

Advice Note 04

Spatial Planning Framework Commission

Job number:	K592		
Job title:	Heathlands SPD		
LPA name:	Maidstone Borough Council	LPA Ref:	N/A
To:	Kevin Bown	cc:	
Topic:	Review of Heathlands Draft SPD		
	Prepared:	Checked/Approved	
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Date:	08/12/2025	08/12/2025	15/12/25

Throughout this response any **ACTION POINTS** relevant to the SPD stage are shown as **bold underlined**.

Introduction

- 1 National Highways (NH) has been consulted by Maidstone Borough Council (MBC), on 3 November 2025, in relation to the Heathlands Garden Settlement Draft Supplementary Planning Document (SPD), which is an adopted site in the current Maidstone Local Plan. The consultation period ends on 15 December 2025.
- 2 The following JSJV Advice Note 04 (AN04) provides an appraisal of the consultation document, with reference to comments previously provided by National Highways to MBC earlier in July 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.

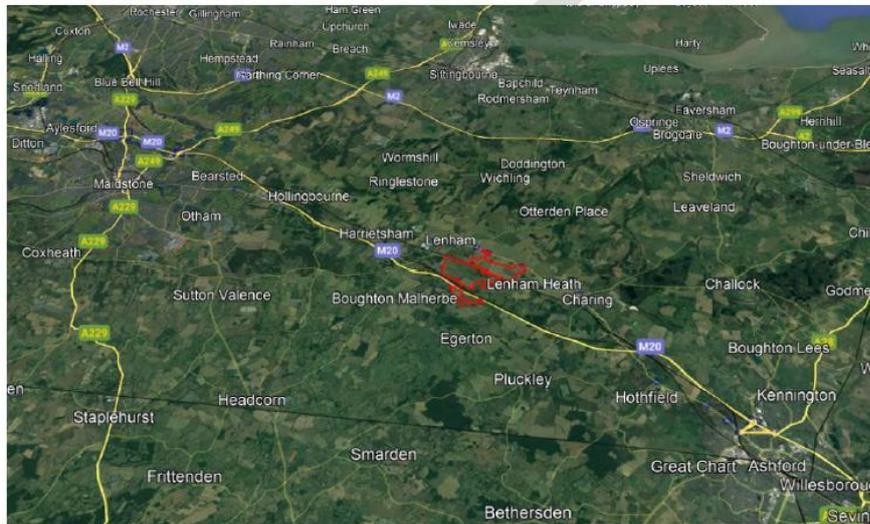
Development Proposals

- 3 The Heathlands strategic site is intended to deliver 1,400 new homes and 19,110 sqm of employment floorspace over the Local Plan period to 2037. By 2050, the site is expected to deliver 5,000 new homes and 125,000 sqm of employment floorspace.

Site Location

- 4 The Site is located in the vicinity of the M20 and A20 between the towns of Maidstone and Ashford, Kent. The Site location in the context of the surrounding area is indicated in Figure 1 below.

Figure 1 Heathlands Site Location



Previous Engagement

- 5 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 (which was formally adopted in March 2024).
- 6 National Highways has also provided advice to the developer of the Heathlands Strategic Site during the process of developing the SPD, via a series of weekly meetings held between May and July 2025.
- 7 Most recently, comments in relation to an earlier version of the Draft SPD were provided by National Highways in July 2025, together with comments on the SPD TA and Transport Annex.
- 8 We note that there is also a parallel consultation on the Lidsing Strategic Site Draft SPD. Therefore, whilst this JSJV AN04 concerns Heathlands, JSJV is aware of the need to ensure consistency in the approach to both strategic sites.

Comments on Draft SPD

- 9 This JSJV AN04 will focus on aspects of the Draft SPD which are relevant to the SRN, with reference to previous National Highways comments made in July 2025 in relation to the previous Draft SPD and, where applicable, the Transport Annex.
- 10 National Highways has previously provided advice on the draft SPD text and the accompanying Transport Annex. Where we have noted that a clarification or amendment has been made in the consultation versions of these documents, these are considered to appropriately respond to the earlier advice unless otherwise stated.

Section A: Background

Introduction

- 11 The Draft SPD relates to the Heathlands Garden Settlement, which was identified and allocated in the adopted Maidstone Borough Local Plan Review (LPR) 2021-2038.

- 12 It is noted that a number of policies adopted as part of the LPR apply to the Garden Settlement. This SPD draws from the adopted policy context and assists to provide additional guidance on the requirements of Policy LPRSP4(A).
- 13 It is understood that the Garden Settlement will be delivered over a long timescale with construction consisting of a number of phases over an estimated 20–25-year period.
- 14 The preparation of the SPD has been led by MBC, as the LPA, working with the site promoter and other key local stakeholders.
- 15 The Draft SPD is being developed through a number of key work stages as summarised below.

Stage 1 (March 2024-May 2025)

- Critical review of previous studies, gathering technical evidence, discussions and engagement
- Informal public engagement in May 2025

Stage 2: Drafting SPD and Formal Consultation

- Feedback from informal consultation used to finalise content of Draft SPD
- Final version of the SPD considered through formal Council decision making and subsequently published for a period of statutory consultation

Stage 3: Finalisation and Adoption

- Consultation responses will be reviewed by the Council and amendments made as appropriate in preparing the final version of the SPD
- Council to then take a decision on adopting the SPD

- 16 The SPD is currently at Stage 2 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

- 17 The Draft SPD notes that detailed proposals for the Garden Settlement are yet to come forward via planning applications and that developers and landowners will need to consider all relevant policies as set out in the LRP and SPD as they prepare planning applications for the site, which will need to be accompanied by more detailed designs, assessments and strategies.
- 18 The Draft SPD states that all subsequent stages of work will be subject to appropriate levels of consultation and engagement with all key stakeholders. Ultimately, MBC will retain the key decision-making role to ensure that the overall vision and objectives for the Garden Settlement will be realised.
- 19 It is worth noting that National Highways has engaged with MBC and the site developer, providing advice on the Transport Assessment required at the outline planning application stage in accordance with current national and local transport policy. The proposed content of the Outline TA which is set out in the Transport Annex reflects and responds to this advice.
- 20 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

- 21 The Draft SPD references DfT Circular 01/2022, alongside the National Planning Policy Framework (NPPF) December 2024 update, which sets out the Government's policy in relation to the Strategic Road Network and how National Highways will engage with the planning system.

Local Planning Policy

- 22 It is noted that Local Plan Policy LPRSP4(A) makes provision for a new large-scale garden settlement, the Heathlands Garden Settlement in accordance with the spatial strategy for the borough. The policy sets out the overarching land-use parameters and detailed design and development requirements for the site, which all future planning applications must comply with.

Site Context

Location

- 23 The Heathlands Garden Settlement is located on a 340-hectare site (approx.) close to the North Kent Downs National Landscape (KDNL) between the villages of Lenham and Charing.
- 24 National Highways previously noted that it would be useful for the description of the local road networks to clarify which parts of this are SRN.
- 25 The wording of the Draft SPD has been amended slightly to include the following clarification: *'Its location follows the existing linear settlement pattern along the strategic road network (trunk motorway and main 'A' roads)'*.

Key Features and Site Characteristics

Transport and Connectivity

- 26 It is noted that the Garden Settlement lies to the south of the A20 in between Lenham and Charing. The M20 runs through the area, with junction 8 around 10km to the west (towards Maidstone & the M25) and junction 9 around 12km to the east (Ashford).
- 27 There are various Public Rights of Way through the site and National Cycle Network Route 17 is located to the north of the site along North Downs Way.
- 28 A main bus route runs along the A20 between Maidstone and Ashford.
- 29 It is also noted that the proposed development is located between two railway stations: Lenham and Charing.

Flood Risk and Water Management

- 30 The Draft SPD states that the majority of the site is located within Flood Zone 1 with low probability of flooding. However, some areas are within Flood Zones 2 and 3 with medium and high probability of flooding. These areas of flood risk are associated with the river Great Stour, which flows from west to east along the southern site boundary in the land to the south of the M20.
- 31 **Given the proximity of the site to the M20 motorway, we expect that National Highways will be consulted on the flood risk and water management strategy for the site.** Paragraph 59 of Circular 01/22 should also be referred to in relation to such matters.

Constraints and Opportunities

- 32 The Draft SPD sets out key issues, constraints and opportunities that will need to be considered as part of the approach to delivering the Garden Settlement.

| Section B: Vision, Objectives & Spatial Framework

Vision and Objectives

Vision

- 33 Heathlands Garden Settlement will play a key role in achieving the overall vision for Maidstone as is set out in the adopted LPR. The vision for the Heathlands Garden Settlement is set out in

the LPR in the supporting text to policy LPRSP4(A) and we note that the SPD has been prepared with reference to this vision.

Objectives

- 34 National Highways previously noted that the objectives “Sustainably Designed” and “Well Connected” make direct references to the Vision for the site which is set out in the adopted Local Plan and can be linked in turn to the transport package which is described in detail in the supporting SPD TA. We note that the wording of these objectives remains unchanged.

Spatial Framework

Access and Movement Framework

- 35 National Highways previously noted during earlier scoping discussions that the Access and Movement Framework plan is expected to capture the major components of the transport infrastructure and services within the masterplan area which will need to be detailed in the TA supporting the Outline Application.
- 36 National Highways has suggested that, in relation to the new rail station, that the Draft SPD should preferably refer to the corresponding policy in the Local Plan requiring the delivery of the rail station prior to completion of the second phase of the development
- 37 We note that the requested clarification has not been made in the Draft SPD.
- 38 National Highways also commented that the paragraph referring to mobility hubs could usefully refer to the roles of the hubs in facilitating transitions between local, active modes (walking and cycling) and longer distance sustainable travel options (bus and rail) as this demonstrates that “end to end” journey requirements have been considered. We are pleased to note that this suggestion has been incorporated within the Draft SPD.

Section C: Placemaking and Design Guidance

Placemaking Guidelines

Employment

- 39 National Highways previously 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 significant 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.**
- 40 That said, we note that the Draft SPD now includes the clarification that:

‘It is unlikely that the site would be suitable for larger scale logistics or distribution, given its location and the need for buildings to be sensitive in terms of their scale and the need to integrate into both the Garden Settlement and wider landscape setting.’

Movement and Connectivity

- 41 In relation to the transport strategy, independent of the delivery of the station, National Highways noted that there was a need to specifically outline how the approach in early phases (1 and 2) is intended to build in resilience in terms of providing alternatives to car travel for trips which would otherwise use the SRN.
- 42 Given that for longer journeys, bus is expected to be the most viable alternative during the early phases, it was suggested that the bus sub-section could clarify the intentions around bus services specifically for phases 1 and 2 in terms of external destinations to be served.
- 43 We note that there have been minor changes to the ‘Public Transport and Improved Bus Services’ section:

‘A highly accessible and direct public transport route will allow buses from the A20 to pass through the site providing linkages to the new railway station, homes, district and local

centres, new schools, local facilities, and to adjacent areas including to Charing and Lenham, and beyond to other destinations.'

- 44 However, the 'other destinations' have not been identified, and it would be worthwhile to include wider destinations that could be served.

Transport & Movement: Key Principles and Guidance

- 45 National Highways previously commented that '*The Transport and Movement Key Principles and Guidance*' are considered to be an appropriate reflection of discussions that have been held in the preparation of the SPD TA.

- 46 We note that there have been some changes to the previous Key Principles and Guidance in the current Draft SPD, namely:

Public Transport

- Point f now clarifies that 'Enhanced bus provision must be provided from the outset of development with routes with priority over other vehicles'
- Point g now states that 'A new railway station must be provided no later than within phase 1 of the development.', whereas previously it was to be no later than phase 2 of the development. We note that this now aligns with the Infrastructure Requirements as per the Local Plan Review.

Streets & Highway Improvements

- Point j – minor change in wording '*local lanes that are assessed as having unacceptable levels of increased use*' in place of '*local lanes that are not suitable for increased use.*'
- Point m has been expanded to include '*Highway and associated lighting and drainage infrastructure design should mitigate potential environmental and wildlife harm.*'

| Section D: Delivery Framework

Phasing and Delivery

- 47 National Highways previously commented that the indicative phasing from the Local Plan has been retained for the SPD, with some minor additional clarifications in terms of the transport measures and mitigation measures anticipated to be required in each of the four stages. The physical relationship of the four phase areas of the site is logical and should allow for evolution of transport infrastructure as the site develops; this also aligns with the work that has been done in preparing the SPD TA to agree the trip rate assumptions for the early, mid- and late phases of development.
- 48 We note that the indicative phasing in the latest Draft SPD remains unchanged from the previous version reviewed by National Highways. As such we have no further comments at this stage.

Approach to Transport Assessment and Mitigation

Transport Assessment Process

- 49 The Draft SPD references the NPPF and the vision-led approach but still appears to omit any specific reference to DfT Circular 01/2022. **We would therefore re-iterate the request that DfT Circular 01/2022 be cited here as it has similarly influenced the transport approach, particularly for longer distance journeys.**
- 50 However, we note the following requests have been incorporated into the Draft SPD as requested by National Highways

- The Draft SPD now includes the additional wording: *'The information listed is to be provided at application stage in the form of a Transport Assessment which accords with the prevailing relevant national and local policy and guidance.'*
- Point e. of the list now also refers to *'Road Safety appraisals as required by KCC Highways and National Highways, including development of approved Road Safety Audit briefs and assessments where required.'*
- The requirement for a Travel Plan has been added to point a. on the list
- The suggested revised wording *'KCC and National Highways will continue to engage with the developer and the monitor and manage strategy throughout the delivery period, alongside other members of the Transport Group overseeing the strategy during each phase of the development'* has been utilised.

51 The Draft SPD includes the additional clarification that:

'The Monitor & Manage Strategy and associated scope of mitigation measures will be secured through an appropriate S106 agreement, with ongoing monitoring and appropriate flexibility to respond to issues as they arise over time. This will include provisions to enable highway mitigation measures to be delivered via a S278 Agreement should they be found to be necessary.'

Approach to Design Coding and Securing Quality

52 The Draft SPD now includes a 'Approach to Design Coding and Securing Quality' section, which was not included in the previous version reviewed by National Highways.

53 The Draft SPD states that:

'Given the scale and context of the Heathlands Garden Community, and the long-term nature of its delivery, the Council expect a comprehensive approach to design via the preparation and approval of a site wide Strategic Masterplan accompanied by a Strategic Design Code, to be submitted alongside a site wide outline planning application. Further neighbourhood specific masterplans and design codes will also be subsequently required for each phase of development.'

Appendix A: Design Coding and the 10 Characteristics of Good Design

In relation to 'Movement'

54 It is stated in Appendix A that 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

55 Whilst not directly relevant to the SRN itself, the content of the Design Codes is considered to be appropriate in encouraging sustainability to be built into the design of the site from the earliest stages and therefore acts as a mechanism to support the assumptions around mode shares

which have informed the trip generation calculations for “residual” vehicle trips as required by Circular 01/22.

Appendix B: Anticipated Developer Contributions to be secured by legal agreements

- 56 We welcome the additional clarification regarding ‘*Off-site Highways Improvements*’ which states that ‘*National Highways will require developer-led, fully funded, developed, and delivered works secured through conditions and S278 agreements.*’
- 57 **However, we note that there appears to be no specific reference to a Monitor and Manage/Transport Steering Group which should be identified as a specific requirement to be secured via a Section 106 agreement; this conflicts with the statements at paragraphs 8.1.7 and 8.1.8 in section D which state clearly that the monitor and manage strategy will be secured via the S106 agreement. The M&M strategy will need to link to, but be discrete from, any specific transport mitigations which are required to be delivered regardless of the Monitor and Manage Strategy and which would be secured via conditions and S278 as described in this table.**

Appendix C: Anticipated Planning Application Requirements

- 58 We note that Appendix B includes the requirement for a TA, Travel Plan and Construction Traffic Management Plan.
- 59 **However, we would request the following additional clarifications to be added in respect of these:**
- **Transport Assessment and Travel Plan – to be in accordance with the relevant prevailing national and local planning policy and guidance, and fully compliant with the requirements of National Highways and KCC**
 - **Construction Traffic Management Plan – to be submitted and agreed as part of each major phase of development**

Concluding Comments

- 60 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.
- 61 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 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

Amendments to document requested – to inform preparation of final SPD