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Growth and Communities

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15 December 2025

Dear Sir/Madam,

Re : Lidsing Garden Community Draft Supplementary Planning Document – Formal Consultation

Thank you for consulting Kent County Council (hereafter referred to as the County Council) on the Lidsing Garden Community Draft Supplementary Planning Document.

The County Council has reviewed the Draft Supplementary Planning Document (SPD) and for ease of reference, has provided comments structured under the chapters and sections used within the document.

General Commentary:

Highways and Transportation

The County Council recognises that the Lidsing Garden Community forms a site allocation within the Borough Council's adopted Local Plan Review covering the period 2021-2038.

The requirement for an SPD to be produced is embedded within site allocation Policy LPRSP4(B). Its inclusion reflects the scale and complexity of a new Garden Community. The SPD is founded on a vision-led approach to transport provision, which is aligned with [National Planning Policy Framework - Guidance - GOV.UK](#) (NPPF) and [Local Transport Plan 5](#) (LTP5). By identifying the key principles that should underpin sustainable, mixed-use development within the local context, it provides a valuable means of shaping the future planning applications.

The County Council, as Local Highway Authority, has actively engaged with the Borough Council, National Highways and site promoter throughout the preparation of the SPD and supporting Transport Annex.

This collaborative approach has ensured the content is based on a shared understanding of the transport priorities and issues to be addressed in the planning applications. Importantly, a requirement for updated strategic traffic modelling using the Kent Transport Model has been included to inform the detailed assessment of impacts and potential mitigations.

The County Council is supportive of the vision and objectives in how they aim to deliver a sustainable new community with walking, cycling and public transport connectivity provided within the site and to surrounding communities. The vision and objectives should emphasise the imperative of all transport infrastructure being delivered in a timely manner. Such delivery is fundamental to achieving the integrated sustainable transport and wider community benefits the SPD describes

Broadband

From a digital infrastructure perspective, given that this development represents an additional 2,000 homes, the County Council would wish to ensure that there is sufficient dialogue with the three mobile network operators (EE, Virgin O2 and Three/Vodafone) to ensure that there is sufficient mobile coverage and capacity to accommodate the additional demand for network coverage and capacity that sizeable developments generate.

It is considered that failure to plan and ensure that sufficient infrastructure is in place at the time of completion risks the community facing mobile connectivity issues, or the additional demand denigrating existing coverage in the area. Retrofitting mobile infrastructure can be difficult to accommodate so the County Council would strongly urge that these provisions are made upfront.

Heritage and Archaeology

Lidsing Garden Community scheme is located on the northern downslope of the Kent Downs in a predominantly rural area. There are clear indications of field clearance by the mid-19th century with shaws and hedgerows, lanes, driveways and footpaths representing remnants of the post medieval or earlier landscape which had been dominated by woodland. There are indications for prehistoric, Roman and Medieval activity in the lower slopes towards the River Medway, particularly ritual Neolithic activity and Romano-British managed estates. There are indications of medieval settlement, especially towards Bredhurst church, and post medieval farms and small holdings surrounding the development site, but the lack of formal historic environment investigations is reflected in limited number of [Historic Environment Record - Kent County Council](#) (HER) known sites. However, there is considerable potential for significance archaeology to survive on this site.

There is also the known Military Balloon Installation site present and there is potential for associated military archaeological sites reflecting the use of the high ground as part of the civil defence for WWII.

Waste Management

The County Council is the Waste Disposal Authority (WDA) in the area and as such has a statutory duty to provide Household Waste Recycling Centres (HWRCs) and Waste Transfer Stations (WTSs) with sufficient capacity to accept arisings from across the county. Maidstone Borough Council is the Waste Collection Authority (WCA) in the area responsible for kerbside collection.

The nearest County Council HWRC for this development is Allington HWRC. The County Council continues to request developer contributions towards this site for the inclusion of a reuse shop, which provides additional capacity to support future housing growth. It should

be noted that the nearest HWRC geographically is the Medway Council operated Capstone Road HWRC, which is within a five minute drive of the proposed development. However, this is currently not available to Maidstone residents.

Libraries

It is very likely that any new development of the scale at Lidsing will require additional access to existing libraries, both in the Kent and Medway authority areas. We do not envisage the development of new library buildings, but through future planning applications we will seek developer contributions to mitigate against the impact of the scheme.

Minerals and Waste

The County Council has no land-won minerals or waste management capacity safeguarding objections or comments to make regarding this draft SPD.

Public Rights of Way

The Public Rights of Way and Access Service is pleased that the existing PRow network is acknowledged and that the ambition is to integrate existing provision into greenspace, encourage connection to the network with new provision and to encourage its use for utilitarian journeys and recreational use.

The County Council asks that the [Rights of Way Improvement Plan - Kent County Council](#) (ROWIP) is referenced.

Please see below for further specific comments on the sections within the Supplementary Planning Document Consultation:

Paragraph 3.2.2 – Flood Risk

Flood and Water Management

The County Council is pleased to note that the Flood Risk is considered in paragraphs 3.2.2 to 3.2.4 and makes mention to Maidstone's Strategic Flood Risk Assessment. As indicated in the document, the County Council will expect the sequential approach to be applied to any layout design(s) with the most 'at risk' property types to be sited outside of any known flood zones or flow paths.

The County Council would remind Maidstone Borough Council (MBC) of the requirements of chapter 14 of the NPPF, specifically paragraph 182.

Further to this, the County Council would also remind MBC that earlier this year, DEFRA published updated technical guidance on the expected principles and standards to be applied - [National Standards for Sustainable Drainage Systems](#) to Sustainable Urban Drainage Systems (SuDS) design. This requires drainage strategies to demonstrate a full 'SuDS Approach' to surface water management and discourages the use of pipe-to-basin designs. The County Council would expect such features to be incorporated into any proposals.

The County Council would encourage that SuDS should be considered from the outset of master planning, in order to distribute features throughout the development and integrate as effectively as possible with the wider landscape design. They should seek to maximise multifunctional benefits such as source control, treatment of runoff, and amenity value from open SuDS features, while also reducing the need for large underground systems and tanks.

The County Council would be willing to attend master planning sessions going forward to advise MBC further.

3.2.14 Heritage & Archaeology

Heritage and Archaeology

In view of the limited nature of the Kent HER, there is an urgent need for preliminary archaeological desk-based and fieldwork assessments to ensure the Lidsing Garden Community scheme considers the historic environment fully and appropriately. Archaeological Consultants for the scheme, RPS, have been liaising with the County Council regarding essential preliminary assessment and welcome this requirement being set out in section 3.2.16 of the SPD.

Heritage and Archaeology is considered within the SPD for Lidsing Garden Community (3.2.14 – 3.2.16). In addition to the Maidstone Heritage Impact Assessment (2021) and the Lidsing Archaeology and Cultural Heritage Scoping Report (2021), the SPD has been informed by preliminary heritage assessment including a Cultural Heritage Desk Based Assessment (DBA) by RPS and a Geophysical Survey by Magnitude. Discussions regarding further preliminary fieldwork have included consideration of targeted trial trenching, metal detecting survey and fieldwalking. The County Council has not received reports on these works yet and would ask that the need for these is recognised in the SPD.

3.2.17 Movement & Connectivity

Highways and Transportation

Paragraphs 3.2.17 to 3.2.22 of the SPD provide a concise overview of the existing transport networks in the vicinity of the site. The main corridors for active travel, public transport and road traffic have been appropriately identified.

It is noted that reference is made to the high traffic volumes and peak period congestion typically prevalent at M2 J3. This underlines the importance of capitalising on the opportunity to achieve access via M2 J4 as part of mitigating potential impacts on this part of the network.

The SPD also identifies the provision of east-west connectivity across the site, which is vital to linking the new and existing communities in a manner that encourages sustainable travel.

5.2 Land Use Framework

Highways and Transportation

The Land Use Framework is appropriate in how it locates the local centre at the heart of the development site. This will minimise distances to local facilities for residents, employees and visitors, thereby enabling many journeys to be undertaken by walking and cycling.

The proximity of the employment area to M2 J4 is supported in how it ensures the associated vehicle movements are discouraged from using the local road network.

5.4 Movement & Connectivity Framework

Highways and Transportation

The Access and Movement Framework is understood to have been developed with regard to the principle of sustainable accessibility, whereby the needs of active travel modes and public transport are prioritised ahead of those of the private car. The County Council supports this approach, which aligns with the sustainable transport objectives within the NPPF.

The Framework covers the key elements of transport provision in how it features a network of pedestrian and cycle routes that extend across the site whilst also linking to surrounding areas. The inclusion of route connections to Walderslade, Hempstead and Bredhurst is appropriate in helping to ensure walking and cycling are the modes of choice for local journeys.

It is the view of the County Council that the bus route through the site will provide direct access to public transport services for longer distance journeys. It is noted that the bus route incorporates the local centre and employment area, thereby ensuring these key destinations are suitably accessible.

Road access to the site via M2 J4 has been included alongside the east-west road link extending to North Dane Way. This route is critical in discouraging the use of alternative local roads to M2 J3, as acknowledged within the Transport Annex.

The Movement and Connectivity Framework highlights how a sizable residential area on the south-western periphery of the site will be more remote from the local centre and bus route. There is a need for this area to be afforded better levels of accessibility through closer proximity to these key facilities or direct linkages to equivalent facilities in Lordswood and this should be reflected in the SPD.

The issue of whether an M2 J4 spur is delivered is of importance to the County Council, as Local Highway Authority, on the basis that the SPD identifies interim measures such as apparent utilisation of the local road network (including potentially Maidstone Road on the County Council network). The SPD states that no further work on this large-scale scheme for M2 J4 spur has been undertaken or will be for the foreseeable future because it is considered at odds with vision and validate/monitor and manage approaches to planning. This is a concerning approach and effective planning ahead should not be set aside. Given the M2 J4

spur is large scale and is stated as an essential part of the network proposals for the Lidsing Garden Community, it is very high risk to not undertake suitable planning and design work to establish the impacts, costs and deliverability of the spur.

Kent and the wider country has plenty of examples of planned infrastructure for development proving to be more expensive than first imagined, or harder to deliver in design and approvals terms. Without progressing the M2 J4 spur proposals at this point, the SPD should establish and set out what the alternatives would need to be to the spur in the event it is subsequently determined that the spur cannot be delivered.

The SPD recognises that mitigation interventions on the wider highway network may be required but that these should be subject to monitor and manage to determine whether they are needed over and above any alternative sustainable travel measures. The delivery of the M2 J4 spur will have a key bearing on journey route choice so its influence will form part of this monitor and manage process.

5.5 Placemaking & Design Framework

Highways and Transportation

It is noted that the Placemaking and Design Framework positions the higher density housing close to the local centre and bus route. This is appropriate in how it maximises the number of houses within close proximity of these facilities.

6.3 Heritage

Heritage and Archaeology

The County Council considers that within this SPD it is appropriate to have further consideration of the historic environment as set out in paragraph 6.3.

The County Council welcomes paragraph 6.3.4 which highlights the limited nature of formal archaeological fieldwork in this area and that the site has potential for significant archaeological remains. Further preliminary archaeological fieldwork and historic landscape assessment is needed as the strategic site progresses through the planning stages. But it should be stressed that it is essential that sufficient archaeological fieldwork is undertaken to ensure the master-planning process is fully informed. It is at the strategic site-wide master-planning stage that archaeological constraints and opportunities are fully understood and integrated appropriately into the layout and design of the Lidsing Garden Community scheme.

The County Council welcomes the specific section on the Military Balloon Installation site (paragraph 6.3.5) but stresses that further archaeological assessment is needed to ensure any associated military sites are identified. Evidence of WWII activities are part of the special historic environment for this SPD and a group of 20th century military sites might be a constraint on development but could also be an opportunity and feed into place-making and inspiration for the design of the public realm.

The County Council considers that the Key Principles/Guidance for Heritage is welcome but notices that it does not include appropriate reference to archaeology. There is a focus on the military balloon installation, and it does not cover the full range of the archaeological resource. There is potential for significant archaeology of prehistoric or later date, not just the 20th century military installations, and the full range and diversity of the potential archaeological resource needs to be considered.

The County Council recommend the Key Principles/Guidance Heritage points include the following:

Point b. - Archaeological Resource:

- Any strategic masterplan for Lidsing Garden Community needs to ascertain the significance of any archaeology on the site to enable this to inform the masterplan and provide reasonable guidance for subsequent planning applications. As such the following is needed:
 - Phased programme of archaeological work, including trial trenching, landscape surveys, assessment of significance, following discussion with Kent County Council Heritage and Maidstone Borough Council.
 - Suitable programme of archaeological fieldwork and safeguarding measures need to be set out to support subsequent planning applications;

Point c. Development proposals must be informed by an understanding of the significance of the Military Balloon Installation, and as such:

- A statement of significance and a desk-based survey should be submitted with the application.
- An informed programme of interpretation and community activities is required to ensure public access to the heritage with suitable integration of the heritage into the public realm.

The County Council would like to encourage the implementation of further preliminary fieldwork including targeted trial trenching, metal detecting survey and fieldwalking. This is to ensure the master-planning process is sufficiently informed and has the ability to identify archaeological constraints and opportunities at an early stage and certainly prior to any planning applications.

6.6 Movement & Connectivity

Highways and Transportation

The County Council is supportive of active travel modes being placed at the forefront of the layout and design, with priority being afforded to pedestrians and cyclists over other road users. Such an approach is essential to encouraging healthy and sustainable lifestyles in preference to car use.

The inclusion of active travel connections to Hempstead, Lordswood, Walderslade and Bredhurst is appropriate in how it will connect the existing and new communities.

The inclusion of a route that enables buses to operate through the site via the local centre is welcomed. The County Council supports the principle of all residential and employment buildings being within 400m of the bus route to aid convenience. The guidance highlights the need for early delivery of the bus route. This is supported in how it enables bus services to be made available at the outset.

It is noted that the bus route will be designed to afford buses priority over other vehicles. The County Council agrees that priority of movement will assist service reliability, whilst also minimising the additional journey time for existing passengers on diverted services and potential additional operating costs. The need for discounted travel incentives to encourage use of the services is agreed.

The County Council would ask that the access to the bus route from the residential area on the south-western periphery of the site should be reviewed, as Figure 32 demonstrates that it will be beyond a 400m walking distance to bus services.

The County Council would ask that the guidance acknowledges how the off-site sections of the bus routes described in section 4 of the Transport Annex will need to be reviewed to identify whether measures could be required to assist or prioritise bus movement. This reflects the importance of the door-to-door journey times in comparison to that of the car.

The guidance outlines how the streets within the development site will function in respect of vehicular traffic. No commentary is included on how the off-site impacts of vehicular traffic on the wider highway network will be managed and mitigated, although this is covered within section 7 of the Transport Annex as part of the monitor and manage process. It would be helpful to include a reference to this content within the SPD.

The County Council is supportive of the 'Monitor and Manage' approach to off-site highway improvements, which is aligned with national policy and provides an ongoing basis for reviewing the extent and timing of required mitigation interventions.

The Transport Annex has confirmed how the east-west link road and access via M2 J4 is expected to influence route choice. This will form part of the 'Monitor and Manage' process to determine whether improvements elsewhere on the network should be implemented to mitigate the impacts of the development. This affords scope for alternative interventions to be identified that prioritise sustainable travel modes, subject to County Council agreement.

6.7 Placemaking, Density & Character

Highways and Transportation

The County Council is supportive of the principle of clustering the highest density housing around the local centre and bus route. This will encourage walking and cycling, whilst also delivering increased patronage for bus services that will help to sustain them in the longer term.

6.9.1 Housing Mix

Adult Health and Social Care

The County Council would encourage the Lidsing Garden Community developers and MBC to engage with its Adult Social Care (ASC) Team to ensure correct provision of certain housing and accommodation need types for adults.

The County Council would ask that there is inclusion in the SPD of more precise information around future ASC need i.e. currently there is an over-supply generally in the market of standard residential care, and a notable under-provision of dementia and nursing care, which are increasingly needed as the population ages and care needs become more complex.

To address these challenges, the County Council recommends the following for inclusion in the development of this SPD:

- Rebalancing Residential Provision:
Rather than additional standard residential care, future provision should focus on:
 - Dementia care
 - Nursing care
 - Extra Care Housing – there is significant need for at least one extra care housing scheme in the district
- Accessibility Standards:
All new housing developments should meet:
 - Part M4(2) of the Building Regulations (accessible and adaptable dwellings)
 - A proportion should meet Part M4(3) (wheelchair user dwellings), based on local evidence of need.
- Supported Living:
 - There is a need to increase the supply of modern, fit-for-purpose supported living schemes for working age adults, particularly for people with learning disabilities, mental health needs, and complex care requirement.
- Modernisation and Cost-Effectiveness:
Residential and nursing homes must be:
 - Modern and fit for purpose
 - Financially sustainable, including consideration of long-term affordability for local authority placements.
- Assistive Technology:
 - All new specialist housing schemes should embed assistive technology from the outset, supporting independence and reducing long-term care costs.

These comments below are drawn from the (draft) [KCC ASCH Market Position Statement](#) (MPS) and the [Report Kent Adult Accommodation Strategy Evidence Base 2025-06-23](#)

6.10 Sustainable & Healthy Design

Energy and Climate

The County Council is supportive of section 6.10 Sustainable & Healthy Design. In relation to overheating, the County Council recommends following the cooling hierarchy ([GLA policy](#)) and using dynamic thermal modelling (as mentioned in the [part o building regs](#)) where applicable and would ask that this be incorporated into the SPD.

Biodiversity

The County Council believes the principle of what is said in the Key Principles/Guidance – Sustainable Design - Biodiversity - points J-P is sound but highlights the following points:

The County Council would ask that the SPD reflects the fact that ecological surveys need to be carried out prior to the planning application being submitted. This ensures that the results are used to help inform the detailed design of the proposed development and ensure that it is following the Biodiversity Net Gain (BNG) mitigation hierarchy and help them achieve the minimum required.

Any proposed Biodiversity Net Gain (BNG) needs to take in to account any additional requirements associated with the Species Mitigation e.g. where species mitigation is required the habitat creation can only be counted up to 0% BNG and cannot count towards the 1-20% as any BNG needs to be over and above any habitat creation requirements which would have been required pre BNG. The following guidance should be taken into account - [What you can count towards a development's biodiversity net gain - GOV.UK](#)

MBC must be looking to include integrated features into all new buildings as well as enhancements throughout the site. Point m should therefore be amended as follows: *"The development ~~should~~ **must** incorporate integrated ecology and biodiversity measures such as appropriately sited bird, bat and bee bricks and boxes"*.

The County Council would ask that the submitted plans must demonstrate that retained habitats (including Veteran trees) and associated buffers will be retained and that habitats will not be subsequently encroached.

The County Council would ask that an outline management plan must be submitted with the outline application. It must provide an understanding of who will be responsible for the management plan and it must demonstrate that the proposed habitat retention, enhancement and creation can be retained/maintained for the lifetime for the proposal. Where habitat creation, enhancement or retention is proposed, it must be with an understanding of how the site will be used by the residents to ensure that what is proposed within the BNG metric can be achieved.

6.11 Local Centre

Highways and Transportation

The County Council is supportive of the requirement that the local centre is centrally located within the site in close proximity to the school. This capitalises on the opportunity to maximise its accessibility and the scope for linked trip purposes.

The County Council is also supportive of the inclusion of a mobility hub as a focal point for travel interchange. This will discourage car use by promoting alternative forms of transport. The mobility hub should include a facility for the drop-off and collection of goods by residents. The County Council would suggest that the SPD should clarify how the Mobility Hubs will be adequately funded and maintained by the developer(s) in perpetuity.

6.12 Education

Education

It is suggested that the following be laid out in the SPD:

Primary Education:

- The County Council's land requirement for a 3FE primary school is 3 Ha to appropriately accommodate 630 pupils
- The primary school site should also have an allowance for 26 nursery places
- The school should be developed at minimum to the Government's BB103 standard
- The land must be provided at nil consideration / £1
- The land must be provided unencumbered, on a level site and in line with the [Technical-Appendix-8 KCC-General-Transfer-Terms](#)
- Opportunities for primary pupils to access the proposed school through active travel means (safe walking and cycling routes) should be maximised.
- Drop off and pick up of school pupils should be within the confines of the school perimeter on an in and out loop access basis.

Secondary Education:

- The narrative on secondary education not being required on site is noted. It is understood that Secondary education infrastructure will be provided at Medway Schools, and that it is Medway Council's preference at this time to set the contributions rates that are required for school build and land contributions. If that is formally agreed as the way forward, the County Council will submit its infrastructure consultation response to any forthcoming planning application for the Lidsing Garden Community on secondary contributions at the agreed rates, which will be transferred to Medway Council once received.

Community Learning & Skills (CLS) (Adult Learning infrastructure):

- CLS services either operate out of main town adult education centres, or on an outreach basis at suitable venues, such as community halls. It is feasible to assume

that future community buildings at the site may be a future option for the operation and delivery of adult education classes.

7.2 Infrastructure Delivery

Highways and Transportation

Section 7.2 highlights how the success of the development will be dependent on the timely delivery of infrastructure. The County Council regards it to be essential that the phasing and delivery schedule enshrined within Policy LPRSP4(B) is adhered to in order to deliver the vision for the development and to ensure its impacts are adequately mitigated in accordance with the NPPF.

Developers will generally be expected to fund and deliver transport infrastructure with County Council oversight via the S278 Agreement process. This is intended to minimise delivery risk and ensure it is provided at the point it is needed. The County Council would ask that the content within section 7.2 be expanded to capture this approach.

7.6 Planning Application Process

Highways and Transportation

The County Council is supportive of the guidance in sections 7.1 and 7.6 of the SPD, which seeks to avoid a fragmented approach to planning application submissions. A comprehensively planned Garden Community affords the best opportunity to ensure timely delivery of the supporting transport infrastructure and associated benefits for the new and existing communities.

Transport Annex (Supporting Document)

Highways and Transportation

The Transport Annex provides important additional detail on the local transport networks. It identifies how several roads run through the site, including Lidsing Road, Westfield Sole Road and Forge Lane. These routes will need to be accommodated, and the County Council is supportive of the principle of active travel and public transport movement being prioritised. It is noted that the opportunity to utilise Forge Lane as a direct, attractive link to Bredhurst village has been identified.

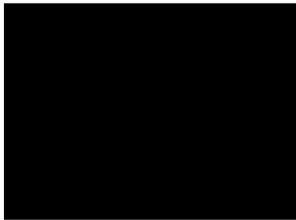
Section 4 of the Transport Annex outlines how existing bus services could be reconfigured to serve the development. This reflects the importance of achieving public transport connectivity to key destinations further afield, including Lordswood, Chatham and Maidstone.

The County Council notes that the methodology framework to be applied in modelling residual traffic impacts across the highway network is included in Section 6 of the Transport Annex. This acknowledges how the modelling will need to capture travel demand across the

wider Medway and Maidstone areas. It should however, also confirm that key junctions in the northern and eastern parts of the Maidstone urban area will be included.

The monitor and manage approach described in Section 7 of the Transport Annex is supported in how it includes the need for specific off-site monitoring in Bredhurst and Boxley villages to determine whether mitigation interventions are required at these locations

Yours faithfully



Simon Jones
Corporate Director – Growth, Environment and Transport