

**From:** Joe Settle [mailto: [REDACTED]]  
**Sent:** 05 October 2021 15:34  
**To:** Programme Officer <Programme.Officer@folkestone-hythe.gov.uk>  
**Cc:** nationalcasework@dft.gov.uk  
**Subject:** NATTRAN/SE/S247/3254

Hello

Please find attached my written statement (of case) as an objector to the proposed Stopping Up of Princes Parade

Regards

Joe Settle

[REDACTED]

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Reference: NATTRAN/SE/S247/3254 – Princes Parade Stopping Up Order

I wish to object to The Stopping up and Diversion of Highways (South East) (No.) Order as the issues I originally raised have not been addressed adequately, or at all, by Folkestone and Hythe District Council in their May 2021 Response to Statutory Consultation.

My original comments of 07/06/2018 are detailed at Annex 1 of this document and this document is an expanded version of my response to Folkestone and Hythe District Councils Response to Statutory Consultation of May 2021 and has been prepared for submission to the Public Enquiry.

5.6 It is clear that Princes Parade does not need to be closed in order for the development to be carried out. There is the site that the council wish to develop then there is a footpath which runs alongside the site and then there is the road, Princes Parade.

5.8.1 There is no physical obstacle or practical impediment to the development proceeding and there is no road running through the development site. The road has always run alongside the development site and has never formed part of the site and does not in any way cross the site. Therefore this does not meet the Court of Appeals requirement of “necessity” under section 247 and the Council does not therefore satisfy the “necessity test”. The Council have made no mention of also closing the footpath that runs alongside the road.

The Merits Test

The SoS(T) must answer the following question:

**Are the disadvantages and losses, if any, flowing directly from a stopping up and/or diversion order of such significance that he/she ought to refuse to make the closure or diversion order?**

There are a number of disadvantages and losses that flow directly from the closure of Princes Parade that do not appear to have been considered by the Council as they were not detailed in any of their documentation used to support the planning process and nor have those points and issues been acknowledged or responded to in the Councils Response to Statutory Consultation.

Those disadvantages are:

- ◆ Increased traffic on the A259, Seabrook Road, by up to 4640 vehicles a day, which currently use Princes Parade (Councils transport report). As I noted in my original response the Council do not want the proposed replacement road alongside the canal to be a replacement equivalent to Princes Parade but have made clear that they would want to hamper the free movement of traffic on the replacement road and would want to force traffic back onto the A259 Seabrook Road.
- ◆ Considerable congestion at the junctions of Horn Street and Hospital Hill with Seabrook Road, where exit onto or off Seabrook Road will be severely hampered as there will be fewer and shorter gaps in the traffic flow in Seabrook Road to allow traffic to enter and exit these junctions. Currently the entrance and exit at the Folkestone end of Princes Parade is some 250 metres away from the two junctions so none of the current Princes Parade traffic has any impact on the junctions, which would not be the case if Princes Parade was closed. There will also be increased exhaust pollution while traffic sits at these road junctions waiting to enter or leave Seabrook Road. The Hospital Hill junction is right opposite Seabrook Primary School and will therefore increase the air pollution risk from vehicle exhausts for all the school children. The Horn Street junction is 30 to 40 metres from the school and will also add to the air pollution risk for the school.
- ◆ Traffic travelling to or through Hythe from Folkestone often use Princes Parade to avoid congestion that occurs at the mini roundabout as you enter Hythe. All this traffic will be forced to use Seabrook Road which will increase congestion getting into and out of Hythe.
- ◆ Increased Risk to children at Seabrook Primary School from up to 4640 additional vehicle movements from vehicles forced to use Seabrook Road. Currently the entrance and exit at the Folkestone end of Princes Parade is some 200 metres away from the school so none of the current Princes Parade traffic has any impact on the school, which would not be the case if Princes Parade was closed. There would certainly be an increased risk of a child being injured while trying to cross Seabrook Road to get into school.
- ◆ The Council has not acknowledged that traffic from other new or proposed developments will also add significant traffic movements to Seabrook Road. These are the developments at Nicholls Quarry which could add 1500 vehicles (estimated at 1.5 per household in line with national statistics), up to 500 vehicles from all the housing developments around Shorncliffe Barracks and 275 vehicles from the St Saviours Foxwood Development. These could add an additional 3000 to 4000 vehicle movements to traffic on Seabrook Road, which along with the 4640 vehicle movements identified in the Councils traffic assessment could add 8000 to 9000 vehicle movements a day to the traffic using Seabrook Road, thereby increasing all the issues I have outlined above.
- ◆ The Kent County Council Local Transport Plan (2011 - 2016) detailed "Growth Without Gridlock" but the proposed replacement road alongside the canal would create delay and is entirely unsuitable for through traffic between Hythe and Folkestone. The report at 5.6 of the Transport Assessment (Shepway District Council document Environmental Statement, Technical Annex 8, Transport, Dated August 2017) details that the new road will retain its use as a relief road for Seabrook Road but then at 5.7 details that traffic calming will deter "rat-running" (which is defined as "a minor, typically residential street used by drivers during peak periods to avoid congestion on main roads"). This shows that there is a desire to stop traffic using the new road and forcing it back on the busy and overloaded Seabrook Road (A259), which is unacceptable.
- ◆ Houses and Residents along Seabrook Road will be subject to a vast increase in air pollution from more than 8000 additional vehicle movements on Seabrook Road from the Vehicles forced off Princes Parade and additional vehicles from new developments unable to use Princes Parade. This goes against all government advice and guidance on reducing air pollution from vehicles in residential areas.

- ◆ Paragraph 5.16 of the Shepway District Council Environmental Statement, Main Report dated August 2017 and used to support the Shepway District Council planning application for the development of the site and the Stopping up of Princes Parade ("Main Report") also reinforces the message that the new road alongside the canal should not be used to relieve the A259 Seabrook Road, as it details "*Relocation of Princes Parade though the site, to form the northern edge of the built development. This will discourage the use of this route as an alternative to the A259/Seabrook Road*". This makes it clear that the traffic situation in the area and the flow of traffic is being put in second place behind the development, and forcing traffic back onto a busy and soon to be busier Seabrook Road is not the answer. The current position where up to 4640 vehicles a day use Princes Parade rather than the A259 means that on Seabrook Road the traffic noise and vehicle exhaust pollution is reduced and is of great benefit to residents and the local school, and for Shepway District Council to be proposing to force that traffic back onto Seabrook Road is a clear breach of their duties and responsibilities and this is not in any way a benefit to the public.

6 At Section 6 The Council contends that the legal tests are satisfied. I would disagree as the Council has not considered or detailed in its Response to Statutory Consideration any of the major disadvantages and losses that flow directly from the closure of Princes Parade.

6.10 The Council claims that there are no disadvantages or losses flowing directly from the S247 Application of any significance. I have to disagree and have listed above the major disadvantages and losses that flow directly from the closure of Princes Parade It is disingenuous of the Council to claim that the Development could only succeed if Princes Parade was closed.

6.14 The Councils assertions at 6.14 are not relevant to the Merits Test as they are simply overstating the importance of closing the road when in fact if the road were left open it would have little impact on the development but would reduce the impact and harm of forcing all vehicles to use Seabrook Road instead as I have outlined above.

6.15 the supposedly specific and important benefits of the development listed are actually not affected in any way by Princes Parade and are not relevant to the road at all, and it is certainly not certain that there will be an enhanced visual environment.

6.16 the Council report suggests that the "*the benefits (of the closure) arise from the development generally but importantly the enhanced car free seafront promenade*". Unfortunately because of the Councils poor plan for replacing the lost Princes Parade car parking spaces there will be few people able to get close enough to the sea front to enjoy any benefit.

## **Section 7 Councils response to Public Objections.**

7.9 The paragraph details that "*It is clear from the approved layout of the development pursuant to the planning permission, which includes (in addition to the building) the promenade improvements, new carparks and vehicle accesses, that in order to carry out the development as a whole it requires the road closure and diversion*" The Council have not detailed or proposed advantages that will outweigh the disadvantages of closing the road. The new car parks do not provide sufficient spaces and are not suitable for use by people who want to use the beach. The Council have made it absolutely clear in various reports that they do not want through traffic to use the proposed new road, and want to force all traffic onto Seabrook Road. It appears that the Councils aim for the new road is nothing more than an access road to the new development and have not planned or proposed a road that would properly replace Princes Parade in traffic flow that would provide an alternative route to and from Hythe other than Seabrook Road.

*Response Theme C – Loss of seafront parking*

7.16 details the parking survey carried out by the Council on which they have based the new car parking for the development and on which they have based their data and predictions for the closure of Princes Parade. For such important decisions it might be thought that a thorough parking report would have been carried out but unfortunately that was not the case and it was deemed necessary that only one days data should be gathered and that was for Saturday 23<sup>rd</sup> July 2016, more than a year before the MLM Transport Assessment was submitted. It should be noted that schools only broke up for the summer holiday on Friday 22<sup>nd</sup> July 2016 so it is unlikely that many family trips to the beach were arranged for the next day (Saturday 23<sup>rd</sup> July) so it is doubtful that the parking survey was representative of normal parking patterns on Princess Parade.

7.17 the Council detail; their mitigation points for the loss of seafront parking.

*(i) Princes Parade adjacent to the golf course, which will remain seafront parking, has approximately 160 parking spaces of which the maximum peak usage is 120 cars parked at 2pm per the parking survey;*

This is a misleading statement that is without relevance to parking in front of the development. The spaces adjacent to the golf course are up to a mile or more from the area of Princes Parade in front of the development, and even spaces adjacent to the golf course right next to the development are 1126 metres away from the Folkestone end of Princes Parade. Do the Council really think that a family with children, and laden with deckchairs, a windbreak, and picnic would be prepared to walk hundreds of yards down Princes Parade to find a gap on the beach . This is unacceptable and shows that no real thought has been given to providing a solution so that residents of Shepway and visitors can continue to use the beach. This parking issue will also affect anglers who can currently park next to their fishing spot but if they can only park at each end of the site they will also have to carry rods and boxes and shelters possibly many hundreds of meters to find a place on the beach. this will deter angling clubs from using Princes Parade as a venue which they have done so for many decades. This will impact business for local tackle shops and local pubs where results and presentations are held.

The parking survey actually reported 122 cars parked at 2pm, not 120.

*(ii) Approximately 26 parking spaces will remain on the seafront on the south west corner of the realigned part of Princes Parade;*

*(iii)The peak parking demand along that part of Princes Parade within the development is 100 parking spaces per the parking survey. In mitigation and addition to the parking in (ii) above, there will be a 71 parking space carpark on the south-west corner of the development. This is situated immediately opposite the seafront. There will also be 32 on-street parking spaces along the realigned road opposite the RMC (which improves accessibility to it). Finally, the relocated Seapoint carpark will provide 23 parking spaces (which currently operates below 50% capacity per the parking survey).*

As has already been detailed above, the parking survey was done on one day only which is a trivial period for a report to be given so much weight by the Council and by the Response to Statutory Consultation and give such weight in the Council request to close Princes Parade. The survey was not done during a particularly representative period for Princes Parade parking so the findings of the parking survey must not be treated as wholly reliable or representative.

The inclusion in the development of a *“71 parking space carpark on the south-west corner of the development, ... situated immediately opposite the seafront. There will also be 32 on-street parking spaces along the realigned road opposite the RMC”* will in practice provide very few spaces for people wishing to use the beach or seafront of RMC because of the following. There does not appear to be sufficient parking for the leisure centre as only 108 spaces are proposed. This seem wholly inadequate for the leisure centre and users of two swimming pools, up to 100

spectators: 100 station fitness suite; dance and exercise studios; badminton and other main hall sports, visitors to the cafe and staff for the whole complex. It is clear that the leisure centre would need a car park of some 250 spaces to cope with the Councils planned capacity for the leisure centre and it is almost certain that leisure centre visitors would overflow to the public parking area which would leave even fewer, or no spaces for all the visitors, holidaymakers and anglers who want to get to and use the beach.

*(iv) In total there will therefore be 353 public parking spaces within the development which will be easily and directly accessible to the seafront, the RMC and the enhanced promenade and open spaces.*

This statement is misleading and wrong as within the 353 figure are 160 spaces adjacent to the golf course and that is not “within the development”

*7.18 Accordingly, the Council acknowledges that there will be a loss of seafront parking as a direct consequence of the road closure and diversion. However, the Council contends that such loss will not be significant given the above listed reasons. Therefore, this response theme does not diminish the Council’s satisfaction of the ‘merits test’.*

The statement at 7.18 shows the lack of thought and consideration that has been put into the consideration of parking for the development and has failed to consider in any detail the effect the loss of parking on Princes Parade will have on beach users and visitors. The additional car parking proposed by the Council is wholly inadequate for beach users and even for the leisure centre. My response to the reasons the Council has listed above show that the loss of parking will be very significant for lots of beach users, and therefore the “merits test” has failed. It should also be noted that the Council carried out a wholly inadequate and lightweight parking survey so the findings of the parking survey must **not** be treated as wholly reliable or representative.

*Response Theme H – Noise and air pollution to walkers of RMC*

*7.35 This response theme is based on the contention of several objectors that the closure and diversion of the road will directly cause adverse noise and air pollution to walkers of the RMC due to its closer proximity. It draws upon issues for the ‘merits test’.*

I raised an issue about air pollution on Seabrook road which does not appear to have been addressed at all in the Response to Statutory Consultation so I will respond here.

*7.36 Noting the level of traffic generation for the development and associated speed limiting traffic calming measures for the road diversion, the Council’s Environmental Health Officer in response to the planning application did not advise of any adverse air pollution levels arising from the development nor required a noise acoustic report. Moreover, the Council contends that the diversion of the road will not directly increase existing traffic levels and associated noise and air pollution.*

The Council has made it clear in numerous documents associated with the development that they do not want local traffic to use the road diversion and the Councils aim is for all that traffic (up to 4000 to 5000 car journeys per day (see above)) to be forced onto Seabrook Road, along with up to 4000 additional car journeys from new developments. This additional volume of traffic will greatly increase the volume of air pollution caused by vehicle exhausts, for all the local people on what is a residential street and especially for Seabrook Primary School which will be affected by the air pollution from the additional traffic and also from traffic queueing to exit and enter Horn Street and Hospital Hill. Almost every day cars waiting to turn right into Horn Street cause a queue of traffic back to Seabrook Primary School creating air pollution from exhaust fumes which will only get much worse if more traffic is using Seabrook Road, as the delays in turning right into Horn Street will increase.

*7.37 Accordingly, the Council contends that there are no adverse, or no significant adverse, noise and air pollution impact to walkers of the RMC as a direct consequence of the road closure and diversion. Therefore, this response theme does not diminish the Council's satisfaction of the 'merits test'.*

There will of course be significant increases of air pollution as a direct consequence of the road closure. Currently vehicles using Princes Parade do not come near to the School, but vehicles forced to use Seabrook Road will considerably increase air pollution. It is therefore clear that air pollution causes the "merits test" to fail.

## *Response Theme I - Traffic impact to the highway network*

*7.38 This response theme is based on the contention of several objectors that the closure and diversion of the road will directly cause an adverse impact to the traffic network. Specifically, the objectors identify potential congestion on the A259 possibly due to traffic controls (eg. reduced speed limits) of Princes Parade resulting in the use of the road less appealing to motorists. It draws upon issues for the 'merits test'.*

*7.39 As part of the planning application the Council's transport consultants, MLM Consulting Engineers Ltd, submitting a transport assessment with traffic modelling. The results of that modelling, accepted by Kent County Council, are summarised in paragraph 8.167 of the Officer's Committee Report which stated:*

*"The modelling undertaken has demonstrated that in a 2023 scenario, which accounts for traffic associated with the development as well as local traffic growth (incorporating the cumulative impact of Imperial Green, Shorncliffe Garrison and the Seapoint Canoe Centre), all junctions will operate within desired capacity parameters within the AM and PM network peak hours (0800 – 0900 and 1700 – 1800, respectively). The greatest increase in modelled traffic flows will occur at the Twiss Road / South Road junction, with 15.7% increase in traffic at PM peak (average 14.5% increase for AM and PM), whilst the longest predicted increased delay would be at the Seabrook Road / Princes Parade junction, at 3.38 seconds. As a result of this no off site highway works are required by KCC Highways". [emphasis added]*

Unfortunately the Transport assessment with traffic modelling was rather selective in picking roads and junctions that would be affected by the closure of Princes Parade. This is regretful because it doesn't provide a balanced picture of the impact of that closure. Both the junctions with Seabrook Road at Horn Street and Hospital Hill would be subject to big increased delays when Seabrook Road was subject to the 4640 vehicles a day that currently use Princes Parade, plus up to 4000 additional car journeys for other local housing developments. You can currently wait at the junctions with Seabrook Road at Horn Street and Hospital Hill for a number of minutes waiting for a gap in the traffic flow along Seabrook Road and this would likely double or treble with 4640 extra vehicles on Seabrook Road. The junctions for Horn Street and Hospital Hill are significant as a lot of traffic filtering off the M20 use the roads to get into Hythe, Seabrook and Sandgate.

It is not clear what part of the 4640 vehicles that currently use Princes Parade account for the 15.7 increase in traffic, but the measurement was only taken at PM peak. The statistic "*whilst the longest predicted increased delay would be at the Seabrook Road / Princes Parade junction, at 3.38 seconds*" is not really at all material as to join Princes Parade from Folkestone direction, there is a left turn which would not delay traffic.

*7.40 Accordingly, the Council contends that there will be no traffic impact, or no significant traffic impact, to Princes Parade or the surrounding highway network as a direct consequence of the road closure and diversion. Therefore, this response theme does not diminish the Council's satisfaction of the 'merits test'.*

It is clear that the Transport assessment was selective and ignored a number of roads and junction that would be seriously impacted by the closure of Princes Parade. It is not clear how the Council can maintain that there would be "*no traffic impact, or no significant traffic impact, to Princes Parade or the surrounding highway network as a direct consequence of the road closure and diversion*" when it is clear that Seabrook Road, the junctions with Horn Street and Hospital Hill and Seabrook Primary School would all be seriously impacted by the increase in traffic. The "Merits Test" has again failed to be met.

I have lived in Seabrook Road near the junctions of Horn Street and Hospital Hill for more than 30 years and have a good understanding of the traffic flows and also of the problems of exiting the Horn Street and Hospital Hill junctions into Seabrook Road. On numerous occasions I have waited 3 to 5 minutes trying to exit the junctions and that is with only the current traffic numbers but with up to 9000 additional vehicle journeys along Seabrook Road a day the delays at these junctions will increase substantially. There is a real risk that vehicles waiting to exit both Horn Street and Hospital Hill junctions will pull out into traffic when there are not proper gaps in the traffic flow and cause accidents. Both junctions suffer from the issue where traffic coming from the Folkestone direction and wanting to turn right into Hospital Hill or Horn Street creates queues of traffic that completely block cars from exiting Horn Street or Hospital Hill and create more delay and danger.

Both the junctions at Horn Street and Hospital Hill are "Stop" junctions rather than "Give Way" junctions. They have been designated as "Stop" junctions because it has been recognised that both the junctions are highly hazardous and are considered to be "closed junctions" because the view into Seabrook Road is severely restricted by the Fountain Pub for traffic looking to the left from the Horn Street junction and traffic looking to the right from the Hospital Hill junction.



## ANNEX 1

These are my original comments of 07/06/2018

The application will remove the current sea front road and direct access to the beach which is to the detriment of the more than 100,000 Shepway residents and the 10's of thousands of visitors to the area, and be only to the benefit of 150 houses being proposed, that is an entirely unacceptable because the new road A (shown on the plan and given the reference letter A) does not provide the amenity or convenience of the existing road, for visitors and users of the beach and promenade and nor will it provide an equivalent highway for the drivers and other road users who currently use the road.

Princes Parade is used by hundreds of motorists who wish to avoid the heavy traffic in Seabrook Road and Princes Parade is an important alternative route to and from Hythe. It is used by traffic approaching from Folkestone to avoid the delays at the junctions of Seabrook Road with Hospital Hill and Horn Street by traffic wanting to turn right, which can hold up the flow of traffic. It is used by traffic from and coming through Hythe to avoid the same two junctions.

Pushing the traffic back onto Seabrook Road will also create congestion and delay at the junctions of Horn Street and Hospital Hill with Seabrook Road there will be fewer and shorter gaps in the traffic flow to allow the traffic from Horn Street and Hospital Hill to exit onto Seabrook Road. Queues of traffic waiting to exit Horn Street and Hospital Hill will also increase pollution levels from the idling cars.

In providing traffic volumes of vehicles using the roads around each end of Princes Parade, to support their planning application the traffic volume forecasts detailed in the Transport Assessment (Shepway District Council document Environmental Statement, Technical Annex 8, Transport, Dated August 2017) did not appear to take into account the likely 1500 additional vehicles (estimated at 1.5 per household, in line with national statistics) from the Nicholls Quarry development, when completed or the additional 275 likely vehicles from the St Saviours Foxwood sites on Seabrook Road that would want to use Seabrook Road (it is more likely that the journeys will be towards Hythe and Folkestone that towards the Romney Marsh). These will create many thousands of additional journeys, putting an even greater pressure on Seabrook Road and increasing the requirement for the alternate use of Princes Parade.

The traffic flow profile detailed in Shepway District Council document Environmental Statement, Technical Annex 8, Transport, Dated August 2017 (which was used to support the Shepway District Council planning application for the development of the site and the Stopping up of Princes Parade) at Fig 2.2 of paragraph 2.15 details that approximately 4640 vehicles used Princes Parade in a 24 hour period. 4640 vehicles in a day shows how important Princes Parade is to local Traffic flows. The diverted road would be subject to a 30 mph speed limit and also traffic calming (one lane in both directions, with give way) which will destroy the use of the new road as an alternate route and create constant delays and this appears to be the aim of the application by diverting the road.

The Kent County Council Local Transport Plan (2011 - 2016) detailed "Growth Without Gridlock" but the replacement road would create delay and is entirely unsuitable for through traffic between Hythe and Folkestone. The report at 5.6 of the Transport Assessment (Shepway District Council document Environmental Statement, Technical Annex 8, Transport, Dated August 2017) details that the new road will retain its use as a relief road for Seabrook Road but then at 5.7 details that traffic calming will deter "rat-running" (which is defined as "a minor, typically residential street used by drivers during peak periods to avoid congestion on main roads"). This shows that there is a desire to stop traffic using the new road and forcing it back on the busy and overloaded Seabrook Road (A259), which is unacceptable. This will again have a detrimental impact on Shepway residents and visitors and only be of benefit to the houses, hotel and sports centre on the site.

Paragraph 5.16 of the Shepway District Council Environmental Statement, Main Report dated August 2017 and used to support the Shepway District Council planning application for the development of the site and the Stopping up of Princes Parade ("Main Report") also reinforces the message that the new road should not be used to relieve the A259 Seabrook Road, as it details "Relocation of Princes Parade though the site, to form the northern edge of the built development. This will discourage the use of this route as an alternative to the A259/Seabrook Road". This makes it clear that the traffic situation in the area and the flow of traffic is being put in second place behind the development, and forcing traffic back onto a busy and soon to be busier Seabrook Road is not the answer. The current position where up to 4640 vehicles a day use Princes Parade rather than the A259 means that on Seabrook Road the traffic noise and vehicle exhaust pollution is reduced is of great benefit to residents and the local school and for Shepway District Council to be proposing to force that traffic back onto Seabrook Road is a clear breach of their duties and responsibilities and this is not in any way a benefit to the public.

Pushing the traffic back onto Seabrook Road will also create congestion and delay at the junctions of Horn Street and Hospital Hill with Seabrook Road there will be fewer and shorter gaps in the traffic flow along Seabrook Road to allow the traffic from Horn Street and Hospital Hill to exit onto Seabrook Road. Queues of traffic waiting to exit Horn Street and Hospital Hill will also increase pollution levels from the idling cars.

When road works were recently carried out on Seabrook Road at the junction with Cliff Road the queue to the traffic lights stretched for 1.086km (1188yards) back towards Hythe and ended at the Convent next to Cannongate Road, and this was with Princes Parade being available for traffic to avoid the roadworks. The queue of traffic would have been considerably longer if traffic had only had the proposed alternative routed road, or even longer delays with Shepway District Councils aim to push all the Princes Parade traffic back onto Seabrook Road.

In May 2018 Kent County Council replaced the streetlights in Seabrook Road and this process was carried out at night. KCC advised that the work was done at night because Seabrook Road was too busy during the day for the work to be done then. Seabrook Road would become even busier should traffic no longer be able to use Princes Parade in its current position and current speed limits.

### **Car Parking**

The car parking provision for the developed site is totally inadequate and the public parking seems to be based on only one days data (Saturday 23rd July 2016) of local parking on Princes Parade which is completely inadequate data and evidence to support a planning application of this size and complexity. I would also dispute the Transport Assessment assertion at 2.12 that the conditions on the day represented a maximum use scenario and then details that a peak of 100 cars were parked on Princes Parade. I have witnessed many occasions when there is no parking on Princes Parade because of visitors to the beach.

The council is proposing to replace 187 Princes Parade parking spaces with only 100 spaces on the new development. This is unacceptable because it will deter Shepway residents and visitors from visiting the beach and sea front and is reducing an existing amenity provided by the parking being on Princes Parade.

In fact the whole parking provision on the site will deter people from visiting the beach as currently they can drive along Princes Parade until they can see a parking space or a space on the beach and then stop. With the parking spaces only provided at each end of the development site this will mean that a family may have to carry deckchairs, windbreak, a picnic and children many hundreds of meters along the front until they can find a space on the beach. This is unacceptable and shows that no real thought has been given to providing a solution so that residents of Shepway and visitors can continue to use the beach. This parking issue will also affect anglers who can currently park next to their fishing spot but if they can only park at each end of the development site they will also have to carry rods and boxes and shelters possibly

many hundreds of meters to find a place on the beach. this will deter angling clubs from using Princes Parade as a venue which they have done so for many decades. This will impact business for local tackle shops and local pubs where results and presentations are held.

This will create a significant disadvantage, for the 100,000 Shepway residents and visitors to the district and for families using the beach and anglers fishing, arising directly from the stopping up order. I am a beach fisherman and have fished this beach for over 30 years and want to retain the direct access that Princes Parade provides.

The Shepway District Council application for stopping up the road details at Section B "The Development" - "By relocating the road to the rear of the site we can generate a vehicle free link from the proposed leisure centre and housing development to the beach and existing promenade". This is not sufficient reason to stop up the road because it benefits only the leisure centre and housing development and is to the detriment of vehicles using Princes Parade, and to the detriment of Shepway residents and visitors to Hythe wanting direct access to the seafront and beach.

Statements made by Shepway District Council in the documentation that SDC produced to support the planning application (and highlighted above) make it clear the intent is to force traffic back onto Seabrook Road (the A259) and there is no intention to build a road that will take the traffic that currently uses Princes Parade.