



National Highways Planning Response (NHPR 26-09) Formal Recommendation to an Application for Planning Permission

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To: Folkestone & Hythe District Council (FAO Planning Validation Team)
Planning@folkestone-hythe.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 26/1290/FH

Location: Hythe Imperial Hotel & Golf Course East & West, Princes Parade, Hythe, CT21 6AE

Proposal: : 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 from Princes Parade and Imperial Gardens.

National Highways Ref: NH/26/17640

Referring to the consultation on a planning application dated 10 August 2026 referenced above, in the vicinity of the M20 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);

d) ~~recommend that the application be refused (see reasons at Annex A)~~

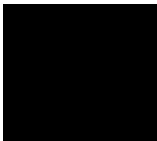
Highways Act 1980 Section 175B, regarding the highway authority consent required for trunk road access, is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they must consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to Planningse@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature		Date: 30 September 2026				
<table style="width: 100%;"><tr><td style="width: 50%;">Name: Bidur Rajbhandari</td><td style="width: 50%;">Position: Assistant Spatial Planner</td></tr><tr><td colspan="2">National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk</td></tr></table>			Name: Bidur Rajbhandari	Position: Assistant Spatial Planner	National Highways Ground Floor, Building 1000, Cathedral Square, Guildford GU2 7YL www.nationalhighways.co.uk	
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¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommend that planning permission not be granted for a specified period:

Reasons

It is recommended that the application should not be determined for a period of three months until **02 January 2027**.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of M20.

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Throughout this response **ACTION** points for the applicant are highlighted in **underlined bold**.

Background

The nearest SRN junctions are M20 J12 is located circa 2.2 miles north-east of the site, M20 J11a located circa 3.2 miles north of the site and M20 J11 is located circa 4 miles north-west of the site.

It is understood that the proposed development site is not allocated within the Folkestone and Hythe District Council Local Plan (adopted September 2020) or the Core Strategy Review 2022.

National Highways previously provided pre-application advice in respect of development proposals at this site in August 2025, which is provided in Appendix A of the submitted TA.

Transport Vision

The assessment applies a blanket 10% reduction to residual development traffic based on an assumed "vision-led" mode shift. **The 10 per cent mode shift reduction target should be directly linked to the baseline mode share for each proposed land use type. There should be a quantifiable package of measures, and an appropriate mechanism for monitoring and review in the Travel Plan.**

Committed Growth

The assessment only considers a limited number of committed developments and further discounted and relying principally on TEMPPro growth factors.

There will be a need to agree the committed developments or growth consideration with the LPA and to then provide this information to National Highways for review depending on the area of impact.

Trip Rates

The TRIC outputs contained in the Appendix K has been reviewed and the proposed trips rates are acceptable. However, it is noted that final dwelling mix is not fixed and could materially affect trip generation.

The TA also states that, as with the proposed leisure/health club and golf related uses are subject to a 20% reduction has been applied. **Further information on how this 20% reduction has been determined should be provided along with the assumption that the hotel guests will be utilising on-site facilities rather than generating new trips.**

Trip Distribution and Assignment

The distribution exercise has been informed by 2011 Census Journey to Work data for the Folkestone & Hythe (formerly Shepway) 008 MSOA, with the Google Maps journey planner used to assign routes. We accept the applicant's distribution approach for the residential trips.

However, it is not clear from the Appendix what category has been used. **The applicant is therefore required to base the distribution assessment for journeys to work from residences within Shepway 008 for trips falling within the "Driving a Car or Van" category, so that the distribution proportions to be applied to the development's vehicle trip generation are appropriate. The calculation excel sheet needs to be provided along with route maps for this to be assessed.**

Section 7.11.4 and 5 of the TA notes:

'NH have requested an alternative means of assessing the trip distribution associated with non-residential uses (with the exception of staff trips), via either a 'first principles' assessment or a gravity model.

7.11.5 In this regard, it is considered that very few primary vehicle trips to these uses will be undertaken during the weekday peak periods, with many likely to be linked to

journeys to or from work or other purposes. As such – and in the context of the Local Highway Authority’s agreement to the originally-proposed trip distribution methodology – it is not considered that an alternative approach would yield materially different results.’

Given the size of the facilities and the trips rates during peak hours an alternative means of assessing the trip distribution for the non-residential land uses (with the exception of staff trips) is required, this could take the form of a first principles assessment or make use of a population/distance-based gravity model for robustness of the assessment.

The applicant has provided development traffic flow diagrams in the TA appendices. We note that these cover Local Highway Network junctions only and do not extend to the SRN junctions which can be potentially affected. **The applicant is required to extend the diagrams to include M20 Junctions 11, 11A and 12, so that the development’s impact on the SRN can be clearly demonstrated.**

The need for, and scope of any SRN assessments, in accordance with DfT Circular 01/2022 can be determined once there is an agreed trip generation, distribution and assignment.

Standing advice to the local planning authority

The UK Government has committed to achieving net zero greenhouse gas emissions by 2050 through amendments to the Climate Change Act 2008. The National Planning Policy Framework (NPPF) supports this objective, with Chapter 5 recognising the need to support the transition to a low carbon future and contribute to achieving net zero by 2050. Policies CC2 and TR3 promote sustainable patterns of movement, reduce reliance on the private car and seek to ensure that significant development is located where it offers a genuine choice of transport modes.

Policies TR3 and TR4 also advise that opportunities to improve walking, wheeling, cycling and public transport should be taken up as part of a vision-led approach to creating sustainable, inclusive and well-connected places.

These considerations should be weighed alongside any relevant Development Plan policies to ensure that planning decisions support sustainable travel patterns and align with the transition to net zero by 2050.