

NATTRAN/SE/S247/3254 or DPI L2250 21 22 SUOH - Princes Parade, Folkestone, CT21 6AQ

Mark Brophy
[REDACTED]

I wish to object to the stopping up of Prince's Parade on the basis of two concerns.

1. Parking

I object to the stopping up of Princes Parade on the basis that there will be a significant loss of parking overall in the area as a result of this action. It will create access issues both for existing residents and residents of the new development, visitors to the swimming pool and visitors to the area in general. People searching for parking spaces will also contribute to air pollution with the area likely to suffer significant congestion due to the new road layout and the likelihood is this will worsen with time. Core document 18 (Environmental Statement Technical Annex 8 - Transport) section 2.11, Table 2.1 details that currently there are approximately 187 on-street parking spaces on Princes Parade in the section that runs through the site, a distance of approximately 1100 meters. When the traffic survey was conducted in 2016, at peak, Figure 2.1 of the document shows that of those 187 spaces, 100 were occupied. From this, it appears to have been concluded that the new scheme will only need to provide 103 spaces in that same area as detailed in section 5.18. This means that in terms of future parking need, the designers have only allowed for an increase of 3 spaces before there is potentially nowhere left to park in the very area that will attract most vehicles trying to park. According to the Department for Transport's Road Traffic Forecasts 2018,

"...traffic is forecast to grow by between 17% and 51% by 2050"¹

with car ownership increasing at an even higher rate;

"3.67 Car ownership in England and Wales is forecast to grow from approximately 29m in 2015 to between 38m and 42m in 2050, which equates to growth of between 30% and 45% over 35 years (Figure 22)." ²

With these figures in mind, a 3% increase above the peak demand figure as surveyed 5 years ago, seems rather shortsighted, especially when one considers the ample parking currently available even on busy days. It should also be remembered that currently, larger vehicles such as campervans, trucks, vans and motorhomes can all park with ease along the seafront and do not create any significant issues as a result. Some of these particular

¹ Road Traffic Forecasts 2018 published by The Department for Transport
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/873929/road-traffic-forecasts-2018-document.pdf page 6

² Road Traffic Forecasts 2018 published by The Department for Transport
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/873929/road-traffic-forecasts-2018-document.pdf page 45

visitors will pay to park all day along the seafront, enjoying the easy access to the area and contributing to public funds as they do. These larger vehicles will effectively be prohibited from using the area or even worse may park illegally (perhaps taking up more than one space) creating problems for other users, the authorities and the free flow of traffic through the area.

It seems ludicrous that so much parking should be lost at the very time when more visitors will be attracted to the area visiting the pool for instance, staying at the hotel or accessing the dwellings as residents or visitors. This loss is a significant demerit of the scheme. The result I would argue is that parking will become prohibitively problematic and traffic will be pushed further from the site to surrounding roads and already congested areas. I live in close proximity to Princes Parade in a house that has no direct road access. I and many others locally have no option but to park on the road. I often already have to drive around searching for a parking space for some time. This is worse at peak times when Seabrook school is open and throughout the summer as people try to find somewhere to park which they don't have to pay for. Without the good number of spaces on Princes Parade, the situation for me personally and many other local residents like me will dramatically worsen. Add to this the fact that Princes Parade will no longer be able to function as a suitable alternative to the A259 (despite the assurances given in the technical annex) and the picture is increasingly grim. By not adequately providing sufficient parking after the realignment, the resultant knock on effect will be to increase congestion and far from promoting access will have the reverse effect. The site itself currently enjoys traffic free access with the promenade providing an off road route all the way from Folkestone to Hythe. The realignment of the road is not necessary to encourage cyclists or walkers, it is perfectly suitable as it is. A simple zebra crossing from the seafront across to the canal area in the Seabrook Lodge and Seaview Bridge areas could be included if necessary although, as I have stated, there are few issues currently. As the annex shows, there are no particular safety issues currently either.

In core document 18, page 22 section 5.20 it states that;

"The formalisation and better organisation of parking will remove current obstacles and improve the existing situation."

Unfortunately this summary does not identify what the current obstacles are nor what needs improving about the existing situation? At present, there is no difficulty parking and there are no access issues. The parking is better for being informal because it allows various vehicle types to access both the beach and the canal easily. These areas are attractions in their own right. People come to this area because it is unspoilt, open and easily accessible. The stopping up and realignment of Princes Parade will prevent not promote access, create traffic chaos as people suffer the loss of parking and lead to the road losing its current status as a suitable alternative to the A259 - and even as a pleasant road to drive along.

2. Environmental Harm

The loss of Princes Parade as it currently is will have a detrimental effect on the environment. This is because its realignment will be to a position in close proximity to the Royal Military Canal.

5.5 There is a risk that pollutants will enter RMC LWS post-development through surface run-off.

This one line statement in core document 94³ was quite shocking to me when I first read it and remains a terrible prospect. The issues with drainage and surface water run-off have long been associated with the Princes Parade scheme - the Environment Agency commenting that the proposals were “just about viable”. I have found no mitigation measures relating to this statement, no alternatives proposed and no recognition that this could be a serious issue. The post-development that is referred to here must be (although not specified) the realigned road as it is that which would be closest to the Royal Military Canal and from where significant pollution could come from. The realigned road and the stopping up of Princes Parade are inextricably linked because the realignment is only necessary if the stopping up is approved. Clearly whatever drainage system is in place this week, is not good enough to ensure that no pollution enters the canal, otherwise I am certain Lloyd Bore would not have included this text in their statement. The statement above includes the designated Local Wildlife Site. It should be noted that, “LWSs can be amongst the best sites for biodiversity. It is essential, therefore, that the different status assigned to LWSs should not lessen the perception of their importance and the vital role they play in conserving our natural heritage.”⁴ The land next to the canal which forms this site is of particular importance which is why the Environment Agency stipulated that it should be a minimum of 20m in width. If polluted, its value for both visitors and wildlife will be degraded and this is an unacceptable side effect of the realignment.

The risk of pollution to the Royal Military Canal itself, which has the designation ‘main river’ in addition to its ancient scheduled monument status, is surely important enough to be addressed properly. The life that this water course supports and the fact that currently there is no risk of pollution from run-off means this issue must be addressed. Princes Parade as it is now drains to the beach, the realigned Princes Parade will drain to the canal. It is on this basis that the approval to stop up the road should be refused.

³ Core document 94 Ecological Method Statement (Lloyd Bore 2021) Ref. 3609-LLB-RP-EC-0015

⁴ Different Types of Protected Wildlife sites in the UK
<https://www.wildlifetrusts.org/wildlife-and-wild-places/protecting-wildlife-sites/different-types-protected-wildlife-sites>

