



SANDGATE PARISH COUNCIL
Minutes of a Planning Committee
Meeting held on Monday 12th October
2026
at 6.30 in 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.

Present:

Chair: Councillor Guy Valentine-Neale

Councillors: Hazel Barrett, Susan Claris & Simon Horton

Clerk: Gaye Thomas

1. **Apologies for absence:** Councillors Peter Hickman & Michael Fitch
2. **Declarations of interest:** None
3. **Minutes of the last meeting** – the minutes of the meeting held on 7th September 2026 were circulated ahead of the meeting. They were accepted as a correct record of the meeting.
Proposed by Councillor Simon Horton
Seconded by Councillor Susan Claris
Approved by all present
4. **Planning applications for discussion:**

26/1290/FH	Hythe Imperial Hotel & Golf Course East & West, Princes Parade, Hythe, CT21 6AE	Hybrid planning application comprising of full planning permission for: (i) extensions to, and the redevelopment of the Hythe Imperial Hotel to provide additional hotel accommodation, a new spa facility and a public gym and swimming pool, and (ii) the redevelopment of the existing golf course to include an 'academy' golf course and clubhouse, an adventure golf course and splash park with associated access, parking, landscaping and other ancillary works, and; Outline planning permission for the erection up to 291 residential dwellings (Class C3) with all matters reserved except for the principal access	Comments by 16 th October 2026 Objection For:4 Against: 0 Int Dcl'd: 0 Abs :0
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Sandgate Parish Council objects to this application on the grounds of its detrimental impact on the setting of the Royal Military Canal, the loss of valuable open recreational space, the adverse effect on visual amenity, the proposed density of residential development and the uncertainty surrounding the long-term provision and protection of the proposed leisure facilities.

Whilst we recognise the importance of investment, regeneration and the provision of housing, we consider that the benefits of this particular proposal do not adequately outweigh the harm it would cause to the character, recreational value and historic setting of this important part of Hythe.

1. Impact on the Royal Military Canal and its historic setting

We concur with the concerns raised by Historic England regarding the impact of the proposed development on the setting of the Royal Military Canal, an important historic asset.

The scale and nature of the proposed development, including the residential element and associated infrastructure, risk materially altering the character and setting of this historic landscape.

The application must be assessed against the statutory heritage framework, including the Ancient Monuments and Archaeological Areas Act 1979 where applicable, and the heritage policies of the National Planning Policy Framework (NPPF), particularly policies HE4 and HE6 concerning the conservation of heritage assets and proposals affecting designated heritage assets.

We consider that substantial weight must be given to the conservation of the historic environment and that any harm must be clearly justified. The public benefits of the scheme must be weighed carefully against the harm identified. In our view, the benefits advanced by the applicant do not adequately justify the adverse impact on the setting of the Royal Military Canal.

2. Loss of open space and the established recreational use

The existing golf course forms an established open recreational landscape within Hythe. Its value extends beyond its immediate sporting function: it contributes to the open character of the area, the local landscape and the visual setting between the coast, the Royal Military Canal and the surrounding built environment.

The proposal would substantially change this landscape through the introduction of housing, buildings, roads and associated infrastructure.

The adopted Folkestone & Hythe Places and Policies Local Plan 2020 includes Policy C3, *Provision of Open Space*, which is relevant to the consideration of proposals affecting open space. Policy C1, *Creating a Sense of Place*, and Policy C2, *Safeguarding Community Facilities*, are also relevant to the assessment of the scheme and its effects on local character and facilities.

National planning policy is particularly important in this respect. Policy HC7 of the 2026 NPPF states that development should not result in the loss of existing open space, sports and recreational land unless specified criteria are met. These include demonstrating that the land is surplus to requirements, providing equivalent or better replacement provision in an appropriately accessible location, or demonstrating that the benefits of alternative recreational provision clearly outweigh the loss of the existing use.

We ask the District Council to demonstrate clearly how the application meets the relevant policy tests and to assess the loss in terms of the quality, accessibility, quantity and established recreational value of the existing golf course.

3. Importance of golf to Hythe and the district's sports strategy

Golf is an established sporting activity which is appropriate to Hythe's demographic profile and provides opportunities for recreation, physical activity and social participation across a broad range of ages and abilities.

The existing golf course makes a meaningful contribution to the district's sporting offer. Its value should be assessed in the context of the District Council's sports and leisure objectives, including the need to maintain appropriate provision and opportunities for physical activity as the population changes.

The Council's published work on sport and leisure provision recognises the importance of assessing existing facilities and future needs. We consider that the existing golf course should be evaluated as part of this wider picture, rather than treating its replacement with a smaller or materially different facility as an automatic improvement.

The proposed academy golf course, adventure golf and other leisure attractions may offer some benefits. However, these are not necessarily equivalent to the existing golf provision in terms of playing experience, sporting capacity, quality or the range of users served.

We therefore question whether the proposed replacement facilities provide a demonstrable improvement in sporting provision. The Council should require a robust assessment of the existing facility against the proposed replacement, including playing capacity, accessibility, suitability for different users, management arrangements and long-term viability.

In our view, the proposed scheme has not demonstrated that the benefits of the replacement recreational facilities clearly outweigh the loss of the existing golf course and its contribution to Hythe.

4. Residential density and the pressure to retain open space

We object to the proposed density and scale of the residential development.

The outline proposal for up to 291 dwellings introduces a substantial residential component into a sensitive coastal and historic landscape. We are concerned that the scale of the housing provision creates pressure to retain as much developable land as possible while providing only a reduced area of open recreational space and replacement leisure facilities.

This raises a fundamental question about whether the scheme is being designed around the proper conservation of the site's landscape, heritage and recreational value, or whether these important considerations are being compromised to accommodate the proposed number of dwellings.

We recognise the need to provide housing, including affordable housing, but housing delivery should not be pursued at the expense of the established character and recreational value of the site.

The Council should assess whether the proposed scale and density of development can be accommodated without unacceptable harm to the historic setting, visual amenity and open character of this location. We consider that the current proposal fails to demonstrate that these competing objectives have been satisfactorily reconciled.

5. Nature of the proposed facilities and long-term enforceability

We have serious concerns about the nature of the replacement facilities being offered and the mechanisms by which their continued provision, accessibility and use would be secured.

A planning permission should not rely solely on descriptions of intended facilities or assurances

about how the site will operate in the future. The Council must be satisfied that the facilities relied upon to justify the loss of the existing golf course will be delivered and retained in a form that provides a genuine and lasting benefit.

We therefore seek clarity on how the following matters would be secured:

- The precise nature, extent and quality of the replacement golf and leisure facilities.
- The extent to which facilities will be available to the local community, including any restrictions, charges or membership requirements.
- The phasing and timing of delivery, particularly whether replacement facilities will be operational before the existing provision is lost.
- The arrangements for ongoing management, maintenance and funding.
- The mechanisms available to the planning authority to enforce the approved use and prevent the facilities from being materially altered, reduced or discontinued in the future.

Where appropriate, these matters should be secured through precise and enforceable planning conditions and/or a planning obligation under section 106 of the Town and Country Planning Act 1990.

Unless the replacement provision is demonstrably equivalent or better, appropriately accessible and secured for the long term, we do not consider it reasonable to treat the proposed facilities as sufficient compensation for the loss of the existing recreational resource.

6. Visual amenity and landscape character

We object to the adverse impact of the proposal on visual amenity and the established landscape character of this part of Hythe.

The existing golf course provides an open landscape which contributes to the setting of the coast and the Royal Military Canal. Its openness is an important part of the area's character and helps distinguish it from the surrounding built-up environment.

The introduction of up to 291 dwellings, together with associated roads, buildings, parking and infrastructure, would substantially alter this character. The impact must be considered not only in terms of individual buildings, but also the cumulative effect of the development across the site and its relationship with the wider landscape and historic environment.

We consider that the proposed development would result in a significant loss of openness and visual amenity. The scale of this loss is not adequately balanced by the proposed landscaping or the provision of replacement leisure attractions.

The relevant considerations include Policy C1 of the Places and Policies Local Plan 2020, the applicable landscape and environmental policies of the adopted development plan, and the NPPF's policies concerning high-quality places and the conservation of the historic environment.

We consider that the harm to visual amenity and local character would be substantial and that the benefits of the proposal do not adequately outweigh that harm.

7. Planning balance and conclusion

Sandgate Parish Council recognises the importance of appropriate development, investment in leisure facilities and the provision of housing. However, these objectives must be balanced against the need to protect historic assets, retain valuable recreational provision and preserve the character of the local environment.

Our objection is based on the cumulative effect of the proposed development:

- Harm to the setting of the Royal Military Canal, consistent with the concerns raised by Historic

England.

- The loss and alteration of established open recreational space.
- Insufficient demonstration that the replacement golf and leisure facilities provide equivalent or better sporting and recreational benefits.
- The proposed residential density and the pressure this places on the retention of open space.
- Uncertainty about the long-term delivery, management, accessibility and enforceability of the proposed facilities.
- A significant adverse impact on visual amenity and the established character of the site.

We consider that the existing golf course and its open setting provide a valuable contribution to Hythe's sporting provision and local character. The proposed development would result in a substantial change to this established landscape, while the replacement facilities do not, in our view, adequately compensate for the loss.

The Council should give appropriate weight to the conservation of the historic environment, the protection of recreational land and the need to secure high-quality, sustainable development.

For these reasons, Sandgate Parish Council objects to planning application 26/1290/FH and requests that planning permission be refused unless the identified harms can be satisfactorily addressed and the relevant policy requirements demonstrably met.

25/2278/FH	32 RADNOR CLIFF, FOLKESTONE, CT20 2JJ.	This is a re-consultation following the submission of additional details or a change in circumstance. These are detailed below: Revised Information added 29.09.2026	Comments/observations you may have on the proposal reach us not later than 15/10/2026. Objection For:4 Against:0 Int dcl:0 Abs :0
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Parish Council response to the revised proposals

Sandgate Parish Council maintains its objection to this application. Having considered the revised information, we do not consider that the amendments adequately address the substantive concerns raised in our previous representations.

We acknowledge that a small reduction in the height of building C has been proposed, together with a change to its position to allow for a green buffer. However, the principal concerns relating to buildings A and B at the upper part of the site remain unresolved. These were fundamental to the Parish Council's original objection and, in the absence of meaningful amendments, that objection stands.

1. Impact on the Conservation Area and local character

The site occupies a sensitive position on the Radnor Cliff hillside, where the relationship between the built environment, the natural slope and the established vegetation makes an important contribution to the character and appearance of the Conservation Area.

The fact that the site may be described as underdeveloped, or that vegetation has become established through self-seeding, does not mean that its existing character is without value. The presence of vegetation, open areas and the natural hillside contributes to the visual amenity and green character of the locality. These features should not be dismissed simply because they are not the result of formal landscaping.

The proposed development would introduce additional built form into this sensitive setting. We do not consider that the addition of further buildings would preserve or enhance the Conservation Area. Rather, the scale, massing and positioning of the proposed dwellings would cause harm to the established character of the hillside.

The fact that there are buildings at the base of the hill on adjoining plots does not, in itself, establish that further development is appropriate. Each proposal must be assessed on its own merits, taking account of its particular position, scale, impact and relationship with the surrounding landscape.

The Parish Council considers that the proposal remains contrary to the objectives of Policies HB1 and HB2 of the Folkestone & Hythe Places and Policies Local Plan 2020, concerning quality places and design principles, and Policy NE3 concerning landscape character and designation.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the decision-maker, when exercising planning functions in relation to buildings or land in a Conservation Area, to pay special attention to the desirability of preserving or enhancing its character or appearance.

In our view, the revised proposals do not demonstrate that this statutory objective has been satisfactorily addressed.

2. Buildings A and B: no meaningful resolution of the original concerns

The Parish Council notes that the revised information includes a limited reduction in the height of building C. However, the principal concerns regarding buildings A and B at the top of the site appear to remain substantially unchanged.

These buildings were a central part of the original objection. Their scale, massing and prominence on the hillside raise concerns about overdevelopment and the erosion of the area's established character.

The Parish Council's earlier representations highlighted the disproportionate scale of the proposed built form in relation to neighbouring properties, the loss of greenery and the adverse visual impact of the development. The revised information does not, in our view, demonstrate that these concerns have been resolved.

A limited amendment to one building cannot be considered in isolation from the development as a whole. The cumulative effect of all three proposed buildings, their associated works and the alteration of the hillside must be assessed.

We therefore maintain our objection to the overall scale and design of the scheme.

3. The hillside, vegetation and landscape setting

The applicant's assertion that the development will strengthen the structure of the hill requires careful scrutiny and must be supported by robust technical evidence.

The existing vegetation and natural ground profile form part of the site's present landscape character. Vegetation and root systems can also contribute to soil cohesion and surface-water management, although their precise role in slope stability must be established through appropriate technical assessment.

The removal of vegetation, excavation, terracing, new foundations and changes to drainage could have implications for ground conditions and adjoining land. These matters are particularly important given the known concerns about instability in the wider Radnor Cliff area.

The Parish Council's previous objection raised concerns that the submitted geotechnical information did not adequately address the wider cliff system, the potential effects on neighbouring plots or the cumulative implications of the proposed works.

We continue to consider that a suitably comprehensive and independently scrutinised

assessment of slope stability, drainage, construction methodology and potential off-site impacts is essential.

Policy NE6 of the Places and Policies Local Plan 2020, concerning land stability, is relevant to these concerns. The application must demonstrate that the development can be undertaken without unacceptable risk to the stability of the site or adjoining land.

A statement that the proposal will strengthen the hillside is not, on its own, sufficient to resolve these concerns.

4. Visual amenity and loss of the green hillside setting

The existing site contributes to the visual character of Radnor Cliff through its relationship with the hillside and the vegetation between and around the buildings.

Although the land may not have been formally landscaped throughout, this does not diminish its contribution to local visual amenity. The naturally established green character is an important part of the setting and should be considered in its own right.

The proposed development would introduce additional built mass into this setting and would alter the existing balance between buildings and greenery. The proposed green buffer associated with building C is noted, but it does not adequately compensate for the overall impact of the development or resolve the concerns relating to buildings A and B.

The Parish Council considers that the visual harm arising from the development remains significant and that the revised information does not demonstrate that the proposal would preserve or enhance the character and appearance of the Conservation Area.

5. Construction impacts, access and neighbouring properties

The Parish Council's earlier objection also raised serious concerns about the practical implications of construction on this steep and constrained site.

The demolition of the existing property, excavation, ground engineering, construction traffic and movement of heavy machinery could cause substantial disruption. These activities must be considered alongside the potential effects on road safety, access for neighbouring residents, drainage and the stability of the hillside.

The earlier objection also questioned whether lawful and safe construction access had been adequately secured and whether the submitted technical information sufficiently addressed the implications for adjoining land and properties.

These concerns remain material unless the revised submission provides clear, comprehensive and satisfactory evidence to resolve them. Any construction management arrangements must be realistic, enforceable and appropriate to the constraints of Radnor Cliff.

6. Conclusion

Sandgate Parish Council has considered the revised information submitted on 29 September 2026. While the limited reduction in the height of building C is acknowledged, we do not consider that this amendment addresses the fundamental concerns raised in our earlier objection.

The principal concerns remain:

- The harmful impact of the proposed development on the character and appearance of the Conservation Area.
- The scale, massing and prominence of buildings A and B at the top of the site, which have not been meaningfully amended.

- The loss of established vegetation and the erosion of the green hillside setting.
- The disproportionate scale of the overall development in relation to the site's sensitive location.
- The need for robust evidence concerning slope stability, drainage and potential impacts on adjoining land.
- The practical implications of construction, access and associated works on this constrained hillside.

The Parish Council does not accept that an area should be regarded as suitable for additional development simply because it is considered underdeveloped or contains self-seeded vegetation. The existing character and landscape contribution of the site are material planning considerations.

The revised proposal continues to introduce built form that, in our view, fails to respect the sensitivity of the location. The limited changes to building C do not overcome the wider concerns regarding the scale, design and impact of the development as a whole.

Sandgate Parish Council therefore maintains its objection to planning application 25/2278/FH and requests that planning permission be refused.

5. Update on previous planning applications

26/1196/FH	34 Radnor Cliff,	Refused
26/1073/FH	2 Well House, 41 Radnor Cliff,	Approve with Conditions
26/1175/FH	Hillboro, Sunnyside Road,	Approve with Conditions
26/1233/FH/PA9	Encombe,	Refused
26/1336/FH/TCA	Barton Cottage, 56 Sandgate Hill	No Objections
26/1125/FH	9 Chichester Road,	Approve with Conditions
26/1221/FH	Flat 3, East Cliff House, Radnor Cliff Crescent	Approve with Conditions
26/1270/FH	4 Bybrook Way,	Approve with Conditions
26/0916/FH	St Christophers, Coolinge Lane,	Approve with Conditions
26/1237/FH	East Cliff House, Radnor Cliff Crescent,	Approve with Conditions
26/1118/FH	5 Valley Road,	Approve with Conditions

6. Correspondence:

There was none

7. Information: Changes relating to planning are coming into force and a briefing will be given at the Planning Committee following Full Council on 26th October.

8. Date of the next Planning Committee meeting – 19th October 2026

Meeting closed: 19.30

Signed by the Planning Committee Chair Date.....

