

Objecting to Policy No LPRSP4(B): Lidsing Garden Community

I am objecting to Policy No LPRSP4 (B): Lidsing Garden Community, the policy is not sound, it has not been positively prepared or justified, and is not in conformity with the National Planning Policy Framework 2021, for the following reasons:-

Kent Downs Area of Outstanding Natural Beauty (AONB)

Para 176 NPPF 2021 states "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks"

Para 177 "When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."*

The plan proposes a new spur of the M2 to join junction 4 within land designated as an Area of Outstanding Natural Beauty (AONB) at Bredhurst. This will not only destroy this section of AONB but also have a detrimental impact on surrounding areas and is not in accordance with Para 176 of the NPPF.

The proposal is not in accordance with Para 177, it is not in the 'public interest' and should be refused. There are better locations for these houses and there are HUGE negative impacts on the environment, landscape and recreational opportunities (see below).

Ecology

Para 179 of the NPPF states *"To protect and enhance biodiversity and geodiversity, plans should:*

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and*

stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”

Para 180. *When determining planning applications, local planning authorities should apply the following principles:*

if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

- a) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- b) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- c) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate improve biodiversity improvements in and around developments should be encouraged integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.*

The new M2 junction 4 spur will be directly across a narrow country road from Bredhurst Woods, Site of Nature Conservation Interest (SNCI) which is host to over 50 ancient woodland indicator plant species, 9 different types of orchids, several European protected mammal species and is a nesting and foraging site for dozens of bird species.

New houses and employment land at Lidsing would result in a net increase of dwellings within 6km of the North Kent SPAs and Ramsar Sites.

The development would result in a permanent likely significant effect on the SPAs, Ramsar Sites, Purple Hills SSSI and Kent Downs AONB due to increase in recreational disturbance as a result of the new development, traffic, lighting, noise and pollution not in accordance with Paragraph's 179 and 180 of the NPPF 2021.

The development would result in the loss of good quality agricultural land that is used by birds of prey such as sparrow hawk and Kestrels for hunting. Removal of their

hunting ground and the introduction of housing and employment land would result in the loss of these majestic birds.

The loss of this land to housing and employment would also remove wildlife corridors for the migration of badgers, dormice etc

Strategic Gap

The Medway Local Plan has always sought to maintain the separation of Medway from Maidstone. Development within the gap should be prevented where that development would significantly expand existing settlements/create new settlements. The gap is intended to ensure developments are not built which would erode the open character of the countryside and undermine its function of maintaining the separation of the existing settlements.

The Lidsing development will remove the strategic gap that is left between Hempstead, Bredhurst and Lordswood making one giant urban sprawl.

The strategic gap acts as a green lung and buffer, helping to maintain the individual identity of urban neighbourhoods and rural communities, as a green corridor for the existing community to reach the wider countryside; as edge or “fringe” land, needing protection from the pressures of urban sprawl; and as habitats for wildlife and corridors, along which wildlife from the wider countryside can reach the urban environment. There is therefore a need to protect the landscape character and functions of this area for the existing communities and wildlife and not cover this essential area with houses and employment land to meet a housing demand when there are better less invasive areas that they could be placed.

Para 92 of the NPPF states that “*Planning policies and decisions should aim to achieve healthy, inclusive and safe places*” The inclusion of the Lidsing development in the MBC Local Plan is not in accordance with this policy and will erode the health and mental wellbeing of existing communities.

Transport Assessment

Para 111 of the NPPF states “*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*”

The plan seeks the inclusion of a new spur at junction 4 of the M2 motorway for use to access the new houses and employment land. The assertion that residents and employees will use this route to access the houses/employment is not correct. People will use the villages of Hempstead, Bredhurst and Capstone to ‘rat run’ to the motorway jamming up the surrounding roads including Hempstead Road, Capstone Road, Chapel Lane, Forge Lane, Westfield Sole Road etc.

This would have a huge impact with 3000+ cars using these residential/rural roads. The suggestion of sending buses along Westfield Sole Road to service the development, is a preposterous suggestion on this narrow, often single track road.

During development how is the village of Bredhurst reached while the new bridge is built? Are the surrounding single-track roads like Matts Hill Road going to be the diversion?

The proposal is not in accordance with Para 111 of the NPPF and would (if agreed) place an unacceptable impact on highway safety and sever cumulative impacts on the existing road network.

I am objecting to Policy No LPRSP4 (B): Lidsing Garden Community as it does not comply with the Duty to Cooperate.

The Statement of Common Ground (SCG) with Medway Council has identified so many areas for concern that do not seem to have been taken into account with the inclusion of Lidsing in the Local Plan.

In the SCG one of the strategic issues is set out as *“Ensuring that the borough’s biodiversity and wildlife habitats are suitably protected and enhanced. That regard is also had to wider green infrastructure”*. Stating that the areas include *“North Downs Woodlands Special Area of Conservation and, potentially, European designated sites in other boroughs SSSIs, Local Wildlife Sites, ancient woodland which straddle the borough’s boundaries including where established buffer zones cross boundaries. Wider Green Infrastructure, corridors, and biodiversity.*

The fact that so many designated areas are affected surely shows how ill-conceived the placement of this development in Lidsing is.

The SCG states :-

*“Concerns have been raised by MC that development at Lidsing will have impact on a **number of sensitive locations**, and that this will impact both existing communities and the potential for future growth in Medway. In its formal response to Maidstone’s Regulation 18b consultation, **Medway objected to the Lidsing garden settlement on account of transport impacts, impacts on the environment and sustainability, social infrastructure, as well as the risk of settlement coalescence, impact on green infrastructure, sustainability, landscape impact, impact on the Purple Hills SSSI and impact on the Kent Downs AONB.**”*

What a lot of issues that have been raised by Medway and not considered by MBC.

And goes on to say *“**Maidstone Borough Council and Medway Council agree that the proximity of the proposed Garden Community at Lidsing to the Medway boundary would result in the proposed development impacting on Medway.**”*

MBC are seeking to add housing and employment land on the boundary of the settlements of Hempstead and Lordswood in Medway. The impact this will have on the residents of Medway with these new residents using Doctors, Schools, Medway

Hospital etc will be catastrophic. On 5 November 2021 Tracy Crouch MP, Rehman Chishti MP, Kelly Tollhurst MP and Gordon Henderson MP, wrote to the Minister for Health outlining the demands already on Medway Maritime Hospital from the residents of Medway and Swale. Do MBC really think that residents of Lidsing Garden Development will travel to Maidstone Hospital for their needs when Medway Maritime Hospital is less than 5 miles from the site? One off Developer contributions are NOT going to help if 2,000 homes are built.

The development at Lidsing will undoubtedly have more impact on MC than MBC and yet MBC will reap the long-term rewards taking the Council Tax.

The SCG sets out the following Strategic issues: -

Protected sites

The proposed **garden settlement at Lidsing will lie within the 6km zone of influence of the Thames Estuary and Marshes and Medway Estuary and Marshes SPA and Ramsar sites.**

AONB & Landscape

The proposed new **garden settlement at Lidsing lies adjacent to and within the setting of the Kent Downs AONB**, and its landscape impact will need to be understood and addressed as the garden settlement policies are developed. Both authorities have had discussions with the Kent Downs AONB unit. **The impact of the development on the Kent Downs AONB and its setting is one of the grounds for objection from Medway Council.**

Medway Council has raised concerns that the garden settlement at Lidsing will result in the loss of the green gap formed by the area around Lidsing between the distinct settlements of Lordswood and Hempstead, which has a high sensitivity to development incursions. More widely, Medway Council has concerns around the wider impact of the proposals on the setting of the AONB and surrounding landscape. Changes to the NPPF highlight the need for any development within the setting of AONBs to be 'sensitively located and designed to avoid adverse impacts on the designated landscapes' (2021) and green infrastructure.

Maidstone Borough Council and Medway Council agree that the potential impacts on the Kent Downs AONB are a strategic cross border issue, and that **development should avoid adverse impacts on the designated landscape** and this issue should be carefully managed by both authorities.

Green Infrastructure

MBC notes Medway's comments and is committed to **ensuring that biodiversity and habitats are, where appropriate, secured and managed as part of the new garden community.** Furthermore, MBC will refine its approach to biodiversity assets through its forthcoming DPD. However, **MBC does not agree that that it is appropriate to commit to enhancing and protecting undesignated and unspecified sites**

Statement of common and uncommon ground

Maidstone Borough Council disagrees with Medway Council that non designated sites and sites of unestablished habitat and biodiversity status should be preserved and enhanced.

Infrastructure

Maidstone Borough Council and Medway Council agree that the **proposed development at Lidsing would have impacts on infrastructure and services in Medway.**

Water supply and treatment

MBC is exploring capacity for **WWTW capacity downstream of Lidsing which is likely to be in the Medway area.**

The SCG is damming, it clearly shows that the duty to cooperate with MC has not been met. It shows on so many levels the vast chasm of deficit where the two Councils cannot agree. The site should be thrown out of the Local Plan.

Proposed Modifications

Policy No LPRSP4 (B) Lidsing Garden Community should be removed from the plan. There are better sites set within the Maidstone District that will have less impact on Ecology, Designated sites, Air pollution, Noise Pollution, Landscape etc. Sites that are expansions of existing settlements, for example Marden which has existing infrastructure in place. Marden already has a mainline train station, library and much bigger village centre than Lidsing (13 houses and a pub). It also would require far fewer alterations to the roads so would be financially more viable and would deliver houses far quicker than Lidsing.

I am objecting to Policy No LPRSP4 (B): Lidsing Garden Community, the Sustainability Appraisal is not sound, it has not been positively prepared or justified, and is not in conformity with the National Planning Policy Framework 2021, for the following reasons: -

7.82 Policy LPRSP4(b): Lidsing sets out that a new local centre of not less than 1,500 square metres of retail, leisure and services will be provided within Lidsing garden settlement on a new orbital bus route with good access to employment (including at the Medway town centres), Hempstead, and Lordswood.

The requirement in the policy for the local centre to have good access to Hempstead and Lordswood suggests that the local centre and services and facilities there will be accessible to a large number of residents. However, MBC have set out in the Statement of Common Ground that it will not be a significant retail centre so as to take trade from Medway? Which one is it - not a significant retail centre or a retail centre that is accessible to a large number of people? It cannot be both?

The policy sets out that a new primary school and open space (to meet the area requirements of policy INF1) will be provided within the settlement. Contributions

towards the creation of a new secondary school in the Capstone Valley area will also be required. Considering these requirements for education provision alongside the requirement for a new local centre it is likely that occupants of Lidsing will be able to access day to day services and facilities.

Where is the new secondary school going? Capstone Valley? In Medway? Why are Medway taking all the services for a development that meets Maidstone Councils Housing targets? This goes to show the unsustainability of the development and how unsound the policy is.

7.83 In addition, a significant amount of employment (exceeding 2,000 new jobs) is required by the policy which is likely to help the resident population gain employment within their local area. This will also facilitate residents of surrounding areas to access employment opportunities here. Due to the scale of Lidsing garden settlement, it will be the case that residents and other occupants will need to visit other settlements to access higher order facilities and services. Some occupants will also need to travel away from the site to find employment opportunities which align with their skills and career ambitions. The provisions of the policy include a new orbital bus route which links to the Medway urban area, and strategic walking / cycling links along the Capstone Valley. These will help to ensure residents are able to access services, facilities and employment opportunities in the Medway urban area using active modes of travel and public transport, thereby reducing dependency on private vehicles. The proposed highway improvement at M2 junction 4 will also facilitate those with a private vehicle to access facilities, services and employment in other settlements. In accordance with the above, the effects of the policy in relation to this SA objective are anticipated to be significant positive.

The SA sets out that people will travel to other settlements for facilities and services – all of these will be within Medway NOT Maidstone. The SA is heavily relying on services and facilities in a neighbouring authority. All of this can be provided by Marden where there is already a mainline train station to London and a significantly better road network. Lidsing doesn't even have so much as a village shop or bus stop and yet MBC believe this is a better location than Marden???

7.88 LPRSP4(b) Lidsing set out that mitigation and requisite infrastructure should be ready to operate upon occupation of the garden settlement. The provision of services and facilities may benefit existing communities around the site, which may lead to some positive community views about the new settlement.

There is zero benefit to any settlement in the surrounding the area, each settlement (Hempstead, Bredhurst, Lordswood) has its own community, its own infrastructure and indeed its own identity, this new development at Lidsing will erode those villages, not add positively to them.

However, the Lidsing garden settlement is likely to result in increased traffic from occupants of the development. The proposed new arm to Junction 4 of the M2 (which is an element of the transport package associated with this settlement option) should help to ensure that this traffic is directed to main routes rather than local roads, which should help to avoid potential friction with the existing communities.

There is no guarantee this will be the case. You cannot account for human behaviour and undoubtedly people will use the quickest route to their destination, the roads around Bredhurst will be used to gain access to Maidstone, and the roads around Hempstead will be used to gain access to the mainline train stations (there are none near the new development) and all facilities in the Medway Towns that the new development will rely on – secondary schools, hospitals, retail etc etc.

The enhanced access to the M2 may be seen as a positive change by these communities. The potential for erosion of identity of the existing, adjacent communities is less than for Heathlands because most of the nearby residents are already living in the larger, urban Medway urban area, rather than, for example, a discrete rural settlement which is more likely to be dominated by such a scale of development. The adverse effects are not considered to be significant.

How on earth has the SA assumed "*The potential for erosion of identity of the existing, adjacent communities is less than for Heathlands because most of the nearby residents are already living in the larger, urban Medway urban area, rather than, for example, a discrete rural settlement which is more likely to be dominated by such a scale of development. The adverse effects are not considered to be significant.*" This is utter nonsense and is just being used as a justification to get what is a totally unsound idea for a settlement through the Sustainability Appraisal. Have MBC spoken to the communities involved? Has one person from Lidsing, Bredhurst, Hempstead, Lordswood etc been contacted directly and asked how they feel about the development that is proposed to ruin their communities, jam up their road networks, use their already overburdened facilities (doctors, hospital, schools, retail)? The very fact that the effects have been noted as "not considered to be significant" is wholly unsound. The effects will be devastating to the lives of the residents that inhabit these settlements. Just because Medway is a larger urban area than Marden or Heathlands does not, and cannot be used as a reason to say that the effects on the lives of those people is "not considered to be significant". I would like to see the facts surrounding this statement, the polls that have been undertaken, the research that has been done to justify this.

It is recognised that Bredhurst village is close to the site (within 100m of the boundary) but the segregating effect of the M2 is likely to reduce such effects. In accordance with the above, mixed minor positive and minor negative effects are identified from policy LPRSP4(b) in relation to this SA objective. All effects are uncertain as different members of the community may perceive this garden settlement differently.

If MBC were to actually ask the people that will live with this development what they actually think and took time to read the HUGE volume of objection letters that those residents of all settlements involved have written, they would see only negative impacts upon community cohesion. Medway Council is also not in agreement with MBC that this development will do anything by tear apart communities not strengthen them in the Statement of Common Ground.

7.94 A significant portion of the Lidsing site is adversely affected by road noise from the M2, which may result in a lower quality of life and at worst, compound health conditions.

It has been identified that the site is adversely affected by noise which may lower quality of life and compound health conditions and yet it is acceptable to add thousands of additional cars to the surrounding roads, along with the associated air and noise pollution. There will be no mitigation measures that can overcome this. The addition of extra cars to a road cannot be mitigated. The site is wholly unsustainable, there is no train station (unlike Marden) and no bus links (other than the ones that are proposed to go down narrow country lanes – which is absolutely absurd). There are poor connections to surrounding areas with no footpaths to Hempstead, Bredhurst or Lordswood and any that are proposed would likely be on Medway Council land and in their control not that of MBC, added to the fact the roads would have to be widened to gain new footpaths taking even more land.

Is it really considered acceptable to add to the noise and air pollution of an already affected area – to further compound the areas problems or is it really the case that MBC are passing the buck passing the noise and air pollution onto the residents of surrounding boroughs to contend with?

Policy LPRSP4(b) requires that noise and drainage and light pollution mitigation measures should be incorporated into the design of the site. This should help to limit the potential for adverse effects relating to noise and light pollution from the nearby motorway, although there is some potential for residual effects to result. Furthermore, similar to policy LPRSP4(a), LPRSP4(b) includes a provision that climate change adaptations and a mitigation strategy based on national and local guidelines should be incorporated into the design of the site. Similar to policy LPRSP4(a), this policy also re-iterates the significant provision of open space and cycling and walking links. In conclusion, policy LPRSP4(b) is considered likely to give rise to mixed significant positive and minor negative effects in relation to this SA objective.

It cannot be said that there will be “minor negative effects” there will be Major negative impacts on the existing residents of the area. Thousands of extra cars, houses and employment land cannot be said to have a “minor negative” effect – I would like to see the data that pertains to this and how you have come to this very “throw away” statement.

It is noted that mitigation may be to plants trees. And yet MBC are willing to destroy a carbon sink through the loss of acres of land to development in a AONB? This is ill conceived, no amount of small highway trees and areas of grass can overcome the devastation in order to create of series of road networks, new junction to the M2, houses and employment land. This policy is unsound and has not been fully thought through.

7.96 Access to health care and community support is crucial in helping with the diagnosis and treatment of mental and physical health matters. Policy provisions relating to the development of a healthcare strategy for each garden settlement, including how residents will be able to access healthcare and community support, would help to further enhance positive effects in relation to this SA objective, as would on-site provision of primary healthcare facilities at Heathlands, as noted under SA objective 3.

The reality is that access to healthcare will not be provided in the MBC area. The residents of the 2000 new houses are not going to drive nearly 9 miles to Maidstone Hospital when Medway Maritime Hospital is literally down the road. The whole premise of this site is based on the fact that Medway authority will give the new residents all the healthcare provision and support their mental and physical health. This is wholly unsound and unacceptable.

7.99 Policy LPRSP4(b) sets out that job delivery at Lidsing should seek to exceed the ratio of 1 job to 1 home, and as such it is anticipated that at least 2,000 jobs will be provided at this garden settlement, resulting in direct economic benefits through providing increased space for business to grow. In addition, the policy includes the provision of walking and cycling links connecting to the Medway Urban Area, a new orbital bus route linking to Lordswood and Hempstead, and a link to M2 Junction 4. These transport connections will facilitate the movement of the labour force to the most appropriate job locations. As such, significant positive effects are anticipated in relation to this SA objective.

The creation of new walking and cycling links... where? There are no footpaths, and those that would be created would totally change the landscape through the need to widen roads, many of which would be in the control of Medway Highways not Kent County Council and as such would need joint party working which as set out the Statement of Common Ground is not agreed. A bus service? On narrow lanes? This statement has no substance, I would like to see the evidence of where these paths and bus services would run.

7.101 The garden communities that are to be provided for under policies LPRSP4(a) and LPRSP4(b) would result in an increase in population within Maidstone Borough. Given the key role of Maidstone town in providing the greatest number and range of services, facilities and employment in the borough and the distances of the garden settlements from Maidstone town centre (Heathlands approximately 14km miles; Lidsing approximately 7km), it is likely that residents of both Heathlands and Lidsing will visit Maidstone town to access these. As such, the development of the garden communities as prescribed under policy LPRSP4 is likely to result in increased use of Maidstone town centre and minor positive effects are anticipated.

The increase in population will lead to an increase the Council Tax taken by MBC but the actual increase and effects of a new development in Lidsing will be felt in Medway not Maidstone. The siting of this settlement is not in any way connected to Maidstone, it will not "support vibrant and viable Maidstone". The settlement is detached from the town centre, and indeed borough, the settlement will appear to be set in Medway not Maidstone. This objective is not met and is unsound, to state that there are no negative effects is not true as indeed there will be 2000 new homes and areas of employment that are not supporting Maidstone and instead are using all the facilities of Medway.

7.105 The effects of site allocations in relation to SA objective 7: Sustainable travel will partly depend on reducing the need to travel by ensuring that the garden settlements provide essential services and facilities and employment as part of their overall development package.

7.109 Policy LPRSP4(b) includes several requirements of the Lidsing garden settlement that will help to reduce dependency upon, and use of, private vehicles. These include:

- Optimisation of density around areas which can best facilitate access to services;
- An orbital bus route linking Lordswood and Hempstead, as well as the Medway town centres;
- A new half-hourly bus service between the site and Chatham, although it is questionable whether this is sufficiently frequent to encourage a significant shift from use of private vehicles;
- New walking and cycling links within the site and to the Medway urban area through the Capstone Valley.
- Measures to prevent rat-running and to prioritise vulnerable road users and active travel modes, which will help to improve the safety of site users making use of active modes of transport.

The site is entirely unsustainable, there is no rail network (unlike Marden), the surrounding roads are narrow and for the most part are country lanes. There are no footpaths. An orbital bus link on narrow lanes is utterly unworkable. The rat-running will be awful for the surrounding settlements, those residents trying to get to Chatham will use the very narrow Capstone Road and then bottle neck onto Pear Tree Lane or Luton Road, those going to Maidstone will be going through Bredhurst and Boxley, small settlements with narrow roads with traffic calming. All new walking and cycling links that are relying on Medway to provide the links. The development does not meet this objective and is totally unsound.

7.110 These design and infrastructure provisions should help to ensure that dependency upon and use of private vehicles is reduced. However, the policy also sets out the requirement for a new link to junction 4 of the M2, which is likely to facilitate the use of private vehicles and as a result lead to increased traffic levels and, in some places, localised congestion although the delivery of these road improvements is likely to help offset this to some degree. Overall, uncertain mixed, minor positive and minor negative effects are anticipated in relation to this SA objective as a result of policy LPRSP4(b).

Please advise how the effects are “minor”. There will be catastrophic effects on the local network. There will be thousands of new cars flooding the roads around the site. The development does not meet this objective and is wholly unsound.

The uncertainty arises because the manner by which people will travel will be informed the timing of the provision of new infrastructure, its location, design and final routing, public awareness, journey time and cost of parking at the destination. This appraisal is subject to change as further transport modelling assessment may identify evidence which justifies a change to this assessment.

This paragraph alone demonstrates how little work has gone into researching the Lidsing development, there is “uncertainty” and “*further transport modelling assessment may identify evidence which justifies a change to this assessment*”, this

cannot be left as an afterthought, the development clearly does not meet this objective and is unsound.

7.120 The development of both settlements would therefore result in the loss of greenfield land. As such, significant negative effects are anticipated in relation to this SA objective for policies LPRSP4(a) and LPRSP4(b).

Significant negative impact.. and no mitigation for the Lidsing site? This is entirely unsound, how can there be such a damaging effect on an area and no mitigation proposed? Only Heathlands is mentioned not Lidsing? Please advise how this objective can be accepted?

7.125 Neither of policies LPRSP4(a) or LPRSP4(b) include provisions in relation to safeguarding water quality, other than the nutrient issue dealt with under SA objective 14.

7.126 In accordance with the above, given the lack of protection for water resources or water quality, each of policies LPRSP4(a) and LPRSP4(b) are assessed as potentially giving rise to significant negative effects in relation to this SA objective.

There is a significant negative effect, how is this sound?

7.131 The Lidsing garden settlement is approximately 7km from Maidstone Town centre and as set out in the discussion in relation to SA objective 6: Town Centre, it is likely that some residents of Lidsing will access Maidstone town centre. It is also likely that residents of Lidsing will visit the Medway urban area, a network of roads within which have been identified within the Central Medway AQMA. It is likely that some trips to both of these areas would be made by petrol/diesel vehicle. This is likely to result in increases in the pollutants for which the AQMAs are declared. As noted for Heathlands, there is also the potential for air quality issues to arise within the new garden settlement itself, due to use of petrol/diesel vehicles. As also noted for Heathlands, the policy includes provisions which will help to limit the use of motorised road vehicles including a settlement form and infrastructure to promote active travel, high ratio of jobs to homes and new public transport infrastructure. These elements reduce the potential for air quality impacts to arise. As such, minor negative effects are therefore anticipated in relation to this SA objective as a result of policy LPRSP4(b).

As identified in the SA above the site will introduce more cars into an area that is already heavily congested and within areas where there are existing AQMAs. How can there be a "minor negative effect", there may be a minor effect on Maidstone but there will be significant effects on Medway and areas that are already suffering from poor air quality. This objective is not sound and needs to be fully explored. Please advise how MBC have decided the effect is "minor". 2000 new homes, associated infrastructure and employment land cannot be mitigated through the planting of some trees, the development would devastate the existing "green lung" that helps to absorb pollutants, this justification is lacking and unsound.

7.135 Small areas of the Lidsing option are identified as having a 1 in 30 year surface water flood risk. Groundwater levels are anticipated to be at least 5m below ground

level. The site falls entirely within flood zone 1. Policy LPRSP4(b): Lidsing sets out that a flood risk assessment will be required. Furthermore, sustainable drainage methods are to be implemented to manage surface water flooding issues and to ensure that flood risk is not exacerbated elsewhere. Climate change adaptations and a related mitigation strategy are also required for the site which is likely to help address the potential for increased flood risk associated with climate change. The current low level of flood risk on the site is likely to reduce the potential for issues to result. In line with the requirement for a flood risk assessment and the minimal flood risk, it is considered likely that the flood risk matters can be appropriately mitigated and effects in relation to this SA objective will be negligible.

Mitigation

7.136 None identified.

The Climate is Changing. Governments are at last realising that human action is leading to more flooding and yet here MBC is placing more houses with hard surfacing onto greenfields that currently absorb water. Any local residents can advise that the area floods, the fields are constantly under water with large ponds on the surface well into the summer. No mitigation has been identified and “negligible” effects are recorded in the SA. This is unsound, I would like to be advised how this statement has been formed and how 2000 homes with associated infrastructure and employment land will not impact on surface flooding.

7.143 Policy LPRSP4(b): Lidsing expands on the provision of policy LPRSP4 and includes further provisions that will help to reduce potential greenhouse gas emissions from the Lidsing garden settlement. These include a new primary school, new bus routes and cycling and walking links within the settlement and to the Medway urban area to the north. Priority is to be given to active travel users through the site’s design. However, the policy also provides for a new link to M2 junction 4, which will help to facilitate travel by road which is, (based on current travel habits) predominantly private vehicle based. This is likely to result in greenhouse gas emissions more so than not providing this junction link. Overall, and taking account of introductory text to policies LPRSP4(a) and LPRSP4(b) as well as the specific requirements included in policy LPRSP4(b), minor negative effects are anticipated in relation to this SA objective.

Where are these bus and cycle routes going? In Medway? Are footpaths really going to be put on the current roads into Capstone? Lordswood? Hempstead and Bredhurst? Where are they going on these narrow country lanes? Is even more land going to have to be taken to ensure the roads are compliant to Highways standards?

A circular bus route? On narrow lanes? Or are MBC proposing to widen those roads as well? The climate is going to be irrevocably altered forever by the number of cars, the road network that has to be built to sustain this amount of development, the hard standing for the houses and employment land, the loss of this “green lung” in the heart of a built-up area. The siting of this development will decimate the countryside and the carbon sink and instead in its place will be a new settlement that will pump out pollution exacerbating climate change and yet this is seen as a “minor negative” effect. The policy is wholly unsound and does not meet the SA objective.

7.147 The Lidsing site does not intersect with any international, national or local designations. However, there is an area of ancient woodland within it and several

areas of ancient woodland adjacent to the site. In addition, there is a small area of Deciduous Woodland priority habitat within the north-east margin. The site is also within Impact Risk Zones for certain industrial processes which may cause air pollution – due to the sensitivity of the Purple Hill SSSI, just over 1km to the east. Northern parts of the site are also within an Impact Risk Zone for rural residential development associated with the Medway Estuary and Marshes SSSI.

The Lidsing site will have a catastrophic impact on the SSSIs, Ancient woodland and green buffer zones not only by directly reducing the land area available for the foraging and migration of animals but through the introduction of human activity and the far reaching impact this will have on nationally designated sites.

No amount of green space within the development will overcome the loss of species in these designated sites that have taken hundreds of years to establish. The biodiversity net gain associated with some open green space that will also be used for recreation will not be suitable for the many invertebrates, mammals and birds that currently live in the area. The predation of wildlife by cats and dogs that will be introduced as pets by the thousands of houses, will run over these new green spaces not allowing the establishment of ecosystems that the existing designated sites currently do.

7.151 Policy LPRSP4(b): Lidsing re-iterates and clarifies the biodiversity net gain requirements, citing that a biodiversity net gain of 20% must be achieved. However, the policy does not include any specific provisions to the designations and sensitive habitats / species within and near to the garden settlement boundary. Due to the provisions for 20% biodiversity net gain, minor positive effects are anticipated from policy LPRSP4(b) in relation to this SA objective. Having said this, until further assessment is undertaken and ecological mitigation designed, the potential effects in relation to this SA objective is uncertain.

How can the destruction of wildlife areas be equated to a “minor positive effect”? Where is the data to support this? Where has the figure of 20% net gain arrived from? How can any of this be supported when the final sentence in the paragraph clearly states, *“Having said this, until further assessment is undertaken and ecological mitigation designed, the potential effects in relation to this SA objective is uncertain.”* This is entirely unsound and not in accordance with the NPPF 2021.

7.156 There are no designated heritage assets within the Lidsing garden settlement site allocation but there are 10 grade II listed buildings approximately 200m to the east of the site at Bredhurst and Kelmsley Street. In addition, there is an archaeological priority area associated with Bredhurst Church. MBC officer assessment as part of the SLAA notes Abbots Court and Kelmsley Street farmsteads (listed, curtilage listed and non-designated assets) appear highly vulnerable to impact from potential motorway spur and access to the site and that development within their curtilage and setting would likely result in harm. Potential impact on the setting and significance of other listed buildings in Bredhurst, particularly St Peter’s Church is also noted. In relation to archaeology, the MBC officer assessment notes a general potential for Prehistoric and later activity, especially as Lidsing settlement is focused on a dry valley through the North Downs. There is a historic routeway which links St Mary Magdalene Chapel Lidsing and the historic farm complexes are located along

this routeway, including Abbey Court Farm. This site may also contain remnants of a 20th century military defence balloon site, which it would be preferable to preserve in situ.

7.157 Policy LPRSP4(b) requires the garden settlement to be masterplanned in a manner that interfaces with existing buildings which will be retained. It also requires that the Lidsing site is developed to survey and respond to areas of potential archaeological sensitivity. While the policy does not make reference to the need to ensure that the settings of the nearby listed buildings are protected, it states that the heritage of the site should be responded to, including the site's importance as a 20th century military balloon installation. These policy requirements are judged to reduce the potential for harm to the historic environment, resulting in a minor negative residual effect.

The SA states *"MBC Officer assessment MBC officer assessment as part of the SLAA notes Abbotts Court and Kelmsley Street farmsteads (listed, curtilage listed and non-designated assets) appear highly vulnerable to impact from potential motorway spur and access to the site and that development within their curtilage and setting would likely result in harm. Potential impact on the setting and significance of other listed buildings in Bredhurst, particularly St Peter's Church is also noted."* And yet goes on to say *"While the policy does not make reference to the need to ensure that the settings of the nearby listed buildings are protected, it states that the heritage of the site should be responded to, including the site's importance as a 20th century military balloon installation. These policy requirements are judged to reduce the potential for harm to the historic environment, resulting in a minor negative residual effect."* It is absolutely absurd that a MBC Officer has clearly pointed out the Listed Buildings are "highly vulnerable" and yet the paragraph sums up saying that this would have a "minor negative affect". How can this policy be sound when it is going to have such a detrimental impact on the heritage of the area? There is no way to "design out" harm to the heritage of the area when there is the proposal for a new spur to a Motorway passing within the curtilage of Listed Buildings. This policy is entirely unsound and is not in accordance with the NPPF 2021.

7.163 The Lidsing site falls almost entirely into the Bredhurst and Stockbury Downs character area, which has moderate sensitivity to change. The reasoned justification to the allocation policy sets out that in order to provide the additional link to M2 junction 4 (which is a key infrastructure element of Lidsing garden settlement), an area of the AONB would be required. Although the reasoned justification text also sets out that significant enhancements to the AONB would be provided, it is considered that harm will still arise from this, albeit this may be considered 'acceptable' in planning terms.

The only way that this development can be brought forward is to build a new spur off the M2 at junction 4 in the AONB. This will cause irreplaceable long term harm to the AONB in the immediate area and also far reaching effects through the destruction of habitat and land for foraging, that can never be replaced. The construction phase will in itself create noise and air pollution which will displace wildlife and the long-term use of this road will cause irrevocable damage to the area. How can this be seen as "acceptable" in planning terms. The devastating effects of this development cannot be said to be acceptable in planning terms when there are more sustainable locations (Land north of Marden) which already have infrastructure in place that have not been

fully explored. There are no justifications or reasons why the Land to the North of Marden has not been brought forward, this needs explanation, especially when the site has infrastructure above and beyond the other two sites that have been put forward.

7.166 For Lidsing, the site is considered to be in a location that is moderate sensitivity but due to the proposed road link which travels into the AONB, is considered to have potential for significant adverse effects. Policy LPRSP4(b) includes a provision that a landscape-led approach should be taken for the development to ensure that there are positive enhancements to the Capstone Valley and Kent Downs AONB. The development should also create a positive out-facing edge when viewed from Lordswood, Hempstead and the AONB and the settlement shape should be configured with regards its relationship to the Medway urban area, as well as the AONB and Bredhurst. As a result of this and the significant mitigation proposed in relation to the new link to M2 junction 4, residual minor negative effects are anticipated as a result of policy LPRSP4(b) in relation to this SA objective.

The paragraph clearly states that the development would have a significant adverse effect” no amount of mitigation through a “landscape-led approach” can offset this devastation and reverse the significant negative effect this development would have on the character of the area. It is absurd in the same paragraph to state that significant mitigation will create a “minor negative effect”. What mitigation can possibly overcome the provision of a new spur to a motorway? This objective cannot be said to be met and is entirely unsound.

I am objecting to Policy No LPRSP4 (B): Lidsing Garden Community, as there are other sites that are more sustainable with better infrastructure that relate better to Maidstone Borough Council and have not been fully considered: -

Marden lies on the Ashford International - Tonbridge - London Charing Cross and London Cannon Street lines. It is a large settlement with a population of approximately four thousand people and is the second largest parish in Kent.

Marden has convenience stores, butchers, pharmacy, hairdressers, pubs, florist, Car Garage, Mini day spa and a petrol station.

As set out in the SA the Land North of Marden could have the roughly the same provision as that of Lidsing, only with better infrastructure, that is already in place and yet is not even being considered in the new Local Plan.

Lidsing by contrast has 13 houses and one pub. How can a new development in this area be deemed sustainable when compared to Marden?

Land North of Marden even outperformed Heathlands in sustainability (para 4.47) and flooding (para 4.52) and yet is not in the Local Plan? Why?

4.54 Although Lidsing was appraised as being most sustainable across the range of SA objectives, potential significant negative effects (sometimes mixed with more positive effects) were nevertheless identified in relation to six SA objectives - SA

objective 4: Health; SA objective 9: Soils; SA objective 13: Climate change; SA objective 14: Biodiversity; SA objective 15: Historic environment; and SA objective 16: Landscape. Whichever of the garden settlement options is taken forward, it will be important to further investigate the potential negative sustainability effects highlighted by the SA and to ensure that they are avoided or reduced as far as possible, including by reference to the potential mitigation outlined in Appendix C.

Does this not speak for itself ... the Lidsing development has 6 SA Objectives that have been assessed as having a potential significant negative effect, yet it has made it into the Local Plan? How? Is it because Medway will have to mop up the significant negative effects while Maidstone gain the Council Tax?

Based on the above the SA is totally flawed and unsound and cannot progress in its current state. It is not compliant with the NPPF and any development at Lidsing would have significant adverse impacts on the AONB and Landscape, Biodiversity, Heritage, Surface Water, Climate Change, Soils, Air and water pollution, Health and wellbeing and Community cohesion.

This policy cannot progress, and more work needs to be undertaken to look at other suitable, sustainable sites such as land North of Marden that have been thrown out before they have been properly assessed and clearly have less impact on the above factors when compared to Lidsing.

Please keep me notified of changes to the Local Plan and on-going consultations.

