



SANDGATE PARISH COUNCIL
Minutes of a
PLANNING COMMITTEE MEETING
Held on Monday 27th October 2025
At Sandgate Parish Council
Offices/Library James Morris Court,
Sandgate High Street

These Minutes will only be deemed to be a correct record of the meeting when approved and signed at the next meeting.

In the absence of Councillor Guy Valentine-Neale, Councillor Tim Prater was proposed as Chair for the Planning Committee for the duration of the meeting.

Proposed by Councillor Simon Horton

Seconded by Councillor Susan Claris

Agreed by all

Present:

Chair Councillor Tim Prater

Councillors Hazel Barrett, Susan Claris, Michael Fitch, and Simon Horton

Clerk: Gaye Thomas

One member of the public attended the meeting and made representations regarding application 25/1651/FH

1. **Apologies for absence:** Nicola South and Guy Valentine-Neale
2. **Declarations of interest:** Michael Fitch as a direct neighbour of 32 Radnor Cliff, declared a pecuniary interest and he therefore neither spoke on or voted on that item.
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4. **Minutes of the last meeting** – the minutes of the meeting held on 6th October 2025 were circulated ahead of the meeting. They were accepted as a correct record of the meeting.
Proposed: Cllr Simon Horton
Seconded: Cllr Michael Fitch
Approved by all present
5. **Planning applications for discussion:**

25/1651/FH	32 RADNOR CLIFF	Demolition of existing house, garden structures and boundary treatments. Erection of two dwelling houses (C3), one holiday house (C5) and associated landscaping, slope stability and driveway work. Erection of new boundary wall.	Comments and observations before 30/10/2025 Objection For 4 Against:0 Int Dcld :1
Sandgate Parish Council's Planning Committee, members resolved to object to the above application for the reasons set out below. 1. Cliff and Slope Stability / Geotechnical Concerns The Parish Council expresses serious concern about the adequacy of the submitted geotechnical report,			

which covers only the immediate site and not the wider cliff system or its implications for neighbouring plots. The Radnor Cliff area is an identified zone of historical instability and landslip risk, and therefore any development must be subject to rigorous geotechnical evaluation.

Under Policy NE6 (Land Stability) of the Folkestone & Hythe District Places and Policies Local Plan (2020),

“In areas of known or potential instability, all development proposals — particularly commercial or more intensive forms — must be accompanied by a detailed and site-specific land stability report, prepared by a suitably qualified specialist, demonstrating that the development will not adversely affect the stability of the site or adjoining land.”

The application fails to meet this requirement. The report provided is partial, limited in scope, and does not assess off-site impacts or the cumulative effect on adjacent properties. It is therefore non-compliant with Policy NE6 and insufficient to support commercial-scale development.

Nationally, NPPF paragraphs 174–177 and the Government’s Land Stability Guidance (formerly PPG14) also require local authorities to ensure that development only proceeds where it can be demonstrated that land is, or can be made, stable and will not cause instability elsewhere.

The Parish Council further notes that the proposal involves removal of vegetation, root systems, and terracing, all of which currently provide natural slope reinforcement. Such disturbance risks destabilising an already fragile cliff structure.

Accordingly, a full slope stability assessment covering the wider cliff and neighbouring land is required before this application can be properly determined. Any subsequent consent must include conditions for long-term monitoring and developer liability for any resulting instability or structural movement affecting adjoining plots.

2. Overdevelopment and Out-of-Character Scale

The proposal represents a significant overdevelopment of the site, with an enlarged footprint approximately three times greater than neighbouring dwellings. The height, bulk, and mass are inconsistent with the existing architectural rhythm and character of Radnor Cliff.

This is contrary to:

NPPF paragraphs 126–136 (Achieving well-designed places).

Local Plan Policies HB1 and HB2 (Quality Places and Design Principles); and

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires special attention to be paid to preserving or enhancing the character and appearance of conservation areas.

The development’s visual impact, density, and loss of greenery at sea level would cause demonstrable harm to the local character and the setting of the Radnor Cliff Conservation Area.

3. Access, Highways and Construction Management

No lawful construction access has been secured through The Riviera, whose residents have formally refused permission for access by construction vehicles. The absence of safe access renders the proposal unworkable and raises serious highway safety and emergency access concerns.

Radnor Cliff already experiences seasonal gridlock during summer months, and construction activities would exacerbate this problem. Heavy vehicle movements could also contribute to further instability of the road structure atop the cliff.

In accordance with NPPF paragraph 111, development should be refused on highway grounds where it would have an unacceptable impact on highway safety or cause severe residual cumulative impacts — both of which are applicable here.

The Parish Council therefore requests that any future determination includes a Grampian condition requiring legal access arrangements, a Construction Traffic Management Plan, and full road safety assessment before any work commences.

4. Rights to Light and Amenity Impacts

The bulk and proximity of the proposed building will result in significant loss of daylight and sunlight to adjacent properties, with potential infringement of Rights to Light protected under the Rights of Light Act 1959.

Planning permission does not override these private legal rights, and the developer must demonstrate that no actionable loss of light will occur. The absence of a BRE-compliant Daylight and Sunlight Assessment is a serious omission and must be rectified prior to determination.

5. Heritage and Conservation Area Impact

Radnor Cliff lies within or adjacent to the Sandgate Conservation Area, containing several heritage and locally listed properties. The proposed development, due to its excessive mass and overbearing presence, would harm the character and setting of this heritage environment.

Under Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, both the preservation of setting and visual harmony are statutory duties of the decision-maker. The loss of established greenery and alteration of the cliff profile would further erode this character, contrary to:

NPPF paragraphs 205–211 (Conserving and enhancing the historic environment); and

Local Plan Policy NE3 (Landscape Character and Designation).

6. Environmental and Structural Implications

The cumulative effect of excavation, vegetation clearance, and added building massing raises legitimate environmental and structural risks, including:

Increased surface water run-off.

Soil displacement; and

Amplified stress on the cliff structure due to loading from new foundations and machinery.

Under National Enforcement Guidance (NEG) for commercial and slope-sensitive developments, a comprehensive slope and site stability assessment is required, encompassing adjacent properties and wider topography. This process should be activated before any further consideration of this application.

7. Party Wall and Liability

Given the proximity of adjoining properties, the proposed works fall within the scope of the Party Wall etc. Act 1996. Any destabilisation or damage resulting from these works must be met entirely at the developer's cost, including latchgate protection and structural repair obligations.

8. Summary and Recommendation

Sandgate Parish Council objects to the proposal on the grounds of:

Non-compliance with Policy NE6 (Land Stability) and inadequate geotechnical reporting.

Potential cliff and slope instability.

Overdevelopment and loss of character.

Lack of lawful construction access and highway safety concerns.

Harm to the Conservation Area and visual amenity.

Loss of daylight and infringement of rights to light.

Insufficient mitigation for environmental and structural impacts.

The application is therefore contrary to the National Planning Policy Framework, the Folkestone & Hythe Places and Policies Local Plan (Policies NE6, HB1, HB2, and NE3), and the Planning (Listed Buildings and Conservation Areas) Act 1990.

Accordingly, Sandgate Parish Council recommends REFUSAL of this application in its current form.

25/1832/FH	Hillboro, Sunnyside Road	Variation of condition 2 (approved plans) of planning permission 23/1892/FH to allow for material and floor plan changes.	Comments and observations before 27/10/2025 No Objection For 5 Against: 0 Int Dcl'd Non-Pecuniary
25/1855/FH	23 Sandgate High Street	Listed building consent for the conversion of single storey building to form a two-bedroom residential unit together with associated internal works.	Comments and observations before 29/10/2025 No Objection For:5 Against:0

Sandgate Parish Council were disappointed with the absence of a reference to the Sandgate Design Statement especially as this property is in the conservation area.

25/1434/FH	Land Opposite Chipchase Lodge, St Stephens Way,	Variation of conditions 2, 4 & 5 of planning permission Y18/1096/FH to allow for changes to parking and landscaping.	Comments and observations before 28/10/2025 Objection For:5 Against:0 Int dcl'd :0
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At its meeting, Sandgate Parish Council's Planning Committee resolved to object to the above application for the following reasons:

1. Insufficient Information and Lack of Clarity

The Parish Council objects to this application on the grounds that the submission lacks sufficient and coherent information to allow proper assessment of the proposal.

The application form and plans do not clearly define the scope or nature of the proposed variations to Conditions 2, 4 and 5, nor do they provide clear details of the changes to parking layout or landscaping. The supporting documentation fails to identify the implications of these alterations for the approved scheme under permission Y18/1096/FH.

Without clear and detailed plans, the Council — and the Local Planning Authority — cannot assess the potential impacts on access, drainage, landscape quality, or slope stability.

2. Unclear Compliance with Previous Planning Permission

This application seeks to vary conditions attached to Y18/1096/FH, yet there is no evidence before the Council that the original permission has been implemented in full compliance with its approved conditions.

Until the Local Planning Authority has verified that the conditions of Y18/1096/FH have been properly discharged and adhered to, it is inappropriate to consider any variation.

The Parish Council is concerned that granting variation without confirmation of compliance risks legitimising potential non-compliance and undermines confidence in the planning process.

3. Construction and Land Instability Concerns

The site lies within an area of known land instability, forming part of the Radnor Cliff slopes where there is a long-recognised risk of ground movement.

The Council is particularly concerned that this variation application provides no updated geotechnical or engineering information explaining how the proposed changes — especially alterations to parking surfaces and landscaping — will affect the ground conditions, drainage, or stability of the site.

Under Policy NE6 (Land Stability) of the Folkestone & Hythe District Places and Policies Local Plan (2020):

“In areas of known or potential instability, all development proposals — particularly those involving commercial use, excavation, changes in drainage, or ground profile — must be supported by a detailed, site-specific land stability report prepared by a suitably qualified specialist, demonstrating that the development will not adversely affect the stability of the site or adjoining land.”

No such report accompanied this application. Accordingly, the submission is contrary to Policy NE6 and fails to demonstrate that the development would not compromise slope or cliff stability.

The Parish Council also notes that the application lacks details of construction methods or vehicular access, which are essential in a geotechnically sensitive location such as this.

4. Landscaping and Visual Amenity

The proposed amendments to the approved landscaping are not supported by clear or detailed plans. Landscaping plays an important role at this site — both in stabilising the slope and in maintaining the coastal character and appearance of the area.

The removal or reduction of soft landscaping, or replacement with impermeable surfacing for parking, may increase surface water run-off and reduce soil cohesion, further undermining stability. The lack of clear planting or maintenance details makes it impossible to ensure that visual and environmental impacts are properly mitigated.

5. Summary and Recommendation

For the reasons set out above, Sandgate Parish Council objects to planning application 25/1434/FH on the following grounds:

The application lacks sufficient detail or clarity regarding the proposed variations.

There is no confirmation that the conditions of Y18/1096/FH have been complied with.

The proposal fails to provide any updated or site-specific land stability assessment, contrary to Policy NE6 of the Folkestone & Hythe District Places and Policies Local Plan (2020).

There is inadequate information on construction methods, drainage and parking design in an area of known land instability; and

The proposed changes to landscaping are poorly defined and risk harming local character and slope stability.

Until these matters are properly addressed, the application cannot be supported.

Accordingly, Sandgate Parish Council recommends REFUSAL of planning application 25/1434/FH unless and until:

Full, detailed drawings are provided showing the precise nature and extent of the proposed variations.

Evidence is submitted confirming full compliance with all conditions of the previous consent (Y18/1096/FH); and

A comprehensive, independent geotechnical land stability report and construction management plan are submitted and approved, in full accordance with Policy NE6.

6. **Update on previous planning applications:**
25/1587/FH 75 Enbrook Road Approve with Conditions
25/1572/FH Hillside, Brewers Hill Approve with Conditions
25/1449/FH 21A,21B, 21C The Crescent Approve with Conditions
7. **Correspondence:** Emails from the Sandgate Society had been received regarding 25/1651/FH and these were considered as part of the deliberative process.
8. **Information:** There was none
9. **Date of the next Planning Committee meeting –TBC**

Signed by the Planning Committee Chairman Date.....
Chairman's initial & date

