

Mrs K Parkin
Gravesham Borough Council
Windmill Street
Gravesend
Kent
DA12 1AU

BY EMAIL ONLY

5 October 2023

our ref: ECP/GWO-3-S065/1/TK
your ref: 20221064

Dear Mrs Parkin,

APPLICATION: 20221064

DETAILS: Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment
LOCATION: Northfleet Harbourside - Land Surrounding Ebbsfleet United Football Club, Stonebridge Road, Northfleet

Thank you for the opportunity to comment on the above planning application.

I am responding to this consultation in my capacity as the National Trail Officer (NTO) for the South East section of the King Charles III England Coast Path (KCIIIIECP). As the NTO, it is my responsibility to ensure that the interests of the trail are protected and the continuity of the route is preserved for the public to enjoy.

This development provides a unique opportunity to improve the character and alignment of the KCIIIIECP, as it currently passes inland along the local highway network. It is therefore pleasing to see the applicant has acknowledged the existence of the trail and proposed a diversion route for this KCIIIIECP on their plans. In addition to this trail, the applicant should be aware that the Thames Path National Trail has been extended to the Isle of Grain and currently follows the alignment of this KCIIIIECP section.

With reference to the attached georeferenced map, the general principle of re-aligning the KCIIIIECP closer to the River Thames is supported, as this would provide a more direct and convenient route for path users. Opportunities to re-align the trail through green corridors and open space are welcomed, however it is requested that the applicant revises sections of the proposed re-alignment to ensure the trail is positively accommodated within the development.

The eastern section of the proposed realignment would be an indirect route with sharp turns that passes between buildings. This should be revised, as the development

provides a unique opportunity to align the trail closer to the River Thames and create an attractive off-road connection with the neighbouring Northfleet development to the east.

It is requested that the trail is re-aligned through the open green space in the northern corner of the site and passes along the proposed pedestrian route, before continuing east via Robins Creek. Should the section across Robins Creek be located outside the applicants control, consideration should be given to delivering this valuable public access link through a planning obligation. With the support of the local highway authority and local stakeholders, this new connection would provide a direct and attractive riverside trail for the public, enhancing opportunities for active travel and outdoor recreation.

With regards to the north west section of the site, there appears to be a network of public access routes being proposed. It is requested that these routes are consolidated and, where appropriate, the KCIIECP is 'snapped' to the alignment of a PRow that is direct and attractive to use. This approach would avoid a duplication of routes and minimise the public burden of path maintenance.

As a general comment, the proposed surface treatment for the diverted KCIIECP is not clear and should be clarified.

Should the proposed development be approved, the landowner must submit an application to Natural England to legally divert the alignment of the KCIIECP. This process is known as a Variation Report.

Natural England has a responsibility to prepare a Variation Report for Secretary of State approval where the alignment of the KCIIECP changes. The Variation Report involves public consultation and considers the environmental impacts of the proposed KCIIECP diversion, in addition to the potential impacts on landowners and occupiers. Taking these points into consideration, there is a risk that a Variation Report may not be successful. It is therefore recommended that the applicant engages with Natural England at the earliest opportunity to consider the proposed diversion and minimise the risk of the application being unsuccessful.

The applicant may also need to implement temporary diversion measures for the duration of the construction phase, in the interests of public safety. Should the proposed development be approved, it is requested that the applicant engages with myself and Natural England to clarify the nature of the works. We can then consider appropriate closure mechanisms and signs for the KCIIECP.

Finally, you should also be aware of the coastal margin, located adjacent to the KCIIECP. This margin includes all the land seaward of the trail and may extend inland, providing access rights for the public to enjoy the coastline. Most of the coastal margin is open access land under the Countryside and Rights of Way Act 2000 (CROW Act), though some areas do not have these access rights, due to the nature of the land and its use. Further details can be found here: <https://www.gov.uk/guidance/manage-your-land-on-the-england-coast-path>

Summary:

This proposed development would have a significant impact on the KCIIECP and necessitate a diversion of the National Trail. While the efforts of the applicant to accommodate the KCIIECP through the site are acknowledged, it is requested that the applicant revises their diversion proposal for the KCIIECP and clarifies the surface treatment for this route. Further, in the event that planning permission is granted for

this site, the applicant must seek a Variation Report to divert the alignment of the KCIIECP and apply for a temporary path closure during the construction phase.

Given the overlapping nature of the KCIIECP and the PRoW network, the applicant should consult both the KCC PRoW and Access Team and the NTO to develop a coherent approach to public access in this area.

Should planning permission be granted for this development, the following conditions are requested:

1. The applicant shall apply for a Variation Report to divert the alignment of the King Charles III England Coast Path and Thames Path National Trails, where they are directly affected by the development.

Reason: To maintain the continuity of the National Trails and in the interests of the amenity of the public

2. The applicant shall provide a temporary diversion route of the King Charles III England Coast Path and Thames Path National Trails, where they are directly affected by the development, in addition to waymarking this alternative route, for the duration of the construction phase.

Reason: To maintain the continuity of the National Trails and in the interests of the amenity of the public

I should also be grateful if you could also bring the following to the applicant's attention:

- No furniture, fence, barrier or other structure may be erected on or across the KCIIECP without the express consent of the National Trail Officer.
- There must be no disturbance of the surface of the KCIIECP, or obstruction of its use, either during or following any approved development without the express consent of the National Trail Officer.
- No hedging or shrubs should be planted within 1 metre of the edge of the KCIIECP.
- Please also make sure that the applicant is made aware that any planning consent given confers no consent or right to close or divert any section of the KCIIECP at any time without the express permission of the NTO.

Comments are made in reference to the following planning policy;

- **National Planning Policy Framework**
 - **Paragraph 100** - 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 174** - 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;
- **Gravesham Local Plan Core Strategy**
 - **Policy CS06: Ebbsfleet (Gravesham) Opportunity Area**
 - **Policy CS12: Green Infrastructure**

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 application.

Yours sincerely



Thomas Kennedy

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

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