

## **Lidsing Garden Community SPD Consultation – Medway Council response**

### **Overview**

Medway Council acknowledges that the principle of development of Lidsing Garden Community has been established in the Maidstone LPR. However, our authority retains concerns over the potential impacts arising from the planned growth, and is committed to working collaboratively with Maidstone BC to secure sustainable development with effective mitigations. We support joint working to coordinate planned growth across our borough boundaries in this area.

Medway Council welcomes the production of an SPD to provide additional guidance to influence development and secure greater clarity on the appropriate approaches and mitigations needed for sustainable development. We support the work of Maidstone BC in preparing an SPD in advance of the submission of a planning application. We agree with many of the principles and approaches set out in the SPD, and have largely focused in our responses on areas where we consider further detail would help guide the quality and sensitivity of the development approach.

There is scope to significantly expand the consideration of the relationship with Medway in the SPD, to acknowledge and address the complex and multi-faceted issues in approaching place making and development in a cross-border location. The lack of detail is a concern that the wider strategic issues and context have not yet been given the attention required to achieve sustainable development.

Our response sets out specific considerations, including guidance for landscape, heritage, open space, and infrastructure delivery. We view that there are aspects where the SPD could be stronger in its detail and scope to provide greater certainty on achieving the vision and objectives set out in LPR policy.

There are particular concerns about the transport plans for Lidsing and how these account for impacts in Medway. We view that that the Transport Annex published with the consultation SPD does not provide sufficient certainty on effective mitigation and timely delivery of the required transport schemes, both highways and sustainable transport modes. Concerns for impacts on the local road networks are key for local communities, both in Medway, and in the neighbouring areas in Maidstone. We continue to liaise with Maidstone BC, the site promoter's transport consultants and Kent County Council on transport proposals, and to provide more detailed comments outside of this specific consultation. We would like to see a cross-border transport planning group involving our Councils and wider relevant parties. This would provide a strategic view of the cumulative development proposals, impacts on traffic and support a joined up approach to sustainable transport.

We note that much of the detail will be provided at planning application stage. In the absence of specific detail in the SPD, our Council has a key interest as a consultee on planning applications for Lidsing in assessing the cross-border impacts of the proposals. We expect to see specific reference to the importance of engagement with our Council in the developer's Statement of Community Involvement and recognised in the Planning Performance Agreement.

We support ongoing cross border working between our Councils as we plan for the delivery of strategic scale development in the Capstone and Lidsing area that will involve significant changes for residents and the environment. We also intend to provide a comprehensive framework to guide growth in the proposed Capstone Valley strategic allocation in our Medway Local Plan. We wish to work effectively with Maidstone BC on this, and to follow a coordinated approach to avoid piecemeal development.

## **Section A - Background**

We are concerned that the timing of a proposed Design Code is to follow an outline planning application, which could compromise the ability to achieve the quality sought in the vision. We consider that early preparation of a Design Code is important in shaping the development, and view that this would follow best practice.

The policy context should note the draft Medway Local Plan bringing forward policy and potential allocations in land adjoining the Lidsing site.

The SPD has a limited assessment of the relationship of the planned development with the Medway area; particularly considering the context of existing communities, new development, such as at East Hill and emerging plans for Gibraltar Farm and the wider proposed strategic allocation of land in the Capstone Valley for growth as a component of the spatial strategy in the Draft Medway Local Plan.

### *Flood Risk*

Despite not being in an area of high flood risk paragraph 3.2.3 (page 26) states that "low flood risk has been used to define the starting point for the green infrastructure". Instead, this should be used as one of several influences to shape the green infrastructure strategy, including landscape character, historic land-use/ field/ and settlement patterns, archaeology, ecology/ existing vegetation, and existing utility/service constraints.

### *Ecology*

Paragraph 3.2.7 (page 28) refers to the emerging Kent Local Nature Recovery Strategy (LNRS). Whilst its reference is positive, it is unclear how the LNRS has informed the SPD and Site Masterplan.

### *Landscape Character*

The SPD does not give greater detail on the landscape character of the site, in particular the defining features of the "5 distinct landscape character zones spread across the site", how these were determined, and how they have informed both the green infrastructure framework and character areas within the SPD. Consequently, it is difficult to see how the proposals are truly landscape led.

The Landscape and Visual Technical Note (July 2021), Landscape Capacity Study (March 2022), Land at Kemsley Street Road - Opportunities Plan (March 2022), and Key Views (May 2022) have not been published with the Lidsing SPD for viewing,

and as such it is difficult to fully assess decisions within the landscape and masterplan. The SPD could clarify how it has drawn on previously published work and the status of the technical and supporting documents.

Landscapes cross authority boundaries, and as such the development of a garden community, its masterplan, design code and other supporting strategies should consider the analysis, recommendations and guidance of the Medway Landscape Character Assessment (June 2024).

At 3.3.2 the constraints should also reference infrastructure capacity, including transport and impact on traffic through the Downs and impact on Capstone Farm Country Park, and the North Downs Woodland SAC.

## **Section B - Vision, Objectives and Spatial Framework**

We welcome the reference to the Garden City principles published by the Town and Country Planning Association and note these set key challenges in managing delivery so that Lidsing does not become a car dependent suburban extension to urban Medway, lacking in distinctive character, and reliant on external services.

It is unclear how in the absence of more detailed information the SPD and associated masterplan can align with the vision (p47) for providing "a genuinely landscape-led settlement", creating well-defined landscape infrastructure that "enhances the natural environment of its location in proximity to the Kent Downs National Landscape and its relationship with the Capstone Valley". In doing so, the SPD is missing one of the underpinning principles for establishing a Garden Community (figure 21, page 50).

It is unclear how Lidsing Garden Community can become a "Landscape-Led Exemplar" (paragraph 4.2.3, page 49). Landscape-led development is more than creating development that "responds to the challenges and opportunities of Climate change".

We would like to see more consideration of the relationship to sites in Medway, particularly Gibraltar Farm.

Paragraph 3.2.2 – seek greater consideration of linked flood risk outside of the site in Medway and requirements for planning applications.

3.3 - constraints should acknowledge infrastructure capacity.

- 4.2.4 – Sports, play and allotments should follow national guidance. Allotments should be referenced here too.
- 5.3.1 - 37% of the total site area is to be given over to open space. It is, however, unclear whether this calculation includes blue infrastructure, or how much of this land will be usable public amenity.
- 5.3.3 - There is a case for recreational open space / sport also more centrally within the site, to support the new community and promote sustainable active travel modes.

- 5.3.4 - Ecological enhancement to western and eastern edges aligns with the LNRS, however, ecological corridors should be provided across the site to promote best outcomes for biodiversity and residents.
- 5.5 Placemaking & Design Framework
- Whilst lower density is suggested to site edges, Figure 25 (page 59) displays building heights of up to 11m across a large proportion of the site area, where facing away from the Kent Downs National Landscape. Despite land falling away to lower levels in the north, this land will still be visible from the Capstone Valley. In doing so the proposals, conflict with current discussions regarding Gibraltar Farm.
- 5.3.3 – explain why the sports and allotments are on the periphery. These also need to be accessible. Lordswood Centre referenced throughout the document but it is already at capacity. How is the new development mitigating this?

## **Section C - Placemaking and Design Guidance**

Section 6.2 - with an Outline Application expected this year, and no requirement for a Design Code listed at the outline stage within the SPD, this raises concern over the effectiveness of the forthcoming planning application and how matters relative to effective design and delivery have been considered.

A Design Code should be developed as part of an outline application, rather than following on from an approval. This would mean that the Code can be developed and tested as part of an iterative design process in order to promote the best quality outcomes to placemaking and landscape context.

### Section 6.4 Landscape

6.4.1 - In the absence of the supporting topic papers (and landscape framework plan) it is unclear how the proposed framework, and potential future development is landscape led - rather it is led by resolving drainage matters and does not fully embrace historic landscape character and uses to inform the creation of character areas and subsequent development parcels.

6.4.2 - Notes that the landscape framework is based on the pattern of woodlands and hedgerows found within the site but has not referred to the historic landscape and lost landscape components that formed an intrinsic part of the place.

6.4.3 - What is the rationale and purpose of a minimum 15.0m buffer? Where will this be located, and will this increase in size/ depth in areas of increased sensitivity? Is its function to solely serve in mitigating noise pollution from the motorway, instead of providing an appropriate contribution for mitigating the visual effects of development in views to and from the Kent Downs National Landscape and its setting?

### Key Principles / Guidance

d. - Where are key views identified in the constraints plan - where in the document can this plan be found? What is the methodology behind the scoping and establishment of key viewpoints?

Fig. 30 - Green blue infrastructure framework appears primarily augmented around existing hedgerows / woodland, in combination with proposed blue infrastructure

elements (attenuation ponds). This will result in limited areas of usable amenity for a large increase in population.

### Placemaking

It is stated on page 21 that higher density development can feature along the new spine road - It is unclear what the rationale has been for the spine road's alignment and how this corresponds with wider landscape sensitivities and visual impact.

Ridge heights within the employment zone must not exceed 9m - this is the height of a 2-storey residential dwelling with a pitched roof. - In general, it is unclear why employment is all located in character area LCZ 4 Southern Edge Employment, which is situated closest to the boundary of the Kent Downs National Landscape.

It is unclear what principles make this a garden community, and no different from an edge of settlement suburban expansion. There is a lack of clarity on what distinguishes this as a "garden community."

Building heights and density may conflict with views from sensitive areas like the Capstone Valley – an eleven-metre building height parameter takes up a large portion of the site area.

The employment zone placement near Kent Downs raises visual impact concerns, albeit we note the mitigations secured through the LPR Examination.

Paragraph 6.10.13 – we note the reference to the project level HRA and seek to collaborate with Maidstone BC and the promoter in assessing and addressing the cumulative, and in combination potential impacts of development.

### 6.13 - Employment Area

6.13.3 states the development of a 14-hectare employment hub of flexible use, including 15% office space, 35% light industrial, and 50% storage / warehouse. The composition and siting of this mix of employment is likely to have a significant impact on the Kent Downs and wider area, when accounting for typical building footprint and massing.

Figure 39 demonstrates that a major proportion of greenspace will be taken up through inclusion of permanent ponds and drainage basins, in addition to acoustic bunding.

6.13.10 - States that development is expected to have minimal impact on the Kent Downs National Landscape, though this is without any further supporting technical information. We note that mitigations were secured through the LPR Examination, responding to the advice from the Kent Downs AONB/NL unit. Perhaps these could be more clearly referenced in the SPD.

It is unclear what above and below ground constraints exist that could have a bearing on the masterplan, the arrangement of development parcels, and impact on the establishment of appropriate green and blue infrastructure.

Paragraph 6.9.5 – support provision of residential care, and more widely a broad range of housing needs, including specialist housing.

Paragraph 6.12.4 should have a clearer reference to the Secondary School and the need generated by the development. The SPD should acknowledge that the need for the school is wholly generated by development in the Lidsing/Capstone area.

## **Section D Delivery Framework**

We consider that the infrastructure section does not provide sufficient certainty on delivery, or acknowledge the wide range of services that will need to be provided or enhanced. The vision for the Garden Community refers to a degree of self-sufficiency with local services, with the role of the local centre and employment area. However the SPD notes at paragraph 2.2.3 that the community will function as an extension to the Medway urban area, and the context analysis shows a dependency on neighbouring services. The document refers to services such as a new secondary school to meet the needs arising from the Lidsing development being provided in Medway, and to some existing services, such as Capstone Farm Country Park, Lordswood Leisure Centre and Hempstead Valley Shopping Centre. The diagram at Figure 18, clearly shows the majority of existing services that new residents may use are in Medway. Medway Council considers that the development at Lidsing will have significant impacts on services and infrastructure in Medway. These include strategic and local transport networks and services, education, health services, sports, leisure, community facilities, parks and other green spaces.

The guidance notes that the infrastructure needs and phasing have been set in the LPR policy and Maidstone Infrastructure Delivery Plan. Paragraph 7.2.2 states that this has been rigorously tested with input from stakeholders. Medway Council does not consider that its views and updated information have been reflected in the LPR policy and IDP updates. We expect that planning applications will be determined on an accurate assessment of current and planned capacity, and that effective mitigations with clear triggers will be set. Medway Council will collaborate with Maidstone BC to provide information on services in our borough, and identify where enhancements will be needed to mitigate the needs arising from the Lidsing Garden Community, meeting the legal tests.

We will work jointly to achieve the vision for sustainable travel set for Lidsing. We note that the active travel infrastructure referenced to encourage behaviour shift will need to be considered at key destinations in Medway, as well as coordinated planning for an integrated network. We will be seeking further certainty through the Lidsing planning applications.

The SPD does not consider infrastructure needs in detail and refers to the Plan policy requirements and phasing. Further consideration will be at the planning application stage. We wish to see further certainty on the phasing and triggers, such as the medical facility and local centre. We note that the residential phasing plan shows the earlier delivery bordering Medway and we question the timing for infrastructure. References to delivery in Phase 2 could be as late as 2038.

Medway Council wishes to see greater acknowledgement of the anticipated impacts on its local services, and commitment to addressing the increased demands through securing developer contributions to upgrade capacity. The SPD is silent in a number of key areas, such as indoor sports centres, Capstone Country Park, and libraries where Medway facilities will be much closer to residents in Lidsing than services in the centre of Maidstone. The SPD as drafted does not give existing or new residents clarity on their local services, and what will be in place to meet the needs of the increased population. Developer contributions to services and infrastructure in Medway will be required to provide for sustainable development.

Further clarification would be useful on what stewardship model can be expected under paragraph 7.5.5. This may have cross border implications.

Capstone Farm Country Park is mentioned throughout the document, along with photos as precedent etc - 6 photos and 7 references in total. The development will have a big impact on the park but there is no reference to what measures will be put in place to protect it and the impact and mitigation on surrounding rural roads.

Appendix A P64 – Off-site Highway Improvements need to reference Medway Council.

#### Appendix B: Anticipated Planning Application Requirements

The checklist for the outline application does not include the need for a Design Code, which is fundamental in setting design and placemaking principles for any future development. Any Design Code should be tested alongside the emerging outline masterplan to see its potential outcomes, and how it may be refined and strengthened to promote appropriate high-quality development.

Site levels, despite being requested cannot not be completely defined at this stage, in the absence of proposed building types.

Whilst advanced planting to establish and develop the green infrastructure framework early on would be welcome, it is unclear why full planting details are being requested at the outline application stage. A green and blue infrastructure strategy, in addition to an open space strategy would be beneficial for the Outline Application, fully coordinated with the Design Code and site Masterplan.

An overarching lighting strategy may be of benefit at the outline application in setting out key principles. However, further strategies will be necessary as part of any future Reserved Matters and/ or condition application.

#### **Further thematic based comments**

##### [Integration of Landscape Character](#)

The SPD lacks a detailed analysis of both existing and historic landscape character, and how this informs the design and development of character zones/areas. The

consultation would have benefitted from having clear links and availability of technical supporting documents.

The development will impact on the landscape setting, our green infrastructure, such as paths, flood risk and drainage, and green corridors for nature. Lidsing sits to the south of Medway, and there are important links between the Kent Downs National Landscape and biodiversity assets in Medway, such as Darland Banks and ancient woodland. We have provided comments on landscape considerations.

The initial Masterplanning exercise considers site-based constraints, however, does not seem to recognise or integrate existing landscape character, crucial for creating a sense of place especially given its proximity to the National Landscape.

- The approach to site edges requires further consideration regarding landscape and built form density. The approach to wildlife corridors needs to be described.

### Heritage and Historic Landscape Consideration

We consider that greater reference could be made to heritage and historic landscape in guiding development.

- Integrating historic landscape elements can enhance and restore landscape character, align with Local Nature Recovery Strategy objectives, strengthen ecological corridors, develop character areas, and rationalise significant landscape moves like playing field locations.
- Historic mapping shows woodland areas and shaws previously providing connections with Roots Wood and Blowers Wood, contributing to the setting of Bredhurst and Lidsing. Re-establishing Caters Wood to the east would define the new residential community from the employment area, provide visual mitigation from the Kent Downs National Landscape, and enhance ecological connectivity on the eastern side of the site.
- Understanding the relationship between the historic landscape and historic built form can help to inform sustainable development which responds to local context and creates its own unique, but locally distinctive, character. That can be achieved through understanding the positioning of buildings in relation to the natural (such as the shaws on the site) and human-influenced landscape (such as the existing and former historic field patterns within the woodland infrastructure).
- The heritage section within Section C is welcome in that it considers impact on setting of heritage assets and specifically the military balloon installation, as well as the value of the historic landscape. However, the assessment of the historic environment within the site is lacking in depth for the purposes of a garden city development, focusing on archaeology and not settlement patterns as they relate to historic landscape infrastructure.
- Assessment of types and locations of past and current farmsteads should form part of the SPD to assist with the above, including reference to the Kent Downs AONB Historic Farmsteads Guidance, which is based on a comprehensive survey by Historic England and Kent County Council of the farmstead typologies throughout the county. This would assist in a better understanding of how development can integrate into the countryside.
- No mention is made of the Kent Historic Environment Record, which includes a map layer for the historic farmsteads identified in the Historic England and KCC

project. Abbey Court Farm [*this is named as Abbots Court In the Key Principles/Guidance on page 67? Is this a typo?*], Ivy Farm and Lidsing Court Farm are all identified as historic farmsteads, assets which have the potential to be considered non-designated heritage assets as historic dispersed plan and multi-courtyard plan farmsteads. Abbey Court Farm is mentioned only in Part 2 within a 'key principle' but it feels out of context as it states impact on '*Abbots Court Farm and other listed buildings in the vicinity.*' There are no listed buildings on the farmstead?

- The site is directly adjacent to the Kent Downs National Landscape. The Kent Downs AONB/NL Management Plan lists the components of natural beauty as including '*Historic, Cultural and Scientific Heritage*'. This sets out a clear narrative of the morphology of the area and how that has shaped the landscape and settlements (pages 77-79). It would be helpful to reference this specifically given the references to nucleated villages, hamlets, Gavelkind, assart fields, open commons, timber buildings, and the clay, ragstone, flint and chalk geology used in built structures which has established a strong palette.
- Paragraph 3.2.16, which follows a list of the designated heritage assets in Bredhurst, only discusses archaeology and gives no indication of the character of the heritage that will need to be assessed as part of any development.
- Paragraph 3.3.1 pre-empts any deeper heritage impact assessment by concluding that '*there is very limited impact on designated heritage assets on or near the site* [in fact it was concluded earlier that there were no designated heritage assets on the site] *though the potential for archaeology*'. This statement is not qualified in Section C. It is odd in any case to include this in an 'opportunities' section, which conversely should be looking for opportunities to enhance character by relating the development to the historic environment. Is this referring only to archaeology, as 3.3.2 states that the settings of the listed buildings in Bredhurst is a constraint?
- More could be done, therefore, to address paragraph 203 of the NPPF, which states that '*plans should set out a positive strategy for the conservation and enjoyment of the historic environment... This strategy should take into account... (f) the desirability of new development making a positive contribution to local character and distinctiveness; and (g) opportunities to draw on the contribution made by the historic environment to the character of the place.*' This could be potentially done through drawing out more summary conclusions from the heritage work which was completed to support the Local Plan, other than archaeological potential.
- This also relates to the development of the character areas, which give no indication other than geographically of how these were arrived at. The SPD gives little guidance as to how applicants will approach the 'Identity' component of the National Design Guide.

### Approach to Green & Blue Infrastructure

- Reference to Kent LNRS is positive but lacks explanation of its influence.
- Ecological corridors across the site are recommended for biodiversity.
- 37% open space is noted, but usability and inclusion of blue infrastructure are unclear.

- Green and blue infrastructure appears concentrated around existing features, limiting amenity space function.
- Where greenspace is shown within the main residential development, this is focused around flood zones rather than areas of landscape interest or importance. The green and blue infrastructure framework to development appears driven by drainage rather than the historic landscape context.
- The current approach to blue infrastructure states that "the location of this limited flood risk has been used to define the starting point for the green infrastructure" and on its own this is insufficient in developing an appropriate framework for green and blue infrastructure, including open space amenity provision.
- Blue infrastructure mapping, (presumably based on the site's greenfield condition), will significantly change with development. The design should serve multiple functions (e.g., flood management, ecology, and play) without sterilising open space.
- The green infrastructure layout should include open space provision, amenities, play areas, and biodiversity opportunities, ensuring no adverse impacts upon Medway facilities.
- The combined diagram for green and blue infrastructure doesn't seem to consider landscape character, views from outside the site, connections with Bredhurst, and access to the isolated eastern land parcel. It is unclear how this framework enhances long-distance views following the area's topography. Additionally, promoting leisure routes along main highway edges including the motorway, is questionable for leisure and amenity purposes.
- Part of the proposed development falls within the 6km zone of influence for the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) but this is not mentioned in the SPD. There is reference to this in the SEA and HRA Screening report on page 19, point 8G. Should there be reference to SAMMS contributions in the SPD Appendix A page 126, Anticipated S106 Requirements?
- In relation to Public Rights of Way, there is a risk of fragmented planning: Lidsing and Gibraltar Farm developments are progressing independently, lacking a coordinated strategy for shared green infrastructure and open space networks.
- Natural Corridor Disruption: Ecological links, including Ancient Woodland and Priority Habitats, are at risk due to development layouts that ignore landscape character and connectivity.
- PROW Conflicts: Several Public Rights of Way intersect sensitive woodland areas, raising tensions between access and conservation. Proposed downgrades and diversions require formal processes and may face delays.

### Approach to Open Space

- The on-site proposal does not address all open space typologies needed for new residents and falls short in areas such as play, allotments and parks & gardens. MC plans to follow the updated Fields in Trust guidance in its new Local Plan. MBC advised that they are following their own guidance but as the new residents will use Medway's open space facilities, and these will be impacted.

- Open Space: The Open Space Strategy should consider its interrelationship with Medway facilities and provision. The Recreational Hierarchy plan needs to understand significant play areas outside Lidsing and include other recreational elements like sports pitches and allotments.
- 6.5 – also needs to make reference to Medway’s Playing Pitch Strategy and Built Facilities Plan which will be ready in 2026. The impact on Medway must be taken into account, not just Maidstone, and relying on current facilities which are at capacity. Also consultation with Sport England at an early stage to ensure high quality outdoor sports provision on site. This also needs to be referenced in the Key Principles/Guidance.
- A comparison is shown on the following page based on 2,000 homes.
- FiT uses a rate of average household size in England of 2.4. Therefore, based on 4,800 new residents:

<b>Open space typology</b>	<b>New Fields in Trust guidance (per 1000 people)</b>	<b>Lidsing proposal (from page 5 of the Lidsing SPD Landscape &amp; Open Space slides)</b>	<b>What should be delivered on site based on new FiT guidance (as a minimum)</b>	<b>Additional notes</b>
Amenity green	0.6ha	3.33 ha	2.88ha	-
Play	0.25 ha – equipped play + 0.3 ha of informal play	1.19 ha	1.20ha equipped + 1.44ha informal play	Proposed is half of what it should be.  A lot of LAPs/doorstep play is proposed but these are only for very young children (see further comment below). A whole suite of play experiences should be included including formal, natural and older age such as BMX, MUGAs etc.

				These should link into a series of connecting open spaces.
Sports provision	1.2ha	7.6 ha	5.76ha + 1.92 ha of courts, greens, tracks & trails	Sports provision should be incorporated with new community facilities such as a leisure centre, community Hub etc so that there can be access to changing rooms, toilets etc
Allotments	- (Medway proposing 0.25ha)	0.95 ha	1.2ha (based on our research)	Medway will be looking at 0.25ha per 1000 so the expectation would be 1.2ha  Need to be actual allotments with plots and accessible facilities, not community orchards etc.
Natural/Semi natural open space	1.8 ha	31 ha	8.64 ha	Is a lot of this proposed as BNG?
Parks & Gardens	0.8ha	Not mentioned	3.84ha	Should be included

- This development will have a huge impact on Medway's existing facilities. Lordswood Leisure Centre is at capacity and is unable to take additional football pitches. The woodland adjacent to the Lordswood site would make it difficult to install a new 3G pitch here. Lordswood Leisure Centre needs investment, and it is unclear whether this will be able to cope with the additional demand.
- Capstone Farm Country Park – Capstone Road is a narrow country lane, and 2,000 homes will add significant additional pressure to this route. Additional car traffic needs to be minimised to the country park. Consideration needs to be given to additional public rights of way to improve access for pedestrians and cyclists to the south and east of the site. Medway Council would need to discuss transport infrastructure and access with Maidstone BC to plan to mitigate the impacts of development at Lidsing.

- Discussions mentioned the possibility of connecting open spaces between the Lidsing Garden Community and the neighbouring Gibraltar Farm development. How will this work if Gibraltar Farm comes forward before Lidsing phases, and will it be under a different developer? MC want to ensure that a high-quality, joined-up open space network can be achieved across these two sites.
- The diagrams indicate a lot of open spaces will be taken up by SUDs but what form will these take? Is most of the proposed natural/semi natural to address BNG? Will it be accessible? SUDs shouldn't be fenced off ponded areas but multi-functional, moving with the times. What is breakdown of actual usable open space versus SUDs? If these SUDs areas are to be fenced off ponds these should be discounted from the open space amounts.
- Figure 23 – is it possible to have a sense of scale of the greenspaces proposed? Need to ensure they are usable, practical spaces worthy of high quality outdoor pitches, play allotments etc. Can we set a minimum width?
- Figure 26 – shows only 3 play areas but these do not serve all the communities proposed. Also, these cannot just be LAPs. Paragraph 6.5.3 – Play - a site of this scale should be providing a number of NEAPs and LEAPs, not just LAPs as these are only for incidental play for a very young age. Guidance should follow latest Fields in Trust standards.
- Key Principles/Guidance – there would need to be more than one 3G pitch, also what about tennis, paddle, other outdoor sports and ancillary facilities needed to meet the relevant guidance?
- Allotments – also allotments themselves should be accessible, with cycle parking, different size plots, raised beds, consider width of paths etc.

Paragraph 6.10.13 – we note the reference to the project level HRA and seek to collaborate with Maidstone BC and the promoter in assessing and addressing the cumulative, and in combination potential impacts of development.

Paragraph 6.12.4 should have a clearer reference to the Secondary School and the need generated by the development. The SPD should acknowledge that the need for the school is wholly generated by development in the Lidsing/Capstone area.

## Transport Considerations

The SPD could be clearer in presenting a vision for sustainable transport for Lidsing and a strategy for how this will be achieved. Further work and consultation is needed. Transport planning needs to be addressed as a cross-border priority.

This is a critical matter for cross border working and an important aspect of the SPD to secure sustainable development. We want to ensure that the cumulative impacts of growth in this wider location are identified and addressed. This is essential in determining the triggers for transport improvements, particularly the strategic scale interventions, such as the link road and the works to M2 Junction 4. Without a connection to the M2 there is a likelihood of significant road traffic joining the Medway network and our Council needs to understand if increased traffic can be accommodated on the existing network, and how the link is expected to operate. The

SPD references benefits to communities in Medway from the new transport link. We need to better understand the proposal and our long-term aspirations will be realised as a result. We have specific interest in phasing and the nature of the site connection between North Dane Way and the M2. We need to be reassured that the transport measures take account of cumulative development in Lidsing and Capstone in defining triggers.

We wish to work closely with Maidstone BC, Kent County Council, National Highways and the developers in providing for effective transport mitigations and reducing the need for car based travel. Our joint work will include a collaborative approach to addressing potential impacts on the North Downs SAC.

Further work is needed to determine the transport impacts, the trip budget and assess the effectiveness of the mitigation measures. We share the ambitions for delivering more sustainable transport choice and reducing the need to travel. The aspiration to deliver high quality walking and cycling routes between neighbouring attractors in Medway, this is acknowledged and appreciated.

This will need ongoing collaboration to define the function of key links and routes, including the new link, routes such as Chapel Lane, and further consideration of bus routes and links. As many of the destinations for Lidsing residents will be in Medway, it is essential that we are involved in discussions with bus operators, and that there is a joined up approach to the planning and funding of services and supporting infrastructure. We need a similar approach to the design of walking and cycling. We can help your Council in this joint planning work, such as through our active travel and public transport working groups. These meet regularly and we have direct contact with bus operators in our area.

We would like to see greater certainty on the delivery of the highways improvements to M2 Junction 4. Can the SPD stipulate who is responsible for preparing the necessary application for M2 J4 and other parties involved. The SPD should confirm that the Lidsing development is to fully fund M2 J4.

Our draft Local Plan Capstone Valley site allocation policy says 'The design and layout of streets will provide for maximum bus accessibility and connections to an orbital bus route.' Please can the SPD say the same.

We will be providing separate comments to Charles & Associates transport consultancy as per their request in relation to their scoping work, and we will copy Maidstone BC into this response.

### Points of correction/for review

- References should be to Capstone **Farm** Country Park
- Figure 8 – please review to ensure accurate and updated layouts of consented developments are used, particularly around new access.
- Figures 11, 12 and 13 are showing different scales and not easy to follow. Does not seem to be include all the Ancient Woodlands, LNRS etc within the vicinity.

- The scale/context of diagrams ie, Figure 15, could show a wider context, particularly Darland Banks
- Figure 19 – error in labelling – Kestrel shopping area centre – not sub-regional scale – same labelling as Hempstead Valley Shopping Centre
- Overlaying Information: A plan overlaying topography, flood zones, and ecology with the green infrastructure plan is required. It is unclear how existing and potential habitats interact with the layout proposals.
- Building Heights: The site masterplan would benefit from a diagram on building heights, especially for the employment area to the east.

### Incorporation of Strategy Documents

- The masterplanning process should positively address relevant strategy documents and guidance from Maidstone and Medway. These may include but are not limited to Kent & Medway’s Local Nature Recovery Strategy, Medway’s Green and Blue Infrastructure Strategy (Draft), Natural National Character Areas from Natural England, Kent’s Landscape Assessment, the Medway Heritage Assets Review 2017, the Kent Downs AONB Management Plan 2021-2026, and the Medway Landscape Character Assessment (June 2024).
- When accounting for the site’s proximity to the Kent Downs National Landscape, and a statutory duty for seeking to “further the purpose of conserving and enhancing the natural beauty of the area” in accordance with The Levelling-up and Regeneration Act (2023), any masterplanning work should fully consider guidance and publications issued by the Kent Downs Unit, including its Management Plan, Landscape Design Handbook, Guidance on the Selection and User of Colour in Development etc.

### Kent & Medway Local Nature Recovery Strategy

- Kent & Medway Local Nature Recovery Strategy [mapping](#) shows the locations of particular biodiversity importance (APIB), and areas that could become of importance to biodiversity (ACIB). It also highlights desired habitat and landscape management enhancements for geographic locations.
- Areas of Particular Biodiversity Importance (APIB):
  - Predominantly woodland to the western and eastern edges of the Capstone Valley.
  - Proposals provide a positive connection south with Bredhurst Hurst.
- Areas that Could Become of Importance to Biodiversity (ACIB):
  - Significant opportunities in Medway (entire Capstone Valley).
  - Further opportunities to the west and east of the site.
  - Proposed natural habitat in the current masterplan follows ACIB, to the south of site.
  - Looking at historic mapping for field patterns would enable a positive approach to place making that more favourably aligns to the LNRS and current ecological constraints / corridors. This would enable positive enhancements around Roots Wood / Westfield Sole Road, and the setting of Lidsing.

### Further Points of Consideration / Missing Information

- Highway Network: Is there further information on consideration towards the highway network for Lidsing Garden Community, and how this can avoid adverse impact on existing habitats?