

Policies & Places Local Plan Preferred Options Shepway DC Consultation November 2016

Policy UA25 Princes Parade, Hythe.

Analysis of responses by Dr G J Burrell, 18 Dec 2016

A detailed and careful analysis has been undertaken of the responses to SDC's proposal for Princes Parade within the Places & Policies Preferred Options Consultation, which closed on 20 Nov 2016.

Full details of the analysis are presented in file *Consultation UA25 (Nov 16).xlsx*, which is available separately on email request to: pool4hythe@virginmedia.com.

- 265 individual responses were received by SDC specifically to the Policy UA25 item plus a further 236 for the 'Associated Paragraphs', prepared in support of the overall Policy.
- Multiple responses from individuals are counted once only, except for any response submitted separately on behalf of an organisation, (i.e. replications were avoided).
- The analysis counts the number of individuals who submitted comments rather than the number of comments themselves, since most respondents provided a range of different points.
- Of the 236 responses received against the Associated Paras, there were inevitably many replications, with all but 40 also commenting under the main UA25 item. For that reason the summary table identifies separately how many individuals commented on the Associated Paras without having also responded to UA25.
- This summary document includes a list of the comments received by SDC. Most points were raised several times with different forms of wording. All comments have been combined and summarised, but without attributing them to individuals. Original wording is retained where possible.
- The listed comments are combined from both the main UA25 item and also from the Associated Paras.

UA 25 Policy Responses		
Objectors	230	90.6%
Supporters	11	4.3%
Supporters with significant conditions/reservations	3	1.2%
Comments only	10	3.9%

Associated Paras	Overall (combined)
+38	91.2%
+1	4.1%
0	1.0%
+1	3.7%

Notes. The UA25 responses exclude 11 replicated submissions.

The Associated Paras table only includes individuals who did not respond to UA25.

OVERVIEW COMMENTS

- 1 New pool need not necessarily be on PP
 - 2 Existing site is large enough for a new pool - available area has been previously misrepresented
 - 3 Hythe Green was better site for recreation centre but rejected by Hythe residents
 - 4 Need to change policy to demonstrate net gain in protection of wildlife (Bullet 5) - Kent Wildlife Trust
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Comments that SUPPORT Policy UA25

- 1 Need a replacement swimming pool
 - 2 High upkeep costs for current pool
 - 3 Otherwise lost opportunity for new pool
 - 4 Would provide decent facilities for the future
 - 5 Youth will benefit
 - 6 Health benefits from new facility
 - 7 Will encourage tourists and benefit local commerce
 - 8 A café/bar would attract people
 - 9 Long time for NQ alternative to become available
 - 10 Leisure centre on NQ would not be used
 - 11 Current state of site is a disgrace, an overgrown eyesore.
 - 12 The eyesore results from contamination
 - 13 Development would clean up contamination
 - 14 SDC needs to use the land and eliminate the contamination rather than leave it as it is
 - 15 Is a contaminated site where public access is denied
 - 16 PP is a currently under-used area
 - 17 This would be a Sustainable development
 - 18 A leisure centre on NQ would not benefit the Shepway community in the way that PP would
 - 19 Designated parkland would be created, the canal area would be improved, along with the seafront which would have better facilities for visitors.
 - 20 Policy is supported provided self builds ensure good visible appearance
 - 21 SDC land-owner has submitted comments that draw attention to the policies that would be expected to be satisfied and be sustainable.
 - 22 The Leisure Centre proposal is supported provided there are no houses
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Comments that OPPOSE Policy UA25

This is a digest of the frequently repeated comments, summarised and combined, while retaining unique original wording where possible.

A VALUABLE OPEN SPACE AMENITY WITH UNEQUALLED VIEWS IN THE SOUTH EAST

- 1 Sandgate & Seabrook area deficient in open space
- 2 PP should be protected as green open space and preserved for future generations
- 3 Would destroy one of few unspoilt stretches of open coastline
- 4 Nonsense to claim that 'openness of the coastline landscape' will be retained with a development on the site
- 5 Uninterrupted views of seafront and channel
- 6 Proposal fails to provide the claimed open space between the canal and beach.
- 7 PP is the only open green space between Fisherman's Beach & Folkestone harbour
- 8 Last natural public open space in Shepway
- 9 Princes Parade is a place of much valued tranquillity
- 10 Princes Parade is the only stretch of easily accessible seafront with open views from the sea

RECREATION & LEISURE VALUE

- 12 Claim that land has limited recreational value is NOT correct (many objections to that claim)
- 13 This land at Prince's Parade is naturalised now and is teeming with "flora and fauna". It is not derelict land anymore.
- 14 Site was used extensively by public for recreational purposes over many years prior to silt dumping in 2002
- 15 Objections to land being referred to only as a domestic waste tip - lack of awareness by SDC
- 16 Development would destroy open feeling of the canal
- 17 Don't block the view facing inland from the promenade (from walkers, bikers, disabled people)
- 18 Impact on the scenic drive along Princes Parade
- 19 The coast road is a public driving amenity that should not be diverted and home owners should not be given the impression that they have private access to the beach.
- 20 Site in present state promotes physical & mental well-being
- 21 Highly valuable health & well-being resource, especially suitable for the less abled and less mobile
- 22 PP is a unique and locally distinctive place, attracting tourists and boosting the local economy
- 23 One of the very few places left where you can fully escape the noise of traffic & the stresses of everyday life
- 24 Would destroy a lovely walk enjoyed by thousands.
- 25 Diversion of the road to be alongside the canal will destroy the tranquillity of the canal.

- 26 Development will inevitably introduce unacceptable light pollution on one of few dark areas of accessible coastline used by many at night
- 27 The Seabrook/Hythe section of the Royal Military Canal has been awarded Green Flag Status in recognition of its 'value to local people as a recreational resource'. This policy will detract from that status.
- 28 Opportunity will be lost to park at nil cost along Princes Parade with immediate access to the beach
- 29 Need to retain free parking on PP road
- 30 Not many open areas exist to be enjoyed by the public. Do not destroy this one.
- 31 The vistas arising from the openness have not changed since the Local Plan inspectors twice previously rejected similar development proposals
- 32 With increasing development the residents of Sandgate, Seabrook and Hythe won't have sufficient public open green space for informal recreation

WILDLIFE (many comments of grave concern)

- 33 Abundance of Wildlife needs to be protected
- 34 This green open space is an important stopping off and departing site for migrating birds, holds a range of nesting species and is also an important feeding site for breeding and wintering birds.
- 35 The impact on wildlife would be catastrophic on the uniqueness of this area which has remained largely untouched for at least the last 30 - 40 years (Direct evidence - Comment 561)
- 36 Building construction on the scale proposed will affect all wildlife adversely
- 37 "High quality" (pristine) open spaces appears inconsistent with the need to protect wildlife

CONTAMINATION & LANDFILL

- 38 Health risks of building on contaminated landfill may take many years to become apparent, by which time the damage is likely to be irreversible - leaving a legacy of poor health for generations to come.
- 39 Asbestos dust serious health hazard (pathologist)
- 40 Unstable ground conditions
- 41 The proposed method of capping the contamination (with soil) will be ineffective.
- 42 Likelihood of disturbed contamination escaping into nearby watercourses and habitats
- 43 Movement of contaminated soil from the site may well seep into water courses
- 44 Capping site rather than removing toxic rubbish will not be safe
- 45 Land is known to be infested with Japanese Knotweed, now embedded in the contaminated landfill
- 46 Excavation for swimming pool will expose & require removal of contaminated waste
- 47 Appropriate mitigation of contamination' is neither affordable nor achievable
- 48 During construction health of children at Seabrook school will be placed at risk due to spreading contamination
- 49 Unsuitable for self-build - need specialist help to avoid disturbing contamination

50 Landfill was uncontrolled so that the true nature of the contamination is unknown

51 Council will not be able to guarantee public safety after building on Landfill site

CONCERN ABOUT CAUSING HARM TO THE HERITAGE ASSET

52 Damage to scheduled ancient monument

53 Historic England do not agree this is a sustainable location for major new buildings due to likely effect on designated heritage asset

54 ANY development will cause harm to the ancient monument

55 Preservation of RMC does not depend on building houses as has been implied

56 Ground level much higher than canal at eastern end of PP - buildings will overpower canal

57 Proposal would result in many buildings dominating the canal

58 This site provides an important and irreplaceable link between the Royal Military Canal and the coastline

59 Hythe, as a unique Heritage coastline with its protected and historic Military Canal, has the added status established by Royal Warrant as a Cinque Port town

60 Serious objections to any proposal to move road - impractical & would seriously harm canal

61 Change the entire character of the canal as it relates to the coast it was built to protect and defend

THERE ARE BETTER ACCEPTABLE ALTERNATIVE SITES FOR THE LEISURE CENTRE

62 This policy offers no benefits to local people when at least one alternative site exists for a replacement swimming pool/leisure centre

63 Leisure centre is in wrong place especially for the long term, many of people with greatest need will not use pool on PP

64 A number of alternative sites exist for the leisure centre

65 So many more Shepway residents would benefit from the Martello lakes option

66 NQ is more suitable & strategically placed as facility for use by West Hythe residents

67 NQ (Martello Lakes) is a suitable alternative for pool

68 NQ is an eminently suitable and cheaper alternative for leisure centre

69 Need leisure centre closer to centre of town, PP is too far out for Hythe residents and fails for Marsh residents also

70 Too close to Folkestone & Cheriton facilities, NQ better and only 0.6 miles further

71 No new large indoor leisure centre is needed at Seabrook - wrong side of Hythe

72 Inclusion of 100 parking spaces confirms most people would drive to leisure centre - Martello Lakes is therefore acceptable & has public transport.

73 Were Hythe pool to fail before it could be built elsewhere, the short term inconvenience would not outweigh the loss of PP open space for ever.

74 Makes no sense to demolish the existing pool having just spent so much money on it

75 The argument that Martello Lakes will take too long to develop does not add up

- 76 No project plan exists to show that a leisure centre could be built on PP more quickly than on Martello Lakes. All evidence suggests otherwise.
77 Japanese Knotweed eradication will delay PP development by years - to be slower than Martello Lakes
78 With a leisure centre at Folkestone and Cheriton already, Marsh people also deserve good access to leisure facilities
79 Re-develop existing pool site instead for which it is believed there is sufficient space.
80 The Smiths Medical site would instead be ideal for the leisure centre
81 New proposal for leisure centre is needed but with greater involvement of residents.

HOUSING IS NOT JUSTIFIED

- 82 No evidence base exists to justify the need for housing on PP.
83 Plenty of other locations for houses
84 NPPF 5-year rolling housing requirement is being satisfied without developing of PP
85 Core Strategy Housing requirement up to 2026 can already be met without relying on PP.
86 Housing need is not justified in view of recent Otterpool approval
87 Housing development rejected previously (twice) by LP Inspectors
88 Nothing has changed since 2004 LP Inspector rejected proposal for 100 dwellings
89 Even the originally planned 36 homes would be unacceptable
90 There is no compelling reason to develop this site
91 Even were it necessary to place leisure centre on PP this does not justify adding houses
92 Planned development too high, changes character of coastline
93 Would create a blot on the landscape
94 A development on this site offers no hope for young purchasers
95 Any housing on this site would not address the needs of those who need it most
96 High priced housing - second homes
97 Claim of "much needed housing" is being used incorrectly to influence views since Hythe people will not be able to afford houses on this site
98 Will bring little in the way of jobs or growth as are likely to be holiday homes or investment properties for people who have little or no interest in the local area
99 Increases emphasis on long term unoccupied homes
100 Infrastructure insufficient to support housing on PP, especially water & sewerage.
101 Additional demand on services that are already stretched
102 If PP had been privately owned development would have been blocked
103 Original reason given by SDC for developing NQ was that it would eliminate pressure on Hythe for more houses

- 104 Proposed gaps within development and end vistas will be not be sufficient to overcome concerns about the impact of a large housing development on the character of the area and loss of important open views
- 105 Strong objection to housing development but one comment supports open space, leisure and small scale commercial uses, or possible a scheme jointly with Hythe Imperial Hotel, including leisure centre
- 106 Many new build houses in the area remain unsold
- 107 450 empty houses in Shepway should be brought back into use
- 108 Planners advised a year ago that there was no need to build houses on PP
- 109 Apartments in Hythe remain unsold.- housing demand does not exist
- 110 Imbalance of housing provision vs employment opportunities
- 111 Properties will be difficult to insure
- 112 A housing development will be out of character with seafront

FLOOD ISSUES

- 113 Is an exposed flood risk site unsuitable for homes adjacent to the beach
- 114 Development will stop natural drainage and increases flood risk from sea over-topping
- 115 Land acts as a natural flood protection measure. Replacing green space with more concrete stops the natural drainage.
- 116 Unsuitable site for development due to coastal exposure, including high winds and wave over-topping
- 117 Flood risk makes this a non-sustainable site

URBANISATION

- 118 Important separation between Sandgate & Hythe - policy will over-urbanise the area
- 119 Creates urban sprawl from Folkestone to Hythe
- 120 Urbanisation by amalgamating Hythe with Sandgate
- 121 Set precedence for future development of golf course (which will become an 'infill site' between Imperial Green & PP)

TRAFFIC CONCERNS

- 122 Increased traffic damaging to area
- 123 Increased volume of traffic on A259
- 124 The A259 is often heavily congested and will become even more dangerous to cross.at Battery Point
- 125 Traffic congestion in Horn Street will get worse
- 126 Proposed development will cause a traffic bottle-neck at Seabrook

127 Congestion along the seafront would be horrendous. It would destroy a lovely walk for thousands of residents & visitors.

ALTERNATIVE USES FOR PRINCES PARADE

128 PP would be an ideal site for open area sports centre, but there is no case for indoor facilities in East Hythe.

129 Take visionary opportunity to develop a very special, open air leisure facility on PP

130 Suggest should develop site to be similar to Folkestone Leas Coastal Park

131 Unsafe for building on this landfill site, Should be a wildlife reserve..

132 Turn over the land to Kent Wildlife Trust

133 Put PP to better use as a more attractive tourist resort, but not more homes

134 Any development should be restricted to a small scale public visitor centre

135 In line with the drive to designate Romney Marsh a National Park, this site could provide a focus point providing public access to it

136 Need to put in place a permanent means of protecting this site as public open space

137 No mention has been made of the proposed covenant to protect a significant proportion of the green open space as agreed by 28 May 2014 Cabinet.

138 HEART proposal to create a unique Military park and visitor centre

139 Prince Parade could be landscaped in a similar fashion to the Lower Leas Park in Folkestone

140 Children love to play in the wooded area by the play park - it would be lovely to see this wooded area developed further.

CONFLICT WITH OFFICIAL POLICIES OR LEGISLATION

141 No evidence base exists of assessment of need as required by NPPF

142 Methodology applied to SHLAA 153 comes out mainly RED, so it fails the test for inclusion as a suitable site for housing

143 Golf course rejected as unsuitable for development, this PP land is even more so.

144 Core Strategy identifies the time line for replacing Hythe pool as 2026 (page 124, item 6.7 Non-critical project)

145 Conflicts with SDC's Core Strategy in respect of 2.26 (green open spaces protection), 2.38 (preventing undesirable coastal and countryside change), 3.4 (maintaining sense of openness & tranquillity of the countryside & undeveloped coast),

146 Conflicts with current Policies LR9 (protection of green open space) , TM8 (restricting development of eastern end of PP).& BE13 (loss of urban open space with amenity value)

147 Fails to recognise that PP is designated as public open space that SDC has failed to re-instate after the dumping of silt when the originally specified intention was to do so.

148 Extent of proposed development will do substantial harm to SAM in conflict with NPPF133.as indicated by Lee Evans Partnership report Oct 2015.

149 Proposal will be in conflict with NPPF134 even were it possible to devise a scaled down development such as to do less than substantial harm

150 Conflicts with NPPF132 since fails to give convincing argument why harm will be permitted to the heritage asset

- 151 Conflicts with NPPF 7 and NPPF 17 in claiming to be a sustainable development since it fails to meet the environmental element of protecting & enhancing the heritage asset.
- 152 Policy is contrary to Part 9 of the Marine and Coastal Access Act 2009
- 153 Conflicts with SDC's Sustainability Appraisal provided in support of this Consultation: it scores a significant negative effect due to loss of designated green open space, failing to meet local needs, and in regard to flood risk issues.
- 154 Fails to satisfy the Sustainability needs for Shepway as a whole, whereas NQ would do so by providing facilities in West Hythe for which funding and space is provided now but would otherwise be forfeited..
- 155 Princes Parade land is ideally situated to fit the 3 criteria - a Green Heritage site (RMC Green Flag winner), Accessible Natural open Green Space and 'Spreading Room' for the Coastal Path
- 156 There is a lack of SDC evidence in support of this policy to show it is viable, while other evidence shows that it is not.
- 157 Reasons for rejecting the Golf Course as being suitable for development apply equally to Princes Parade
- 158 Conflict of interests with due to the local authority applying to itself - Chinese Wall is not operating effectively.

GENERAL

- 159 Why is SDC pursuing this in face of overwhelming opposition by local people?
- 160 Weight needs to be given to the petition against any development
- 161 This is a vastly unpopular and ill thought out proposal
- 162 Shocked and appalled by the continual insensitive developments which have had absolutely no positive impact on the town or the people who live here
- 163 The idea of developing this site for the purposes proposed is completely unacceptable for so many reasons that I fail to see how it has ever been thought to be a rational proposal
- 164 The arguments put forward by Councillors for committing this act of vandalism are not only absurd, they reveal a complete lack of understanding of the concept of Public Good and/or even rudimentary economics
- 165 What are the benefits to local people from this development?
- 166 Provides short term (once only) financial gain while destroying this open space amenity for ever
- 167 Hythe Civic Society has raised an objection for 850 members
- 168 The voting public is opposed to this policy but will be unable to reverse a decision to develop the site after implementation
- 169 Inadequate public involvement in leading to this proposal against previous consultation results
- 170 There should be no development of PP - FOR EVER
- 171 Any development on PP would damage Hythe irretrievably
- 172 PP in its present state attracts visitors & safeguards local economy
- 173 No one would suggest building houses on the Leas - so why do so on PP?
- 174 Long term residents have moved to Hythe for quality of life which this proposal will permanently damage.

- 175 This land belongs to us all and should be left alone
176 Don't waste any more of our money on this
177 Would make Hythe like many other mediocre coastal towns
178 Would be an excessively costly development
179 Would like to have seen primary school proposal retained
180 Engineering difficulties have not been adequately assessed
181 Project costs are likely to far exceed initial estimates and the cost of ownership is likely to be far higher compared to other sites
182 Money wasted on preparing a planning application on this site where it is known to not be wanted should have been spent on building a new pool where it is wanted.
183 Far too much tax payers money has been wasted on this scheme already
184 Will dissuade people from wishing to locate here
185 Being so close to the coast you loss 50% of any catchment area, making it a bad area to build a sports centre
-