

# Advice Note 03

## Spatial Planning Framework Commission

<b>Job number:</b>	K593		
<b>Job title:</b>	Lidsing Garden Community SPD		
<b>LPA name:</b>	Maidstone Borough Council	<b>LPA Ref:</b>	N/A
<b>To:</b>	Kevin Bown	<b>cc:</b>	
<b>Topic:</b>	Review of Draft Supplementary Planning Document (SPD)		
	<b>Prepared:</b>	<b>Checked/Approved</b>	
<b>Name:</b>	Kelly Chiu / Hazel Morton	Derek Jones amended by K Bown (paras 1,19)	
<b>Date:</b>	08/12/2025	08/12/2025	15/12/25

Throughout this response any **ACTION POINTS** for the applicant are shown as **bold underlined**.

## Introduction

- 1 National Highways has been consulted by Maidstone Borough Council (MBC) on 3 November 2025 in relation to the Lidsing Garden Community Draft Supplementary Planning Document (SPD) to guide the development of the Lidsing Garden Community strategic site (133.25ha), which is an allocated site in the adopted Maidstone Borough Local Plan Review (LPR) 2021-2038. The consultation period ends on 15 December 2025.
- 2 The following JSJV Advice Note 03 (AN03) provides an appraisal of the consultation document, with reference to comments previously provided by National Highways to MBC earlier in 2025 during the preparation of the Draft SPD. Where relevant, reference is also made to the Transport and Movement Annex which is provided as supporting evidence to the main consultation document.

## Development Proposals and Site Location

- 3 The Lidsing Garden Community allocation, as per Policy LPRSP4(B), includes:
  - 2,000 residential units
  - 14 hectares of employment land
  - 44.07ha of open spaces
  - 1 new 3 form entry primary school
  - 1,500sqm of retail
- 4 Figure 1 below shows the location of the site in the context of its relationship to the M2 Corridor and specifically M2 J4.
- 5 It is noted that the Site is a short distance to the south of the boundary of the Medway Borough Council area.

Figure 1 Lidsing Garden Community Site Location



Source: Draft SPD (November 2025)

## Previous Engagement

- 6 National Highways has engaged extensively with MBC and their consultants, and KCC Highways, as part of the preparation and adoption processes for the current Local Plan (adopted in March 2024).
- 7 The Infrastructure Delivery Plan (IDP) currently supporting the adopted Local Plan has been prepared to reflect comments from National Highways and KCC Highways on the various planned transport mitigations. This document is updated annually and will also be relevant to the Monitor and Manage process which has been established as a principle via the Local Plan policies, but which will need to be brought into action as part of the delivery of Local Plan sites. The SPD and subsequent OPA TAs will need to provide further detail on how this will be achieved.
- 8 National Highways provided comments on an earlier draft version of the SPD, and the supporting Transport and Movement Annex in August 2025. (These comments can be found in JSJV AN02 dated 1 August 2025).
- 9 We note that there is also a parallel consultation on the Heathlands Strategic Site Draft SPD. Therefore, whilst this JSJV AN03 concerns Lidsing, JSJV is aware of the need to ensure consistency in the approach to both strategic sites.

## Comments on Draft SPD

- 10 This JSJV AN03 will focus on aspects of the Draft SPD which are relevant to the SRN, with reference to previous National Highways comments made in August 2025 in relation to the previous Draft SPD.

## Section A: Background

### Introduction

- 11 The Lidsing Garden Community SPD is a requirement of the Local Plan Review 2021-2038 Policy LPRSP4(B) which states:

*'The council will work with the promoter to produce an agreed Supplementary Planning Document to masterplan and facilitate the site's delivery.'*

- 12 A Lidsing Vision Document Masterplan Framework was produced by the site promoters to support the allocation in the Local Plan Review 2021-2038. This was built upon by the SPD to create a master plan framework.
- 13 To inform the Draft SPD, a range of technical analyses and site-specific assessment was undertaken. This includes work from the Maidstone Local Plan Review 2021- 2038 to support the allocation of the site and some new topic papers that summarise previous work and update where necessary.
- 14 The SPD has been developed through a series of work stages:
  - Stage 1 – Early Engagement
  - Stage 2 – Preparation of Draft SPD
  - Stage 3 – Formal Public Consultation on Draft SPD
  - Stage 4 – Preparation Final SPD
  - Stage 5 – Adoption of the SPD
  - Planning Application
- 15 The SPD is currently at Stage 3 of the process and National Highways has engaged with MBC during the earlier stages, providing feedback, which has informed the Draft SPD.

#### **Future Stages of Work**

- 16 The core purpose of the SPD is to support and provide guidance at this stage in the planning process, prior to the submission and consideration of planning applications for the Garden Community.
- 17 As previously requested by National Highways, the Draft SPD now includes a clearer, albeit still quite high-level, explanation of what is anticipated to be dealt with at each stage of the process, from pre-application engagement regarding SPD guidance, outline planning application, submission of reserved matters etc. through to delivery of development.
- 18 It is noted that all subsequent stages of work will be subject to appropriate levels of consultation and engagement with all key stakeholders and that ultimately, MBC as LPA (together with input and consideration by KCC) will retain the key decision- making role to ensure that the overall vision and objectives for the Garden Community will be realised.
- 19 National Highways has adopted a flexible approach with regards what is produced by way of evidence at the Local Plan, SPD and/or application stages, but has been clear throughout what evidence does need to be produced ahead of any consent. This is to ensure that National Policy in C01/22 and the NPPF regarding the assessment and mitigation of any impacts on the SRN are complied with.

### **Policy Context**

#### **National Planning Policy**

- 20 As previously requested by National Highways, the Draft SPD now references DfT Circular 01/2022, alongside the National Planning Policy Framework (NPPF) December 2024 update, supported by National Planning Policy Guidance (NPPG). This sets out a vision led approach to transport planning and we note that this will be explored further in the accompanying transport annex in respect of how it will be applied to the Lidsing Garden Community.

#### **Local Planning Policy**

- 21 The Local Plan's policy framework for Lidsing Garden Community is set out in Policy LPRSP4(b): Lidsing Garden Community. This explains the overarching site requirements, land use parameters and references the promoter's original masterplan vision framework plan.

- 22 It is noted that development at Lidsing Garden Community will need to comply with the site allocation in the Local Plan Review 2021-2038. The SPD is a material consideration which provides guidance as to how that can be achieved and should be read alongside the Local Plan Review and other documents in the Development Plan.

### Site Context

#### Location

- 23 The site is located north of Maidstone town separated from it by, two motorways (M20 and M2) and the Kent Downs National Landscape (KDNL). The KDNL provides the strategic gap between Maidstone and the Medway urban area.
- 24 It is noted that, to the north and west are sites with planning permission and presently being developed or close to commencement. These include East Hill and Gibraltar Farm in Medway Council's area and Gleaming Wood Drive within Maidstone Borough area.

#### Flood Risk

- 25 The site is formed of agricultural farmland with smaller pockets of housing within it. The Draft SPD states that there is some surface water flood risk within the site. As such the scheme will need to control the distribution of surface water to minimise flood risk.
- 26 **Given the proximity of the site to the M2 motorway, we expect that National Highways will be consulted on the surface water strategy and mitigation of flood risk measures.** Paragraph 59 of Circular 01/22 should also be referred to in relation to such matters.

#### Movement and Connectivity

- 27 The site is adjacent to the SRN, the M2 motorway runs south of the site area (with the exception of circa 20ha of land located within the National Landscape south of the M2).
- 28 M2 Junction 4 is a three-arm junction, with the potential for an additional access arm to the south. The principle of the provision of a fourth arm has been established via the Local Plan assessments and is accordingly referenced in site-specific Local Plan policies. The SPD document (and supporting Transport Annex) confirm that further technical details of the proposed improvement will be included with the Transport Assessment supporting the outline planning application. **It is stated within the Transport Annex that the design of the junction will be refined through additional transport modelling work; the proposed process for this is set out in detail in section 6 of the Transport Annex and this is consistent with the technical discussions that have been held with the developer during preparation of the draft SPD. It is expected that this process will be followed in due course and that National Highways will be consulted on relevant assumptions and details at each stage.**
- 29 M2 Junction 3 is located west of Lidsing. It is noted that this junction experiences more significant traffic flow and peak congestion and is a key route to the Medway towns and a main link south to Maidstone. Confirmation of the development-specific flows at this junction is to be provided as part of the TA assessments.
- 30 North Dane Way lies to the west of the Lidsing Garden Community site and the Medway Southern Peripheral Route was historically planned to connect this road with the M2 but was never implemented and the road terminates within Lordswood.
- 31 Whilst there are various Public Rights of Way (PROW) and footpaths within the site, it is noted that there are no National Cycle Routes through/near the site and there are no bus routes/bus stops within the site.

#### Opportunities and Constraints

- 32 The Draft SPD identifies the principal constraints and opportunities of the site, which have informed the development of the masterplan.
- 33 Key opportunities listed include improved access to the M2 at Junction 4.

- 34 Key constraints include areas of surface flood water risk within the site, and the setting of listed building within Bredhurst, particularly where the new link to the motorway is to be formed.

## Section B: Vision, Objectives & Spatial Framework

### Vision and Objectives

#### Vision

- 35 The Draft SPD states that the Lidsing Garden Community will play a key role in achieving the overall vision for Maidstone as is currently set out in the adopted Local Plan.

#### Lidsing Garden Community

- 36 The Draft SPD outlines the vision for the Lidsing Garden Community, as per adopted Local Plan Review policy, and then builds on that with objectives that will help to deliver that vision.
- 37 The Draft SPD now includes a specific objective of 'Active Streets':

*'Streets will be designed for people over private vehicles. It will be a place where active travel and public modes of transport are the most convenient, appealing, and efficient choices for short journeys; and it is the intention to provide attractive sustainable transport links to key external destinations in Medway and to Maidstone Borough.'*

- 38 The wording of the above objective matches the previous suggestion from National Highways.
- 39 JSJV note that the list of community objectives also includes:

**☑ Securing integrated sustainable transport:**  
*Provide excellent sustainable connections and environments that make walking, cycling and public transport the most attractive method of travel, maximising the opportunities presented by the East-West link road.*

### Framework Plans

#### Movement and Connectivity Framework Plan

- 40 The Draft SPD includes various framework plans which come together to create the spatial framework plan. These include:
- Movement and connectivity – establishes the street hierarchy, key connections to and from the site and transport options.
- 41 National Highways previously recommended that this framework plan should refer to Vision and Validate as a concept (i.e. how the information in the Framework plan will provide guidance as to measures will contribute to the evolution of transport provision over time). We note that this recommendation has not been included within the Draft SPD but is instead discussed within the Transport Annex. **We therefore wish to re-iterate that this topic will need to be addressed in full within the forthcoming TA report and may also need to be reflected in the relevant Parameter Plan(s).**
- 42 National Highways also previously requested that brief commentary should be provided as to the assumptions about bus routes which would serve the identified bus stop locations (or alternatively a reference / link given to where further bus commentary is provided). It is not clear how any buses would serve the stop indicated in the south-west corner of the site.
- 43 JSJV note that 'Figure 24: Movement & Connectivity Framework' of the Draft SPD has been revised since the previous version was commented upon. Changes include the location of bus stops and an amended bus route through the site. **However limited information regarding the proposed bus routes and bus stop locations has been provided and this will need to be addressed fully as part of the TA report.**

## Section C: Placemaking and Design Guidance

- 44 The Draft SPD provides guidance on specific parts of the emerging masterplan to guide subsequent planning applications and will be used in the decision-making process alongside the relevant policies in the Maidstone Borough Development Plan.

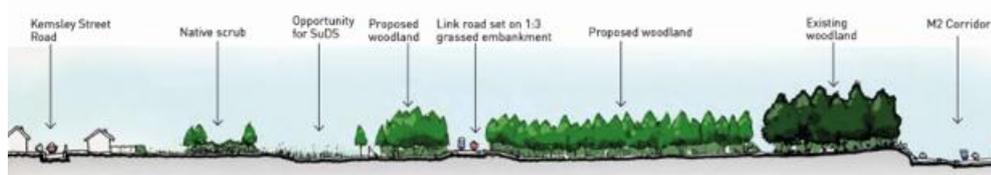
### Design Code

- 45 The Draft SPD states that it is expected that there will be a Design Code to follow as part of the planning application process for the site, prior to any reserved matters applications.
- 46 It is noted that the Design Codes will be broadly in accordance with the Lidsing Garden Community SPD.

### Landscape

- 47 It is noted that the area to the south of the M2 is broadly to be used as open space following the principles of design laid out in Figure 29 of the draft SPD, reproduced as Figure 2 below.

Figure 2 Cross-section of the land south of the M2 Junction 4



Source: Draft SPD

- 48 The Draft SPD also states that 'Landscape buffers shall be provided to the major transport corridors of the M2 and to the Kent Downs National Landscape to the south. The form of planting and landscaping shall be informed by noise surveys and discussions with the Kent Downs National Landscape'
- 49 **National Highways must be consulted on any 'landscape buffers' to be implemented adjacent to the M2 corridor.**

### Open Space

- 50 **Further consultation with National Highways will be necessary regarding the following aspects:**
- **Land South of the M2 Junction 4 (as indicated within the indicative open space plan)**
  - **Green Bridge (across M2 Motorway)**

- 51 We are satisfied that the information provided within the draft SPD is sufficient at this stage.

### Movement & Connectivity

#### Active Travel

- 52 It is noted that the site has the opportunity to enhance the existing network to help provide for Active Travel.

#### Public Transport

- 53 As previously requested by National Highways, the Draft SPD now provides clarity on what was described as a 'regular' bus service. It is stated that the bus route must support the provision of a regular (half hourly) and frequent service connecting the site to Medway and Maidstone.

### Key Principles/Guidance

## Active Travel

- 54 National Highways previously requested that the guidance should refer to how cyclists will be accommodated as part of street design (i.e. where a dedicated cycle path will not be present).
- 55 We note that the guidance has been updated to include references to Active Travel England Guidance and LTN1/20 guidance or successor document standards.

## Public Transport

- 56 **National Highways previously requested that the 'key outer destinations' to be served by public transport should be identified at point f (previously point 1). This comment remains outstanding.**
- 57 We note that point g (previously point 2) has been expanded, as requested, to include information on how the stated aim would be achieved; this clarification is considered acceptable.

## **Character Areas**

- 58 Through the development of the evidence base of the Local Plan Review to inform the Lidsing Vision Masterplan, it is noted that a total of 5 neighbourhoods emerged including:
- 'LCZ 3 – Southern Edge M2' with the following principles to be followed:

*'k. Noise attenuation measures will need to be incorporated along the southern boundary with the M2.*

*l. New landscape planting along this edge to provide visual screening from the M2 as well as providing any required screening of development from the Kent Downs National Landscape to conserve and enhance this landscape.*

*m. Continuous diverse building frontages to help reduce noise impacts from the M2.'*

- 59 **In relation to the need for and form of any noise attenuation measures, attention is drawn to paragraph 55 of DfT Circular 01/22.**
- 60 **In relation to any boundary treatments along the M2, National Highways must be consulted at each stage of the planning process.**

- 'LCZ 5 – Infrastructure Provision':

*'Please see opens space section of the SPD entitled 'Land South of M2 Junction 4' for details.'*

- 61 **As previously noted, further consultation with National Highways will be necessary with respect to any infrastructure provision in relation to, or which could potentially impact on the SRN.**

## **Employment Area**

- 62 It is noted that the 14ha employment hub will comprise a flexible mix of office, light industrial, and storage/ warehousing units with the following target mix of floorspace:
- Office (15%)
  - Light industrial uses (35%)
  - Storage/warehousing (50%)
- 63 In respect of these proposals, we would reiterate that it is recognized that the mix of employment uses needs to remain flexible to enable appropriate opportunities to be taken up as the site develops. **However, any provision of B8 Parcel Delivery as part of the allocated**

**employment space will require its own bespoke transport analysis as part of the Outline Application, or we will be likely to recommend a condition covering the matter.**

## Section D: Delivery Framework

### Overview

- 64 As previously requested by National Highways, we note that the wording of the Draft SPD has been updated to specify that access details will also need to be considered at Outline Planning Application stage. It is stated that individual development parcels are then likely to come forward as reserved matters applications within distinct land parcels defined by appropriate planning application boundaries.

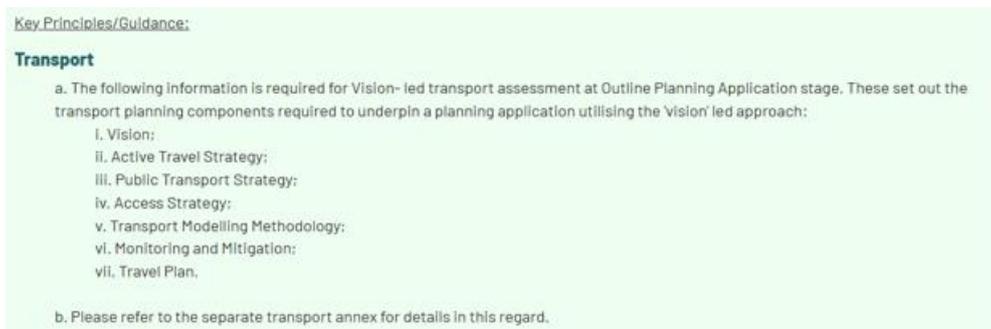
### Infrastructure

#### Infrastructure Delivery

- 65 We would note that the phasing of the infrastructure proposals is consistent with the previous version of the Draft SPD reviewed by National Highways. **However, we would re-iterate that all current trigger points for transport mitigations will need to be re-assessed and confirmed as part of the Transport Assessment for the OPA.**

### Transport

- 66 As previously noted, this section of the Draft SPD provides a suitable summary of the expected approach to transport matters.
- 67 We note that a proposed transport and movement framework accompanies the Draft SPD and will be used as the basis for subsequent planning applications. Comments on an earlier version of the transport and movement framework were provided by National Highways in August 2025.
- 68 Within the IDP the following transport interventions have been set out for the Lidsing Garden Community:
- M2 Junction 4 improvement works
  - Improvement to existing bus services to serve the development
  - New bus services from the site
  - New walking and cycling routes in the site and connections to the north and south along the Capstone Valley and east and west to Medway
  - Off-site highway improvement works to the local highway network in Medway and Kent and the M2 Motorway
- 69 The Draft SPD also includes the following key Principles/Guidance regarding Transport:



### Governance and Stewardship

- 70 This section of the Draft SPD sets out the governance and stewardship arrangements for the Garden Community. National Highways previously noted that the intention to establish a steering group for the application of Monitor and Manage could be referenced within this section. **However, we note that the text does not include reference to a steering group in this particular section of the Draft SPD in relation to Monitor and Manage matters, and we would suggest that this could be added.**

## Planning Application Process

71 We note that there has been a minor change to the wording in relation to access:

*'This will establish the overall scope and scale of development and a set of design and development parameters, such as access, the disposition of land uses and scales of proposed built development.'*

72 National Highways previously commented that an application, even if hybrid, must be accompanied by a TA and sufficient detail to assess the wider highways and transport implications. As such, in order to demonstrate NPPF and DfT Circular 01/2022 compliance on these matters, an applicant must, and in practice will, assess "access". **We note that it is assumed that the TA structure and contents set out in the Transport Annex will be adhered to, to ensure that this requirement is met.**

## APPENDIX A: ANTICIPATED S106 REQUIREMENTS

73 National Highways previously noted that a Monitor and Manage / Transport Steering group should be identified as a specific requirement to be secured via a Section 106 agreement, as should the actual Monitor and Manage strategy itself. These will link to, but be discrete from, any specific transport mitigations which are required to be delivered regardless of the Monitor and Manage strategy.

74 We note that Appendix A has been updated to include references to *'the monitor and manage mechanism that should be enshrined in the S106 agreement.'* as part of the requirements relating to *'Public Transport and Active Travel'*, and *'Off-site Highway Improvements'* provisions.

75 It was also previously noted that the entry relating to *'Off-site Highway Improvements'* needs to be caveated. National Highways cannot accept financial contributions. Rather, developer led fully funded, developed and delivered works secured through conditions and S278 agreements will be required. As such, we welcome the addition of the clarification that *'Improvements to the Strategic Road Network managed by National Highways will be led and fully funded and delivered by the developer and secured through S278.'*

## APPENDIX B: ANTICIPATED PLANNING APPLICATION REQUIREMENTS

76 National Highways previously highlighted the need to include the following:

- A Transport Assessment (TA) in accordance with the relevant prevailing national and local planning policy and guidance, and fully compliant with the requirements of National Highways and KCC
- A site wide Travel Plan
- A Construction Traffic Management Plan or Construction Environmental Management Plan to be submitted and agreed as part of each major phase of development

77 We note that these elements are now listed in Appendix B (extract below):

Transport Assessment and Travel Plan	To be compliant with the latest Kent County Council Highways & National Highways guidance. Details of what are to be included can be found in Appendix C of the SPD. Items to be included include - site wide Travel Plan & Construction Management Plan etc.
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78 It was previously understood that the Transport and Movement Annex was to be appended to the SPD as Appendix C, and this also appears to be referred to in the above extract from Appendix B.

79 However, Appendix C of the current Draft SPD under consultation consists of *'Design Coding and the 10 Characteristics of Good Design'*

- 80 Clarification should be provided regarding whether the intention is to include the Transport and Movement Annex as a further separate Appendix to the SPD when adopted.

## APPENDIX C: DESIGN CODING AND THE 10 CHARACTERISTICS OF GOOD DESIGN

- 81 We note that the 10 characteristics of good design includes ‘Movement’, in relation to which the Design Codes must demonstrate how proposals have incorporated a well-designed movement network and suitable hierarchy of street types that:
- is safe and accessible for all
  - functions efficiently to get everyone around, takes account of the diverse needs of all its potential users and provides a genuine choice of sustainable transport modes
  - limits the impacts of car use by prioritising and encouraging walking, cycling and public transport, mitigating impacts and identifying opportunities to improve air quality
  - promotes activity and social interaction, contributing to health, well-being, accessibility and inclusion
  - incorporates green infrastructure, including street trees to soften the impact of car parking, help improve air quality and contribute to biodiversity
- 82 Whilst the current Appendix C provides useful general guidance regarding Design Codes, we would reiterate that it would be useful to understand whether the Transport and Movement Annex was also intended to be included as an appendix, to support the main SPD and provide additional evidence with regards to the expected transport impacts of the development and how these will be assessed in detail as part of the forthcoming Outline Planning Application (OPA).

### | Other Matters

- 83 National Highways has previously made a general comment re sustainability and the need to ensure that Lidsing is as sustainable as possible throughout the build out and not only at maturity. We would recommend that concise text be included within the main SPD to explain how measures to embed sustainability will evolve during the build-out of the development (i.e. with means provided to facilitate existing residents and businesses being able to take advantage of this evolution). This will then demonstrate how Lidsing will seek to mitigate risks that early residents or occupiers develop “unsustainable” travel habits which are resistant to change even once other elements of the planned transport provision come online. **We would re-iterate this general comment in respect of the current Draft SPD.**

### | Concluding Comments

- 84 We are generally satisfied that the draft SPD document achieves the necessary aims of setting out a clear “vision” for the proposed development and appropriately captures how this vision will be developed to form the basis of a forthcoming outline planning application.
- 85 We re-iterate that the Transport Annex contains a considerable amount of detail on how the forthcoming Transport Assessment will be prepared, with particular reference to Transport Modelling, the design of the required improvements to M2 Junction 4, and the development of the Monitor and Manage strategy. It is assumed that this document will be adhered to during the process of preparing the necessary technical assessments and reports to accompany the outline planning application.

## Conclusion

