

Canterbury City Council  
Military Road  
Canterbury  
Kent  
CT1 1YW

## **BY EMAIL ONLY**

3 June 2024

our ref: KCIIECP/Canterbury\_LP  
your ref:

Dear Sir/Madam,

### **Draft Canterbury District Local Plan 2040 - Consultation**

Thank you for the opportunity to comment on this consultation. As the National Trail Officer for the southeast section of the King Charles III England Coast Path (KCIIECP), it is my responsibility to ensure the path is protected and seek opportunities to enhance the trail where possible.

The KCIIECP is a new National Trail that will pass around the whole of the English coast. When it is complete, the KCIIECP will be approximately 2700miles long, making it the longest managed coastal walking route in the world. The stretches of KCIIECP that pass through the District of Canterbury are open to the public, so it is disappointing to note that the KCIIECP is only referenced within two Draft Canterbury Local Plan policies (Policy W3 and Policy DS22).

To address this matter, it is requested that the Canterbury Local Plan includes the following specific Coastal Access Policy.

#### **Policy: Coastal Access**

1. The King Charles III England Coast Path (KCIIECP) National Trail shall be protected, with opportunities taken to enhance the route where appropriate (e.g., re-aligning the trail closer to the sea).
2. Public access to the coast will be retained and improved where possible (e.g., through the creation of new path links).
3. Applicants will be required to record the route of the KCIIECP on their plans, where it is affected by development, and demonstrate how the trail will be positively accommodated within the development site. Proposals that would adversely affect the KCIIECP will not be permitted.

#### **Justification:**

The KCIIECP is a national asset that links iconic places and heritage sites along the coast, enabling people to experience, recognise and value the benefits of our

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environment. Research has also shown that the Trail brings significant health and wellbeing benefits, boosting local economies and coastal communities.

For example, research has shown that when local coastal resident expenditure is excluded, an additional £334 million was spent in local economies by people walking on English coastal paths. This directly supported £167 million of output (gross value added) in local economies and 5,900 full time equivalent jobs (<https://publications.naturalengland.org.uk/publication/6476962745024512>).

Taking this evidence into consideration, it is imperative that the new Local Plan includes a specific policy reference for the KCIIECP. This approach would support the management and development of the KCIIECP, enabling the potential economic and social benefits of the Trail to be fulfilled.

Additionally, it is requested that reference to the KCIIECP is added to the following draft policies, which are generally supported:

**Policy SS4 - Movement and Transportation Strategy for the district (Pg 20)**

**Suggested text:** New development will support the enhancement of the KCIIECP National trail and links to the coast path, providing opportunities for active travel and outdoor recreation.

**Policy W1 - Whitstable Town Centre Strategy (Pg 75)**

**Suggested text:** 8. The council will seek to protect and enhance existing open space, and blue and green infrastructure, such as the KCIIECP National Trail, Cornwallis Circle and Whitstable beach, to deliver environmental, social and health benefits to communities.

**Policy W2 - Whitstable Harbour (Pg 77)**

**Suggested text:** Appropriate uses for the site may include fishing, commercial, business, employment, leisure, community facilities and services, parking and residential, along with improvements to public realm and accessibility for walking and cycling, including the KCIIECP National Trail.

**Policy HB1 - Herne Bay town centre strategy (Pg 95)**

**Suggested text:** The council will seek to protect and enhance existing open space, and blue and green infrastructure, including the KCIIECP National Trail, Seafront promenade, the Coastal slopes and Memorial Park, to deliver environmental, social and health benefits to communities.

**Policy DS6 - Sustainable design (Pg 165)**

**Suggested text:** (d) Promote healthy lifestyles by making walking, cycling and low-carbon travel modes easy, safe and accessible, with wide footways and dedicated cycleways where possible, which link to the off site walking and cycling network including PROW and the KCIIECP National Trail.

**Policy DS14 - Active and sustainable travel (Pg 180)**

**Suggested text:** The KCIIECP National Trail shall be protected, with opportunities taken to enhance the route and develop link routes to the path.

**Policy DS24 - Publicly accessible open space and sports (Pg 201)**

**Suggested text:** Proposals for new development along the coast must demonstrate how the KCIIECP National Trail will be positively accommodated within the development site. Proposals that would adversely affect the KCIIECP will not be permitted.

**Glossary:**

The KCIIECP should be included within the glossary. Draft text below:

**King Charles III England Coast Path (KCIIECP):** A new long distance walking route, with National Trail status, that will eventually pass around the entire coastline of England.

Comments are made in reference to the following planning policy;

- **National Planning Policy Framework**
  - **Paragraph 104** - Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.
  - **Paragraph 124** - Planning policies and decisions should:
    - a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains - such as developments that would enable new habitat creation or improve public access to the countryside;
  - **Paragraph 178** - Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:
    - d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast.
  - **Paragraph 180** - Planning policies and decisions should contribute to and enhance the natural and local environment by:
    - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

This response is made on behalf of the King Charles III England Coast Path National Trail. The views expressed should be considered only as the response of the National Trail officer in respect of King Charles III England Coast Path matters relating to the proposal.

Yours faithfully,



**Thomas Kennedy**

National Trail Officer for the King Charles III England Coast Path - South East

