

Matthew Jones

Mob: [REDACTED] email: [REDACTED]

Folkestone & Hythe District Council,

Civic Centre, Castle Hill Avenue,

Folkestone, Kent. CT20 2QY.

Office: 01303 853315 Attention: Caroline Williams

Programme.officer@folkestone-hythe.gov.uk

Register Objection – Princes Parade Stopping Up Order

Reference: NATTRAN/SE/S247/3254

WITNESS STATEMENT

Dear Sirs,

We would like to register our objections to the movement of the road and Stopping Up Order.

The following is a summary of our understanding of the project being proposed.

For simplicity, we have divided our objections to moving the road, away from the sea front towards the end of this document.

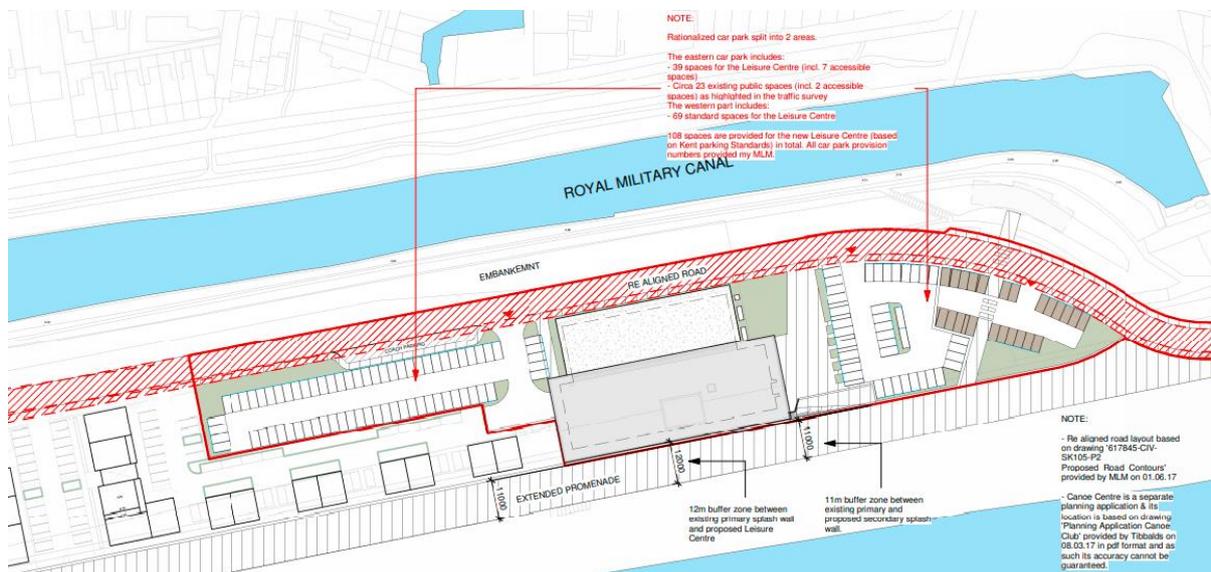
Relocation of the road from the sea front to running alongside and within proximity of a 'Structure of Historic Importance.' In addition to the current usage of the road, road traffic will increase to serve a new leisure centre, hotel, restaurant (s), café (s) and 150 dwellings.



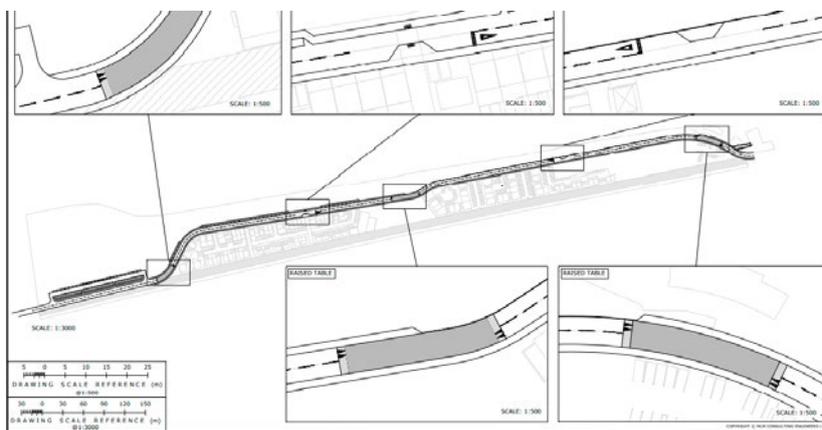
- A new Leisure Centre of unspecified height but the following suggests the intent



- parking area with 108 spaces
- coach parking bay (s)



- The north side of the highway may require a crash barrier to avert the danger of vehicles entering the canal
- Raised table traffic calming measures indicate the concerns about traffic speed. Acceleration and braking results in higher traffic noise and pollution.



Our objections:

Close Vicinity to the Historic Military Canal

~~This is an area is a designated local wildlife site (LWS) which is of great importance as a wildlife corridor and a place of natural beauty where nature has taken back where man had taken it away.~~

~~We believe the plan to move the road will have significant impact on:~~

What I'd like to do is probably move on to my actual objections. As has been said, this is an area of designated local wildlife. I think the Acronym is LWS. It is of great importance for the wildlife corridor, and it is a place of natural beauty. Strangely enough an area that, twenty years ago, when you saw the tip, you would have said was not an area of natural beauty. As nature has taken its course, it has retaken the land and produced something which is quite unique within this area.

1. Light pollution.

~~Presently the area along the canal is in total darkness. Street lighting necessary for the road would have a significant and permanent impact on an area of remarkable darkness. Presently you can see the Milky Way with ease. Moving the road would destroy this element of an area of outstanding beauty.~~

My first concern was light pollution, presently the area along the canal is in total darkness. Street lighting necessary for the road would have a significant and permanent impact on an area of remarkable darkness. Presently, you can see the milky way with ease. Moving the road would potentially destroy this element of an area of outstanding beauty. I'd like to add at this point that during the past few days, I've heard very little about the positive solutions to this subject. There has been no talk about low-level lighting. There has been no discussion about lighting to adjust to the ambient lighting levels of the area at the time of the day. In terms of the buildings adjacent to the Royal Military Canal and the area, I have seen no discussion about having blinds on the building so that at night-time, darkness can descend.

It reminds me of my brother-in-law who has a house in Funchal, and he put in a lovely picture window to overlook the sea. The local authority contacted him and said: 'At night-time, please put up a darkness blind, so that you stop creating light pollution to the area'. I would hope that, through this process that we are going through today, we can start to broaden the subject a little bit further and to find some of the solutions that may help to mitigate whatever happens in the future.

2. Noise Pollution.

~~Presently the area along the canal is silent and not disturbed. Moving the road would have a significant impact on retaining an area of remarkable peace and tranquillity. Concern is also raised by the impact of high buildings, adjacent and close to the road, acting as sound reflectors. The calculation of sound needs to be explored and anything that impacts on the natural acoustics, (bird song / frogs croaking etc.), which is presently clearly audible, is not acceptable.~~

~~Plant rooms and air conditioning units are never silent, and the road will not provide natural screening or acoustic barriers.~~

Presently the area of the canal is silent and not disturbed. Moving the road would have a significant impact on retaining an area of remarkable peace and tranquillity. Concern is also raised by the impact of high buildings adjacent and close to the road acting as sound reflectors. This is, again, something which I haven't heard in the last few days. The calculation of sound, perhaps, in my view, needs to be explored a little further. The natural level of sound in the area is birdsong and frogs croaking which are presently clearly audible. When you visit, I'm sure you'll be able to identify that for yourself.

By the stopping up order moving the volume of traffic away from the seafront to this area, I would have thought it would have been possible to establish what that impact would be from a scientific background not

just an emotional background. Within the area there are going to be plant rooms (particularly at the leisure centre) and air-conditioning units, these systems are never silent but with good planning, good thinking and a good structural approach, they can be mitigated. Again, this is something I would ask the designers to consider.

The road itself will not provide a natural screening or an acoustic barrier, perhaps the designers could go back and re-look at this and think about this subject. We often see today in modern architecture, what I call a green wall or living wall façade. Perhaps this could be considered. A wall that is alive, nesting birds and bees, making the structure of the building sound-absorbing.

Another subject I haven't heard at all but would like to propose or put forward for consideration would be the road surface itself. I'm not a specialist in the subject but I understand that roads of different surfaces can emit different levels of sound. Is this something which should be considered? Whether there is a stopping up order or not, it is about looking to see how we can mitigate the potential damage of the area.

Another little story if I may, we visited Baden-Baden. I don't know if you've been to Baden-Baden in Germany, it's a beautiful area. Again, an area which is well recognised for being a spa-town and for its peace and tranquillity. Whilst I was there, a gentleman knocked on my window and very abruptly in good German told me to switch off my engine because I was disturbing the peace. It is a reflection of the situation which can occur, but perhaps there needs to be an approach of signage. 'Please treat this area with care', 'please turn off your engine.'

3. Emissions.

Because of the suggested location of the road between the Royal Military Canal (Scheduled Monument) and high buildings and potentially walls, calculations of emissions must be made. Logic says emissions (airborne) have to travel somewhere and this can only be towards the Royal Military Canal. It is unlikely for every vehicle to be low emission before 2050.



In terms of emissions, I'll just read on because of the suggested location of the road and the fact that the Royal Military Canal is a scheduled monument - calculations of emissions. I haven't seen anything in terms of that calculation. It's a scientific approach, I would have thought it would be possible to take readings of the pollutants in the area at that position and to model that against the ramifications of increased traffic on that road. Again, it is about interrogating the data, it is about finding the best way forward. Logic tells me that emissions must go somewhere. A couple of years ago I got a ticket on the M1. I was rather bemused by this ticket, it turned out it was one of the new smart motorways. I got it because the road speed of the motorway had been adjusted according to noise and emissions. So, if we have smart motorways, perhaps this also needs to be a bit of a smart road.

I've heard discussions around the fact that the present road is classified at forty miles per hour, I understand the new road will be classified for thirty miles per hour. Have we considered twenty miles an hour? A lot of

residential areas, you drive into London nowadays and it is almost a nightmare as a driver but for the people who live there, it enhances their environment. Perhaps, that is something else, which going back to drawing boards, whether the stopping up order is granted or not, these are all points which I think should be considered.

4. Increased traffic

My next section actually discusses increased traffic. I don't propose to go through that today because I think you've had lots of discussion on that subject, and I don't think I have anything to add to the subject.

The planners have already projected increased levels of traffic. Traffic brings people and people will inadvertently create further disturbance. Coach parking is scheduled close to the peace and tranquillity of The Royal Military Canal.

Please do take the opportunity of visiting the Royal Military Canal in Hythe and particularly the part where the canal is adjacent to Waitrose. Please take careful note of the distances between the canal and Waitrose and the landscaping, as well as the height of the bank, which disguises Waitrose when one is standing at the canal side. There does not seem to be anything within the plans for the new road which would protect the canal in this way.

Indeed, the area in question provides a valuable alternative screen of wildness and nature's order.



Formal landscape near Waitrose



Natural landscape under threat

An environment is not simply what you see. It's how the air smells, what you hear. Moving the road will destroy all these elements.

5. Road Stability, Underwriting and Maintenance.

The old road is not built on top of a tip. The current road has proven stability.

The new road will be built on top of unstable ground and in a period of significant flooding, where the foundations of the road could be submerged for an extended and significant period of time, what would happen to the substructure of the new road and the excess water run off?

Unless the road is built on prohibitively expensive pilings, the road will move and will need major repair and renewal. Who would be responsible for and underwrite such a risk? The developer will almost certainly be long gone and even if still around, unwilling / unable to meet the huge financial obligations needed to address the subject. Hythe and Folkestone Council, for what seems presently to be a remarkably small financial gain,

will leave the liability with the people of Folkestone and Hythe. This risk is totally avoidable if the road is left in its current position. I object to the people of Hythe, Folkestone and associated areas being subjected to potentially huge financial liability.

The same way that my section five which talks about road stability, underwriting and maintenance. It is not my area of expertise; I have concerns about it about the potential financial liability that the council is taking on. That is the council's choice, not my choice. It was just to highlight that liability.

6. Facts and figures.

I raise concerns with the accuracy of information gathered and presented to the council, planners and other bodies.

For example:

Source of flooding	Initial level of risk	Appraisal method applied at the initial flood risk assessment stage
Rivers	Low	OS mapping and detailed study of the Royal Military Canal
Sea/Estuaries	Low	Environment Agency flood zone map
Ordinary and man-made watercourses	Low	OS mapping
Overland flow	Low	Environment Agency 'Risk of Flooding from Surface Water' flood maps, and aerial height data
Groundwater	Low	BGS Geology mapping, OS mapping and geo-environmental report
Sewers	Low	Historic sewer records contained within the SFRA and topographic survey
Artificial sources	Low	Ordnance Survey mapping and Environment Agency 'Risk of Flooding from Reservoirs' flood map

Table 3.1 – Summary of flood sources and risks.

I understand, through global warming, the risk of flooding is increasing, not decreasing. May I request you take a further look at this aspect.

The Section I really wanted to move to was what I call facts and figures. I raise concern with the accuracy of the information gathered and presented to me. I'm not necessarily saying to the project, but from what I can find in the public domain. I apologise if I can't find the reference to where I found this document but there is a document from Herrington who I believe were employed by the council. They were looking at the subject of flood risk.

The point I'm making and I'm sure this will be picked up by my learned gentleman over here is that document shows an initial level of risk for Prince's Parade as low; when I go onto the website there is a web-based service to tell you. As a resident you can put your home address in. It does tell you your flood risk and the government website says the flood risk is high. Now, I'm not saying that Herrington were wrong in their approach. They may have a completely valid process of coming to that decision but what I would say is that in the past few months we have seen the dreadful consequences of high rainwater in Germany and in Belgium with towns completely decimated.

We're very English, we accept 'it's God's will, it'll be okay'. In fact, we have a climate conference in the North this next week to discuss this exact subject. I would ask you, just for yourself, to just check this position, check the accuracy. What would be the ramification if the actual level of risk is higher than perhaps is being considered? When was this information gathered and how current is it?

7. Historic Relevance

~~We are bemused by the lack of protection being afforded to a site of historic significance. I would appreciate your time in reflecting on the documents you have seen and particularly to reflect upon the lacklustre response from other bodies such as Historic England and the Environment Agency. Nobody would consider building a road at such proximity to Hadrian's Wall, an ancient monument of equal standing. It is almost as if these bodies have not understood the momentousness of this plan.~~

~~Moving the road would, in my opinion, have a huge impact on the ancient monument of the Royal Military Canal and I would appreciate your support in protecting this site.~~

That's actually probably where I started. I have printed off the various documents from Historic England, particularly in relation to Prince's Parade. As my learned gentleman opposite me will acknowledge, there are copious amounts of documents on this subject. The last document I found related to the badger set and I could not find a document which related to the stopping up order. It just struck me that if you're going to ask Historic England about the re-positioning of badgers, surely, logic to me is that you'd ask them about the redesignation of the stopping up order and the potential movement of traffic from the sea-front to being adjacent to a historic structure.

From my knowledge, Historic England is a statutory body. Whether the council has any legal responsibility to converse with Historic England, I can't answer that. I would have thought as it is a building (monument) of natural historic importance, it would have been prudent to talk to Historic England and to take their most recent opinion on the subject. Not necessarily to extract an opinion based over documentation going back many years. So that is something I would urge you to look at again please.

It is for my learned gentleman opposite to discern whether it is applicable or not. What I can say, and I do have copies here, is that after I wrote this document, I continued to investigate the subject with Historic England and like a lot of organisations it takes a lot of time to get answer out of them. I eventually did get an answer out of them which was on Friday the 15th which I think was a week ago today. I actually wrote, if I may read this to you:

"I enquire regarding the planned re-routing of the road 'Prince's Road – Hythe'. Folkestone District Council intend to move the road from the sea-front to close proximity of the Royal Military Canal. An inquiry is being held on the 19th of October for four days (that was my initial understanding) and please confirm you will attend and contribute to the inquiry. To provide background I attach a copy of my submission and may I implore you to intervene at this late stage on behalf of the people of Hythe, Sandgate and Seabrook. The inquiry will take place on the 19th of October. Once lost, this unique historic setting of the Royal Military Canal will be lost for present and future generations."

After a number of phone calls, I actually received a reply. The reply came from a lady called Sarah Garcia who is the Business Officer and has responsibility for Kent and the South-East. She replied:

"Thank you very much for your email notifying Historic England of the inquiry and the planned rerouting of the road at Prince's Parade. Historic England has not been consulted by Folkestone & Hythe District into the proposed stopping up order, so we were unaware of the date of the inquiry. I have passed your email onto our inspectors so that they are aware of the inquiry, but I am afraid that we are not able to make representations at this late stage.

I'm sorry we're unable to help you in this matter but if you have any further questions, please do not hesitate to contact me'.

I then received a further email, which I have a copy for you. Basically, it is just a further confirmation of the points that I have just made, and she confirms that she has raised the subject with the Team Leader who in turn discussed the inquiry with their Head of Region. It is just a further confirmation from Ms Garcia that they are not specifically aware of the events of today. My learned gentleman will question, and I do apologise for bringing this at such a late stage, but I do think it is very important because there has been a lot of discussion

on the subject of Historic England and I think it would be remiss of me not to actually bring this to your attention.

What the legal responsibility of the council actually is, in talking to Historic England, is not for me to judge. If the learned gentleman opposite believes that in fact that there is no legal responsibility, he can clearly have this removed from the record.

8. Existing Road

~~In our experience the existing road works well. It provides ample parking and easy access to the beach. It forms an essential alternative to Sandgate Road. The current promenade works well as a shared path with plenty of room for cyclists, roller skaters, walkers and runners.~~

In summary

~~The land currently provides a natural buffer (both in terms of noise and visually) between the current road and the canal, creating a unique tranquillity which is rare. Moving the new road next to the canal will utterly destroy a unique historical, floral, and environmental location. Despite any claims that new planting would ameliorate the harm I believe the above has demonstrated that this will not be the case.~~

~~This unique area once lost, it will never be replaced for the enjoyment of this and future generations.~~

~~You are the guardian of the land and please protect the Military Canal. Please reject this proposal.~~

So, in conclusion, the land currently provides a natural buffer both in terms of noise and visibility. Once this area is lost, it will never be replaced and you are a guardian of the land Sir and I ask you to reject this proposal, thank you.

Yours sincerely

Matthew Jones

Information and drawings taken from:

Shepway District Council Proposed Leisure Centre and Mixed-Use Development at Princes Parade Hythe
Environmental Statement Technical Annex 8 Transport August 2017