



Folkestone and Hythe District Council
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CT20 2QY

Highways and Transportation
Kroner House
Eurogate Business Park
Ashford
TN24 8XU

Tel: 03000 418181
Date: 3 July 2026
Our Ref: MH

Application -	26/1039/FH
Location -	Former Aldi Store, 72 High Street, Hythe, CT21 5AL
Proposal -	Redevelopment for 32 retirement living apartments, 2 retirement cottages, and 179 sqm of Class E commercial space, including communal facilities, access, car parking and landscaping.

Thank you for the consultation on the above planning application. I have the following comments to make in respect of highway matters:

Transport Statement

The application has been supported by a Transport Statement prepared by Paul Basham Associates (June 2026). The submission assesses the accessibility of the site, proposed access arrangements, parking provision, trip generation and the implications arising from the reconfiguration of Mount Street Car Park.

The site occupies a sustainable town centre location with convenient access to a range of shops, services, healthcare facilities and public transport connections within easy walking distance. The location therefore provides realistic opportunities for residents and visitors to travel by sustainable modes.

The proposal seeks to reinstate a historic vehicular access from Bank Street to serve the parking area associated with the retirement living development. Recorded vehicle speeds on Bank Street are low, and the submitted visibility assessment demonstrates that appropriate visibility splays can be achieved. Furthermore, the personal injury collision analysis does not identify any existing highway safety concerns associated with the proposed access location.

Trip generation forecasts indicate that the development would generate significantly fewer vehicle movements than the former Aldi store and fewer trips than the previously considered residential-led redevelopment proposals for the site. As such, the development is not expected to give rise to a severe transport impact on the local highway network.

The parking proposals of 11 spaces for the 32 apartments (0.34 spaces per unit) is largely based on Churchill Living's own survey data rather than adopted Kent standards. Whilst this is acceptable given the town centre location of the site and on-street parking controls, the use of the apartments as retirement accommodation only needs to be controlled through a relevant planning condition to ensure that the proposed parking provision remains fit for purpose.

The applicant has also undertaken parking surveys to assess the impact of the proposed reconfiguration of Mount Street Car Park. Whilst the car parking surveys are relatively finely balanced at peak periods, the submitted evidence demonstrates that alternative public parking capacity (both within Folkestone and Hythe District Council car parks and supermarket car parks such as Sainsburys and Waitrose) exists within Hythe town centre sufficient to accommodate displaced demand. On this basis, the Local Highway Authority does not consider the proposed reduction in public parking provision to constitute a sustainable reason for refusal. You should however consult your colleagues in the parking services team at Folkestone and Hythe District Council to ascertain whether they are happy with the loss of parking spaces within this car park.

The submitted swept path analysis demonstrates that the site can accommodate emergency vehicles and that appropriate turning facilities are available within the development. However please consult your environmental services team regarding refuse collection to the proposed apartments. It may be the case that a specific loading bay is required on Bank Street to accommodate a refuse collection vehicle.

Secure cycle and mobility scooter storage is proposed within the ground floor of the proposed apartment building.

Having regard to the scale and nature of the proposal, the accessibility of the site and the forecast traffic impact, the Local Highway Authority considers that the development would not result in a severe residual cumulative impact on the highway network nor would it result in an unacceptable impact on highway safety. Accordingly, no objection is raised subject to the following conditions.

1. Submission and approval of a Construction Management Plan before the commencement of any development on site to include the following:
 - (a) Routing of construction and delivery vehicles to / from site.
 - (b) Parking and turning areas for construction and delivery vehicles and site personnel, which may require supporting vehicle tracking/swept paths.
 - (c) Timing of deliveries, avoiding network and school peaks where possible.
 - (d) Provision of wheel washing facilities.
 - (e) Measures to prevent the discharge of surface water onto the highway.
 - (f) Temporary traffic management / signage.
2. Provision and permanent retention of the vehicle parking spaces as shown on the submitted plans (20095HY_PL002 P1 and 536.0102_0005 P01) prior to the occupation of any of the apartments hereby permitted.
3. Provision and permanent retention of the vehicle turning facilities as shown on the submitted plan (20095HY_PL002 P1) prior to the occupation of any of the apartments hereby permitted
4. Provision and permanent retention of the cycle and mobility scooter storage facilities as shown on the submitted plan (20095HY_PL002 P1) prior to the occupation of any of the apartments hereby permitted
5. Provision and maintenance of the visibility splays as shown on the submitted plan (536.0102-0001 P03) with no obstructions over 0.6 metres where a footway crosses the access, prior to the use of the site commencing.
6. Prior to first occupation of the development, details of servicing, refuse collection and delivery arrangements, including the operation of the proposed loading facilities, shall be submitted to and approved in writing by the Local Planning Authority. The approved arrangements shall thereafter be retained and operated accordingly.

7. The apartments and cottages hereby permitted shall only be used as retirement accommodation only.

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.