



Historic England

Alex Stafford
Folkestone and Hythe District Council

Our Ref: P10003697

25 September 2026

Dear Ms Stafford

T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

**Hythe Imperial Hotel & Golf Course East & West, Princes Parade, Hythe, CT21 6AE
Application No. 26/1290/FH**

Thank you for your letter of 26 August 2026 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice.

Summary

The site is immediately south of an especially significant section of the Royal Military Canal which is a nationally important scheduled monument.

We are concerned regarding harm that would be caused by development of the open space between the canal and sea, that is fundamental to understanding and appreciating the monument.

We think a residential scheme here would be very harmful and cannot support the proposals in their current form.

We advise that you should seek amendments to this application to reduce the harm the proposals would do to the significance of the Royal Military Canal, as required by the NPPF.

Historic England Advice

Proposals



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The proposals are a Hybrid planning application to include:

Outline planning permission on the western part of the golf course for up to 291 residential homes, with new buildings of between 5 and 3 storeys (with all matters reserved except for the principal access from Princes Parade and Imperial Gardens).

A full application for; i) extensions to, and the redevelopment of the Hythe Imperial Hotel to provide new leisure facilities (spa, pool etc.) and ii) the redevelopment of the existing golf course to include an 'academy' golf course, new clubhouse, an adventure golf course, formal park including splash park in the central area, all with associated access, parking, landscaping and other ancillary works.

Land level changes would be required to mitigate flood risk for new buildings to the west (rising up to 4.5m) and water bodies are proposed across the site as part of the golf course design to help manage flood and drainage issues.

Public accessibility would be increased, and include a heritage trail and heritage interpretation, and potentially funding of an initial phase of maintenance of the adjacent Royal Military Canal.

Significance

The site is immediately south of an especially significant section of the Royal Military Canal (RMC):

- The Royal Military Canal (scheduled monument) Twiss Road Bridge to Seabrook Lodge Bridge section (NHLE ref.1003127), plus continuing sections of the canal.

The Royal Military Canal was conceived as a 28-mile-long fortified stop line, rampart, water filled defence and military road, when the threat of attack by Napoleon was at its greatest and the south coast viewed as particularly vulnerable to attack. As a unique and well-preserved example of this type of defence it is of exceptional significance.

The eastern end of the monument is particularly important because of its complexity and legibility, including the ability to understand the relationship between the canal, the land to its south (now the golf course site) which had an open character historically to aid defence, and the sea beyond.

The experience of this open ground contrasts with that of the adjacent sites to the east and west. On the proposal site, the land opens up significantly, and the impression of open space, as it would have been historically for functional reasons (as a field of fire and strategic space), combined with views along the length of the canal and across this open area, remain striking and evocative, despite modern land change.

This section of the monument is the only part where it is possible to understand the multiple facets of the Royal Military Canal's form and function, its direct relationship with the sea and coastal frontage it was designed to defend, and its strategic position in relation to the wider system of military monuments of which it was part (including Martello towers, and



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fortifications on the higher ground beyond). This means the site makes a particularly important contribution to the significance of the monument.

Despite the undeniable changes that have occurred around the site since the canal was first dug, the area to the south here has remained remarkably undeveloped. While the views of the sea are limited by the embanked roadway, what once was mainly pasture giving way to the shingle beach, is still a relatively flat, open, uncluttered and undeveloped landscape. The raised esplanade does not break the ability to understand the function of the monument, and imagine an enemy coming ashore and being confronted by the canal and its defences.

The landscape and archaeological studies provided with the application give a more detailed understanding of the land here (LIDAR analysis is particularly revealing), and these studies further reinforce the important relationship of the canal to its surroundings. For example, waterways present on maps contemporary with the monument's construction, are shown to be retained in the landscape today.

There is also high potential here for undesignated archaeology; the site lies within an area of archaeological importance associated with the RMC. There is also potential for earlier prehistoric and geoarchaeological evidence relating to past coastal environments, and for evidence of Second World War date, relating to the fortification of the Hythe seafront at that time. Collectively, this means that the site is very sensitive in heritage terms.

Impact

We think the proposed residential development would be very harmful to this section of the Royal Military Canal scheduled monument.

We think proposals for wider development of the golf course would also harm its significance but to a lesser degree.

Harm would occur to the canal's significance from changes within its setting, and changes to the open landscape with which the canal is directly associated. Harm could also occur from disturbance of currently unrecorded archaeological deposits or features associated with it.

The proposed residential development would substantially encroach on a significant area of the remaining open ground that is part of the historical and functional context of the RMC, making it difficult to understand the defensive nature of this part of the monument as a frontline defense for attack from the sea.

The scale and density of built form would challenge understanding of the monument as a dominant feature in what would have been a relatively flat landscape, and the formalisation of the western half of the site with built form and park-landscaping, would make it harder to envisage the bleak, open context that formed the frontline of the defensive line.

The landscape changes required to deliver the viability of the scheme in relation to flood risk, and the excavation of new waterbodies, would add to the overall harm. They would change the current landscape, and could impact on historic and archaeological features that



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tell the story of the landscape in this area. Even without built form, these changes would cause harm to the legibility of the RMC and therefore also to its significance.

Position

We are very concerned by the proposals to redevelop the hotel and golf course for residential accommodation for the following reasons:

We think that residential development here would cause a very high level of harm to the part of the Royal Military Canal scheduled monument which is immediately adjacent to the site, and it is highly unfortunate that we were not invited to give more recent pre-application advice to ensure the scheme was far less harmful than that submitted.

We think that harm from redevelopment of the golf course with enhanced facilities is of a lower level; the golf clubhouse has been designed as a single tier building, and although re-configuration of the site would have an impact, if the space is largely retained as open ground, then the important characteristics of this space in relation to the canal would be retained.

Harm may also come from disturbance of archaeological deposits and landscape features that are related to and may inform further understanding of the military canal.

We also think the supporting information provided underestimates the contribution of the open setting of the canal to its significance, when the baseline evidence points to the contrary, so the level of harm arising from parts of the proposal appears underplayed.

We note that the site is not allocated for this form of development (residential). The site is allocated as Open Space, and residential development on this site does not therefore seem to be in the spirit of an Open Space allocation or support the priorities of relevant Core Strategy Policies.

We therefore cannot support the proposals in their current form, because the proposals would cause harm to heritage of exceptional significance, and in the case of the proposed residential development, a high level of harm.

If your Council decides to seek amendments to the scheme, we think there are ways that the harm could be reduced. These include:

- Removal of the residential component to respond to the setting and context of the canal.
- Consideration of overall design of the golf course and placing more of the leisure activities (such as the proposed splash park) close to the hotel.
- Archaeological field investigation to further inform appropriate design and landscape proposals.
- The design of the golf course and park is currently interdependent with the residential proposition; without residential on the site, the golf course might be better configured to reduce heritage impact.



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We remind you that according to the NPPF (HE6 3) any harm to a designated heritage asset will be a matter of considerable importance and weight, and when considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset's conservation (HE6 1). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance.

It will be for your Council to weigh the harm to heritage significance against the public benefits (HE6 4 NPPF). In your consideration of this, we note that there are some heritage benefits identified in the proposals including interpretation and a heritage trail to the immediate south of the scheduled area. However, we think that such heritage benefits are relatively limited and might partly be delivered independently of the proposed scheme through other means, or through a less harmful proposal for this site.

Recommendation

Historic England advises that your Council should seek the following amendments to this application in order to limit the harm the proposals would do to the significance of the Royal Military Canal, especially the Twiss Road Bridge to Seabrook Lodge Bridge section:

- Removal of residential to respond to the setting and context of the RMC.
- Consideration of overall design of the golf course and placing more of the leisure activities close to the hotel.
- Request archaeological field investigation to further inform appropriate design and landscape proposals.
- Seek greater heritage benefits particularly regarding the condition and presentation of this part of the RMC.

Should the proposals remain unchanged, it will be for your Council to assess whether the harm to the Royal Military Canal would be outweighed by public benefits secured by the development. In doing so, it should give considerable importance and weight to the conservation of this designated heritage asset.

If there are any material changes to the proposals beyond those we have suggested, please contact us. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please also advise us of the decision in due course.

Yours sincerely

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