

to be revisited and very likely updated as part of a Plan review. I am also recommending **MM14** which would insert a new paragraph into the Plan providing guidance on the Landscape and Visual Impact Assessment required by modified part 3 of the Heathlands policy. This modification would also be necessary for plan effectiveness.

Lidsing (Submitted Policy LPRSP4(b))

149. The Lidsing proposal would to a significant degree function and be regarded as part of the wider Medway urban conurbation. This would be reinforced by its general containment by the M2 motorway along the southern boundary of the site, which would form a notable physical barrier to the wider countryside and the rural settlement of Bredhurst. Nonetheless, it is justified that plan preparation has considered that the site is a location that could deliver garden community principles and a degree of self-containment given its overall scale at 2,000 homes and 14ha of employment land. The location and general approach to Lidsing is consistent with NPPF paragraph 73(b) and (c).
150. In terms of creating a sustainable community, with sufficient access to services and employment opportunities within the development itself, the submitted plan sets out a clear vision for Lidsing by 2057. This includes establishing an exemplar urban extension with a distinctive local character, to create a new place with its own identity. The submitted vision confirms it would be a landscape-led settlement, designed and constructed with climate change resilience at the forefront. Development would also be subject to a masterplanning process to ensure open space connectivity through the site from the Capstone Valley to the edge of the KDNL.
151. The site is required to provide 14ha of new employment land, which has been broadly profiled to comprise 50% storage/warehouse use, 35% light industrial and 15% office. Given the site would be directly connected to the M2 strategic road network this would be a justified approach. As such the objective of the policy to generate circa 2,000 new jobs, and possibly more, is realistic, with a reasonable prospect that a proportion of the new residents in the development would be able to access employment without the need to travel extensive distances. The proposed employment provision is central to delivering along the garden community principles. The proposed employment provision has fed appropriately into the transport modelling work for this stage of plan making.
152. In terms of wider on-site services and infrastructure to underpin the new community the policy requires a new local centre for retail, leisure and service uses. It also requires a new primary school. This is consistent with the evidence in the IDP. The proposal would also be required to contribute towards secondary school capacity in the area. Additionally, given the scale of

development, it should be made clear that the proposed new local centre would be the location for a new medical centre and a MM is necessary to identify this.

153. The development is envisaged to take 30 years and so the policy sets out a sound approach to governance arrangements over the long term. In addition to the initial masterplanning and SPD work, the project will need durable governance to ensure infrastructure is delivered in a timely manner over time. This also links to ongoing IDP and ITS processes, which will review and amend infrastructure requirements going forward. The significant evidence base for Lidsing provides a solid foundation of known infrastructure requirements, the ultimate cost and timings of which will change over the lifetime of this strategic project. Accordingly, and consistent with the approach described above for Heathlands, it would not be practical or necessary for soundness for a strategic policy to set out extensive detail on infrastructure planning for a 30 year project. Nonetheless, as submitted, the policy lacks sufficient content on overarching phasing and related infrastructure dependencies, some of which has now become clearer as further technical evidence has been prepared. As such a MM is necessary to add additional content on phasing and delivery in the policy.
154. In terms of creating a sustainable community, the Lidsing proposal would benefit from close proximity to existing services and facilities within the adjacent areas of Medway. This includes local services and employment in Lordswood to the west. The site is also adjacent to the Hempstead Valley Shopping Centre to the east. These would be within walking distance of large parts of the Lidsing site and cycling distance from within the whole site. Moreover, Hempstead Valley Shopping Centre benefits from a regular bus service connecting into the wider Medway Towns. Similarly, there are existing bus services circulating through Lordswood and along Wigmore Road. Accordingly, opportunities exist to extend bus services into and through the Lidsing development, including through to Maidstone. This would not only serve the new community but has the potential public benefit to significantly enhance public transport connectivity for existing communities.
155. In creating a sustainable community at Lidsing, it is inevitable that the residents would look to services and facilities in Medway. The IDP³⁶ and ITS underpinning the Plan reflect this, including revisions during the examination process. As submitted the policy for Lidsing recognises this, including in respect of secondary education capacity and transport connections.
156. The vast majority of the Lidsing site is urban fringe arable farmland. It is a relatively open landscape at a point where the southern end of the Capstone

³⁶ See IDP Infrastructure Delivery Schedule (pages 43-46) and projects HTY15, HTY17-19 inclusive, Projects HTY20 and the specifics at HTY20A-G (including schemes in Medway), EDLPR5, EDLPR6 (c.£4.7million for secondary education in Medway), HPLR3, HPLPR4 (c.£2.5million for Medway Maritime Hospital), SCLPR2, SCRLPR3 (libraries in Medway), SCLPR5, PSLPR5 and GBLPR1 (c.£6.5million to Medway for open space and formal sport provision).

Valley gently plateaus before moderately rising as part of the lower dip slope to the Kent North Downs. This dip slope becomes a more pronounced landscape feature to the south of the M2 and Bredhurst. Large parts of the site have a relatively weak landscape framework, including the large open arable field within the KDNL part of the allocation. Mature trees are generally located towards the peripheries of the site. In large parts of the site, the rural character is extensively eroded by significant volumes of local traffic, the proximity of existing urban settlement and the M2 motorway. Other than the land required to facilitate highway access the site is outside of the KDNL. Overall, the landscape harm outside of the KDNL would be limited and localised.

157. As part of the MMs consulted on it was recommended to delete a specific reference to the provision of 31ha of natural/semi natural open space as part of the open space requirements for the site. On reflection, I am reinstating the figure, given the clear vision³⁷ for Lidsing as an exemplar garden development. I accept the figures are necessarily indicative given it is a strategic policy for a long-term development. Consequently, I am recommending some additional text to part 5d) of the policy to reflect this, and this would be necessary for effectiveness. On the large 20ha open arable field within the KDNL, required for highways access, the remaining balance of land (19ha) is proposed for habitat creation. Further environmental assessment work as part of masterplanning and planning application(s) will determine local mitigation where required in accordance with other policies of the Plan.
158. There are various protected habitats within the vicinity of the site, including the North Downs Woodland SAC to the south and the Medway Estuary and Marshes SPA and Ramsar site to the north. Accordingly, the allocation policy has been assessed as part of the HRA. I deal with the Woodlands SAC below because it is integrally linked to transport. In terms of the Medway Estuary and Marshes SPA and Ramsar, future occupants of the proposed dwellings are likely to add to recreational pressure on this habitat and as such, without mitigation, the integrity of the site would be adversely impacted. The submitted policy requires the Lidsing proposal to make a financial contribution to an existing mitigation scheme and on this basis the HRA has been able to conclude positively that there would be no adverse impact on this habitat.
159. In terms of the historic environment there are various heritage assets on the site and in its vicinity. There would be the issue of additional traffic generated by the Lidsing proposal passing through the Boxley Village Conservation Area. Having regard to the SA³⁸ any harm to the significance of heritage assets from the principle of allocating the site in the Plan would be less than substantial and outweighed by the public benefit of delivering much needed new homes in a

³⁷ LPR1.97 (page 83) refers to the 31ha figure

³⁸ Submission SA report LPRSUB002a paragraphs 7.156-7.157

sustainable location. Additional policy content is required to reflect the presence of heritage assets.

160. The potential highways implications arising from the Lidsing proposal have been a significant issue. This is in relation to impacts on the wider strategic road network (the M2), connectivity into Medway and localised impacts for rural communities between Medway and Maidstone (Boxley and Bredhurst). The submitted plan was accompanied by strategic transport modelling. A significant volume of additional transport assessment work for Lidsing has been provided.
161. The Lidsing development would be principally accessed from the M2 strategic road network. The proposed approach would require an improved connection to the adjacent M2 Junction 4, immediately to the east of the proposed allocation. Various constraints mean the proposed allocation cannot connect to the existing Junction 4 via Hoath Way. The identified solution would be to create a new fourth arm at the junction. This would require replacing the existing Maidstone Road overbridge with a new realigned bridge and a new arc of approach road to the south of the existing junction. This new approach road, including embanking and lighting, would be within the KDNL.
162. I address the KDNL issue below and deal here with the acceptability of what is proposed at M2 Junction 4. Initial assessment work has appropriately considered various options to connect to the M2, including a "do nothing" scenario and a free-flow three arm junction at Junction 4. Neither of these options are reasonable given constraints elsewhere in the local road network within Medway. In terms of alternative means to access the M2 consideration has been given to the Plan's proposed new arm to existing Junction 4 and a new junction altogether. There are cogent reasons, including securing a new east-west link through the site, that support the identification of connecting into Junction 4 as the approach to be preferred.
163. The technical work shows the connection into Junction 4 to be feasible. It would reconfigure the existing Maidstone Road connection between Bredhurst and Hempstead and involve a replacement overbridge. In principle, National Highways do not object to the proposed approach at Junction 4, although it will clearly require further work. In addition to the new junction arm, associated measures to improve capacity at the junction, through the options of lane markings and part signalisation have been identified (set out in ED53c). Overall, the requirement of the policy for a new connection to the M2 at Junction 4 is justified. MMs, however, would be necessary for effectiveness to indicatively identify when it would be required.
164. In addition, National Highways have also sought confirmation that identified impacts on Junction 3 of the M2 are also considered at this strategic level of plan making. Whilst modelling had identified impacts on the M2 Junction 3

arising from growth in the Plan, the issue by the time of the MMs consultation had been picked up in the IDP (Project HTLPRJ3) and as part of a specific modification for the Lidsing policy in terms of further assessment of off-site highway mitigations. This is in addition to the IDP separately identifying the A229 corridor (Blue Bell Hill) between the M20 (Junction 6) and M2 (Junction 3) in respect of Borough-wide growth (Project HTLPRJ4). In relation to this latter project, KCC are advancing a major scheme for improvements to the A229 Blue Bell Hill corridor including at M2 Junction 3.

165. I recognise the Council's latest evidence [ED135] creates some potential tension between identifying a specific local scheme for the Plan's growth as opposed to the approach of a strategic solution to Junction 3 and the A229 corridor now being advanced by KCC. However, the evidence now being presented seeks to reassure National Highways that Plan growth can be mitigated in respect of the strategic road network. I do not consider it undermines the case for a more advantageous strategic solution as advanced by KCC. I do, however, consider that where the Plan identifies specific highway mitigation to support the Plan's growth that capacity at M2 Junction 3 be added to this list. As it was already identified in **MM16** in relation to the Lidsing policy and in the IDP I do not consider making a further specific amendment to **MM51** in relation to Junction 3 would be prejudicial. No MMs are necessary as a consequence of the further evidence on M2 Junction 3 to Policy LPRSP13 as this identifies that any infrastructure requirements in site specific policy are not an exhaustive list.
166. In terms of local access and highways at Lidsing there is a clear transport strategy to deliver an east-west highway link through the site and to encourage modal shift. As such it has been appropriate that high-level transport assessment work for Lidsing has taken account of these two factors. It is evident that appreciable volumes of traffic are unsatisfactorily using the network of lanes across the Lidsing site to travel east-west, to the detriment of more sustainable forms of travel. As such the Lidsing proposal presents a strategic opportunity to establish improved connectivity (for various modes) between areas of the Medway towns, which should be regarded as a clear benefit.
167. The obvious solution for a cross-site link at Lordswood would be to connect into North Dane Way, which is already laid out at Albemarle Road to continue south-east into the Lidsing location. This would require land not in the control of the site promoter to make the connection. The land is controlled by Medway Council who have determined previously not to dispose of the land in order to protect the area. This matter is regarded by those opposed to Lidsing as key to the soundness of the proposal. At this stage, I disagree for two reasons. Firstly, other major development has already been approved in the vicinity of North Dane Way. If the Lidsing Garden Community proposal is added to this,

particularly in combination with the adjacent Gibraltar Farm scheme³⁹ (in Medway), the potential benefits of North Dane Way, particularly for bus circulation, should not be disregarded. Secondly, whilst sub-optimal, other options for an east-west link may exist via an upgraded Ham Lane and the Gibraltar Farm scheme⁴⁰. As such it remains justified that the Lidsing proposal seeks to deliver the clear benefit of a new east-west link across the site.

168. The Transport Assessment work in ED53(a)-(c)⁴¹, identifies a potential number of off-site junctions in Medway that would require improvement as a consequence of traffic generation arising from the proposed allocation. This has been considered further in a technical note on indicative phasing and mitigation⁴². Details on the practical delivery of off-site improvements would be more appropriately addressed through the SPD, masterplanning and attendant transport assessment processes. I do, however, consider it necessary for soundness that the policy for Lidsing is clear that off-site highway improvements will be necessary, including in the Medway area. This would align with evidence in the IDS and ITS. Accordingly, MMs are required which I set out below.

169. Whilst there is an emphasis on encouraging containment in Lidsing in line with the garden community principles, transport modelling shows additional vehicle trips towards Maidstone. However, the implementation of an east-west link through the scheme is shown to have an appreciable effect in re-distributing traffic away from Boxley to the enhanced access at M2 Junction 4. Nonetheless, the route via Boxley provides the most direct link to the northern edge of Maidstone, rather than the better standard of the A229. In this regard I share the concerns of local Parish Councils and KCC regarding the need for mitigation. The issue of this traffic assignment also aligns with the impact on protected woodland habitat between the Lidsing development and Boxley. As such there are two clear reasons to deter and manage traffic south of the site.

170. The proposed approach for Lidsing must start from the point of encouraging modal shift in terms of its location, comprehensive mixed-use development and the potential of bus, cycle and walking. This has been analysed through the Transport Assessment and subject to further detailed work on bus routes and wider site connectivity for pedestrians and cyclists. At a high-level, modelling work (using either KCCs VISUM or Medway's AIMSUN strategic models) shows that an east-west link through the site will re-assign some off-site traffic from the local road network. This is likely to be the case for Bredhurst given an east-west link would be a more attractive route than the current arrangement.

³⁹ Principle allowed on appeal March 2017.

⁴⁰ LPR1.97 page 51 and LPR1.109 (paragraph 3.3.6) and sensitivity tested in ED53 Lidsing Transport Assessment

⁴¹ Following the scoping presented in ED4F

⁴² ED93 Technical Note - March 2023

171. Whilst I appreciate local communities will want to know specific interventions at this stage that would not be reasonable or necessary for plan soundness for a strategic policy. What is evident from the transport evidence for Lidsing (and indeed wider growth) is that deterrence measures are likely to be required in both Bredhurst and within the development that will discourage the number of movements south towards Boxley such that the alternative routes would be preferred. This would need to be the subject of more detailed work. Supporting interventions have been considered at a level proportionate to plan-making as part of the further assessment work. At a high level the possible interventions include internal road layout design within the development, measures within Bredhurst and possible intervention at the Forge Lane bridge. It would be premature to contain specificity on the interventions in the strategic policy and so it would be sufficient for soundness to modify the policy to confirm that a transport assessment will consider mitigations in Bredhurst and Boxley as set out in **MM16**.
172. Deterrence is also going to be required as part of the strategy to address air quality on qualifying features of the North Downs Woodland SAC, as set out above in the HRA being able to arrive at a positive conclusion. The mitigation strategy identified as part of the HRA will include, amongst other things, traffic calming to discourage access/egress via Boxley and Bredhurst, green travel planning and modal shift at the Lidsing development, layouts that discourage access via Boxley and softer measures such as signage strategies. Consequently, in order for the plan to comply with the Habitats Regulations and to be justified, effective and consistent with national planning policy with regards to actively managing patterns of growth and mitigating impacts on the road network to an acceptable degree significant additional content needs to be added to the Plan in respect of Lidsing. I set this out below in the recommended MMs.
173. Clearly, Natural England will have a role in advising on an effective mitigation at the project level. Given the issue relates to traffic and mitigation will also likely involve highway interventions, I have amended the wording of **MM16** to include an additional reference to the input of the highway authorities, where relevant. I consider this further modest change, post the MM consultation, is necessary for effectiveness.
174. The proposed housing and employment development at Lidsing would be outside of but within the setting of the dip slope of the Kent Downs. As set out above, the highway connection to the M2 would require land within the KDNL. The NPPF at paragraph 176 states that the scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

175. The proposed highway within the KDNL requires approximately 1ha of land and would involve a length of new single carriageway spur, elevated on an embankment to cross over the M2 via a new over-bridge and with various lighting columns and signage. Having regard to the proposed nature and scale of the development and its potential to adversely impact the purpose of the KDNL the proposed scale of the highway works would amount to major development.
176. There is a need for a direct connection to the M2 to serve the allocation and avoid harm to the surrounding road network. Whilst some early development may be feasible without it, later phases of the housing as well as the employment development will require the link. More widely, an east-west link through the site, has the potential to offer appreciable transport benefits including for bus circulation between existing communities in the Medway Towns.
177. In terms of the scope for connections to the M2 to avoid the KDNL, this is challenging as the M2 forms the boundary to the KDNL. Other options to accommodate a connection to the M2 have been explored and appropriately considered in LPR5.6, ED21 and ED53⁴³. Alternative options, including those that would also require land within the KDNL, have been appropriately discounted. In terms of detrimental effect to the KDNL, I find the large, generally featureless 20ha arable field within which the proposed highway works would be accommodated has relatively few key landscape characteristics of the KDNL. There are no public footpaths across it and only very limited biodiversity value. Current traffic noise from the adjacent M2 means this is not a tranquil location.
178. Of the 20ha host field, approximately 19ha would be available for landscaping, biodiversity and appropriate public access. As such the harm would be significantly moderated. I do consider, however, a MM to part 3 of LPRSP4(b) is necessary to ensure that the 19ha is clearly secured for the intended mitigation and subsequently reflected in the SPD and masterplanning processes⁴⁴.
179. Overall, I consider there is a reasonable prospect that planning permission would be granted having regard to the test of exceptional circumstances and the public interest considerations, in the terms set out at NPPF paragraph 177 a)-c).
180. The allocation is immediately to the north of the KDNL and within its setting. The policy as submitted seeks to address the impact, but it would be broad-brush and therefore not effective in terms of securing necessary mitigation.

⁴³ Strategic Road Network Access – Options Appraisal

⁴⁴ As shown, indicatively, at Appendix 7 to ED68

Accordingly, significant MMs are required for effectiveness and to ensure consistency with national planning policy at NPPF paragraphs 174 and 176.

181. The policies of the Plan, including for Lidsing, have been assessed as part of plan-wide viability work and then further as part of addendum for strategic sites to take account of proposed MMs. For Lidsing, the vision is to create an attractive, exemplar community which would have appeal and value. Additionally, the proximity to the M2 will generate commercial value for the proposed employment uses. The site would have significant infrastructure costs, notably the improved access to the M2 including replacement of an existing overbridge. Approximately £12million has been ascribed to this⁴⁵.
182. Lidsing at present values would be a £737million development. The latest viability assessment for the Plan shows that the development would be viable based on 40% affordable housing and some £77.6million for infrastructure. There is a clearer viability for Lidsing, compared to Heathlands, such that it would require notable decreases in values or increases in costs to render the scheme unviable. I note that some infrastructure costs for Lidsing are disputed, including with Medway Council, but further work will be required to determine specific costs. As set out elsewhere, the viability assessment for the Plan has taken a cautious approach on factors such as build costs that would provide some contingency to be balanced against increases in infrastructure costs. There is little to persuade me that the viability situation at Lidsing is so tight that this strategic site should be removed from the Plan on deliverability grounds. The viability assessment of Lidsing assumes no external funding. As set out above in relation to Heathlands, this is a long-term strategic project, where costs and values will flux over time. In accordance with the PPG, if fundamental delivery issues arise, this would be a matter for Plan review.
183. As submitted the Plan considers that Lidsing would start delivering first completions in 2027/28, immediately ramping up to 130 units per annum. I find the date for initial completions optimistic by at least a year given the various stages that follow plan adoption. A more realistic scenario would also see an incremental delivery profile in the first two years resulting in a maximum annual output at 130dpa thereafter. As such, this feeds into my separate conclusion below in Issue 7 that the overall housing trajectory in the Plan needs to be stepped.
184. In summary, for the various reasons set out above, the detail of the submitted Lidsing Policy LPRSP4(b) is not sound. Accordingly, MMs are required for plan soundness.
185. Additional text is required in the introduction to the policy setting out the need for AA as part of the HRA and the broad mitigation strategy required, including

⁴⁵ IDP Project NTY15 at £12,058,000.

- for Lidsing. In addition to further transport modelling work, this would include a comprehensive, but not exhaustive, list of measures that could be deployed either alone in combination to comprise an effective mitigation strategy. This part of the modification is necessary to ensure a positive HRA outcome for this plan but also for effectiveness and consistency with national planning policy at NPPF paragraphs 174a), 175, 179 and 180.
186. Additional detail in the submitted policy is needed to ensure that impacts on the KDNL are appropriately mitigated. This includes further parameters for the strategic landscaping required, details on the scale and design of commercial development, the requirement for a detailed Landscape and Visual Impact Assessment as part of the progression to an SPD and generally lower densities of housing at the southern parts of the site. Allied to this additional policy content is needed to ensure that the 19ha of mitigatory landscaping south of the M2 is secured and factored into the SPD and masterplan. This are all necessary for effectiveness and consistency with national planning policy at NPPF paragraph 176. I have also recommended that additional text is added to the policy to reference the need for appropriate buffering to any ancient woodland and/or veteran trees within the vicinity of the allocated site. This would ensure consistency with NPPF paragraph 180c).
187. The addition of a new comprehensive table at part 1 of the policy on phasing and delivery is necessary. The table would set out for each 5 year phase the likely infrastructure dependencies and how they relate to the scale and progress of development. This would reflect the IDP and further detailed evidence during the examination that has reinforced the deliverability of the proposal subject to necessary mitigations. All of this is necessary within the policy to ensure that the Plan would be effective and consistent with national planning policy regarding national landscapes (NPPF paragraph 174), delivering sustainable larger scale development (NPPF paragraph 73b), c) & d)), managing sustainable patterns of growth (NPPF paragraph 105), facilitating modal shift (NPPF paragraph 106) and avoiding severe residual cumulative impacts on the road network (NPPF paragraph 111).
188. To provide further clarity on delivery and assist the masterplanning process, a Masterplan vision framework plan should be set out alongside the policy and referred to in part 3 of the policy. This would ensure the policy would be effective and consistent with NPPF paragraphs 73c) and 127. Although I do not recommend it for soundness, the diagram would benefit from a key to assist implementation of the plan.
189. Significant additional text is required to part 6 of the Policy including a requirement to submit a 'Monitor and Manage Strategy' for transport infrastructure in line with the 'vision and validate' approach in DfT Circular 01/22 and to be agreed in consultation with National Highways and KCC. I have slightly amended the wording of this part of the MM to clarify that the

implementation of the 'Monitor and Manage Strategy' will be agreed by the Local Planning Authority in consultation with National Highways and KCC Highways, to ensure further effectiveness. Confirmation that off-site highway mitigations in Boxley, Bredhurst, the A229 and A249 corridors, the M2 Junction 3 and at locations within Medway, are all necessary. That they will be subject to further assessment including through the 'monitor and manage' approach. In this regard, and following the consultation on the MMs, I have sought to strengthen the requirement that further transport assessment must be undertaken prior to the submission of any initial planning application and not just at the SPD process. I have also sought to make clear that such assessment work must consider the impacts on Bredhurst and Boxley as well as other locations identified, including in the IDP. These modifications would be necessary so that the plan is justified, effective and consistent with NPPF paragraphs 104, 105, 106, 110 and 111.

190. The policy needs to be modified to clarify that a medical facility could be included as part of a new Local Centre within the development, consistent with the IDP⁴⁶. This part of the modification is necessary for effectiveness.
191. A revised trajectory for housing delivery, amending first delivery from approximately 2027 to 2028 to reflect more realistic lead-in times is necessary. Additionally, revising the capacity of the site to be delivered within the revised plan period of 2038 from 1,300 to 1,340 homes is required. Additionally, clarifying within the policy that 40% affordable housing would be the target is also needed. These modifications would ensure the policy would be justified and consistent with NPPF paragraphs 68, 73d) and 74.
192. All of the above MMs are presented in **MM16** which I recommend so that the plan in relation to the strategic policy framework for Lidsing is justified, positively prepared, consistent with national planning policy and effective.

Conclusion on Issue 2

193. Subject to the MMs identified above the Plan's strategic policies for the Garden Settlements would be sound.

Issue 3 – Whether the policies for the proposed strategic development locations would be justified, effective and consistent with national planning policy?

⁴⁶ Project HPLPR2