



**Folkestone and Hythe District Council**  
Civic Centre  
Castle Hill Avenue  
Folkestone  
CT20 2QY

**Highways and Transportation**  
Kroner House  
Eurogate Business Park  
Ashford  
TN24 8XU  
**Tel:** 03000 418181  
**Date:** 14 January 2026  
**Our Ref:** MH

<b>Application -</b>	<b>26/0002/FH</b>
<b>Location -</b>	<b>EAST STATION GOODS YARD, SOUTHERN WAY, FOLKESTONE</b>
<b>Proposal -</b>	<b>Development of a Class E(a) retail food store and Class E units, with associated parking, landscaping and access</b>

Thank you for the consultation on the above planning application. The proposals comprise the construction of a new 2,185 m<sup>2</sup> (23,519 ft<sup>2</sup>) food store intended for Lidl, along with two Class E commercial units of 232 m<sup>2</sup> (5,000 ft<sup>2</sup>) each.

Unfortunately, the applicant did not seek pre-application advice with Kent County Council in its position as Local Highway Authority to scope out the submitted Transport Assessment. I must object to the application in its current state for the following reasons:

### **Transport Assessment**

Accident Analysis – Up to date crash data needs to be sourced from the crash data team at Kent County Council. The crash data currently sourced is out of date being up to December 2023.

Accessibility by Sustainable Modes of Travel - The existing central island on Southern Way should be improved to a refuge island being at least 2 metres deep to accommodate both pedestrians and cyclists together with appropriate dropped kerbs and tactile paving. Any proposals will need to be subject to an independent Stage 1 Road Safety Audit and Designers Response. It also suggested that a central pedestrian island is provided across the site access junction in that pedestrians can safely cross the junction given the width of the junction being 3 lanes wide.

Accessibility by Public Transport – Stagecoach South East should be consulted on the proposals to ascertain whether improvements to bus services or bus stops are required as part of the proposed development.

Trip Generation Assessment – The submitted TRICS assessment should only include suburban sites within a population range of 100,000 with 5 miles to reflect the locational characteristics of the site within Folkestone.

Trip generation evidence for the Class E units - Saturday café/local-shops trips are derived from weekday data due to “insufficient Saturdays” and based on a very small sample (3 café sites)—in different regions (North West England, Wales, Scotland). A sensitivity assessment using alternative robust TRICS sets (with Saturday coverage) is required.

Table 10 is incorrect when it states the floor area is only 120 square metres for the retail unit. This should be updated based on the 232 square metre floorspace.

Traffic Impact Assessment – A future year scenario of 2031 is required (5 years on from the 2026 application).

Extent of Traffic Impact Assessment - Only the site access has been modelled with no reasoning as to why other junctions in the vicinity of the site have not been assessed. An updated trip distribution and assignment exercise is required to be undertaken based on a much wider study area. Given the new flows from the proposals as set out in paragraph 7.3.1, an ARCADY assessment of the A260/A2033 roundabout, PICADY assessment of Southern Way/Tram Road junction and of the Canterbury Road/Dover Road junction is required to be submitted.

Vehicle tracking – The submitted vehicle tracking shows substantial over-run of the opposing lane for a vehicle entering the site. This is unacceptable and a highway safety issue. The junction should be widened accordingly to prevent any highway conflict. It should also be noted that no Stage 1 Road Safety Audit has been undertaken for the proposed access arrangements.

**Application Form** – The application form is incorrect in that it states that there is no altered access onto the public highway. It also incorrectly states the proposed number of car parking spaces for both food superstore and two class E units. The application form should therefore be updated accordingly.

I look forward to further commenting on the application once the Transport Assessment is updated accordingly.

Notes:

Any proposed retaining walls within 3.65 metres of the highway will require separate structural approval from the structures team here at KCC Highways and Transportation.

**It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.**

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Yours faithfully

**Director of Highways & Transportation**

\*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.