

## Statement for Public Inquiry

### *Additional words in blue*

I am speaking as one of the District Councillors for the ward in which Princes Parade lies.

I want to be clear that I have not been a member of or committee member of the Save Princes Parade campaign since I was elected to the district council in May 2019.

*Before I read my statement I would like apologise if I have strayed beyond the scope of the inquiry. At the Pre Inquiry Meeting the Inspector did say that there were some grey areas and if in doubt about something to include it anyway so that is what I have done.*

*However I do think there has been too much pressure to limit the scope of the inquiry to the narrowest of interpretations and this has stifled discussion.*

*The council claims in para 5.7.4 of Mr Woodhead's proof that should the stopping up order be declined they will continue with the development with both the new and the existing roads in place. That seems highly unlikely to me. For one thing there wouldn't be room on the site for both roads and for another some of the new building is supposed to be on what is now the carriageway of the existing road.*

*Therefore I think the council's argument that most of the harm from the new road will happen whether or not the old road is stopped up is not valid.*

I was elected in May 2019 with a significant majority largely as a result of the work I had previously done to oppose the development on Princes Parade so I do have a mandate to speak on behalf of local people on this matter.

I spend a lot of time on and around Princes Parade and have spoken with many local residents who are all dismayed by the proposals to develop this area. I have encountered particularly strong opposition to the stopping up and diversion of the road.

Many of the comments that I will make in this statement relate to the harms that the new road would cause. The building of the new road is a direct consequence of stopping up the old road. The amount of traffic the existing road carries means that stopping up the road without providing an alternative is not an option and so the stopping up of the road cannot be considered without also considering the impacts of the new road.

One of the main reasons that local people are so opposed to moving the road is the impact on the tranquility of the canal. At the moment it is possible to walk along the tow path in almost complete peace. This became even more important to the well being of local people in the recent lockdowns.

As the Lloyd Bore Ecological Mitigation Strategy 3/7/18 (**CD33**) makes clear, the new road will be as close as 13.32m to the canal.

This is contrary to the recommendation from the Environment Agency in their letter dated 10 April 2018 (**CD52**). They accepted that the 25m ecological buffer they had previously required was not achievable in all locations. They believed that a buffer of 20m could be achieved and suggested a planning condition to that effect. As they stated "*development that encroaches on watercourses has*

*a potentially severe impact on their ecological value. Land alongside watercourses is particularly valuable for wildlife and it is essential that this is protected. “*

Regrettably that condition was not attached to the planning permission.

*I now accept that the EA have caved in and accepted the reduced buffer zone but I still think that their original advice is worth reading as an example of best practice.*

Allowing the road to run that close to the canal will inevitably disturb the peace and quiet both for the wildlife and for people using the canal and its tow paths. ~~This~~ **The current road** is not a minor, little used road but one that carries a significant amount of traffic.

~~And that traffic will be increased during the construction of the development and once the new homes are occupied.~~

The promotor will argue that the proposed mitigation deals with all the ecological issues but the mitigation only relates to the development site itself. The fact that the Environment Agency's **initial** advice about the ecological buffer zone was ignored means that the wildlife on the canal will be affected by the new road and there is no mitigation proposed to address that.

In their letter dated 24 June 2021 (attached) which was a response to planning application 21/1182/FH/CON (ie approval of details pursuant to conditions 15, 16 and 17) the Environment Agency say *“The conditions detailed do not align with the those recommended by us .”*

The SE Design Panel met on 23 November 2016 to consider the proposals for the site. **(CD 111)**The panel was made up of some highly respected architects and urban designers and I think their views on the stopping up and diversion of the road are worth considering here **as even though** not all their comments were reflected in the officer's report on the planning application.

In their view *“ the proposal to re route Princes Parade to the north is misconceived, introduces unnecessary costs and undermines the character of the site”* and it *“ potentially creates as many problems as it solves”*

They say *“it brings an intrusive roadway close to the scheduled ancient monument and to the series of trails and paths which run alongside it.” “ The character of this site is of a vibrant sea-front and a quiet canal areas. The realignment proposal does not respect that character ,bringing a busy access and through road, which will be hard to calm, close to the canal.”*

According to the design panel, the main motivation for relocating the road was because homes with direct access to the beach would command a higher price. However, moving the road introduces considerably higher costs to the project so this justification makes little sense.

As the Design Panel said, the Royal Military Canal is a scheduled Ancient Monument. In their letter dated 26 October 2017 Historic England (CD 40) objected to the granting of the planning permission *“ We believe that this proposal would cause serious and unjustified harm to the significance of the RMC and its associated monuments, as a consequence of the proposed major change affecting the setting.”*

Whereas much of this harm will be caused by the buildings, it must be the case that the closer the road is to the canal the more it harms its setting and the ability of the public to appreciate its historical significance.

It is also worth remembering that the road itself has heritage significance having been opened in 1881 by the then Prince of Wales.

~~There will need to be retaining wall or other structure to support the new road and this will interfere with the wildlife and potentially be unsightly to those using the canal and the tow paths.~~

As the May 2021 Buckles Stopping Up Report (**CD66**) admits, there will be a loss of seafront parking. They claim that there will be 353 spaces. Adding up the spaces listed in their report I make it just 312. The Technical Annex to the Environment Statement (Aug 2017) (Transport) (**CD18**) lists 400 spaces currently available – excluding the Twiss Road Car park. So the realignment of the road will cause a significant reduction in parking spaces. This will be a considerable inconvenience to users particularly the disabled, those with young children and those with heavy fishing equipment. In peak periods it will also cause a problem with displacement parking in the surrounding area. This has already proved to be a significant problem following the introduction of parking charges along Princes Parade. I note that the parking data quoted in the Transport Report dates back to 2016. I would argue that this information is now out of date as the pandemic has greatly increased the number of visitors. I would also dispute that there are any free parking spaces at peak times during the summer.

And as the design panel pointed out , there would be problems of parking enforcement in the residential areas as visitors would want to get closer to the beach.”

The Buckles report puts a lot of emphasis on the significance of the planning permission but the only benefit identified by the report arising directly from the stopping up of the road is the enhanced car free seafront. There is no sign that alternative methods of calming the traffic along the existing road have been explored. For example, the speed limit of the existing road could be reduced to 20mph and the Design Panel offered some other suggestions.

The fact that so many local people have objected to the development and to the diversion of the road in particular suggests to me that the public do not view an enhanced car free promenade as much of a benefit. ~~Nor indeed do they view the claimed benefits of the development as a whole to be worth the losses that they will suffer.~~

I urge you therefore to refuse permission for the stopping up of the road.

Revised 22/10/21

Cllr Lesley Whybrow  
Hythe Ward FHDC