

TO WHOM IT MAY CONCERN

12 May 2018

Ref: NATTRAN/SE/S247/3254

I strongly object to the plans to develop Princes Parade and ‘stop up’ the beachfront road for the following reasons:

It will cause significant harm to a scheduled ancient monument, the Royal Military Canal: The Royal Military Canal (RMC) is the *only* military canal in the country and, as a Scheduled Ancient Monument, is of national as well as local importance. The ‘historic openness’ of PP is intrinsic to the Canal’s significance. Should the proposal to develop Princes Parade and divert the beachfront road to run alongside the RMC ever be implemented, the Canal’s ‘setting’ – fundamental to its status as a Scheduled Ancient Monument - would suffer ‘substantial harm’.

It will destroy a ‘significant local landscape’ with ‘a strong sense of place’: Princes Parade is a ‘significant local landscape’ with, as the government inspector noted in 2004 in overturning a previous attempt to develop this site, a ‘strong sense of place’. Under NPPF objectives this, alone, should safeguard its continued designation as Public Open Green Space.

It will cause significant harm to the biodiversity of the site and the destruction of an important wildlife habitat: The RMC is demonstrably special, not only because of its historical significance but, also, because it is tranquil and a haven for wildlife. This area is currently designated as ‘Public Open Green Space’. At least 39 different species of birds including the rare Cetti’s warbler inhabit the site; bats thrive in the vicinity and orchids are among the wide variety of wild flowers growing here. The ‘remediation strategy’ associated with this development, ‘will require all vegetation to be removed’ from the entire area of ‘informal open space’. This, and the noise and light associated with the new road will have a devastating and wholly negative impact.

It will deny access to an area of public open space that has always been one of the most attractive and popular destinations in the District: The existing road at Princes Parade allows easy access to both the canal and beach for all those who are unable, for one reason or another, to make their way there ‘under their own steam’. In conjunction with the seafront promenade, the RMC’s peaceful, sheltered, waterside paths have always been open to all to enjoy throughout the year whatever their age, income or physical abilities. A wide variety of low-key leisure activities can be enjoyed here. These include running, walking, cycling, fishing, canoeing, picnicking etc to simply ‘getting away from it all’ to enjoy the natural surroundings and a ‘taste of the countryside’ by the sea.

The development and diversion of the road will cause further loss of informal open space in the District which is already deficient in ‘accessible open space’: Paragraph 4.66 of January 2018’s Sustainability Appraisal notes that a significant proportion of residents are ‘deficient in access to open space’ in the District and that there is a lack of opportunity for ‘informal recreation’. It also records a loss of open spaces to residential development and ‘no gains’ in open space.

In the Government Planning Inspector's report of 2004, Seabrook was already described as 'deficient in every sort of public space'. Since then, on-going, large-scale development and proposed development in the Seabrook area are increasing the pressures and problems. PP and the RMC are of incalculable value and benefit to the local community. The natural, informal open space is at the very heart of the local community and is extremely well-used.

In recognition of its value to local people as a recreational resource, the RMC has Green Flag status. Its vital contribution to the health and general well-being, both physical and mental, of local people as well as its attraction to many visitors from outside the immediate area cannot be overstated.

It will cause additional pollution and traffic chaos in the Seabrook/Hythe area: Traffic congestion is already a major issue in Hythe. Developments at Shorncliffe, along Seabrook Road (the busy, narrow A259) and adjoining roads will exacerbate existing problems. The additional traffic chaos, noise and pollution of all kinds that the closure of the beachfront road and associated development would bring to this area would have significant environmental consequences and a grossly negative impact on the well-being of residents, most notably in Seabrook.

The Council's claims of 'public benefit' are a nonsense: FHDC acknowledges that 'major harm' would be inflicted by policy UA18 upon the RMC but argues that this would be 'outweighed' by the 'public benefit' of the on-site leisure centre. KCC and Historic England are among the statutory consultees who are *unpersuaded* by this argument.

The Council also claims the prospect of 'an enhanced pedestrian promenade and cycle path' as a 'benefit'. This is a nonsense. The reality is we already have a wonderful promenade and cycle route along Princes Parade and last year Kent Highways allocated £3 million to improving the route for cyclists. The work is almost complete. What a scandalous waste of public money should the plan to develop PP go ahead.

If 'public benefit' counts for anything, Princes Parade should remain – as concluded by government inspectors on at least two previous occasions - as Public Open Green Space for the continued enjoyment of this generation and those to come.

The 'stopping up' of Princes Parade and the development of this site conflicts with local and national planning policies: FHDC's proposal to develop this site clearly conflicts with the guiding principles of the District's Core Strategy, the PPLP and NPPF guidelines where the importance of safeguarding existing open space and quality of life are key issues. The plan to develop Princes Parade (policy UA18) 'scored a significant negative effect' in January 2018's Sustainability Appraisal. The purpose of the SA is to ensure and maintain an acceptable quality of life for residents. In this case it counted for nothing it seems. Likewise, many of the major risks and problems associated with Policy UA18, both financial and logistical, have either not been properly investigated or have been completely ignored.

The Council's own consultants have established that there is no need for housing development on Princes Parade: The District's current and future housing needs are amply met elsewhere in Shepway. In July 2014 Shepway's own consultants, Lee Evans, concluded that 'there would appear not to be any justifiable need for housing in this location' and recommended that 'housing is deleted from the development scheme'.

It ignores the fact that a viable, alternative site for a leisure centre, far better placed to serve the needs of Romney Marsh, already exists at Nickoll's Quarry: An alternative site for the new leisure centre already exists at Nickoll's Quarry. In October 2015 Shepway's resource Scrutiny Committee recommended that Cabinet reconsider Nickoll's Quarry as the preferred site. The recommendation was ignored. To the west of Hythe, Nickoll's Quarry is far better placed to serve Romney Marsh, identified by the Council's own consultants as the area of 'greatest need' for this facility. It would also cut down on traffic making its way through Hythe

It takes no account of the views of residents who, in recent years, have responded to a succession of public consultations and demonstrated their overwhelming opposition to the plans to build on Princes Parade: Since the 1970s (maybe even before this) the community has fought passionately to prevent the development of Princess Parade. Government planning inspectors on at least two previous occasions have acknowledged PP's 'special qualities' and have overturned Shepway District Council's (now Folkestone and Hythe District Council) attempts to develop the site. In 1997 the government inspector ruled that residential development on PP would be 'out of character' with the site's open nature. SDC's proposal to develop the site was refused. And in 2004, a government inspector found that 'the harm from residential development' [on PP] would be 'so fundamental' that SDC's proposals were again refused.

In promoting their current development plans FHDC have wasted tens of thousands of pounds of public money on a public relations campaign. Despite this, a large majority of the residents who responded to the PPLP consultation in November 2016 strongly objected to the proposal to build on Princes Parade. The 494+ objections have been completely ignored. A further indication of the level of local opposition is that approximately 6500 people have signed an online petition objecting to the development plans for PP. The Council has refused to acknowledge, or accept, this petition.

Finally, because I object so strongly to the entire scheme I request that the 'stopping up' order for the road at Princes Parade be considered by the Secretary of State at the same time as the planning application for the development of this site.

Dr Jean Baker,

