

Date: 15 December 2025
Our ref: 532059



Strategic Planning Team
Maidstone Borough Council



BY EMAIL ONLY

Dear Sir/Madam,

Planning consultation: Maidstone Local Plan – Lidsing Garden Community Supplementary Planning Document (SPD)

Thank you for your consultation on the above dated 03 November 2025 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

To inform our comments we have reviewed the following documents made available to us during the consultation period:

- Lidsing Garden Community Supplementary Planning Document (October 2025)
- Lidsing SPD – Design Topic Paper
- Liding SPD – Green & Blue Infrastructure Topic Paper

We would like to thank your authority for your work in developing this SPD however, we feel that further detail is required to ensure that the development meets the criteria set out in LPRSP4(B). In our view, the SPD should incorporate a Strategic Masterplan and Design Code to ensure that good quality design is implemented from the outset, rather than attempting to embed these at the later planning stages. A good example of this in practice is the work that has been undertaken for [Medway's Innovation Park](#) which is also in close proximity to Kent Downs National Landscape.

Please note that we have not provided comments on all aspects of the SPD, only those which are relevant to our remit. Our answers to the specific questions posed can be found in Annex 1 and further comments can be found in Annex 2.

We would be happy to comment further should the need arise but if, in the meantime, you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondence to consultations@naturalengland.org.uk.

Yours faithfully,

Sophie Moore
Senior Officer for Sussex – Sustainable Development
Sussex & Kent Team

Annex 1: Natural England's Answers to Specific Questions Posed

Do you agree with the principle of introducing additional planning guidance for the Lidsing Garden Settlement in the form of a Supplementary Planning Document?

Given the location of the site both within the Kent Downs National Landscape (KDNL) and within the immediate setting, as well as the quantum of development proposed, we not only agree with the principle of producing a SPD but feel it is central to delivering a truly landscape-led development which protects and enhances the KDNL by ensuring good design, appropriate location of buildings and natural screening.

Do you agree that the correct key issues and elements have been identified in relation to the context of the site?

Yes, we agree with the opportunities and constraints identified on page 42 of the SPD and welcome the identification of the sites location within/adjacent to KDNL as both an opportunity and a constraint.

Do you agree with the Vision & Objectives for Lidsing Garden Settlement as set out in the SPD?

Natural England supports the Vision for Lidsing Garden Community, in particular the focus on enhancing the natural environment of the location and the sites relationship with the Capstone Valley. We are pleased to see reference to providing strong north-south links from the country park through to the KDNL, thereby connecting both existing and new residents with the landscape.

With regard to the Objectives, we welcome the requirement for the development to deliver a landscape-led place and the prioritisation of active travel throughout the site.

Do you suggest any changes to the Vision & Objectives?

Given that 'pockets of Ancient Woodland' and 'areas of ecological value and habitat' are both identified as key constraints, we are surprised that there is no reference to the retention and enhancement of existing ecological features in the Vision nor any reference to the importance of green infrastructure in connecting these areas in either the Vision or Objectives.

We therefore recommend that a new section is added on page 49 of the SPD which outlines the overall vision for the ecology, biodiversity and green infrastructure at the site.

In addition, paragraph 4.2.3. (Landscape-Led Exemplar) begins by outlining the need for any development to be 'genuinely landscape-led' but then moves on to discuss the challenges and opportunities of climate change. In our opinion, this feels like two separate parts of a vision with the climate change aspect more suited to paragraph 4.2.5. We recommend that paragraph 4.2.3. is amended to be solely landscape focused and highlight the opportunity to reference KDNL here.

Do you agree with the framework plans as set out in the SPD?

We have provided our comments on the framework plans in Annex 2 below.

Do you have any other comments on the Draft Supplementary Planning Document?

We have set out further comments on the Draft SPD and associated documents in Annex 2.

Annex 2: Table of Natural England's comments on Heathlands Garden Settlement: Draft Supplementary Planning Document

	Heading, paragraph & page of SPD Quote	Quote taken from the SPD	Natural England's Comments
Section A: Background			
1	<u>Future Stages of Work</u> 1.5.4 Pg 13	<i>'Given the anticipated timescales for the overall build out of the Garden Community, it is envisaged that a design code will be produced following an outline planning application but prior to reserved matters...'</i>	<p>We are concerned that a design code has not been produced as part of this SPD to ensure that any development that comes forward will incorporate good design from the outset. While we acknowledge that the design code <i>should</i> be completed prior to any reserved matters applications, certain elements will need to be decided at outline stage and the approach does not recognise that development could come forward as part of a hybrid application.</p> <p>We therefore strongly recommend that a design code is produced prior to outline planning stage and highlight Innovation Park's Design Code as an exemplar. A design code produced at an earlier stage will help to guide the design of the Garden Community to ensure that it meets the requirements and aspirations of the Local Plan and SPD.</p>
2	<u>Design Guidance</u> 2.3 Pg 18	<i>'There is a range of design guidance that informs the framework for the SPD and this is set out in the following paragraphs'</i>	Given the development's location we are surprised that the KDNL's planning publications have not been used to inform the framework of the SPD and recommend that they are included here.
3	<u>Ecology</u> 3.2.7. Pg 28	<i>'The emerging Kent Local Nature Recovery Strategy, Medway Green Infrastructure Strategy and Maidstone Green Infrastructure Strategy acknowledge existing habitats of importance and recognise their existing and potential connection to the surrounding landscape...The LNRS should inform the consideration of the creation and enhancement of new and existing habitats as</i>	<p>While we agree that the LNRS should inform the creation and enhancement of habitats on site, it would be helpful to understand how the referenced documents have informed the framework plans set out in the SPD and ultimately how the development will contribute to the delivery of the strategy.</p> <p>We would also like to highlight that the Kent LNRS was published on 28 November 2025 and should therefore no longer be referred to as 'emerging'.</p>

		<i>part of emerging proposals for development'</i>	
4	<u>Landscape Character</u> 3.2.9 Pg 30	<i>'This area is characterised by the following landscape features:</i> <ul style="list-style-type: none"> • <i>Setting of KDNL,</i> • <i>Level to gently sloping plateau,</i> • <i>A mixture of arable fields, paddocks, remnant orchards and small to medium blocks of woodland,</i> • <i>Mixed of historic and recent buildings, traditional materials and narrow lanes in addition to the M2 Motorway'</i> 	For completeness, we recommend that the full list of 'Key Characteristics' for the Bredhurst and Stockbury Downs LCA are listed from the Maidstone Landscape Character Assessment (2013). In addition, we suggest that the SPD outlines the special qualities of the KDNL, considering whether they are exhibited on site currently and how these could be protected/enhanced. This is particularly important for the southern parcel located within the KDNL given the need to 'seek to further the purpose' of the landscape as required by s245 of the LURA 2023.
5	<u>Opportunities & Constraints</u> Figure 20 Pg 43		We are pleased to see that areas of existing priority habitat, ancient woodland and other habitat have been mapped though it is unclear why these have not been included within Figure 23.
Section B: Vision, Objectives & Spatial Framework			
6	<u>Land Use Framework</u> 5.2.4 Pg 52	<i>'It is expected that the residential area of the site will be defined by key character zones, each zone with a range of densities and mixture of typologies and tenures. Further detail on this will be established through a Design Code that is to follow the SPD as part of the planning application process'</i>	In our view the design code should form part of the SPD , given that the SPD is being produced to shape the delivery of the garden community. This will guarantee that any development that comes forward will be in line with agreed design principles. Of particular concern is the development proposed along the M2 corridor given its location in the setting of the KDNL.
7	<u>Green & Blue Infrastructure Framework</u> 5.3.4 Pg 54	<i>'The semi-natural and natural green space is to be consolidated at the eastern and western sides of the site to enhance ecological connectivity. This work is to evolve through the design code as more evidence emerges in that process'</i>	As mentioned in our comments on the draft SPD in May 2025, it is unclear what is meant by consolidating semi-natural and natural green space 'at the eastern and western sides' and we therefore recommend that this is clarified. It is also unclear how this has followed through to the Green & Blue Infrastructure Framework (Figure 23), as semi-natural/natural green space is not marked and 'public open space' is evenly spread out across the site.

8	<u>Green & Blue Infrastructure Framework</u> 5.3.5 Pg 54	<i>'Proposals should start with the landscape responding to the site being in the setting of the KDNL and the Capstone Valley. As such open space buffers to the south of the site should be created that conserve and enhance the KDNL and reflect that the site sites within the setting of it as per the site policy'</i>	<p>We are pleased to see the requirement for open space buffers to conserve and enhance the KDNL, however we recommend that these are in accordance with both the KDNL Management Plan and special qualities to ensure they are delivering against the aspirations of the National Landscape.</p> <p>In addition, we ask that these buffers are clearly marked on Figure 23 and that a minimum acceptable width of open space buffer is agreed as part of the SPD.</p>
9	<u>Green & Blue Infrastructure Framework</u> Figure 23 & 5.3.7 Pg 55	<i>'The site has distinct pockets of biodiversity value with habitats located across the site but also wider connectivity as suggested through the LNRS. Open space corridors seek to reflect this and should be maintained in the development'</i>	<p>We recommend that the 'distinct pockets of biodiversity value' are clearly marked on Figure 23, as they have been in Figure 20, to promote both their retention and the potential for these to connect with new green infrastructure.</p>
10	<u>Movement & Connectivity Framework</u> Figure 24 Pg 57		<p>While we welcome the focus on providing active travel routes through the development to encourage sustainable journeys, we are concerned that the bridge connection to the southern parcel does not appear to be highlighted as an active travel route.</p> <p>Though we acknowledge that connectivity is required for vehicles exiting the M2, it is important that a safe and enjoyable route is provided for pedestrians who want to access the proposed recreational space in the southern parcel.</p>
11	<u>Placemaking & Design Framework</u> 5.5.2. Pg 58	<i>'In terms of heights it's also proposed to have higher buildings towards the centre of the site around the local centre with smaller buildings on the edges, especially adjacent to the M2 Motorway to minimise impact on the KDNL'</i>	<p>While we support the use of lower building heights on the southern boundary of the northern parcel, it should be recognised that other design elements such as building orientation, massing, form and colour will also help to minimise impact upon KDNL.</p> <p>Ideally these design elements would be agreed as part of the SPD through a Strategic Design Code embedded within the document, similar to the work that has been done for Innovation Park Medway.</p>

12	<u>Placemaking & Design Framework</u> Figure 25 Pg 59		<p>Despite stating in paragraph 5.5.1 and 5.5.2 that density will taper from the edges and lower building heights will be used on the southern boundary, the majority of development parcels in this area are marked for medium density (30-40 dph).</p> <p>Higher density development can be more visually intrusive and make it harder for mitigation to be effective. We therefore recommend that buildings in the immediate setting of the KDNL be lower in height and density to ensure a sensitive transition.</p>
13	<u>Illustrative Spatial Framework Masterplan</u> Figure 26 Pg 61		<p>Given that <i>'all planning applications must conform to the framework set out by the masterplan'</i> (paragraph 5.6.3), we are concerned that the location of the green bridge has not been indicated on Figure 26.</p> <p>The provision of a green bridge across the M2 is required by LPRSP4(B) 3.h.iii and is key to creating a sensitive transition from the KDNL to the development site, as well as provide a high quality experience for recreational users accessing the public open space to the south of the M2. In our view, the green bridge should be incorporated into the new M2 connection at Junction 4 to maximise benefits for both people and nature, as modifying the existing bridge connections will limit what can be provided.</p>
Section C: Placemaking and Design Guidance			
14	<u>Design Code</u> 6.2.2 Pg 65	<i>'This [design codes] can provide greater certainty for communities about the design of development and bring conversations about design to early stages of the planning process rather than the end'</i>	<p>Though we agree with this statement, in our view delaying the Design Code to after outline permission does not constitute bringing conversations about design to the early stages of planning. As advised above, we believe that the Design Code should be developed and agreed as part of this SPD and definitely prior to the submission of an application for outline permission to ensure good quality design across the site and particularly in areas adjacent to KDNL.</p>
15	<u>Design Code Key</u>	<i>'(a) ...The Design Codes shall be broadly in accordance with the Lidsing Garden</i>	<p>It is unclear what is meant by point (a) as, in our view, there is limited guidance provided in the SPD with regard to design, other</p>

	Principles/Guidance Pg 65	<i>Community SPD'</i> <i>'(f) The preparation of Masterplans and Design Codes must be informed by the appropriate design review and assessment frameworks such as the National Design Guide, National Model Design Code, Building for a Healthy Life and Building for Nature, or similar'</i>	than deferring this to post-outline consent stage. We believe that the Lidsing Garden Community SPD should include a detailed design code to ensure clear design parameters are agreed prior to a planning application being submitted. We therefore recommend that either the SPD is revised to incorporate a detailed design code or a separate design code is drafted and agreed prior to the submission of application for outline consent. In addition, we would expect reference to the relevant KDNL planning publications and design guidance under point (f).
16	<u>Landscape</u> 6.4.3 Pg 68	<i>'A sensitive transition between the development and the KDNL must be provided. Mitigation will be carried out by generous appropriate planting, a minimum 15m buffer zone and appropriate use of scale and form of adjacent buildings.'</i>	We strongly support the inclusion of wording requiring a sensitive transition between the development and KDNL, and suggest that this is included within the 'Key Principles/Guidance' section given its importance. While we are pleased to see a minimum buffer zone being proposed, it is unclear where this applies as it is not referenced in requirement (c) of the Key Principles/Guidance but is referred to in requirement (a) in relation to ancient woodland.
17	<u>Landscape</u> Key Principles/Guidance Pg 69	<i>'(c) Landscape buffers shall be provided to the major transport corridors of the M2 and to the KDNL to the south. The form of planting and landscaping shall be informed by noise surveys and discussions with KDNL and adhere to the following:</i> <ul style="list-style-type: none"> • <i>Prioritise structural planting to the south along the boundary with the M2 motorway using species of trees that create large crowns such as oak or beech.</i> • <i>Allow opportunities for community of access.</i> • <i>Building design should be diverse in order to break up the massing along</i> 	As mentioned above, it is unclear from this wording whether the proposed landscape buffers will be required to be 15m in size as inferred in paragraph 6.4.3. We are also concerned that little detail on top of what is required by LPRSP4(B) has been given on the form of planting and landscaping at this stage. We recommend that further detail is given on the landscape buffers to the north of the M2, similar to what has been provided in Figure 29. In addition, we ask that the word <i>should</i> in the final bullet point is changed to must .

		<i>this boundary.'</i>	
18	<u>Open Space</u> Figure 30 Pg 71		As discussed in our comments in row 8, the relevant framework plan(s) should clearly indicate where pedestrian access is expected to be provided so that both existing and future residents can access the green space south of the M2.
19	<u>Open Space</u> Key Principles/Guidance Pg 73	<i>'(e) Sports provision is to be located to the periphery of the site to enable its use by existing communities in Medway and Maidstone Boroughs'</i>	We note from Figure 30 that some sports provision is planned within the employment area to the north of the site. It should be highlighted that any sports provision in this area should consider impacts to KDNL, in particular from lighting (e.g. floodlights).
20	<u>Open Space</u> Figure 31 Pg 75		<p>We are pleased to see an indicative plan for the Land South of the M2 (Junction 4) has been included in the SPD however our comments from the draft SPD consultation (May 2025) still stand. We have included them below for ease of reference:</p> <p>In order to deliver policy LPRSP4(B) 3 c, e, h. iii., and vi there could also be a strong GI and active travel element by connecting the north and south buffering of the M2 with a green bridge.</p> <p>It would be helpful if clarity can be provided as to the reason for the location of the SuDS detailed on Figure 31.</p> <p>We also recommend that the scale of the proposed woodland in Figure 31 and how the proposed woodland has been informed by the landscape character of the area are clarified.</p> <p>Natural England suggests it would be helpful to have more than one cross section for Figure 29, for example in a southeast to northwest direction i.e. the direction of the view from a higher elevation of the KDNL to the M2 Junction 4. This is to better understand what the view of the landscape from higher up in the KDNL following mitigation will be.</p>

21	<p><u>Open Space</u> 6.5.7 Pg 76</p>	<p><i>'The definition [of a green bridge] boils down to the following:</i></p> <p><i>'an artificial structure over road or rail infrastructure which is either vegetated or provides some wildlife function'.</i></p> <p><i>It can take the form of a modified bridge or new structure and can be used by a range of modes or none.'</i></p>	<p>Instead of focusing on technical definitions of a green bridge, we recommend that your authority utilises the Landscape Institute's Green Bridge Technical Guidance Note to expand upon what your authority expects from the green bridge and include this within the SPD. This will enable certain design considerations to be pinned down at the strategic level, which should result in better outcomes once delivered.</p>
22	<p><u>Open Space</u> Key Principles/Guidance – continued Pg 77</p>	<p><i>'(a) The land to the southern of the M2 junction 4 is to follow several key principles:</i></p> <ul style="list-style-type: none"> • <i>Land to be used for highway improvements is to be screened by trees.</i> • <i>The remaining land is to be accessible by the community, especially walkable from Bredhurst Village and maintained as open space.</i> • <i>Respect the setting of listed buildings within the vicinity'</i> 	<p>We recommend that the following is added as an additional bullet point:</p> <ul style="list-style-type: none"> • Land should integrate with the KDNL and demonstrate how it is achieving its key objectives.
23	<p><u>Open Space</u> Key Principles/Guidance – continued Pg 77</p>	<p><i>'(c) access from the development to the Capstone Valley shall be provided in two ways:</i></p> <ul style="list-style-type: none"> • <i>Via active travel (walking and wheeling) to be provided from the site towards the Capstone Country Park.</i> • <i>Wildlife connections as identified in the Green and Blue Infrastructure Framework Plan.'</i> 	<p>We are pleased to see that access to Capstone Valley Country Park has been considered within the SPD and encourage your authority to work with Medway on the following:</p> <ul style="list-style-type: none"> • Potential for linking the development with the country park via other proposed developments in the area. • How any increased visitor use from Lidsing will be accommodated and whether any additional funding will be required. <p>We strongly support wildlife connections through the landscape but recommend that these are more clearly shown on the Green</p>

			and Blue Infrastructure Framework Plan, for example highlighting areas of existing green space that must be retained and where connections can be made.
24	<u>Open Space</u> Key Principles/Guidance – continued Pg 77	<i>'(e) a green bridge connection shall be developed over the M2 motorway connecting the site to the KDNL.'</i>	<p>Though some principles have been established, we are disappointed that the plans for the green bridge have not advanced much further from the Local Plan Review stage. In our view, the M2 Junction 4 improvement works provide an ideal opportunity for an exemplar green bridge to be provided that not only boosts ecological connectivity but encourages a sensitive transition to the KDNL, thereby providing additional mitigation for the improvement works, and engages people with the landscape.</p> <p>We strongly recommend that the location of the green bridge is determined as part of the SPD as a minimum and further detail provided on what the green bridge should include (e.g. what modes of transport will have access, are there particular habitats/species that should be targeted etc.).</p> <p>We would encourage a design which provides a high quality pedestrian experience, allowing those who want to, to access the new open space in the southern parcel and the wider KDNL without the need for a vehicle. This will enable users to experience the natural environment and a continuity of semi-natural habitat from the KDNL into the development site.</p>
25	<u>Movement & Connectivity</u> Key Principles/Guidance Pg 81	<i>Active Travel: (a)-(e)</i>	While we agree with each of these principles, we recommend that they are strengthened to replace the word <i>should</i> to read either must or shall .
26	<u>Movement & Connectivity</u> Key Principles/Guidance Pg 81	<i>'(q) ...The primary street should be designed to support ecological linkages across the site including allowing for wildlife movement'</i>	<p>As above, we recommend that the word <i>should</i> is replaced with either must or shall.</p> <p>In addition, it should be noted that there are opportunities for secondary streets to provide ecological linkages for example through the provision of street trees and/or living verges. This is</p>

			<p>particularly important as there appears to only be one primary street proposed on site which is located more towards the north of the site when, ideally, ecological linkages would be provided throughout.</p> <p>While ecological linkages maximise biodiversity across the site, they provide multiple benefits for example, climate change adaptation through natural cooling and flood risk management.</p>
27	<p><u>Placemaking</u> Key Principles/Guidance Pg 83</p>	<p><i>'(a) Development must be delivered at densities that reduce towards the M2 motorway'</i></p> <p><i>(d) Lower densities are required at the south of the development near to the KDNL, to respect the landscape character'</i></p>	<p>We strongly support the inclusion of these two placemaking principles, however we highlight that they are not reflected in Figure 25 (Placemaking & Design Framework). We recommend that Figure 25 is revisited to reflect these principles.</p>
28	<p><u>Placemaking</u> Key Principles/Guidance Pg 83</p>	<p><i>'(c) Appropriately designed higher density development can feature along the new spine road where they will create a buffer between the road and the rest of the site'</i></p>	<p>We recommend that the following additional wording is added to this principle:</p> <p><i>'(c) Appropriately designed higher density development can feature along the new spine road where they will create a buffer between the road and the rest of the site where shown as being suitable in an LVIA'</i></p>
29	<p><u>Placemaking</u> Key Principles/Guidance Pg 83</p>	<p><i>'(f) indicative housing types shall be provided to illustrate the densities envisaged and further detail provided in the subsequent design code'</i></p>	<p>We recommend that indicative housing types are provided as part of the SPD to demonstrate to applicants the acceptable building types for each density.</p>
30	<p><u>Placemaking</u> Key Principles/Guidance Pg 83</p>	<p><i>'Heights'</i></p>	<p>We ask that an additional principle is added here requiring lower building heights on land immediately north of the M2 to ensure a sensitive transition to/from the KDNL.</p> <p>We strongly support the inclusion of principle 'k' requiring ridge heights in the employment zone to not exceed 9m in line with LPRSP4(B).</p>

31	<u>Character Areas</u> Key Principles/Guidance Pg 87	<i>(l)</i> and <i>(o)</i>	Natural England strongly supports the requirement for new landscape planting along the edge of LCZ 3 and LCZ 4 but recommend that further detail is provided on the minimum size of these and form of planting.
32	<u>Character Areas</u> Key Principles/Guidance Pg 87	<i>(m)</i> and <i>(p)</i>	It is unclear what is meant by ‘continuous diverse building frontages’ here. While we recognise the need to reduce noise impacts from the M2, we are concerned that a continuous frontage will hamper the creation of a positive outfacing edge (as required by LPRSP4(B) 3(e)).
33	<u>Sustainable Design</u> <u>– continued</u> Key Principles/Guidance Pg 95	<i>Biodiversity (j) – (p)</i>	Natural England strongly supports the principles outlined in this section.
34	<u>Employment</u> Key Principles/Guidance Pg 105		<p>Natural England provided extensive comments on this section in May 2025 in relation to:</p> <ul style="list-style-type: none"> • Lighting • Structural planting • Design ideas for buildings • Biodiversity opportunities <p>It appears that your authority has now removed the principles that our comments were based upon (k-n) which, in our opinion, weakens this section.</p> <p>We strongly advise that principles relating to lighting requirements, planting requirements, building design and biodiversity opportunities are added back into this section, given the employment areas location in relation to KDNL.</p>