Planning & Heritage Impact Assessment

Proposal: Stationing of a kiosk for ticket sales, merchandise and takeaway café, in association with the Leas Lift

Site Address: Land to northeast of the Leas Lift, The Leas, Folkestone

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On behalf of: The Leas Lift Company

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1 Introduction

1.1 This Planning and Heritage Impact Assessment supports a full planning application for the installation of a kiosk on The Leas promenade, providing ticket sales, merchandise and takeaway refreshments in connection with the Grade II* listed Leas Lift Funicular Railway.

1.2 The proposed kiosk would be located on the southern side of The Leas promenade, immediately adjacent to the upper entrance to the Leas Lift. Its location is directly related to the operation of the Lift, providing a readily identifiable point of arrival, ticketing and visitor information for members of the public using, or wishing to use, this important heritage attraction.

1.3 The Leas Lift is undergoing essential restoration and represents a significant investment in Folkestone's historic environment and visitor offer, with the potential to enhance the character and vitality of the immediate area and strengthen the connection between The Leas and the lower town.

1.4 The restoration has been supported by funding from the National Lottery Heritage Fund and the Architectural Heritage Fund, a grant from Folkestone & Hythe District Council, Section 106 funding and substantial community donations. This investment reflects the importance of the Leas Lift as a heritage asset and community facility. Its long-term success will, however, depend not only on the completion of the restoration works but also on the provision of appropriate facilities to support its operation and continued use.

1.5 The proposed kiosk would provide a practical and identifiable point of access to the Lift from The Leas. The upper station is somewhat concealed from view along the promenade, and the kiosk would help address this by providing a visible focal point at the entrance, improving the legibility of the attraction and encouraging passing visitors to engage with and use the Lift. Ticket sales, merchandise and takeaway refreshments would complement the Lift's operation and contribute to the overall visitor experience.

1.6 The proposal also has a supporting financial sustainability objective. Although funding has been secured for the restoration, the Leas Lift Charity will need to meet ongoing maintenance, servicing and operational costs once the Lift reopens. A café has been incorporated into the design of the restored lower station to provide an additional source of income. The proposed upper kiosk would complement this facility by providing further opportunities to generate revenue directly associated with the Lift's operation.

1.7 In this context, the kiosk may also be considered as a form of enabling development, insofar as the income it generates could contribute towards the long-term financial sustainability and conservation of the Leas Lift. This is a supporting consideration alongside the kiosk's primary functional role in facilitating access to, promoting and supporting the operation of the Lift. The proposal therefore seeks to secure a practical and complementary facility that supports the renewed use of this important heritage asset and helps safeguard its future as a valued community attraction.

2 Site Location

2.1 The application site comprises a small section of The Leas located to the northeast of the Upper Lift. The site comprises tarmac hard standing and the proposed Kiosk would be located adjacent the southern edge of The Leas. The Leas is a historic public promenade with dedicated pedestrian and cycle access along the entire route.

2.2 The Lift Café and Funicular Railway is a grade II* heritage asset and is located approx. 75m to the east of the site. There are also a number of listed buildings in proximity to the site. The site is located within Folkestone Old Town / Bayle Conservation Area and an Area of Archaeological Potential.



Fig.1. Location – Source Google Maps ©

2.3 The Leas promenade is largely open and underdeveloped, however there are three notable structures on the Leas itself;

2.4 The Grade II Listed Bandstand which was built in 1895 and comprises 8 slender east iron columns support a tent-shaped canopy surmounted by a weathervane. Anthemion motif decorations. Plinth (Historic England Listing)

2.5 The Grade II Listed Leas Cliff Hall which is a seaside pavilion built into the cliff between 1925 and 1927, which is largely hidden from view apart from the modern glass frontage and raised flat roof which is utilized as a public space and viewing platform, surround by historic railing. Opposite is a 1980 octagonal pagoda style entrance (predominantly modern glass and render with lead roof) to the Leas Cliff Hall which replaced the original neo-Grec entrance. The pagoda contains toilets, café and an entrance lobby and stairs connecting down under The Leas to the Leas Cliff Hall.

2.6 It is also relevant to note that there is a modern timber kiosk located adjacent the southern pagoda entrance to the Leas Cliff Hall, which is situated on The Leas promenade. The kiosk is used in association with The Leas Cliff Hall café and sells ice creams and drinks in the summer. A planning history search has been undertaken but no planning history has been found for this kiosk structure. The kiosk has the akin to a shed like structure as depicted on the below photo.



Fig.2. Photo and Google Maps © image showing location of timber ice cream hut located on the Leas outside the Leas Cliff Hall.

3 Pre-Application Advice -

3.1 The Leas Lift Charity has engaged with the Council and sought pre-application advice in relation to the proposed kiosk (reference 25/1110/PREAPP), as confirmed in the Council's letter dated 15 July 2025 (see Appendix 3).

3.2 The Council confirmed in its pre-application response that an ancillary kiosk to support the operation of the Leas Lift is acceptable in principle. However, concerns were raised regarding the appearance of the structure submitted at pre-application stage, which took the form of a shipping container. The Council advised that a more sympathetic design — either contemporary or traditional — would be required given the sensitive and prominent historic location of the site.

3.3 The pre-application response also included helpful guidance on the type of structure that would be supported in this location. The current proposal has been developed with careful regard to this advice and now comprises a traditional, sympathetic design. The kiosk adopts a concave roof form and architectural cues inspired by the examples referenced by the Council (notably images 7, 8, and 9), resulting in a structure that responds positively to the character of the Leas promenade and its historic setting.

3.4 The Council further advised that the proposed location on the Leas promenade is acceptable in principle, although it suggested moving the kiosk slightly further away from the Leas Lift in order to reduce potential impacts on the heritage asset. This recommendation has been carefully considered; however, the primary function of the kiosk is to act as a visible signpost to the upper entrance of the Leas Lift, which is currently largely hidden from view along the promenade. Positioning the kiosk adjacent to the entrance is therefore essential to achieve its purpose of attracting visitors and directing passers-by towards the Lift, and is considered justified in this context.

4 Proposal

4.1 The proposal is for the stationing of a sales Kiosk adjacent to the upper entrance to the Leas Lift of the Leas promenade.

4.2 The scale, location and design of the Kiosk has been carefully considered and has been guided through pre-application advice obtain from Folkestone & Hythe planning department – see appendix 3.

4.3 The Kiosk would be a small scale traditional structure with a concave traditional roof and timber cladding to all elevations, in accordance with the advice obtain from the Council at pre-application stage.

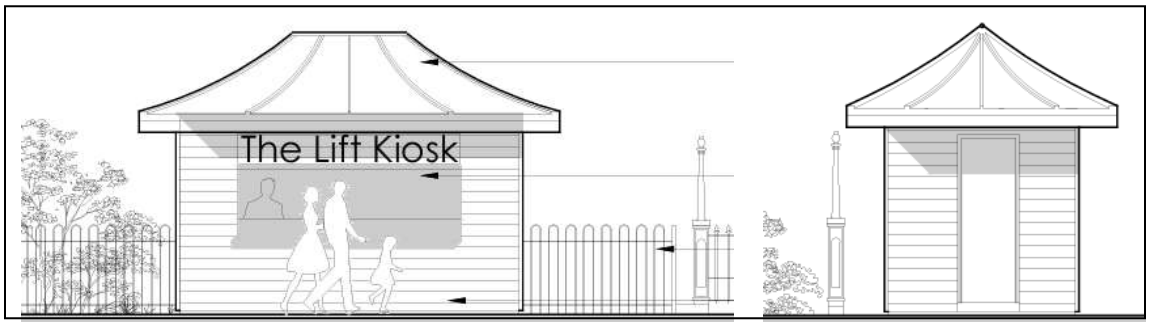

Fig.4. Front and side elevation of proposed Kiosk

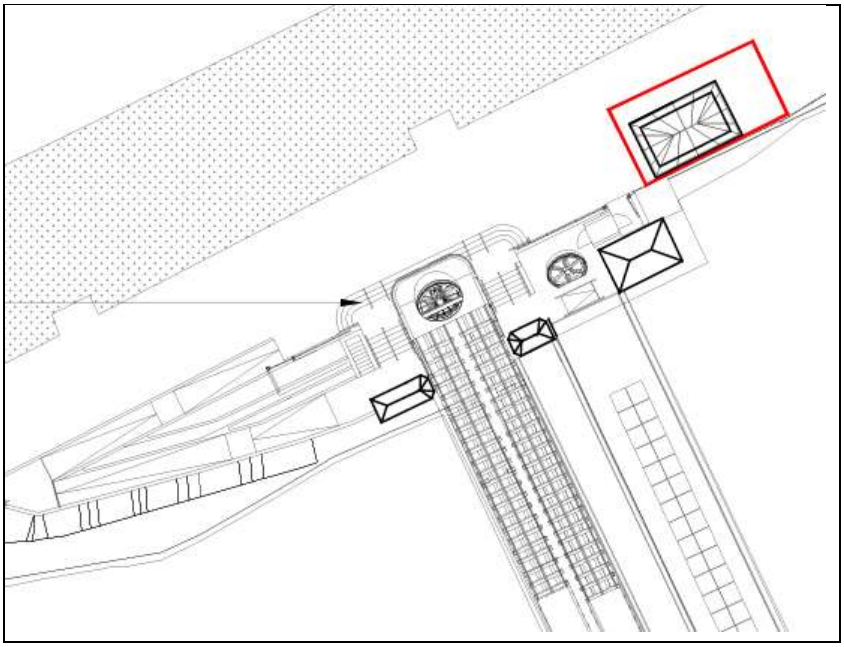

Fig.5. Proposed Location on The Leas

5 Planning Policy

5.1 The Council has a duty to have special regard to preserving a listed building or its setting or any features of special architectural or historic interest (Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990) (hereafter referred to as The Act). Section 72 of the Act requires that special attention is paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

National Planning Policy Framework

5.2 The statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 are reinforced by the September 2026 National Planning Policy Framework (NPPF), which establishes the national policy approach to the conservation and enhancement of the historic environment. The Framework requires the significance of heritage assets to be identified and assessed, including the contribution made by their setting, and for this assessment to inform the consideration of development proposals. As the site is located within a Conservation Area and within the setting of listed buildings, particular regard must be given to the desirability of preserving or enhancing the character or appearance of the Conservation Area and to the preservation of the listed buildings' special architectural or historic interest. The effect of the proposal on the significance of these designated heritage assets, including any harm arising from development within their setting, must therefore be carefully assessed in accordance with the Framework's heritage policies, with the objective of avoiding or minimising conflict between the conservation of heritage significance and the proposed development.

Folkestone and Hythe Core Strategy (2022)

- Policy CSD4 (Green Infrastructure)
- Policy CSD6 (Central Folkestone Strategy)

Folkestone and Hythe Places and Policies Local Plan (2020)

- Policy HB1 (Design)
- Policy E3 (Tourism)
- Policy NE3 (Protecting Landscapes & Countryside)
- Policy HE1 (Heritage Assets)
- Policy HE2 (Archaeology)
- Policy HE4 (Folkestone Historic Gardens)
- Folkestone Old Town Conservation Area Appraisal
- Folkestone Heritage Strategy

5.3 Local Policy HE4 (Folkestone Historic Gardens) does not specifically mention The Upper Leas as a designated historic park and garden. However, The Leas is mentioned in the pre-text to policy HE4 at the following paragraphs:

5.4 **Paragraph 17.24** - *Parks and gardens within the urban areas of the district are also important heritage assets that act as natural oases for people and wildlife. While they are not listed, they are integral to the identity and sense of place and also contribute to the better wellbeing of local residents, visitors and wildlife.*

5.5 **Paragraph 17.25** - *In particular, the Leas and the west end of Folkestone are characterised by grand nineteenth and early twentieth century buildings arranged around private gardens. These gardens contribute significantly to the character and quality of The Leas and Bayle Conservation Area, but are subject to development pressures. Their retention is important in maintaining the character of this part of Folkestone.* ***Small-scale development (such as pavilions or shelters) maybe permitted provided that these do not detract from the character of the gardens and their setting.***

5.6 Therefore, whilst The Leas is not mentioned under policy HE4 it is believed that the principle of small-scale sensitively designed structure would be acceptable on The Leas, as confirmed by the Council at pre-application stage.

National Planning Policy Guidance

What is meant by the term 'public benefits'?

5.7 The National Planning Policy Framework (NPPF) requires any harm to the significance of a designated heritage asset to be weighed against the public benefits of the proposal. This assessment must take account of the significance of the heritage asset, the nature and extent of any harm, and the benefits arising from the development.

5.8 Public benefits may arise from developments that deliver economic, social or environmental objectives. They must flow from the proposed development, be of a nature or scale that benefits the public at large, rather than being exclusively a private benefit, and be sufficiently evidenced to inform the planning balance. Public benefits do not necessarily need to be directly accessible or visible to the public. In the heritage context, securing the future conservation of a designated heritage asset may itself constitute a public benefit.

5.9 Relevant heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution made by its setting;
- reducing or removing risks to a heritage asset; and
- securing the optimum viable use of a heritage asset in support of its long-term conservation.

5.10 In the context of the Leas Lift, the proposed kiosk's principal benefits arise from its functional relationship with the Lift, including providing a recognisable point of arrival, facilitating ticket sales, promoting visitor use and offering complementary refreshments and merchandise. Its potential to generate income that contributes towards the Lift's ongoing maintenance and operation represents an additional consideration, insofar as this supports the continued use and conservation of the heritage asset.

Historic England Guidance – Enabling Development and Heritage Assets

5.11 Historic England's guidance on enabling development recognises that, in appropriate circumstances, development that would otherwise conflict with planning policy may be acceptable where it is necessary to secure the future conservation of a heritage asset and the public benefits outweigh the disadvantages of departing from policy. Enabling development is therefore a potential means of securing heritage conservation where the asset's future cannot reasonably be secured through an otherwise policy-compliant scheme.

5.12 The guidance also recognises that enabling development may itself have an adverse effect on the heritage asset or its setting. Such effects should be avoided wherever reasonably possible and, where avoidance is not achievable, minimised through careful siting, design and mitigation. Any residual harm must be assessed transparently against the conservation benefits and other public benefits of the proposal.

5.13 The purpose of enabling development extends beyond funding immediate repair or restoration works; it may also assist in securing the long-term future of a heritage asset. However, the designation of a proposal as enabling development requires a reasoned assessment of its necessity, the relationship between the development and the conservation objective, and whether the identified benefits justify any policy conflict or heritage harm.

5.14 In this case, the kiosk is principally proposed as a functional facility associated with the reopening and operation of the Leas Lift. It would provide ticketing, visitor information, merchandise and takeaway refreshments, while improving the visibility and legibility of the Lift's upper entrance from The Leas. These benefits can be considered on their own planning merits. In addition, the kiosk has the potential to generate supplementary income to help meet the Lift's ongoing maintenance and operational costs, thereby contributing to its long-term sustainability.

5.15 Accordingly, the proposal may have characteristics associated with enabling development, insofar as the income generated could support the continued conservation and operation of the Leas Lift. However, it is not necessary to rely solely on that characterisation to establish the planning case. The kiosk's functional benefits, contribution to the visitor experience and potential heritage benefits should be assessed alongside its design and impact on the Conservation Area and the setting of nearby listed buildings. Any heritage harm must then be weighed against the public benefits in accordance with the relevant statutory duties and national planning policy.

6 Planning & Heritage Assessment

Site and heritage context

6.1 The application site is located on the upper Leas promenade, immediately adjacent to the upper entrance of the Grade II* listed Leas Lift Funicular Railway. The site lies within the Old Town Conservation Area and occupies a sensitive historic and public realm location where the character and appearance of the promenade make an important contribution to the significance of the Conservation Area.

6.2 The Leas does not appear to be specifically identified as a heritage asset under the relevant provisions of the Folkestone & Hythe Places and Policies Local Plan 2020,

including Policy HE4. However, it is identified on the Kent County Council Heritage Maps as a Historic Park and Garden. This identification provides relevant context for understanding the historic interest of the area.

6.3 Irrespective of its specific designation status, The Leas is an important historic landscape and public open space within the Conservation Area. Its historic promenade, open grassed areas, formal planting and relationship with the historic buildings on the northern side of the Leas contribute to its distinctive character and public amenity value. These characteristics are material considerations in assessing the acceptability of the proposed kiosk.

6.4 A defining characteristic of this part of The Leas is its open and spacious appearance. This is expressed through the combination of managed grassed areas, formal planting, railings and the broad pedestrian promenade, which provides an important linear public space and historic route along the Upper Leas promenade. The promenade is itself a feature of historic and townscape interest, and development within this setting must be carefully designed and positioned to avoid an unacceptable erosion of its openness or interruption of its established visual character.

6.5 The principal listed building relevant to the proposal is the Grade II* Leas Lift, whose significance derives from its historic, architectural and engineering interest. The largely subterranean Grade II listed Leas Pavilion is situated broadly opposite the application site. The Folkestone War Memorial and Folkestone Memorial Cairn are also nearby heritage assets. The significance of each asset, and the contribution made by its setting, must be considered in assessing the effects of the proposal.

6.6 The principal considerations are therefore:

- The acceptability of the kiosk in principle, having regard to its purpose and relationship with the Leas Lift.
- Its effect on the openness and historic character of The Leas and the significance of the Old Town Conservation Area.
- Its effect on the significance and setting of the Grade II* Leas Lift and other nearby listed buildings and structures.
- The quality, scale, design and materials of the proposed kiosk in this sensitive historic setting.
- The effect on the safe and convenient movement of pedestrians and cyclists along the promenade.

Principle of development

6.7 The principle of providing a kiosk in this location to support the operation and public use of the Leas Lift has been discussed with and supported by the Council at pre-application stage, as recorded in its advice letter reproduced at Appendix 3. While this advice does not predetermine the outcome of the planning application, it provides relevant context for the consideration of the proposal and the design approach subsequently developed. The kiosk has a direct functional relationship with the Lift, providing ticket sales, merchandise and takeaway refreshments while helping visitors identify the upper entrance, which is not readily apparent to passers-by along The Leas.

Heritage and visual impact

6.8 The application site occupies a sensitive part of the Conservation Area, where the open character of The Leas is an important component of its significance. The proposal must therefore be assessed against the statutory duties relating to conservation areas and listed buildings, together with the relevant policies of the September 2026 National Planning Policy Framework. The objective is to ensure that the kiosk preserves the character and appearance of the Conservation Area and does not cause unacceptable harm to the significance of the Leas Lift or other designated heritage assets.

6.9 The introduction of a kiosk would inevitably introduce a built element into an otherwise relatively open part of the promenade. The relevant consideration, however, is the extent to which this change would affect the significance of the heritage assets, having regard to the kiosk's modest scale, limited footprint, siting and design. The kiosk would be positioned adjacent to the southern boundary railings, rather than occupying a more central position within the promenade or the adjoining open grassed areas. This would consolidate the structure towards the edge of the public space and limit its visual intrusion, helping to retain the essential openness and continuity of the promenade.

6.10 The kiosk has been designed as a simple, traditional structure, using natural materials intended to complement the historic character of the Conservation Area and Folkestone's Victorian and Edwardian seafront. Its form and appearance have been informed by the Council's pre-application advice, which identified traditional seaside buildings of the nineteenth and twentieth centuries as an appropriate design reference. In particular, the design draws on the example reproduced at Image 9, which was suggested by the Council as a suitable precedent for this location. The proposal therefore responds to the historic context and the design guidance provided through the pre-application process, rather than introducing an overtly contemporary or visually dominant structure.

6.11 The proposed scale, form and materials are intended to ensure that the kiosk reads as a modest, complementary addition to the promenade. Its traditional appearance would provide an appropriate architectural response to the historic seafront setting, while its limited size and positioning adjacent the railings would help preserve the visual prominence of the open public realm. As such, the kiosk is considered capable of integrating successfully into this sensitive location without materially undermining the defining characteristics of The Leas.

6.12 The kiosk's location is also fundamental to its intended function. The upper entrance to the Leas Lift is relatively inconspicuous when approached along The Leas, and the kiosk would provide a recognisable point of arrival, helping visitors locate the entrance and encouraging passing pedestrians to use the attraction. Locating the kiosk immediately adjacent to the upper station would establish a clear functional relationship between the two facilities and avoid the need for a separate, detached structure elsewhere along the promenade. Its siting is therefore justified by operational and visitor-management considerations, provided that the resulting visual impact and effect on pedestrian movement remain acceptable.

Impact on the Leas Lift and other heritage assets

6.13 The Grade II* Leas Lift is the principal heritage asset associated with the proposal. The Lift's largely subterranean arrangement means that the upper entrance forms only a limited part of the structure visible from The Leas. The proposed kiosk would sit alongside this entrance and would be read primarily as an ancillary facility serving the Lift, rather than as a competing or dominant structure. Its modest scale, traditional design and functional relationship would help maintain the legibility of the Lift and its relationship with the surrounding historic environment. On this basis, the proposal is not considered likely to cause material harm to the significance of the listed building, subject to its final design and siting.

6.14 The relationship between the Leas Lift and the lower slopes towards Lower Sandgate Road is also an important consideration. Views from the south provide an appreciation of the Lift's position within the hillside and its historic relationship with the town and seafront. From these viewpoints, the proposed kiosk would occupy a position at the upper level of the slope and would be separated from the principal visible elements of the Lift by the intervening landform and vegetation. It is therefore unlikely to materially alter the appreciation of the Lift from these views. Nevertheless, the assessment of setting should not be confined to a single viewpoint: the kiosk's effect must also be considered from the immediate surroundings of the upper station and from relevant public viewpoints along The Leas.

6.15 Other nearby designated heritage assets include the Grade II listed Leas Pavilion to the northwest and the Folkestone War Memorial and Folkestone Memorial Cairn to the northeast, as identified in Figure 3 of Appendix 1. The kiosk would be separated from these assets and would not involve physical alteration to them. Having regard to its modest scale, location and intended appearance, it is not considered likely to materially affect the ability to appreciate their architectural or historic significance. In particular, the Leas Pavilion's relationship with its immediate surroundings and the public realm would remain substantially unchanged. The proposal is therefore considered unlikely to cause harm to the significance of these other heritage assets through development within their settings.

Overall heritage assessment

6.16 The proposal has been developed with regard to the sensitivity of The Leas and the surrounding designated heritage assets, including the Council's pre-application advice. While the kiosk would introduce a built element into an open historic public space, its limited scale, edge-of-promenade position, traditional design and direct functional relationship with the Leas Lift would help minimise its visual impact. The kiosk would also provide a practical facility supporting the public use and visibility of the restored Lift.

6.17 It is also noted that the kiosk is a small temporary style structure and can easily be removed at the end of its lifespan without causing any permanent impact on conservation area.

6.18 The kiosk's potential to generate supplementary income towards the Lift's ongoing maintenance and operation provides an additional public benefit, insofar as it contributes to the long-term sustainability of this important heritage attraction. This benefit is complementary to, rather than a substitute for, the assessment of the kiosk's design and heritage effects. The proposal may have characteristics associated with enabling development, but its acceptability should principally be assessed on its own planning merits, with any heritage benefits weighed appropriately in the overall planning balance.

6.18 The proposal is considered capable of preserving the essential character and appearance of the Conservation Area and avoiding material harm to the significance of the Leas Lift and other nearby designated heritage assets.

7 Pedestrian, Cycle and Council Vehicle Access

7.1 The proposed kiosk would not prejudice the free and unobstructed movement of pedestrians, cyclists or Council maintenance vehicles along The Leas promenade. A clear width of approximately 4.2 metres would be retained between the kiosk and the grass edge on the opposite side of the promenade.

7.2 This would provide ample space for pedestrians and cyclists to pass safely, while also accommodating Council maintenance and operational vehicles, including the DAF Hiab vehicle, which is approximately 2.6 metres wide.

7.3 The retained width would therefore ensure that the kiosk does not materially impede the existing use or functionality of the promenade, allowing pedestrian and cycle movements and necessary Council vehicle access to continue without undue restriction.

7.4 The width of the promenade is shown on dimensioned drawing No. 25.35.20.

8 Planning Balance & Conclusion

8.1 The proposed kiosk would provide a practical facility directly associated with the operation and public use of the Grade II* listed Leas Lift. It would improve the visibility and legibility of the upper entrance, facilitate ticket sales and provide complementary refreshments and merchandise, enhancing the visitor experience and supporting the successful reopening of this important heritage attraction.

8.2 The assessment acknowledges that introducing a built structure would result in some change to the open character of The Leas promenade. However, the kiosk's modest scale, position adjacent to the boundary railings, traditional design and sensitive material palette have been developed with regard to the site's historic context and the Council's pre-application advice. These characteristics would help minimise its visual impact and preserve the essential character and appearance of the Old Town Conservation Area. The proposal is also considered unlikely to cause material harm to the significance of the Leas Lift or other nearby designated heritage assets.

8.3 An additional benefit is the kiosk's potential to generate income towards the ongoing maintenance and operation of the Leas Lift, thereby contributing to its long-term financial sustainability and conservation. While this does not, in itself, establish that the proposal constitutes enabling development, it represents a further public benefit associated with supporting the continued use of this important community heritage asset.

8.4 Overall, the proposal represents a modest, purpose-designed addition that would support the operation and public enjoyment of the Leas Lift. Subject to appropriate control of the final design, materials and siting, and confirmation that safe and convenient pedestrian and cycle movement would be maintained, the benefits of the proposal are considered to outweigh its limited visual and townscape effects. The application is therefore considered acceptable in heritage and planning terms and is respectfully recommended for approval.