



CANTERBURY DISTRICT
DRAFT LOCAL PLAN 2042/43
CONSULTATION (REGULATION 19)

REPRESENTATIONS BY
FORDWICH TOWN COUNCIL

10 JUNE 2026



CANTERBURY DISTRICT DRAFT LOCAL PLAN FOCUSED CONSULTATION (REG19): REPRESENTATIONS BY FORDWICH TOWN COUNCIL, 01 JUNE 2026

1. Introduction

These representations on behalf of Fordwich Town Council ("FTC") are made in response to the publication of the Draft Canterbury District Local Plan Reg 19 Consultation in March 2026 (the "Consultation") by Canterbury City Council ("CCC"). We note that the consultation closed on 18 May 2026, but hope that these representations will nevertheless be taken into account.

2. Executive summary

FTC supports the objective as stated in the Consultation "to enable our ... villages to adapt and thrive, and to protect and enhance our unique natural and historic environment and the open spaces we all enjoy." We also support the strategy set out in the Draft Canterbury District Transport Strategy to prioritise "sustainable travel, such as walking, cycling and public transport."

3. Fordwich's Unique Features

- 3.1 The Consultation again fails to mention Fordwich in particular, other than to confirm that no development is to be added. As we said in our response to the consultation on the Draft Local Plan, Fordwich has a number of unique features which should, as a matter of strategy, be protected. Without repeating these in detail these include:

- **Heritage assets.**

The Pleistocene sands and gravels capping the high ground south of Fordwich (sometimes known as the 'Fordwich Plateau')

The entire town of Fordwich is a Conservation Area, an area that CCC has recognised as being of special architectural and historical interest. There are 23 listed heritage assets in Fordwich, including the Grade 1 listed Church of St Mary and Two Grade 2* listed buildings.

- **Environment/Ecology.**

Fordwich is set in Countryside which functions as an important green infrastructure supporting species such as great crested newts, turtle doves (and in the river) beavers and Fordwich trout. It is surrounded by ancient woodland also representing a high quality, high value habitat.

4. Existing Highways Environment at Fordwich

- 4.1 We agree with paragraph 6.79 of the Consultation which says that "Transportation is one of the biggest challenges facing the district and affects both the local economy and residents' quality of life." In our response to the Draft Local Plan, we called on CCC to consider these unique features and **address the excessive traffic movement** through Fordwich expressly in the Local Plan and to adopt as strategy the protection of these assets.

- 4.2 There are few roads connecting south and north Kent east of Canterbury. There are roads through Canterbury itself, the new development on the old MoD land – now mainly closed, Fordwich and Grove Ferry. It is likely therefore that all south north and north-south traffic will continue to seek to use Fordwich as a rat run until the policy at CF1 is implemented (as to which please see below).
- 4.3 The existing highway environment within Fordwich presents substantial constraints:
- The route functions as a through-route for approximately 6,000 vehicles per day (as evidenced by ANPR survey data), despite the medieval street layout.
 - Pedestrians, wheelchair users and cyclists are required to navigate narrow and uneven pavements, frequent obstruction from vehicles parked on footways, and a single carriageway bridge with no clear priority or safe segregation.
 - There is a lack of dropped kerbs at crossing points, poor intervisibility at key locations, and in practice it is often necessary for pedestrians to walk within the carriageway.
 - Vehicles do not adhere to the 20-mile speed limit, and we have shared recorded instances where on the corner of High and King Street, we have had more than three accidents on one day;
 - Large lorries do not adhere to the width restrictions, and these vehicles cannot negotiate the narrow bridge over the Stour or the tight corner on High and King Street. This has resulted in damage to private property and the bridge over the River Stour
 - Vehicles are noisy
 - There is little or no enforcement of any parking restrictions, now exacerbated by the introduction of the ANPR system at the George & Dragon.

5. **Vulnerable Road Users – the Policy Framework**

- 5.1 FTC reminds CCC of national priorities for the safety and inclusion of **vulnerable road users (VRUs)**—pedestrians, cyclists, horse riders, motorcyclists, and others.
- 5.2 The National Planning Policy Framework (“**NPPF**”) provides clear guidance in Chapter 9: ***Promoting Sustainable Transport***.
- **Paragraph 109** requires transport issues to be considered from the earliest stages of plan-making and development proposals, including opportunities to promote walking, cycling, and public transport use.
 - **Paragraph 110** states that the planning system should actively manage patterns of growth to limit the need to travel and offer a genuine choice of transport modes, improving air quality and public health.
 - **Paragraph 111(d)** specifically calls for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking.

- **Paragraph 113** requires that **developments generating significant movement provide a travel plan and measures to promote sustainable transport.**

- 5.3 These provisions align with the **Highway Code's hierarchy of road users (Rules H1–H3)**. We welcome its inclusion and adoption at Policy DS16 – Movement Hierarchy. We hope that its principles will be adopted in addressing the pedestrian safety, excessive traffic movement and parking issues in Fordwich: **FTC calls for a meeting with CCC to discuss these issues further.**
- 5.4 It is not sufficient that the Local Plan only includes Policies for new development to promote active and sustainable travel (cf. Policy DS17) and address parking (Policy DS18). The Local Plan should include policies to promote Active Travel, adequate parking and pedestrian safety in existing centres, villages and towns.
- 5.5 Indeed, FTC has significant concerns regarding the coherence and evidential basis of the Local Plan Transport Strategy. Whilst the Strategy places clear emphasis on the promotion of Active Travel, there is an evident disconnect between that stated objective and the infrastructure interventions identified. In particular, the Key Infrastructure projects listed in Table 2.1 are predominantly focused on facilitating motor vehicle movements, which is inconsistent with the Strategy's stated modal shift ambitions.
- 5.6 Further, the target mode shares set out in Table 2.2 are not supported by any clear evidential framework. There is no demonstrated linkage between those targets and either (i) specific infrastructure proposals, or (ii) behavioural or safety interventions capable of delivering such outcomes. In the absence of such evidence, it is difficult to see how the proposed Active Travel targets can be regarded as realistic or deliverable.
- 5.7 The Strategy also identifies safety as a principal barrier to increased Active Travel. However, there is no clear articulation within the Local Plan of how the proposed infrastructure schemes will address perceived and actual safety concerns. In particular, the document does not demonstrate any structured relationship between infrastructure investment, safety improvements and the achievement of modal shift targets. This lack of alignment is a fundamental weakness.
- 5.8 These deficiencies are particularly acute in the context of Fordwich. In practice, a significant proportion of residents already rely on Active Travel to access essential services in Sturry, including the railway station, bus services, healthcare facilities, schools and local retail provision. Notwithstanding this existing demand, there is currently no dedicated or safe Active Travel route between Fordwich and Sturry identified within the Local Plan.
- 5.9 Without the inclusion of targeted and evidence-based interventions of this nature, the Transport Strategy does not demonstrate a logical or deliverable relationship between its stated objectives, identified infrastructure projects, and the experience of local users. The Strategy should therefore not proceed in its current form without a clear evidential alignment between mode share targets, safety considerations and infrastructure delivery.

6. **Objection to Policy R23 – Land to the south of Sturry Road**

- 6.1 This Policy merely copies that which was set out in the draft local Plan. FTC reiterates its objection to this Policy. The Local Plan contains no more detail than the draft. While FTC supports policies that offset the impact of development on the nitrogen and phosphate levels at Stodmarsh, the location of the proposed strategic wetland is inappropriate.

- 6.2 The main reason for FTC's opposition is that the planned area removes 2/3rds of the Water Meadows. The Water Meadows are the centuries old Flood Plain protecting Fordwich. FTC refers to its response to the draft Local Plan of 03 June 2024.
- 6.3 Since Central Government accepts that there will be a higher probability of higher rainfall in the winters over the next decades, it is unacceptable to remove the flood defence for a community.
- 6.4 FTC supports the condition that planning permission for the wetland will be provided subject to the condition that groundwater quality is not to be adversely affected in line with Policy DS24. **However, FTC advocates that the existing walkway and cycle route should be accommodated. Relocating the route is not a feasible option.** The route demarcates the ancient Augustine Way between Fordwich and Canterbury and for the heritage reason itself should be preserved. Elsewhere in the Local Plan CCC acknowledges that "the historic environment of the district is valuable locally, nationally and internationally". This includes this ancient walkway.
- 6.5 Walking and cycling amenity should be improved rather than relocated in furtherance of the CCC's strategy to encourage active journeys. FTC is generally in favour of active journeys: many Fordwich residents use the footpath on a daily basis and the extensive footpaths surrounding the town is one of the key attractions of living in Fordwich. FTC notes the support for the preservation of National Cycle Routes in paragraph 6.84, and calls on CCC to expressly incorporate the principles there expressed in Policy R23: "a number of National Cycle Routes pass through the district and are enjoyed by residents and by visitors. It is important to protect and enhance the variety of routes across the district for commuting and for leisure, and to promote sustainable travel and an active lifestyle. Proposals for development will be expected to incorporate these routes or, if unavoidable, to amend them sensitively and enhance them to encourage their use."
- 6.6 Finally, the Water Meadows provide ancient view across Fordwich which should not be obscured by the proposed strategic wetland. Preservation of these views should be an additional condition. See [Canterbury Landscape Character Assessment and Biodiversity Appraisal](#), October 2020 at page 202.
- 6.7 In summary, FTC supports the principle of nutrient neutrality schemes to protect the Stodmarsh National Nature Reserve, but not at the cost of the flood defence of Fordwich, the Augustine walkway and the view towards Fordwich. Despite calling for constructive discussion with CCC on this topic, no such engagement has been forthcoming. Policy R23 proposes the wrong solution in the wrong place.
- 6.8 It is not clear that CCC has considered alternatives to Policy R23 as it is bound to do under Regulation 12(2)(b) of the Planning and Compulsory Purchase Act 2004.

7. **Policy R24 – Broad Oak Reservoir**

- 7.1 FTC supports this policy and urges CCC to consider the interface between this policy and Policy R23 carefully. It might be that no wetland is required with the potential changes in the water table that the new reservoir could entail.
- 7.2 FTC also supports the proposed country park and suggests that low or medium use be promoted rather than heavy use with extensive use of the reservoir, which is likely to further increase traffic flow on the Broad Oak Road and potentially undermine the policies

to promote biodiversity. Further the impact of this major development on Fordwich should be incorporated in the Design and Layout Criteria.

8. **Gypsy and Traveller Accommodation**

- 8.1 FTC notes that neither the gypsy sites to the south of the Town have been designated for intensification or regularisation. FTC reminds CCC of the Inspector's decision in and refers to its letter to CCC dated 01 June 2026 urging CCC to take enforcement action, also attached to this response for reference. FTC urges CCC not to entertain any proposed regularisation of those sites on the bases set out in its letter.
- 8.2 FTC also note Policy DS20 and urges CCC to consider whether the Romany Green and Moate Farm sites could be used as functionally linked land for species associated with the Stodmarsh Ramsar. Such a use would, FTC submits, be consistent with the Inspector's findings in the Romany Green Acres appeal and would support CCC's goal of biodiversity net gain as set out in Policy DS25 – Supporting biodiversity recovery.

9. **Green Gaps**

FTC welcomes the policy to designate Green Gaps. In particular, those that will preserve the character of those settlements in the countryside as being rural rather than part of the larger Canterbury conurbation: as stated at paragraph 6.116, the gap between Canterbury and Sturry. FTC would be supportive of additional green gaps around Fordwich so as to preserve its character as an ancient town set in the countryside.

10. **Objection to Policy R9– The Hill, Littlebourne**

- 10.1 FTC clarifies that it is not in principle opposed to housebuilding on these sites, but these **developments must not take place without being subject to resolving the traffic and parking problems in Fordwich.**
- 10.2 FTC anticipates that contractors' vehicles will seek to by-pass Canterbury and bring materials through Fordwich. Once built, it is likely that local residents will wish to use the amenities at Sturry, including the schools, and the coast to the north. We anticipate that they will, like current residents in this area, seek to travel through Fordwich, hugely exacerbating the already unacceptable position. FTC welcome the requirement that any development will be subject to "a Transport Assessment to demonstrate the connectivity of the site with the existing highway network, any necessary mitigation and measures to minimise the need for use of private cars in line with Policy DS18." That Traffic Assessment should expressly consider Fordwich.

11. **Policy CF1 – Strategic Site Allocations and Policy CF9 – A28/A257 Barracks Link Road**

- 11.1 FTC welcomes the requirement for the provision of a new A28/ A257 link road before further development can happen at Howe Barracks – site 9. But further connections – so as to minimise the use of Fordwich as a rat run should be built or opened.
- 11.2 It makes no sense that the Chaucer Road, which could connect the two roads, be cut off in the name of pedestrian safety, when pedestrian safety in Fordwich is an acute an ongoing issue. The burden of the connectivity should at least be shared. FTC calls on CCC to permanently open and signpost Chaucer Road as a road that can be used to access the A28 from the south.

12. Solutions.

FTC supports CCC's objective of a bus-led transport strategy as set out at Policy SS3 - Development Strategy for the district, but calls on CCC to adopt a bolder vision. The development of sites N4 to N6 should be subject to the production and implementation of a sustainable travel plan in line with NPPF guidance. Such a travel plan should include the following features:

- **prioritise safety of pedestrian and other vulnerable road users.** In Fordwich, this should include encourage active transport by designating the town a shared space and/or low traffic neighbourhood in line with Active Travel England's proposals so as to improve pedestrian safety and the way the streets are used. The shared space street and then be linked to the Sustrans cycle route to Canterbury as well as the extensive public rights of way network through the countryside around Fordwich, which are so prized by the local community;
- a **continuous Active Travel route** between Fordwich and Sturry should be developed. Such a scheme would directly address identified safety concerns, support existing travel patterns, and provide a credible basis for achieving modal shift;
- align **standards for travel through Fordwich with the Highway Code hierarchy**, ensuring safe junctions, crossings, and segregated routes wherever feasible;
- include ANPR at the entrances to Fordwich in the south at Moat Lane as well as the north by the bridges over the Stour, **charging vehicles** that just pass through a fee, but exempting those that do not travel through or travel through but remain in Fordwich for at least one hour; and
- in the district more generally, considering an extensive **mass public transport** such as trams or guided buses connected to the national rail network.

12.2 FTC welcomes and supports CCC's inclusion of use of traffic management powers to:

- manage access and egress from specific locations such as through pedestrianised urban centres and low traffic neighbourhoods; and
- encourage Heavy Goods Vehicles (HGVs) to use the primary route network, where possible.

12.3 Both of these measures urgently needs to be implemented in Fordwich. **FTC calls on CCC to expressly mention Fordwich in relation to these parts of Policy DS18 – Highways and Parking.**

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