save Princes Parade objection suggests that the new road is fundamentally unsafe and that straight roads are safer than those with bends. That is not the case and it is not what the RSA concludes. The purpose of an RSA is to identify potential issues, make recommendations and require the designer to respond to them. The designer's response and the RSA are included in Road Safety Audit contained in Appendix 08 of the Additional Information and Clarification Feb 2018 (CD27). In this case the RSA recommends that a Road Restraint Risk Assessment Process (RRRAP) be carried out at the detailed design stage. This was accepted by KCC as appropriate (letter 11.04.18, Tony Jenson, CD48), noting the importance of considering the visual impact on the RMC of any barrier required. Any barrier could be screened by planting from the RMC, as also noted by Tony Jenson.
- 7.2.7. The comments by the Save Princes Parade Campaign conclude by contending that the stopping up and diversion order would lead to "less convenient parking arrangements" and "a less safe and convenient highway". In my professional opinion, as I have explained in this proof, the opposite is the case. None of the campaign group's objections on the highway related impacts of the stopping up and diversion order are correct.
- 7.2.8. I now consider other objections received under the key topics covered, where the objections are not previously covered in my proof, including those raised in the campaign group's Statement of Case dated 28 September 2021.

7.3. Highway Safety

- 7.3.1. Highway safety concerns have also been raised by other objectors over the safety of the position resulting from the stopping up and diversion order.
- 7.3.2. It is important to note that the existing Princes Parade has a fairly poor safety record, with a pattern of accidents evident involving pedestrians and parked cars.

- 7.3.3. In the TA, accident data was reviewed for the 3 years prior to 31st December 2015. The accident data has been updated for this proof and is shown in **Table 7.1**. In the 5 years since the TA was written (up to 31st December 2020), there have been 8 personal injury accidents on Princes Parade – 2 classified as serious and 6 classified as slight. One serious and 1 slight accident occurred on the section of Princes Parade within the Site boundary, although on the part near the golf course which is unaffected by the realignment. 2020 was obviously an anomalous year for traffic flows and consequently collisions, due to covid, and therefore the zero recorded collisions in 2020 does not contribute to a reliable picture of the highway safety position on Princes Parade.
- 7.3.4. Three accidents involved pedestrians being hit by vehicles. Two of these involved pedestrians crossing the road, one with a vehicle reversing into a pedestrian. Four of the crash reports specifically mention parked cars. Hitting pedestrians in the carriageway suggests either excessive speed (and therefore being unable to stop) or inattention, particularly since in both incidents the pedestrians were in pairs, or both. Similarly, hitting parked cars suggests impatience on the part of the drivers – the road is too narrow and vehicles try to fit into the gap and find themselves with the choice of hitting an oncoming vehicle or the parked vehicle. It is therefore not at all correct that the current design of Princes Parade is safe. This is based on my professional judgement supported by the accident data.

TABLE 7.1 – RECORD OF ACCIDENTS DEC 2015 TO DEC 2020

Reference/ Location	Accident Category	No. Vehicles Involved	No. Casualties	Weather/ Visibility Conditions	Description
2019460355935 Princes Parade -section in front of golf course.	Slight	2	3	Dry and fine without high winds. Darkness with no street lighting.	Vehicle proceeding normally along the carriageway, not on a bend. Front of V1 collided with back of V2 which was parked in the carriageway.
2019460355364 Princes Parade -near Princes Parade Car Park.	Slight	1	2	Dry and fine without high winds. Daylight.	Back of vehicle collided with pedestrian whilst reversing.
2018460315165 Princes Parade -near Princes Parade Car Park.	Serious	1	2	Dry and fine without high winds. Daylight.	Vehicle proceeding along the carriageway collided with 2 pedestrians in carriageway (not on a crossing).

Reference/ Location	Accident Category	No. Vehicles Involved	No. Casualties	Weather/ Visibility Conditions	Description
2018460314954 Princes Parade -western end of Site.	Serious	3	2	Wet/ Damp and fine without high winds. Daylight.	Offside of V1 impacted, nearside of V2 impacted and back of V3 impacted. circumstances unclear from crash report.
2018460259366 Princes Parade -western end of Site.	Slight	1	2	Dry and fine without high winds. Darkness (no street lighting).	Vehicle proceeding along the carriageway collided with 2 pedestrians in carriageway (not on a crossing).
2017460237290 Princes Parade – in front of Hythe Imperial Hotel.	Slight	3	1	Dry and fine without high winds. Daylight.	V3 was parked in the carriageway. V1 was performing a U-turn. V2 (motorcycle) was proceeding along the carriageway.
2017460213698 Princes Parade near junction with minor arm of Twiss Road.	Slight	2	1	Dry and fine without high winds. Daylight.	V2 was parked in the carriageway. V1 was proceeding along the carriageway and collided with the open door of V2.
2016460089490 Princes Parade -section in front of golf course.	Slight	2	1	Dry and fine without high winds. Daylight.	V1 (motorcycle) was passing a stationary vehicle on its offside. V2 was in the ac of turning right. Front of V1 impacted with offside of V2.

7.3.5. In contrast to the existing Princes Parade, the new road will be wider, with space to step out of a car due to wider parking spaces. Traffic speeds will also be lower with dedicated crossing points provided. Overall, it will be a significant improvement in highway safety terms for the traffic to be diverted from the existing Princes Parade on to the new road. The widened promenade which can be created due to the diversion would also be safer for pedestrians and cyclists to use than the existing situation on Princes Parade.

7.4. Emergency Vehicle Access to Local Roads

7.4.1. Comments have been made by objectors regarding emergency vehicle access and danger to life. These objections are based on the suggestion that the stopping up and diversion order will make access to residential properties in Hythe significantly worse for emergency vehicles.

7.4.2. The highway authority, KCC, were consulted on the planning application and access for emergency vehicles, such as fire appliances, would have formed part of the consideration that they carry out to provide their comments when assessing the development including the new road layout. The new road will be wider, with slower traffic speeds and wider parking spaces, so safety would improve. As discussed in Section 6 of my Proof of Evidence, the extra time it will take to use the new road compared to the existing Princes Parade is just 20 seconds, despite the reduced speeds. KCC have considered and approved the design of the new road, including the Road Safety Audit contained in Appendix 08 of the Additional Information and Clarification Feb 2018 (CD27). It is my opinion that it is much less likely that accidents will occur on this improved road compared to the part of Princes Parade which will be stopped up and diverted, therefore access is likely to improve not worsen for emergency vehicles. The new road is wider so easier for a large vehicles, such as fire tenders, to pass. There will be no changes to local traffic flows or local parking beyond the Site due to the stopping up and diversion order and therefore nothing to affect the ability of emergency vehicles to reach destinations in the locality.

7.4.3. In addition, access to the RMC, which is used for canoeing, Stand Up Paddleboarding (SUP), and other activities, for emergency vehicles would again be improved over the existing situation and certainly not worsened as a result of the stopping up and diversion order. The new road carriageway would be closer to the RMC than today.

7.4.4. Access to the seafront would be retained throughout and, again, without the splash wall to navigate on the section of Princes Parade that would be stopped up, access by emergency vehicles to the promenade and seafront should in fact be improved in certain circumstances. Ambulances would be able to drive along the widened promenade and enable ambulance personnel to reach patients without having to climb over the splash wall, for example.

7.4.5. In summary, the stopping up and diversion order is likely to improve, not worsen, access to and through the local area.

7.5. Traffic calming and Shared Surface

7.5.1. Save Princes Parade Campaign group state in their June 2021 comments (CD67) that *“traffic calming it [Princes Parade] for its complete length and turning over to a shared pedestrian/vehicular surface”* is a potential solution. In paragraph 29 of the campaign group’s Statement of Case dated 28 September 2021, they also argue that *“it would still be possible to improve the Princes Parade promenade by turning it into a shared vehicular/pedestrian route with linear parking and a reduced speed limit”* .I understand that it is not relevant to consider alternative schemes from that included in the planning permission but I briefly address this point anyway to ensure that the

Inspector has an answer to it as it has been raised by the campaign group in their recent Statement of Case.

- 7.5.2. Whilst traffic calming, as proposed for the new road, is possible, a shared surface would be wholly inappropriate for a Local Distributor Road such as Princes Parade. Carriageways that are flush with the footpath are often safely implemented but they always have a footway to both sides and need a way to delineate between the space that vehicles use and the space that pedestrians use. This is particularly important for people with impaired visibility, with tramline tactile paving or a shallow kerb common. They are not true shared surfaces but give the impression that pedestrians and cyclists have priority. This arrangement is for town and city centres with a very high volume of pedestrians crossing the road, which is not the case for Princes Parade. It would also require all the car parking to be removed to create a new footway on the southern side or for Princes Parade to be widened along its length.

7.6. Drainage

- 7.6.1. Drainage relating to the road has been raised as an objection in the Save Princes Parade Campaign group's Statement of Case dated 28 September 2021. Both Development and highways drainage is dealt with in Richard Andrews's proof but to clarify here, run-off from the new road will be discharged through an oil separator, and a series of catch pits and attenuation to a piped outfall to the sea, which will mitigate the risk of pollutants entering the sea.
- 7.6.2. I understand that this strategy, and the wider drainage strategy, are the Environment Agency's preferred approach, rather than draining towards the RMC (letter to the Council - 17 January 2019 (CD/56)). The drainage strategy covered by Condition 21 of the planning consent and a further submission will be made in 2021 to satisfy that condition.

7.7. Princes Parade Access to be a Private Space

- 7.7.1. Public access to Princes Parade has been raised as an objection, suggesting that the existing route of Princes Parade would be taken into the proposed Development and will become a private space for residents and users of the leisure facilities which is said not to be acceptable.
- 7.7.2. Highways rights would be removed from Princes Parade but that is not the same as creating a private space. The ability to access and pass along the widened promenade would be the same as for the current promenade. The main difference between the existing Princes Parade and the widened promenade will be that the widened promenade on the stopped up road would be maintained by FHDC, rather than KCC, and that it would be a public space for pedestrians and cyclists only, as the existing promenade is.

7.8. Retaining Wall

- 7.8.1. The alleged need for a retaining wall or similar retaining structure along the length of the new road has been raised by the Save Princes Parade Campaign group. In paragraph 25 of the campaign group's Statement of Case dated 28 September 2021,

they contend that there will be a retaining wall between the new road and the RMC, as shown on a drawing in Appendix II to that Statement of Case. It is important to note that the new road will not be hard up against the canal but set back, so no retaining structure is required. The road will be on flat area of land at the top of the embankment and cut and fill analysis to date (i.e. the extent to which existing land levels need to change) indicates that minimal level changes are needed. Design work is ongoing and, as is usual, slope stability checks and CBR tests have been undertaken. However, at no point during preliminary or detailed design has a retaining structure along the length of the new road been considered. Detailed design work has continued and Appendix A to the proof of evidence of Martin McKay provides heights and cross sections of the RMC bank, footpath, slope and new road that comply with the parameter plans.

7.9. Parking Meters and Local Parking

7.9.1. Comments have been made by objectors about Pay and Display parking charges and how they have affected parking in the local area. Pay and Display has been introduced since the TA was written in August 2017, and some lengths of double yellow lines have been introduced. The changes have been identified in the plans in **Appendix B**. The parking surveys were undertaken before the implementation of Pay and Display so are now even more robust, as I understand car parking on Princes Parade has if anything reduced as a result of the charging. I understand and would expect that all new parking on Site is proposed to be subject to Pay and Display charging so that there would be no change in this respect.

7.10. Phasing of the new road

7.10.1. Comments have been made by objectors that the new road may not be open for some time after the section of Princes Parade is closed (Vivienne Kenny, 17.09.21). I can advise that the construction phasing has been developed by the council's appointed contractor BAM on the basis that the new road will be complete before closure to traffic of the section of Princes Parade concerned. The submission to satisfy Condition 30 of the planning permission, phasing of the new road, will be on this basis.

7.11. Convenience

7.11.1. The issue of convenience has been raised in several objections. The Save Princes Parade Campaign group refers in its Statement of Case dated 28 September 2021 to the issue of the convenience of the alternative route. It is appropriate to consider whether the alternative highway route that would result from the grant of a stopping up and diversion order is convenient and reasonable. In this case convenience is not in my opinion a real issue because the highway still starts and ends at the same place with only a 20 second additional journey time, and no access to properties are affected. There is not a material difference in terms of convenience for vehicles. The new road provides a perfectly reasonable diverted route for the highway. Also, and as set out earlier in my proof, there will still be plenty of spaces, existing, re-provided and new, where visitors will be able to park and walk to the seaside. The only access affected by the stopping up and diversion order is the car park at the Seapoint Canoe Centre, which will be re-provided in a very similar location.

- 7.11.2. Convenience of the new road and car parking reprovision has been considered in my proof and I have discussed how the quality will improve and the quantity will be more than sufficient. It is important to recollect that currently the on-street parking spaces on Princes Parade are narrow and drivers and passengers must exit into the road and unload fishing equipment or prams/pushchairs and the like over the splash wall. In comparison, the replacement car parking spaces will be built to modern design standards, with 57 wider than standard spaces across the Site and all much easier to use than the current on-street spaces. New footpaths will be provided through the Site where required with either no road to cross or a traffic calmed crossing point, and no splash wall to navigate. All of the spaces are within a comfortable distance from the beach for all users, even those with mobility issues or heavy or bulky items, added to the fact that the route from the parking space to the beachside is much safer with more places to rest. Objections have been raised that the new road will introduce severance from the car parking to the RMC, where none exists today. However, as a pedestrian crossing point and traffic calming is proposed, this is not really correct and is of little if any significance, particularly when considered against the removal of severance from most of the car parking to the beachfront (noting that it is possible to park by the beachfront but passengers and drivers must all get out into a live carriageway, cross to the footpath, walk along and cross back when they reach a break in the splash wall).
- 7.11.3. Objections have been made that car parking spaces will not provide as convenient access to the seafront and beach as they are not as evenly spread out as currently. It is accepted that the location of some people's preferred car parking spaces may be lost, but incorrect to suggest that the replacement car parking will not still provide convenient access to the beachside by car. Indeed the quality of the replacement spaces, and the safety of the spaces and the walking route will, as stated above, be much better. Therefore, the replacement spaces will in my opinion fully mitigate the impact of the relocation and loss of existing spaces in terms of overall convenience, as well as quantity.
- 7.11.4. It is also relevant that the stopping up and diversion of Princes Parade will change where visitors wish to park. Each end of the new traffic-free widened promenade will be popular locations and the replacement car parking is provided in those locations. The western end of the site will become more popular than today to park. This impact of the stopping up and diversion order is added to, as a separate consideration, by the approved Development which will create a greater demand for car parking at the western end due to the benefit of the new open space with play equipment. A café and restaurant is also permitted towards the western end of the site, although the design and car parking for this part of the Development will be the subject of a Reserved Matters Application and will be provided in addition to that shown on the proposed car parking arrangements plan in **Appendix B**.
- 7.11.5. It is also important to note that convenience of use is not just about access by car. Convenience is access and enjoyment by all. There are still facilities to park, as described above, and these will improve (safety of spaces, new footpaths). Of equal if not greater importance is that access by foot and cycle to the seafront, and facilities in the form of a wide traffic free amenity promenade nearly 1km long with more space for all, will be created as a result of the stopping up order. Therefore, convenience for

cyclists and pedestrians will not just be maintained, it will be significantly improved with the stopping up order in place. This is a critical consideration in terms of the approval of the order and is in line with regional and national guidance to promote these active modes of travel.

- 7.11.6. Access by coach will also be improved, with a dedicated bay provided as part of the new road provided as mitigation for the stopping up order. This will allow visitors to the beachside or the RMC to arrive by coach, with a place where coaches can park, which is not available today.
- 7.11.7. In summary, I have considered convenience in this section and set out how, despite the fact that the stopping up and diversion order causes some changes to what may be some people's preferred car parking spaces, there is still convenient access by car as a result of the replacement car parking proposed, and that this car parking will be of a much higher quality than currently afforded on the highway to be stopped up. The effect on convenience relating to the driving route from a to b is negligible, with a maximum 20 second difference in journey time. Counter to this are the benefits, where access and enjoyment by walk and cycle will improve significantly as a result of traffic free widened landscaped promenade with seating, and the coach parking provided.

7.12. Response to Save Princes Parade Campaign Statement of Case

- 7.12.1. This section provides a response to highways matters raised in the Save Princes Parade Campaign group Statement of Case (dated 28 September 2021) where I have not been able to address the points in the text of other parts of this proof of evidence. It also seeks to draw together points made elsewhere in this proof of evidence where appropriate to answer what is alleged in the Statement of Case.
- 7.12.2. Paragraph 15 of the Statement of Case alleges that the outline planning permission drawings are "merely illustrative" and suggests that the position of the new road is "liable to change at reserved matters approval". I do not agree with this. The proposed site plan drawings for the detailed planning permission listed in Condition 4 show the location of the eastern part of the road. Condition 6 covers the outline planning application and the location of the road is shown on the access and circulation plan and the land use plan, as well as in the Design Code in Section 5 of the PDAS. I have checked with the design team and can confirm that the detailed design is being worked up in line with those plans and that the detailed design to be proposed in the reserved matters application will also be in line with those plans, including the location of the new road, as is shown on the plan for the stopping up and diversion order.
- 7.12.3. Notwithstanding the pre-inquiry note and Inspector's ruling, design and construction matters have been raised in the objector's Statement of Case in paragraph 25 and 26. The evidence of Richard Andrews and Martin McKay deal with the proximity of the new road to the RMC, explaining why there will be no significant environmental and heritage impacts of the approved new road, as was agreed at the of the planning approval. I have set out previously in my proof of evidence that the stopping up and diversion order will have no impact on the design of the road, including street lighting, drainage, or its construction. The new road is permitted under the planning permission

and its construction and use by development traffic is not to be authorised under the stopping up and diversion order. I have addressed the retaining wall point in paragraph 25 elsewhere in my proof of evidence. Contrary to what is said in paragraph 26, the construction of the road, and the width and height of the carriageway, and the street furniture, are not a consequence of, and are not affected by, the stopping up and diversion order.

- 7.12.4. Paragraph 26 also refers to the replacement car parking as being less convenient. However I have shown previously in my proof that the new car parking will be more than sufficient to accommodate peak demand and will be safer and more convenient for most if not all visitors, with dedicated footpaths and pedestrian crossing points. In contrast, there is a record of accidents on Princes Parade relating to vehicles striking pedestrians and parked cars, as the carriageway and parking spaces are too narrow. The seawall hinders access and forced pedestrians to walk in the live carriageway.
- 7.12.5. Paragraph 29 includes a suggestion that Princes Parade should be turned into a shared vehicular/pedestrian route. Alternative potential designs should not be considered at the Inquiry, but nonetheless because this has been raised by the campaign group I have explained previously in my proof how a shared surface would not be safe on this type of road, and how any changes to Princes Parade would require widening of the carriageway or a significant loss of car parking. Even then, the seawall would still hinder access to the promenade for many people, particularly those with mobility issues.
- 7.12.6. Paragraph 30 refers to KCC as the only body that can construct the road. This is incorrect. FHDC have appointed the contractor BAM to design and build the new road. The new road is being designed to adoptable standards in close liaison with KCC. KCC would then adopt the road as public highway once complete. The highways works would be secured under a S278 and a S38 agreement between FHDC and KCC. It is in my experience normal practice for a developer to construct new roads in this way.

8 Transport Benefits of the Realigned Princes Parade

8.1.1. In this chapter I seek to summarise the benefits of the realigned Princes Parade and why the approved planning permission was based around this proposal. These would be benefits flowing directly from the stopping up and diversion order, if made. I seek to distinguish between the direct benefits of the stopping up and diversion order itself (including the widened promenade) and the benefits of the Development which has planning permission (including the construction of the new road) which provide the context within which the claimed adverse impacts (e.g. loss of parking spaces) need to be considered.

8.1.2. The benefits are of the stopping up and diversion order include:

- a) The creation of a new wider promenade would provide an enhanced car-free area of public realm, which would also connect the approved replacement car parking, new community facilities and housing to the coast without the need to cross or step into the road. The diversion would allow 'untrammelled' recreational use of the widened promenade, increasing the area of car free public realm from 6,575 sqm to 11,190 sqm - an increase of 4,615sqm (paragraph 8.93 the Officer's Report to the Planning Committee (16.08.2018) (CD03)). The Officer's Report also identifies "*significant enhancements to the quality of the pedestrian and cycle network as a consequence of the widened promenade*" (paragraph 8.170). The open space on the seafront in the form of the new widened promenade is a direct benefit of the stopping up and diversion of Princes Parade. This was identified in the Buckles Report of May 2021 at 4.3, 6.14-6.16 and 7.20(iii) (CD 66).
- b) The new widened promenade provides better access to the coast compared to the current situation where the splash wall creates a barrier, particularly for disabled visitors and those with heavy or bulky equipment such as anglers. Indeed, the new promenade provides a significant improvement to accessibility for all people with mobility issues as a result of the creation of the new car free promenade and the re-routing of the existing highway, which can only be achieved if the stopping up and diversion order is approved. As stated in the introduction to Inclusive Mobility (DfT, December 2005): "*designs that satisfy (disabled people's) requirements also meet the needs of many other people. Those who are travelling with small children or are carrying luggage or heavy shopping will all benefit from an accessible environment, as will people with temporary mobility problems (e.g. a leg in plaster) and many older people*". Current updates to the document Inclusive Mobility also consider, critically, the importance of considering mental health issues in the design of streets and places, and providing traffic free areas and separation from cyclists is a key early finding (Section 6, Accessible Public Realm: Updating Guidance and Further Research, Jan 2020).
- c) The PDAS at page 93, which I agree with, states: "*The promenade does not currently fulfil its potential as a public space because:*
 - *it is cut off by a busy road, splash wall and parallel parking that make access difficult;*

· it has the same hard character all the way along, which makes it feel bleak on poor weather days; and there are limited opportunities to sit and enjoy the space”

In contrast, the new promenade will be traffic free, wider to provide separation for users, will provide spaces to rest, and removes the sea wall which is a major barrier to access. The new promenade, resulting from the stopping up of Princes Parade, will also be a more peaceful and relaxing space, which is a consideration of the new Healthy Streets guidance, a tool to aid future street design to help create a more inclusive society. The tool has been developed by the Department for Transport to support practitioners across England to apply new national LTN 1/20 guidance.

- d) The widening of the promenade will facilitate the increased pedestrian/cycle activity on the promenade, which forms part of National Cycle Route (NCR 2), including in relation to the new Leisure Centre and residential development. Page 95 of Section 5 of the PDAS sets out the design approach and the look and feel of the new 11m wide promenade and how it will work. This vision is secured by condition 6 which specifically references the reserved matters to be submitted in accordance with Section 5 (Design Code) of the PDAS. This is in line with recent government guidance promoting walking and cycling, including LTN 1/20 and the DfT document Decarbonising Transport (July 21) which states on page 54 *“Cycling and walking can help us tackle some of the most challenging issues we face as a society, not just climate change, but improving air quality, health and wellbeing, addressing inequalities, and tackling congestion and noise pollution on our roads”*. Increased levels of active travel can improve everyday life for us all. The Government document Gear Change (July 2020) sets out a vision for half of all journeys in towns and cities to be walked or cycled by 2030. Significant public realm improvements such as those that the stopping up and diversion order will enable are key to achieving these goals. A cycle from Hythe town centre to the site will take just 8 minutes.
- e) Reduced incidents of illegal speeding by existing traffic. The existing road is straight with a 40mph speed limit. A 7-day automatic traffic count undertaken as part of the Transport Assessment in 2016 showed the westbound 85th percentile speed to be 48.3mph and the eastbound 85th percentile speed to be 45.6mph. The new road, which the highway would be diverted onto, would be traffic calmed with the speed limit reduced to 30mph. Whilst traffic calming and a speed limit change could be implemented on the existing road, that is not currently the position and one of the most effective design features that encourages excessive speed is forward visibility (as cited in many design guides, including the DfT’s Manual for Streets 1 and 2). The new road by nature contains 4 new corners and has been designed from the outset as a 30mph road.
- f) Improved highway safety on the new road over the section of Princes Parade to be stopped up and diverted, including wider parking spaces against a footpath with dropped kerbs, dedicated safe crossing points and a wider carriageway. There is a record of safety accidents involving pedestrians and

parked cars on the existing Princes Parade which will be resolved by diverting the highway onto the new road.

- g) The existing on street parking impedes two-way traffic flow. The proposed alignment of the highway onto the new road removes this and provides setback parking bays so two-way traffic flow can be maintained.

8.1.3. The benefits of the planning permission include the following, providing the context within which the claimed adverse impacts of the stopping up and diversion need to be considered:

- a) The scheme granted planning permission includes a raft of public realm improvements, beyond creation of a 11m wide car free promenade but which would be linked to it, including significant areas of new public open space (3.85ha) with seating throughout, new footpaths and crossing points linking the RMC and the seafront.
- b) The conditions on the planning permission require the reserved matters to comply with Section 5 of the Planning, Design and Access statement and the parameter plans including the Access and Circulation Plan. This will deliver a highly accessible development which is connected to the widened promenade and the new road on which the highway will be diverted.
- c) Better facilities for those with impaired mobility including 18 dedicated publicly accessible disabled spaces instead of 6 currently (2 each in the Seapoint, Twiss Fort and Battery Point car parks) and 43 on street spaces which are wider than standard (2.7m as required for a disabled space compared to 2m standard) so are also safe to use for those with mobility issues. These car parking spaces are designed to best practice guidance, with footways and dropped kerbs.
- d) Facilities to promote cycling and walking, including 34 new cycle parking spaces within the public realm of the site.
- e) Dedicated Coach Parking on the new road, which could also be used by visitors to the beachfront, Seapoint Canoe Centre and RMC.
- f) A re-provision of all car parking that was identified and agreed with the local highway authority, KCC, as required. In fact excluding the Leisure Centre car park, 359 public spaces will be available along the seafront from and including Twiss Fort car park to Battery Point car park. These spaces will provide parking to accommodate 277 recorded cars in the survey. This would equate to parking capacity of just 77%. Including the approved Leisure Centre car park there will be an increase in total public car parking of 78 spaces from 389 to 467.
- g) The main, albeit very limited, disadvantage of the stopping up and diversion order is the loss of some parking spaces in preferred locations for some people. However, as set out in my proof, there is no overall inconvenience or reduction in access as a result of the stopping up and diversion order as all car parking recorded as used and therefore required in the future will be re-

provided, but at a higher standard which will be safer for all users. There are safety issues with the existing car parking layout of Princes Parade so improving this situation is a clear benefit. I have considered convenience, including walk distances, and conclude that the future situation will be an overall improvement to far more people than it is an inconvenience for. Therefore I concur with the conclusions in the Buckles Report (paragraph 7.1.8) that such loss will not be significant.

9 Summary

- 9.1.1. In this section I provide a summary of my proof of evidence.
- 9.1.2. Chapter 1 sets out my 20 years' experience in transport planning and highway design, advising private and public sector clients on the transport, highways and access aspects of development and regeneration projects.
- 9.1.3. Chapter 2 provides the relevant background to the inquiry and the purpose of my proof. I refer to the Transport Assessment that accompanied the successful planning application was produced by MLM Consulting Engineers (CD18). Sweco acquired MLM in 2019.
- 9.1.4. My evidence seeks to focus on the impacts of the stopping up and diversion order, as opposed to the impacts of other elements of the Development which are already permitted under the planning permission. The new road itself has been permitted as part of the planning permission granted.
- 9.1.5. The consequences of the S247 stopping up and diversion order are the use of this new road for existing traffic on Princes Parade due to the diversion of the highways rights over the new road and the removal of highways rights on Princes Parade as shown on the S247 order plan. The removal of highways rights on Princes Parade will enable the Development including the new wider promenade to be constructed. The stopping up and diversion will move the traffic from the existing Princes Parade on to the new road, although pedestrians and cyclists could use the widened promenade on much the same line. The stopping up and diversion will mean that the use of the existing Princes Parade as a highway, including incidental use for car parking, will cease. Replacement facilities for car parking are being provided, in addition to the new road.
- 9.1.6. Chapter 3 sets out the planning application documents and explains why they are still relevant today. All planned committed developments were considered in the Transport Assessment (CD18) and Additional Information (CD27) and a future year of 2023 was assessed.
- 9.1.7. Chapter 4 provides a description of the local highway network, including footways and cycling facilities. The Site is well connected for trips by sustainable and active transport, with frequent bus services available at short walk from the Development on Seabrook Rd (A259), paths and rights of way connecting the Development to Seabrook and Hythe, and National Cycle Route 2 passes the site as part of a traffic free cycle route between Hythe and Folkestone. Chapter 4 also describes the approved Development, including how the proposed car parking will be re-provided, and the considerable benefits to walking and cycling provided by the nearly 1km long 11m wide traffic-free promenade and the new, wider, safer road with crossing points and traffic calming.
- 9.1.8. In Chapter 5 I aim to identify for the Inspector what the impacts of the stopping up and diversion order are. I consider different aspects of the design, and explain why there are no differences in the design or construction of the new road which could be argued

to be a consequence of the stopping up and diversion order for Princes Parade, reflecting the design submitted as part of the approved planning permission. I am confident that there is no argument that the new road is physically any different as a result of the proposed stopping up and diversion.

- 9.1.9. Chapter 6 provides my responses to public objections as grouped in the Buckles Report (CD66) and the Inspector's main issues. The impact of the stopping up and diversion order on car parking will overall be positive for visitors to the beachfront and the RMC. Whilst some spaces which might be preferred by some people will be removed, overall provision will be improved, with much better design and more public spaces overall. All spaces recorded as in use on Princes Parade, plus all of the Seapoint Canoe Centre Car Park, will be re-provided and more. In fact, the recorded use would only fill 77% of the reprovided spaces, excluding the additional public Leisure Centre spaces. The Leisure Centre spaces are sufficient for that use and will be used more on weekdays than weekends, whereas most trips to the beach are at weekends. Good access to the beachfront and RMC will be provided, with short safe walking routes. Spaces will be safer to use than the existing car parking spaces on Princes Parade, where drivers and passengers have to exit into the live carriageway and walk along to a gap in the seawall. The sea wall will be repositioned at the back of the new 11m wide promenade removing this obstacle in the future.
- 9.1.10. In relation to highway amenity loss, whilst there might be a loss of enjoyment for some users from driving on the seafront road when it is diverted as a direct consequence of the order, this loss would not be a significant issue when judged in context.
- 9.1.11. I also consider accessibility and concerns that the closure and diversion of Princes Parade will reduce accessibility to the seafront especially for people with disabilities and other specific needs. With the re-provided better quality car parking, designed to modern standards, the parking facilities will be appropriate to an inclusive society as a direct result of the stopping up and diversion order. In addition, the wider promenade that the stopping up and diversion order allows will provide many more facilities to rest and enjoy the seafront, and rest before moving on further than perhaps some people can today. The wider promenade will be safer, creating a greater space between cyclists and pedestrians, improving comfort for all users and giving those with mobility issues more confidence. Of equal importance, pedestrians will no longer spend time within or crossing the live carriageway of Princes Parade.
- 9.1.12. Lastly in this section I consider traffic impact, and conclude that there would be no adverse traffic impact on the local highway network, including the A259, as a result of the stopping up and diversion order. Traffic will not divert as a result of the position of the new road and the maximum 20 second extra journey time it will entail. The approved new road has been designed to more than adequately cope with the traffic that will result from the stopping up and diversion order and the total flow including the Development.
- 9.1.13. In Chapter 7 I review other topics raised by the Save Princes Parade Campaign group and other objectors. I consider car park locations and access improvements, and how not only the volume but the location and design of the public car parking will be an improvement over the existing situation.

- 9.1.14. Regarding highway safety concerns I report how the existing Princes Parade has a fairly poor safety record, with a pattern of accidents evident involving pedestrians and parked cars. In contrast to the existing Princes Parade, the new road will be wider, with space to step out of a car due to wider parking spaces, and parking provided off the carriageway. Traffic speeds will also be lower, with dedicated crossing points provided. Overall, it will be a significant improvement in highway safety terms for the traffic to be diverted from the existing Princes Parade on to the new road. The widened promenade would also be safer for pedestrians and cyclists to use than the existing situation on Princes Parade.
- 9.1.15. In regards to emergency vehicle access to local roads, I report that the highway authority, KCC, were consulted and access for emergency vehicles, such as fire appliances, would have formed part of the consideration that they carry out to provide their comments when assessing a development or a new road layout. No concerns were raised. The new road will be wider, with slower speeds and wider parking spaces, so the chances of an incident on the new road that would need attendance by the emergency services, or that might block the carriageway and impair access to Hythe, would be lower. In addition, access to the RMC, which is used for canoeing, Stand Up Paddleboarding (SUP), and other activities, for emergency vehicles would be improved over the existing situation. Access to the seafront would be retained throughout and, again, without the splash wall to navigate on the section of Princes Parade that would be stopped up, access by emergency vehicles to the promenade and seafront should in fact be improved. There will be no effect on emergency vehicle access to roads in the local area because the stopping up and diversion order will not adversely affect traffic flows or parking in the local area when compared to the current position.
- 9.1.16. Save Princes Parade Campaign group suggest that Princes Parade should become a shared pedestrian / vehicular surface, which I consider but deem wholly inappropriate for a road of the character and use of Princes Parade.
- 9.1.17. Regarding highway drainage, I explain how run-off from the new road will be discharged through an oil separator, and a series of catch pits and attenuation to a piped outfall to the sea, which will mitigate the risk of pollutants entering the water environment. I understand that this strategy, and the wider drainage strategy, are the Environment Agency's preferred approach, rather than draining towards the RMC.
- 9.1.18. In regards to access and the contention that Princes Parade would be taken into the proposed Development and will become a private space for residents and users of the leisure facilities, I explain that the ability to access and pass along the widened promenade would be the same as for the current promenade. The main difference compared to the existing Princes Parade will be that the widened promenade on the stopped up road would be maintained by FHDC, rather than KCC.
- 9.1.19. I explain that no retaining structure is required for the new road along the RMC. The road will be on a flat area of land at the top of the embankment and cut and fill analysis to date (i.e. the extent to which existing land levels need to change) indicates that minimal level changes are needed. At no point during preliminary or detailed design has a retaining structure along the length of the new road been considered.

9.1.20. I also consider convenience in this section of my proof and explain how any change in convenience relating to the driving route from a to b is negligible, with a maximum 20 second difference in journey time or 3 seconds if you do not consider the change in speed limit (that change could be brought in regardless of the stopping up and diversion order). Counter to this are the benefits, where access and enjoyment by walk and cycle will improve significantly as a result of traffic free widened landscaped promenade with seating, and the coach parking provided.

9.1.21. Lastly in this chapter, I consider and respond to the Save the Princes Parade Statement of Case.

9.1.22. In chapter 8 I set out the benefits of the realigned Princes Parade. In terms of the benefits of the stopping up and diversion order, the benefits can be summarised as including the following:

- a) The creation of a new wider promenade which would provide an enhanced car-free public realm, of great benefit of itself but also connecting the approved replacement car parking, new community facilities and housing to the coast without the need to cross or step into the road.
- b) The new promenade provides better access to the coast compared to the current situation where the splash wall creates a barrier, particularly for disabled visitors or those with heavy or bulky items.
- c) The widening of the promenade will facilitate the increased pedestrian/cycle activity on the promenade, which forms part of National Cycle Route (NCR 2).
- d) Traffic speeds will reduce on the new road, with a naturally enforced 30mph speed limit as opposed to the many incidents of illegal speeding by existing traffic. A 7-day survey on Princes Parade in 2016 showed the westbound 85th percentile speed to be 48.3mph and the eastbound 85th percentile speed to be 45.6mph.
- e) Improved highway safety on the new road over the section of Princes Parade to be stopped up and diverted, including wider parking spaces against a footpath with dropped kerbs, dedicated safe crossing points and a wider carriageway.
- f) The existing on street parking impedes two-way traffic flow. The proposed alignment removes this and provides setback parking bays so two-way traffic flow can be maintained.

9.1.23. The benefits of the planning permission which provide the context within which the claimed adverse impacts of the stopping up and diversion need to be considered include:

- a) The scheme granted planning permission includes a raft of public realm improvements beyond creation of a 11m wide car free promenade, including significant areas of new public open space (3.85ha) with seating throughout, new footpaths and crossing points linking the RMC and the seafront.

- b) The conditions on the planning permission require the reserved matters to comply with Section 5 of the Planning, Design and Access statement and the parameter plans including the Access and Circulation Plan, delivering a highly accessible development which is connected to the widened promenade and the new road on which the highway will be diverted.
- c) Better facilities for those with impaired mobility including 18 dedicated publicly accessible disabled including 18 dedicated publicly accessible disabled spaces instead of 6 currently and 43 on street spaces which are wider than standard so are also safe to use for those with mobility issues. These car parking spaces are designed to best practice guidance, with footways and dropped kerbs.
- d) Facilities to promote cycling and walking, including 34 new cycle parking spaces within the public realm of the site.
- e) Dedicated Coach Parking on the new road, which could also be used by visitors to the beachfront, Seapoint Canoe Centre and RMC.
- f) A re-provision of all car parking that was identified and agreed with the local highway authority, KCC, as required. Indeed, there will be an increase in total public car parking of 78 spaces from 389 to 467, albeit that this increase includes for the needs of the approved Leisure Centre.

9.1.24. The main, albeit very limited, disadvantage of the stopping up and diversion order is the loss of some parking spaces in the locations some people may prefer to park in. However, as set out in my proof, there is no overall inconvenience or reduction in access as a result of the stopping up and diversion order as all car parking recorded as used and therefore required in the future is to be re-provided, but at a higher standard which will be safer for all users. There are safety issues with the existing car parking layout of Princes Parade so improving this situation is a clear benefit. I have considered convenience, including walk distances, and conclude that the future situation will be an overall improvement for far more people than it is an inconvenience for.

9.1.25. Overall, whilst I can understand that some people might miss the sea view from a section of Princes Parade whilst driving or sitting in a parked car, these are not the primary functions of a highway and should not be weighty considerations. For the great majority of people, and in all other respects, the stopping up of the existing highway to allow the creation of the new widened promenade, and the diversion of the highway on to the new road, will lead to an improved situation in highways and transport terms. Other matters which people object to do not relate to the order but rather to the development including the construction of the road, which as the Inspector confirmed at the pre-inquiry meeting are not relevant to this inquiry.

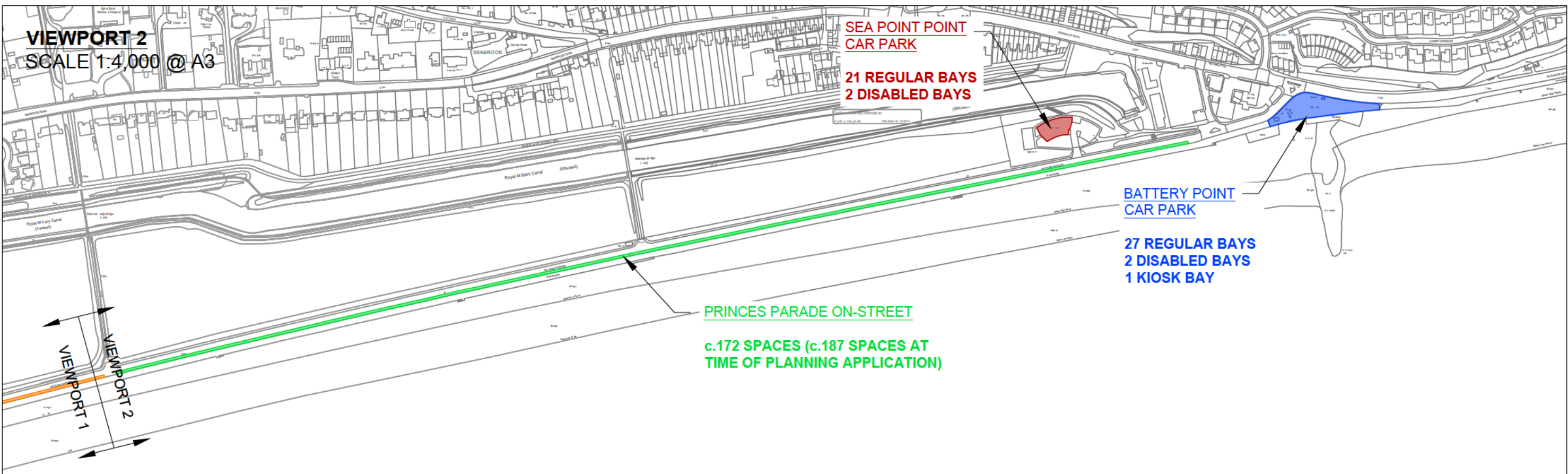
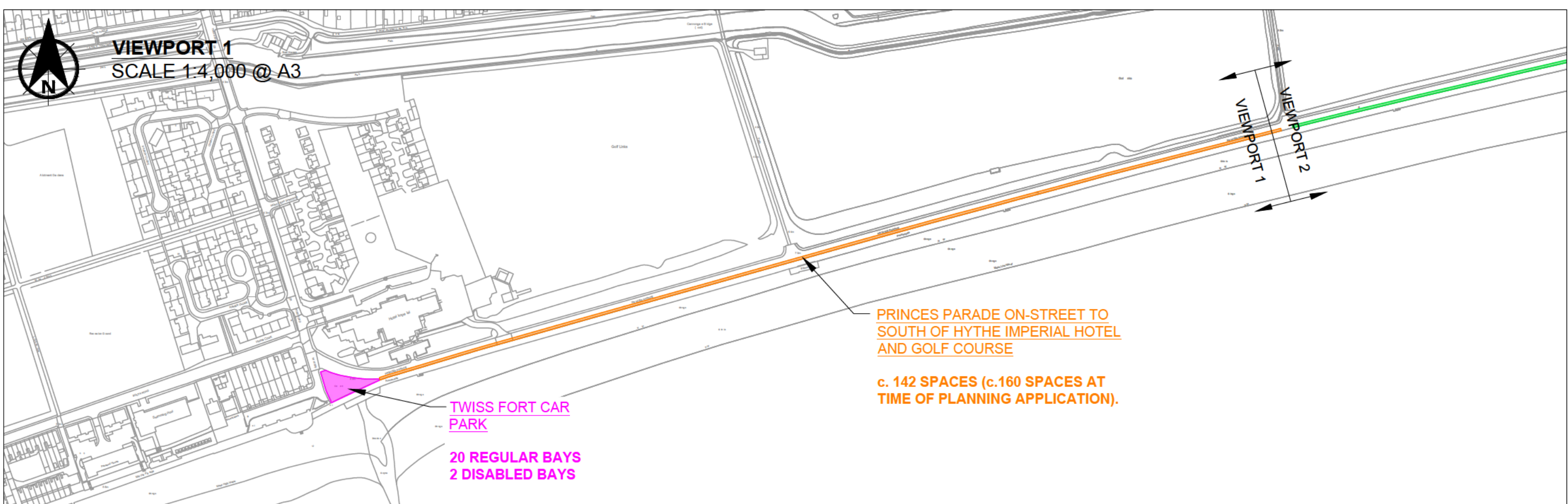
Appendix A – Existing Parking Arrangements

Reg. Office Address:
Sweco UK Limited
Grove House
Mansion Gate Drive
Leeds, LS7 4DN
+44 113 262 0000

Reg. No.: 2888385
Reg. Office: Leeds
www.sweco.co.uk

Sweco UK Limited
3rd Floor Eldon House
2 Eldon Street
London, EC2M 7LS
+44 20 3002 1210

Mark Fitch
[Redacted]
[Redacted]
[Redacted]



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PRINCES PARADE, HYTHE
EXISTING PARKING ARRANGEMENTS

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Appendix B – Proposed Parking Arrangements

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Sweco UK Limited
Grove House
Mansion Gate Drive
Leeds, LS7 4DN
+44 113 262 0000

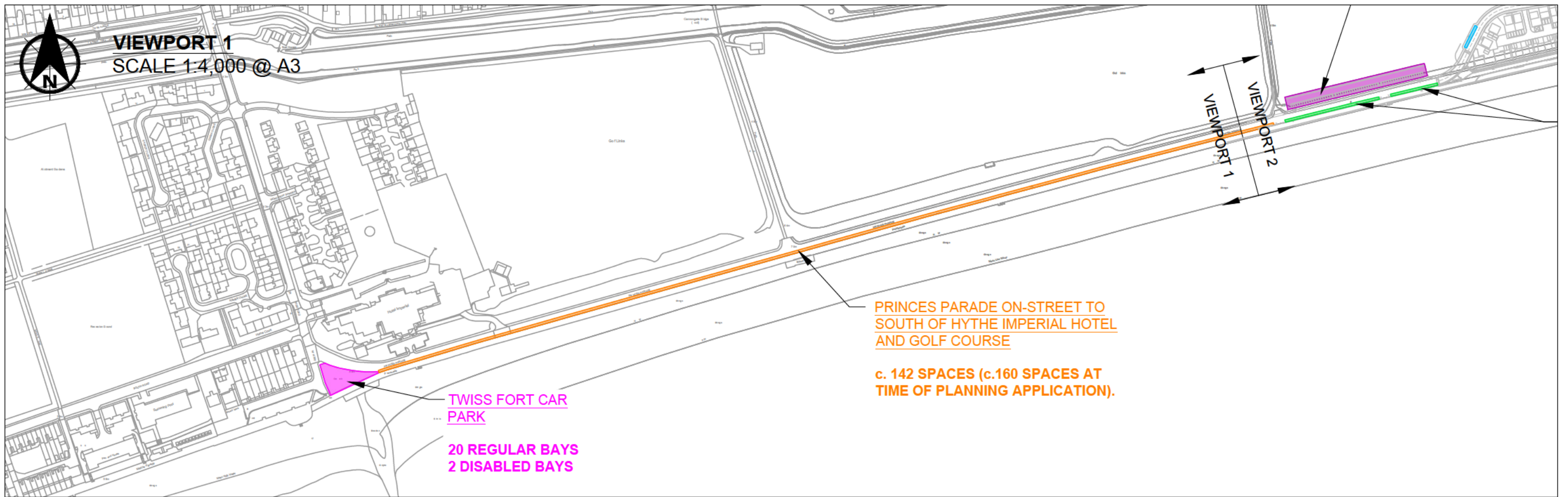
Reg. No.: 2888385
Reg. Office: Leeds
www.sweco.co.uk

Sweco UK Limited
3rd Floor Eldon House
2 Eldon Street
London, EC2M 7LS
+44 20 3002 1210

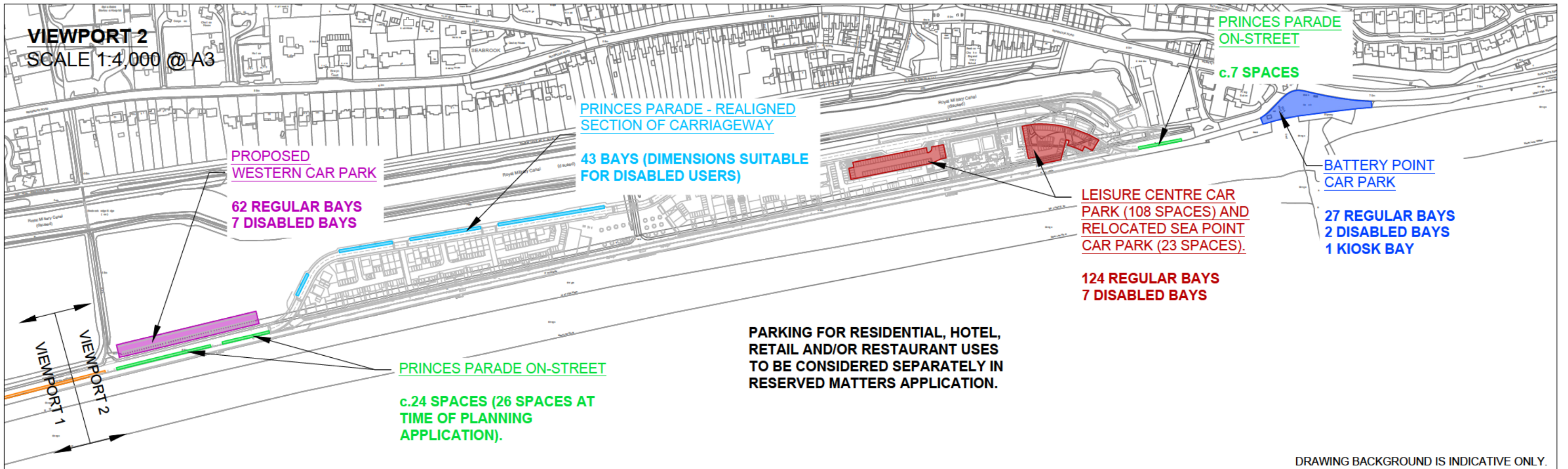
Mark Fitch




VIEWPORT 1
SCALE 1:4,000 @ A3



VIEWPORT 2
SCALE 1:4,000 @ A3



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