

## Wilkins, Danielle

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**From:** Terence Ellames [REDACTED]  
**Sent:** 10 October 2017 13:52  
**To:** Planning  
**Cc:** Allan, Robert; nick.hilditch@hythe-kent.com; Nick Hilditch; Dearden, Malcolm Cllr; Ewart-James, Alan Cllr; Ashley Tanton - Hythe Triangle  
**Subject:** Amendment to comments on the Planning Application for Princes Parade (Y17/1042/SH)  
**Attachments:** Princes Parade Planning Application.docx  
**Importance:** High

Dear/Sir Madam,

Further to my submission earlier today I would be grateful if you could replace it with the attached, as there is a key error on two lines on page 1 and 2 which I have rectified. I accept the Council did consider the 2004 Inspector decision, albeit have given it limited weight. Whilst this does not fundamentally change my comments I would be grateful if you could make the replacement for your records and any online publication.

Kind regards,

Terence Ellames

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**From:** Terence Ellames [REDACTED]  
**Sent:** Tuesday, October 10, 2017 4:09 AM  
**To:** [planning@shepway.gov.uk](mailto:planning@shepway.gov.uk)  
**Subject:** Comments on the Planning Application for Princes Parade (Y17/1042/SH)

Dear Sir/Madam,

I attach my comments for the planning application at Princes Parade.

Kind regards,

Terence Ellames

[REDACTED]

**PRINCES PARADE**  
**PLANNING APPLICATION Y17/1042/SH**

**Key issues and main objection**

I am in two minds about this application submission. On the one hand it is very well thought out, high quality and exciting, providing a new sports centre, a variety of housing types and new accessible open spaces. On the other hand previous Planning Inspector inquiry decisions did not allow housing development because of the unique open character and scenic views the area offers between the sea, Royal Military Canal (RMC) and further afield. There are also detailed objections included in the submission from Historic England confirming the proposals would cause serious harm to the setting of the Royal Military Canal (RMC), a scheduled national monument. The area is well loved by local people and tourists alike as a scenic route and place to stop to enjoy the views and gain easy access to the beach for various activities. These application will severely damage and substantially alter this, though it would will create a new and dramatic built environment serving a range of needs.

Whilst I generally support the new leisure centre it is disappointing the financial appraisal of the development generally has not been made public, or at least key elements of it. I find it difficult to believe that as many as 150 houses are required as enabling development, especially given other funding sources for the sports centre itself. This information is important for some in terms of determining support for the extent of the development and viability of any potential changes/amendments.

Aside from these conflicting viewpoints about pros and cons of the application, it is clear a lot of work has gone in to preparing this imaginative scheme. However, I feel I have to object to the planning application as it is, mainly because of the closure (and re-routing) of Princes Parade, which is currently enjoyed by many, including myself, as a scenic route with highly accessible parking to the beach. I feel the extended seaside promenade is of limited benefit for the general public, mainly benefiting houses fronting the beach. The proposed housing encroaches onto the existing public realm fronting the sea (namely the roadside footpath) and utilises part of the existing road as private amenity space for the housing. In places development 4 storeys high will be right up against the 'extended' promenade, impinging more than necessary on the openness of the area, bringing development closer to seafront maybe more than anywhere else between Hythe and Sandgate.

I believe it is much better to retain the existing seafront road and redesign it like the proposed redirected rear access road, as a main seaside street with speed restrictions, traffic calming, spaced parking bays, landscaping and integration with the existing promenade, proposed open space and housing, possibly as a shared surface. The housing and leisure centre should be set slightly further back, at least beyond the existing roadside footway, with a buffer and amenity space as proposed. The main street should be at the front, not the rear, utilising a hugely

important existing feature of the area, Princes Parade, and integrating it with the development for the benefit of all, not primarily for the housing. I believe this will be a much livelier seaside frontage than the proposed 'extended' promenade and rear access road, particularly for the cafes, restaurants, shops, hotel and the public in general. The proposed rear access road would bring traffic closer to the more tranquil RMC. More of the rear of the development could potentially be given over to footpaths, cycleways and open space/landscaping, with access just for the leisure centre, rather than a totally new road, making it a more tranquil part of the development.

Without further financial information, changes to the road proposals, heights and/or setbacks to some of the housing fronting the seafront I feel I must reluctantly object the application at this stage. These are my main comments about the application but I attach some additional comments/background notes for information. These I think demonstrate whatever is decided it will not be an easy decision for some. These proposals will substantially change the nature and setting of an important part of Hythe for future generations. Consideration needs to be given as to whether to make a referral to the Secretary of State if the Council is minded to grant permission to itself for the development as currently proposed.

#### **Additional comments/background notes**

##### **1) Proposal to build housing, arguments by some this is just a former waste tip, Planning Inspector decisions and housing supply**

With regard to the proposal to build 150 houses and apartments, and the suggestion by some the site is just a former waste tip, two previous planning inspectors concluded the site should not be allocated for housing but retained for leisure and recreation use. Inspectors concluded this because of the unique open character of Princes Parade, its relationship to the RMC and the sea, with some of the finest vistas in the District, all of which add to Hythe's unique character and strong sense of place. Any need for new housing was not considered to be outweighed by the importance of the site for these reasons. Any dwellings on the site, particularly higher ones, was considered unacceptably disruptive and harmful. This was based on a potential proposal for 100 dwellings at that time, including some 4 and 5 story elements.

Aside from Planning Inspector comments and conclusions about housing development on the site, many local residents and visitors to the area share and value the importance of the site for its openness and relationship to the sea and RMC for visual and recreational purposes. It also provides a welcome break from urban development along the seafront between Hythe, Seabrook and Sandgate and is a valuable habitat for wildlife. It is not seen by many as just another brownfield site and former waste tip as argued by some supporters and in the submission.

Any decision to develop the site for a substantial amount of housing as currently proposed would go against the decisions of previous planning inspectors, the wishes of many local people

and visitors to the area. I understand there is a very substantial petition against any development of Princes Parade by the group 'Save Princes Parade', some 4-5,000, which may not have been accepted by the Council but should not be totally ignored as evidence of strong opposition to proposals to develop the area, not just from local people but also visitors to the area.

The Council is considering various housing site allocations in addition to Princes Parade as part of its Local Development Framework, so this is not the only site where housing requirements can be met, including affordable housing. Much larger existing housing sites remain undeveloped or only partially developed such as Folkestone Seafront, Nickolls Quarry and Shornecliffe. The proposed Otterpool Garden Town will potentially deliver an additional 12,000 new homes in to the future, and according to reports this could start to deliver some housing as early as the next four years. One of the arguments put forward to support the new town is that it would put less pressure to develop other sites elsewhere, even though Shepway is not in an area of high housing demand compared to many other areas of Kent. I do recognise though that the District has not performed well when it comes to affordable housing and generally housing targets need to be met.

## 2) Proposed leisure centre, open space, hotel and café/restaurant uses and financial justification for housing

I support the proposal for a new leisure centre given the need to replace the existing pool in Hythe and upgrade leisure facilities. I would have preferred this more centrally located in Hythe or to the west, as Folkestone sports centre is not much further to the east in terms of serving the District as a whole. However each site must be considered on its merits. Princes Parade does have the benefit of being in a beachfront location, very close to existing roads, walkways and cycleways and other facilities such as bus routes, the Seapoint centre and RMC. It does concern me though how the proposed Otterpool new town might affect leisure proposals such as this, especially as it will eventually have a population at least 2-3 times the size of Hythe.

The Planning Inspector in 2004 commented that *'the site is best suited to low-key recreation or tourism use, that would take advantage of and enhance the unique appearance, setting and recreational value of both the seafront and the Canal. A severely limited amount of building might be possible, if essential for those uses and if it would retain the attractive character and openness of the area'*. Whilst this might support a leisure centre proposal Historic England have major concerns about the size and volume of the proposed leisure centre structure in relation to the RMC, which they say cannot be addressed just through detailed design changes. The Council has a problem here in terms of the location and/or bulk of the building if it wishes to seek to minimise any objection from Historic England, but on a personal level I support the leisure proposals because it is needed and exciting for the area. It would however need to be amended if Princes Parade is to be retained to the front.

It is worth noting that the Planning Inspector took into account the fact that housing development could help to finance the provision of recreational facilities and landscaping on

the site, but did find not find this matter (and others) were enough to outweigh the overall conclusion that this site should not be allocated for housing.

Personally I am not totally convinced housing should not be allowed if sensitively designed and landscaped, especially if this was proven necessary to deliver the new leisure centre. 7.2.1 of the Planning Policy Assessment states that 150 dwellings and commercial space on Princes Parade, plus it seems the capital receipt from the sale of the existing Hythe swimming pool site and 3.2 million from the Nickolls Quarry S106 is required. On this basis I do not object in principle to housing on part of the site, provided this does not compromise the retention and improvement of the existing road, and housing is set back a bit further in to the site and maybe excludes all or part of the 4 storey development. If this reduces the number or balance of house types that can be provided or some of the other specifications then so be it, because housing can be provided elsewhere and this is a very sensitive and unique site in terms of its character and setting.

It is disappointing at least some key elements of the financial information to justify the amount of housing to deliver the overall scheme, and particularly the leisure centre, has not been made publicly available as part of the application so more detailed comments can be made on the various elements. I understand only detailed information is available on a confidential basis. Given it is stated in 7.2.1 of the Planning Policy Assessment that the whole premise driving the application proposals is the delivery of a new leisure centre, this information should be made publicly available (or at least the key elements) to help determine more refined views on the submission. Without this I find it hard to fully support the proposal for as many as 150 dwellings, and certainly do not support the cost of diverting the road and encroachment on the existing public realm.

### 3) Further comments on the closure and diversion of Princes Parade.

What concerns me most personally about the current application is the closure and diversion of Princes Parade the road. For me one of the pleasures and characteristic features about Hythe is the drive along Princes Parade in both directions, whatever the time of day or night, as it is such an enjoyable and unique experience. I am sure this is the same for many others living in Hythe and visitors to the area.

As stated by the Planning Inspector about a similar proposal associated with housing in 2004: *'I consider that the diversion of the road away from the seafront would erode its attraction and integrity as a unified seaside drive from all the way from Sea Point to the Imperial Hotel, whilst compromising the quiet setting of the Canal, an Ancient Monument'.*

In addition Princes Parade provides the opportunity to park right on the seafront to enjoy the views, particularly for the elderly and disabled, and to gain direct access to the beach for those with equipment, such as fishermen, kayakers and others with heavy beach equipment. This is intended to be replaced with parking on the diverted road to the rear and a car park to the

west near a proposed open space on the opposite side of Princes Parade, thereby losing the opportunity to park right on the seafront.

I disagree with the assertion in the submission that Princes Parade is just a rat run to the A259 especially for large vehicles. This undervalues the role Princes Parade plays for many local residents and tourists to the area. However I can see the benefits a rear access road provides for the development itself, particularly those houses and apartments on the seafront that will be traffic free and have uninterrupted views. Also the ability to push the housing slightly further forward to the sea. Some drivers will be discouraged by the new dogleg on Princes Parade and maybe avoid the area as it will not have the same scenic value throughout its entire length.

I hope Kent Highways and Kent County Council object to the road closure and diversion as I do not believe it is not necessary or desirable to allow a development to happen. Whatever development is allowed it would be beneficial if KCC and/or the development could fund an improvement scheme for the entire length of Princes Parade so a comprehensive approach is taken to this whole section of highway and public realm.

Whilst I have no objection to an additional off road public car park to the west, parking in this area is only ever really busy during the summer and weekends, though accept could be increased with the development. I say this because it seems a shame to propose a large off road public car park directly in front a major new open space, opposite the existing road. I assume though some of the open space is elevated which might overcome any problem with respect to views out to sea.

#### 4) Referral of application to the Secretary of State

Whilst fewer applications are now referred to the Secretary of State for 'call in' I feel that because of ownership issues, objections from Historic England about the impact on a national monument, the status of the proposed housing designation and previous Inspector decisions the Council needs to consider whether to refer the application to the Secretary of State, should it be minded to grant itself consent. There is also the road closure issue and potential implications of Otterpool new town.

#### 5) Extract from 2004 Inspectors report on the Local Plan Inquiry

*3.1.349 'To my mind the prospect eastwards along Princes Parade from the vicinity of the Hythe Imperial Hotel is one of the finest vistas in the District. The main characteristic of the area is its grassy openness coupled with public access to the seafront, somewhat akin to the cliff top open space of The Leas and rare elsewhere in the District. The character, appearance and historical interest of the area is enhanced by the Royal Military Canal (RMC) which separates it from the built-up part of Hythe to the North. The view is closed to the east by the high ground of Sand gate, and inland by tree clad slopes rising towards the AONB. The sharp contrast revealed in travelling westwards between the closely-developed nature of Sand gate, constrained by*

*topography, and the sudden openness of the Princes Parade area, adds to its character and strong sense of place’.*

*3.1.350 ‘In my view dwellings on the site, particularly if of 4 or 5 storeys, would be unacceptably disruptive and harmful to the attractive open character of Princes Parade and its long vistas, particularly in looking eastwards. The opportunity to provide high quality and high density modern coastal architecture would not outweigh that harm. The loss of openness is as important as visual impact on this key site. The suggested layout shows dwellings at the shore edge, and Princes Parade diverted inland for a significant proportion of its length. Such matters are purely indicative at the Local Plan stage, but there are few options on this shallow site. I consider that the diversion of the road away from the seafront would erode its attraction and integrity as a unified seaside drive from all the way from Sea Point to the Imperial Hotel, whilst compromising the quiet setting of the Canal, an Ancient Monument. The other main alternative of leaving Princes Parade in place and locating dwellings towards the north of the site would, the Local Planning Authority agrees, be even more likely to adversely affect the character of the RMC. I am aware that various forms of mitigation could be secured at the development control stage, but in I find that the harm from residential development would be so fundamental that I cannot recommend it, in principle, for this site’.*

*3.1.351 ‘I agree therefore with the Inspector in his report on the previous Local Plan inquiry that residential development would be out of character with the site’s open nature (CD4.03, paragraph 5.56). This part of Seabrook is deficient in every sort of public open space, according to the plans in Appendix 9 of the RDD, and the tourism industry is of great importance in Shepway. To my mind the site is best suited to low-key recreation or tourism use that would take advantage of and enhance the unique appearance, setting and recreational value of both the seafront and the Canal. A severely limited amount of building might be possible, if essential for those uses and if it would retain the attractive character and openness of the area...’*

*3.1.352 ‘It is unfortunate that the site is one of the District’s few significant areas of previously-developed land within the urban area, although that status arises from the lack of a restoration condition on the old planning permission for landfill use. There is no doubt that it is a sustainable location for housing and that it ranks in the top category of the search sequence of PPG3. Its deletion as a housing allocation would make it more difficult for the Local Planning Authority to achieve its target of 60% of dwellings on previously-developed land in the Plan period, although I do not consider that this is determinative. However, I find that this is one of the rare occasions where the need to preserve the open character of a site, and its relationship to both the sea and the Canal, is so important that it outweighs the imperatives of PPG3’.*

*3.1.3531 ‘... I have taken into account the fact that housing development could help to finance the provision of recreational facilities and landscaping on the Policy LR9 land. Developer contributions could also help towards the provision of any necessary social, community or transport infrastructure, and a development of 100 dwellings would yield a proportion of affordable housing under Policy HO6. I saw that at present the site is somewhat untidy and is not open space to which the public have access. However, I find that none of these matters, nor*

*any others put before me, are enough to outweigh my overall conclusion that this site should not be allocated for housing...'*

*3.1.355 'I consider that the Policy HO2G allocation should be replaced on the Proposals Map by washing the Policy LR9 designation over that site. Alternatively the Council may wish to consider a mixed low-key tourism/recreation use on the land, supported by a new policy and reasoned justification...'*