



Consultation response to Heathlands Garden Settlement Supplementary Planning Document (SPD)

Save Our Heath Lands (SOHL) is a volunteer group formed in September 2019 in response to Maidstone Borough Council's (MBC) proposed Heathlands garden settlement in Lenham. We have strong local support, evident from high petition turnout, packed community meetings, and a large membership and social following.

We are not anti-housing. We support sustainable, needs-led development and back Lenham's adopted Neighbourhood Plan, which allocates 1,000+ homes to 2031. Lenham has already accepted substantial growth, more than other Rural Service Centres and Larger Villages in the borough.

Over the past six years we have engaged throughout the Local Plan Review: submitting formal responses at every stage, participating in the Inspector's Examination in Public, and responding to the Main Modifications consultation.

Despite repeated requests, we were denied a seat on the Heathlands Stakeholder Steering Group established by the Local Planning Authority (LPA) in January 2025. As a major community stakeholder, we are concerned this exclusion may have been politically influenced by MBC leadership. Earlier involvement would have helped shape the SPD at formative stages. We remain committed to constructive engagement with MBC as plan making progresses.

On 14 October 2025, SOHL presented a petition signed by 1,500+ residents asking MBC's Cabinet to pause the Heathlands SPD until:

- A full transport assessment is completed, including modelling with the Kent Integrated Transport Model.
- Government confirms support for a new railway station.
- A costed infrastructure delivery plan is published.
- Meaningful engagement occurs with Lenham Parish Council and SOHL.

The Cabinet neither acknowledged nor debated the petition before sending the SPD to consultation. These conditions are essential to improve the SPD; we set out in more detail below in response to the questions posed within the consultation.

General Principles

SOHL supports, in principle, the introduction of additional planning guidance for Heathlands; however, the draft SPD is inadequate. In his final report, the Inspector set clear expectations for the SPD, including detailed transport modelling and assessment, clarity on the location of wetland provision, and further work on Landscape and Visual Impact Assessment. These requirements have not been met.

It is also disappointing that a more detailed masterplan was not produced alongside the draft SPD. Such a document would have clarified the scale and form of the development and shown how it would integrate with existing settlements and the wider community.

SOHL considers that the SPD has been rushed for reasons of political expediency. An alternative mechanism - an Area Action Plan (AAP) - would have been more appropriate. Because SPDs are not legally binding and carry less weight than Development Plan Documents (DPDs), an AAP would have provided greater rigour. Its statutory status and independent examination would have helped rebuild confidence and trust in a process that has been significantly eroded by the way MBC and Homes England have conducted their business in recent years.

We therefore reiterate the need for detailed transport modelling and comprehensive masterplanning to be undertaken as part of the SPD's preparation. Until this preparatory work is completed, we must register our strong objection to the adoption of any Heathlands SPD.

Specific comments/changes on paragraphs 3.1, 3.1.1 and 3.1.4 can be found in Appendix A.

Vision & Objectives

The Vision and Objectives for the Heathlands garden settlement are commendable but, in our view, unachievable. The vision, objectives, and the wider SPD underplay the relationship with existing settlements and communities, presenting instead a utopian idyll in the middle of the Kent countryside.

Greater emphasis is needed to explain how Heathlands will integrate with and add value to the existing community.

The proposed "*green integration*" which claims to provide "*a sensitive transition between the National Landscape and Heathlands, with strong planting in the northern parcels, and landscaped spaces for village greens, parks, commons and naturalistic green spaces throughout*" is unconvincing. It is difficult to envisage a genuinely sensitive transition given the scale of change at the foot of the Kent Downs National Landscape (KDNL); no amount of planting or boundary protection would conceal the resulting impact on the existing countryside.

The objectives need to add more certainty to when and how they will be realised. A development of this magnitude can not wait 30 years until the development is fully realised (if indeed it ever will be) to deliver on these objectives.

Framework Plans

The framework plans in the SPD lack the supporting studies and assessments needed to make them meaningful and deliverable. In the absence of detailed masterplanning, the four key spatial frameworks read as tentative and unconvincing.

Comments on each of the presented frameworks are as follows:

Green & Blue Infrastructure Framework

The claim in 5.2.3 that over 50% of the site will comprise green infrastructure is not credible without forcing severe over-densification elsewhere.

The indicative green spaces plan appears to ignore topography and existing land uses; for example, sports pitches are shown on elevated or otherwise unsuitable parcels.

- Concentrating a significant share of housing in the northern part of the site conflicts with the aim of protecting views from the Kent Downs National Landscape (KDNL). A 350m offset will not adequately mitigate visual impact.
- Given the rural context, every resident should be within 400 metres of nature and parkland.
- While the framework promises a new “semi-natural” Country Park for local people and visitors, it does not consider trip generation or parking requirements for a destination of that scale.
- Proposed changes: See Appendix A for amendments to paragraphs 5.2.7 and 5.2.11 addressing these deficiencies.

Access & Movement Framework

- The document provides little detail on the dimensions and design of segregated, multi-use streets and paths.
- Principal movement corridors are shown abutting heritage assets, and there is an over-reliance on secondary connections that fall outside the red line and are not suitable for high traffic volumes.
- Bus service proposals are inadequate for a development of this scale. To make Heathlands genuinely sustainable, all residents should be within 400 metres of a bus stop. There is also insufficient detail on how the railway station will be served, including the need for high-frequency routes from the outset to embed sustainable travel habits.
- Proposed changes: See Appendix A for amendments to paragraph 5.3.7.

Land Use Framework

- Figure 12 is unclear and poorly labelled; it does not explain what each colour or block represents.
- The proportionality in the block chart is incorrect: the 50% green block (presumably green infrastructure) is depicted smaller than the 35% orange block (presumably residential/mixed use).
- We maintain that the stated land-use proportions are undeliverable without very high densities that are inconsistent with the setting and surrounding countryside.

Placemaking Framework

- We fundamentally disagree with the statement in 5.5.1 that “*the location for Heathlands has been selected to allow for generous landscape gaps... to avoid the physical*

coalescence of Lenham, Charing Heath and Charing.” The development boundary is less than 600 metres from Lenham’s settlement boundary to the east and directly abuts Lenham Heath (and therefore Charing Heath) to the west. Coalescence will not be avoided.

- Without a detailed masterplan, it is unclear how higher densities will be “greened” or visually screened from outside the site. We do not accept the claim that placemaking will be “sensitive to the surrounding countryside.”

Composite Spatial Framework

- The composite plan is extremely difficult to view in the format provided on the consultation website. At the current resolution it is neither legible nor capable of being interrogated.

Blue Infrastructure

SOHL has repeatedly raised concerns about the proposed wetlands within the Heathlands scheme, which now appear in the SPD under “Sustainable Urban Drainage techniques.” The document is almost entirely silent on the requirements for these systems and how they will mitigate harmful impacts on local waterways, including rare chalk streams.

The Inspector’s final report stated *“the subsequent SPD and masterplanning processes will develop further the detail of how the Heathlands development could be delivered, including scale and location of wetlands and precise trigger points for WWTW infrastructure.”* **This has not been carried out.**

Specific concerns we have previously raised about wetlands:

- Unsuitable locations and technical risks: The indicative plans place wetlands in unacceptable locations and present a range of serious technical issues.
- Risk to principal aquifer: Several proposed wetlands overlie the Folkestone Formation, creating a clear pathway for contamination of underlying groundwater. The Environment Agency classifies this formation as a Principal Aquifer.
- Proximity to Source Protection Zones (SPZs): Wetland areas lie 30 m and 45 m from the SPZ boundary. Even if not directly above the SPZ, groundwater moves laterally, making this close enough for sewage held in wetlands to contaminate the SPZ.
- Floodplain siting: Some wetlands are located directly within the floodplain of a stream that crosses the SPZ. During flood events, contaminated runoff could enter the aquifer, the Great Stour, and ultimately the Stodmarsh SAC.
- Conflict with wastewater expansion land: Proposed wetlands look likely to encroach on land reserved by Southern Water for future expansion of the existing Wastewater Treatment Works (WWTW).
- Railway embankment stability: The proximity of wetlands to the railway embankment raises concerns about potential impacts on embankment stability.

- Geological and access constraints south of major corridors: Some wetlands face similar geological constraints and are located south of the motorway and high-speed rail line, creating significant technical challenges for access and delivery.

Ecological appraisal and protection

SOHL has also flagged the insufficient appraisal of existing ecology within the Heathlands red line and the potential impacts if the development proceeds. We remain deeply concerned about the protection of aquatic life, including wild trout and the invertebrates they depend on. The banks of local waterways support diverse plant communities that feed a wide variety of insect species, some extremely rare, which must be safeguarded.

Minerals

SOHL and the local community believe that the assumptions for intended mineral extraction at Chapel Farm are overly optimistic and will lead to significant delays in the phased approach.

Furthermore, SOHL remain deeply concerned by the significant volume of HGV movements servicing the new Chapel Farm minerals site as well as construction traffic for the proposed Heathlands development. There remains a severe risk to public safety with this volume of movements for both uses and this needs to be factored into the logistics and servicing plans for both sites. Noise and dust are also key cumulative impacts of jointly working both mineral site and building Heathlands.

Protecting Heritage and Archaeology

To date, the development of Heathlands has given scant regard to existing heritage and archaeology. The indicative framework plans supplied in the draft SPD do not give sufficient consideration to heritage sites and their settings.

Placemaking, Density and Character

SOHL finds the proposed densities for the development wholly unacceptable for the setting. Further detailed masterplanning work should have accompanied this SPD in order to better inform residents of the visual intrusion the proposed high-density development will have on the existing landscape. It is unacceptable that this will be left to Outline Planning Application stages.

The highest density category at 50-75 dwellings per hectare is not in keeping for the Kent countryside.

No consideration has been given to existing local character of the area.

Employment

The employment principles and guidance do not provide a credible plan to deliver 5,000 jobs on 14 hectares of employment land. They are also internally inconsistent: paragraph 6.10.4 questions the suitability of Heathlands for large-scale logistics or distribution, yet principle (e) proposes a mix of uses that includes B8 (storage and distribution).

The document shows limited consideration of where employment sites should be located and what types they should accommodate, another symptom of the lack of comprehensive masterplanning to date.

Until the type, location, and scale of employment uses are defined with much greater clarity, it is impossible to assess the implications of delivering 5,000 jobs for access, movement, and wider infrastructure requirements.

SOHL maintains, as we did during LPR examination, that homeworking jobs should not contribute towards the 5,000 jobs total.

Movement and Connectivity

SOHL maintains that the SPD has not been informed by sufficient transport modelling or assessment. As set out in our petition, the SPD should not be adopted until comprehensive modelling is completed using Kent County Council's Kent Integrated Transport Model (KITM), including full junction capacity analysis. Without this detailed work, it is impossible to assess impacts on the existing highway network or define adequate mitigation.

The Inspector's final report recommended *"additional detailed content requiring further assessment, for both junctions 8 and 9, as part of any subsequent SPD process and detailed Transport Assessment and for National Highways and KCC to be co-operatively engaged in this work."* **This has not been carried out.**

The Inspector also specified *"that the SPD will include a detailed Transport Assessment, which amongst other things will look further at the impact on all surrounding road corridors having regard to a number of factors. As Policy LPRSP13 states, the site specific infrastructure in the site allocation policies are not exhaustive lists and further requirements, stemming from more detailed work, may be required."* **This, too, has not been done.**

This serious omission calls into question the overall validity of the SPD. The Local Planning Authority must address it as a matter of urgency.

Phasing and Delivery

It is concerning that the consultation includes no questions on the section about phasing and delivery of Heathlands.

SOHL has maintained from the start that the phasing has been hopelessly optimistic for a flagship development purporting to be infrastructure-first. It is inconceivable that completions could begin from 2031 unless the approach being adopted is to start with an orphaned housing estate in the middle of the countryside.

SOHL believes that Phase 1 needs to be split into two subsets to ensure that sufficient infrastructure is delivered as new homes are completed. Bus diversions from the A20 need to be in place from the first occupation of the first unit to ingrain sustainable travel behaviours from the outset. Both accesses should be delivered from a very early part of phase 1 to allow good public

transport, walking and cycling links through the proposed development. Nutrient neutrality and improvements to the waste water treatment works can not wait until 1.300 units or 2037 arrives. A more granular phasing plan is required to provide confidence in delivery and this should start by splitting phase 1.

Design Codes

It is disappointing that a Design Code has not been produced for the SPD and consulted on. It is not acceptable for this to come at Outline Planning Application stages. The design coding principles/guidance have given no acknowledgment or credence to the Lenham Neighbourhood Plan' design qualities and how any new development would be integrated into existing local character and setting.

Long Term Stewardship

The approach adopted through the Stakeholder Steering Group demonstrates the tick-box approach MBC and Homes England take to being serious about local governance and stewardship arrangements. Until they are serious about properly engaging with local stakeholders like Lenham Parish Council, SOHL and directly impact local residents, the aspirations for collaboration and joint working will remain just that.

General Comments

The document as presented in the online website format is not easy to read or understand. The figures and maps provided do not enlarge to a sufficient size to be legible. For those residents not versed in planning documents, it is difficult to consume.

This was exacerbated by the seemingly lacking knowledge at the formal drop in events arranged with many of the representatives aware of much of the detail or background.

Appendix A – Comments and proposed amendments to SPD wording

Paragraph	Wording of draft SPD	Comment
3.1	<i>3.1 Location Boughton Road</i>	We are unclear why this section of the draft SPD is titled Boughton Road.
3.1.3	<i>3.1.1. The site boundary immediately abuts the existing Hamlet of Lenham Heath.</i>	The site boundary doesn't just abut the existing hamlet of Lenham Heath. It consumes some parts and wraps around others. The context underplays the significant impact this proposed development would have on existing settlements.
3.1.4	<i>3.1.4. There are a number of existing roads running through the wider site boundary serving the existing properties of Lenham Heath. The most notable of these is Forstal Road which provides an existing access onto the A20.</i>	Suggestion for <i>rural</i> to be added to wording of this paragraph to reflect the unsuitable road layout for high volumes of traffic. Forstal Road has one single deck bus traverse it each morning and afternoon. The road width is unsuitable for high frequency buses or HGVs and this needs to be reflected in the context of the existing site.
4.2	4.2 Objectives Sustainably designed Pedestrians, cyclists and public transport will be prioritised providing sustainable travel opportunities with convenient and safe linkages within Heathlands, to surrounding communities and to community facilities, jobs and leisure.	The wording associated to providing linkages outside of the proposed Heathlands development is too vague. For the development to be sustainably designed, it needs to have convenient, safe and sustainable linkages to existing town centres including Ashford and Maidstone.
5.2.7	5.2.7. Protection and enhancement of existing ecologically valuable features within the site, including the Lenham Heaths Habitat Corridor, Local Wildlife Sites, existing water courses and other ecological features. These can all assist to deliver on expectations of 20% Biodiversity Net Gain as will 'wet' sustainable urban drainage infrastructure, restored species-rich meadows, hedgehog	Wording too loose on Biodiversity net gain. Suggested edit in red. <i>Protection and enhancement of existing ecologically valuable features within the site, including the Lenham Heaths Habitat Corridor, Local Wildlife Sites, existing water courses and other ecological features. These can will all assist in delivering a minimum to deliver on expectations of 20% Biodiversity Net Gain as will 'wet' sustainable urban drainage infrastructure, restored species-rich meadows, hedgehog highways and</i>

	highways and integral niches for wildlife within buildings, such as the inclusion of swift bricks and bat tubes where necessary.	<i>integral niches for wildlife within buildings, such as the inclusion of swift bricks and bat tubes where necessary.</i>
5.2.11	5.2.11. A network of multifunctional, and attractive open spaces available to everyone will create new destinations and promote health and wellbeing among new and existing residents. The site will accommodate a hierarchy of open spaces, each with a variety of landscape characters, activities and functions creating leisure destinations ensuring no resident is ever more than 5-10 minutes away from nature and parkland.	<p>Given the location of Heathlands in the middle of the Kent countryside and its rural setting, the maximum distance new residents should be from nature and parkland should be 5 minutes on foot. It is also vague on whether than duration is by foot or by car. A maximum distance is therefore expected.</p> <p>Suggested edit in red.</p> <p><i>A network of multifunctional, and attractive open spaces available to everyone will create new destinations and promote health and wellbeing among new and existing residents. The site will accommodate a hierarchy of open spaces, each with a variety of landscape characters, activities and functions creating leisure destinations ensuring no resident is ever more than 400 metres 5-10 minutes away from nature and parkland.</i></p>
5.3.7	5.3.7. A bus route will be provided across the Garden Settlement, with priority over other vehicles and regular bus stops within easy reach of residents.	<p>A single bus route for such a large development is not sufficient to serve the needs of residents in a genuinely sustainable complex.</p> <p>Suggested edit in red.</p> <p><i>A network of high frequency bus routes will be provided across the Garden Settlement, with priority over other vehicles and regular bus stops no further than 400 metres within easy reach of every residents.</i></p>
6.11.12	6.11.12. The rail station is anticipated to be delivered in Phase 1. The delivery of the station will involve separate processes involving rail stakeholders, and must come	<p>This is not policy compliant. A new railway station <u>must</u> be delivered in phase 1.</p> <p>Required edit in red.</p>

	forward alongside future stages of the planning process.	<i>The rail station is anticipated to will be delivered in Phase 1. The delivery of the station will involve separate processes involving rail stakeholders, and must come forward alongside future stages of the planning process.</i>
6.11.14	6.11.14. 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. High quality bus stops must be provided at regular intervals along the route to ensure walking distances to bus services are minimised. High quality supporting infrastructure, including bus shelters information displays and living roofs should be provided.	Suggested edit in red to align with edits in 5.3.7 above. <i>AHighly accessible, frequent and direct public transport routes 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. High quality bus stops must be provided at regular intervals along the route to ensure walking distances to bus services are minimised every new resident is within 400m of a bus stop. High quality supporting infrastructure, including bus shelters information displays and living roofs should be provided.</i>
6.2.6	6.2.6. Land for open space, green & blue infrastructure and linking corridors should exceed the quantitative, qualitative and accessibility standards set out by Policy LPRINF1, with an overall target to provide greater than 50% of the total site allocation area.	This is not policy compliant. Required edit in red. <i>Land for open space, green & blue infrastructure and linking corridors should will exceed the quantitative, qualitative and accessibility standards set out by Policy LPRINF1, with an overall target to provide greater than 50% of the total site allocation area.</i>
Key principles/ guidance Landscape, Views & Open Space	(c) Existing trees, woodlands, hedgerows, waterbodies and water courses should be retained, sustainably managed and enhanced wherever possible. Proposals must enhance the character of the existing green and blue infrastructure and promote	Strengthened wording required to retain existing trees, woodland, hedgerows, waterbodies and water courses. Required edit in red. <i>Existing trees, woodlands, hedgerows, waterbodies and water courses should will be retained, sustainably managed and enhanced wherever possible. Proposals must enhance the</i>

	linkages between areas of environmental value.	<i>character of the existing green and blue infrastructure and promote linkages between areas of environmental value.</i>
Key principles/ guidance Landscape, and Visual Impacts	(l) Key views into and from the site, including to The Cross and St Mary's Church at Lenham should be preserved and enhanced as identified in the Landscape Strategy and on the Green & Blue Framework.	Strengthened wording required to protect key views. Required edit in red. <i>Key views into and from the site, including to The Cross and St Mary's Church at Lenham should must be preserved and enhanced as identified in the Landscape Strategy and on the Green & Blue Framework.</i>
Key principles/ guidance Biodiversity and Ecology	20% Biodiversity Net Gain will be expected to be achieved on the Site. For phased developments it must be demonstrated how each phase will contribute to achieving net gain over time and support ecological connectivity, recognising that a site wide approach will be required.	Strengthened wording required to ensure commitment to 20% Biodiversity Net Gain. Required edit in red. <i>20% Biodiversity Net Gain will be expected to be achieved on the Site.</i>