

From: Barbara Mercier [mailto:]
Sent: 30 September 2021 17:03
To: Programme Officer <Programme.Officer@folkestone-hythe.gov.uk>
Subject: NATTRAN/SE/S247/3254 Stopping Up Order for Princes Parade

To:
Caroline Williams
Programme Officer
Folkestone and Hythe District Council

Sent by Email 30/09/2021

Dear Caroline

I am writing to you to object to the stopping up order for Princes Parade, Hythe, Kent - NATTRAN/SE/S247/3254. Please consider my objection. I am a resident of Hythe.

Reasons for Objection

Flood Risk

From the Government Flood Map for Planning: <https://flood-map-for-planning.service.gov.uk/>
It appears that the new road will be located in Flood Zone 3, which is the zone that is at the highest risk of flooding.
How will this be addressed?

My understanding is that the Council do not normally grant permission for new developments in Flood Zone 3, therefore any proposal to build on the land that is currently occupied by the road should not be allowed due to it being located in Flood Zone 3, this reinforces the question as to why move the existing road?

Folkestone and Hythe Strategic Flood Risk Assessment (FHSFRA)

For planning purposes, the 2115 FHSFRA map is relevant: <https://www.folkestone-hythe.gov.uk/article/807/Strategic-Flood-Risk-Assessment>
There appears to be a serious error on this FHSFRA map, since it is in direct conflict with the Government Flood Map for planning.
The FHSFRA Map shows that the risk of the Military Canal flooding is 'Extreme' from Palmarsh to the west, ending abruptly to the east, at Stade Street in Hythe. From there, it ceases to be a flood risk at all. It also shows that none of the Princes Parade site is in an area of flood risk. *This is in complete contradiction to the Government Flood Map for Planning, which shows that all of the Military Canal is in Flood Zone 3 and the complete perimeter of the Princes Parade site is in Flood Zone 3, which includes the area designated for the new road.*

How is it possible for the flood risk along the Military Canal to cease abruptly at Stade Street in Hythe? It is of utmost importance that this issue be addressed immediately. The Enquiry should either be adjourned, or it's decision adjourned, until this issue has been satisfactorily examined.

Contamination

The proposed road is to be located on top of a former rubbish tip.
This land is known to be contaminated and include the existence of methane gas, medical waste and many other toxic contaminants.
There is a need for an explanation as to how these highly toxic contaminants will be dealt with when excavation and piling for the new road commences.

I understand that former plans for a marina development on the site were abandoned following a ground investigation which had found contaminants including methane gas.

Pollution and Loss of Green Space

If the intention is to raise the road above flood level, the impact of light, noise and air pollution on both the setting of the Historic Military Canal (a Scheduled Ancient Monument) and the welfare of local residents and wildlife needs to be analysed and the resulting actions explained. The proposed road contravenes the environmental agency recommendations, since it will be within the 16m buffer zone of a waterway (the canal). How will sediments from any earthworks be prevented from contaminating the canal? How will surface water from the proposed new road be drained and where will this effluent be received?

FHDC Places and Policies Plan, adopted in September 2020 states that *...harm to or loss of scheduled monuments should be wholly exceptional* (paragraph 5.137) and goes on to say *... proposals must acknowledge and enhance the canal's historic significance and setting through a well considered, high quality, sensitive and innovative design* (paragraph 5.141). The impact of the current road proposal is neither sensitive nor well considered and even contravenes the environmental agency recommendations.

Covenants / Restrictions / Easements

A Land Registry search showed that there are covenants and restrictions on the use of this land. The information available on the Land Registry website is limited.

It is requested that ALL land title and deed documents be disclosed and that the Council / applicants provide a detailed explanation as to all relative covenants restrictions and easements.

Impact on Existing Local Road Network

Princes Parade is a safe, straight road that currently provides an alternative route to the A259, which is already very congested at peak times. An impact assessment needs to be undertaken, to ascertain risk to local residents with particular attention to impact on the Emergency Services.

Health and Wellbeing of the Vulnerable population

The current parking spaces on Princes Parade, along a stretch of more than one mile of seafront, are especially important to the elderly, those accompanying very young children and the less physically able. Those with significant physical disabilities are currently able to enjoy the sea view and air whilst in, or close by their vehicles. Losing this direct accessibility will impact on the physical and mental health of the most vulnerable.

I look forward to hearing from you

Barbara Mercier

Barbara Mercier

[Redacted signature block]