

**APPENDIX A: Maidstone Borough Local Plan - Key Issues arising from Public Consultation (Regulation 18)**

Policy No.	Policy title	No. in support	No. of objections	No. of observations	Key issues arising
SS1	Spatial Strategy	14	239	23	<p><b>1. The objectively assessed need figure of 19,600 dwellings:</b></p> <p>The figure is too high. Objectors suggest various figures generally ranging from 11,000 to 15,500.</p> <p>The methodology behind the figure is flawed</p> <p>The figure results from atypical recent trends</p> <p>Population growth cannot be projected accurately</p> <p>This number of homes is not needed</p> <p>This number of homes is not deliverable</p> <p>The figure should take account of the unmet requirement resulting from the Plan for London.</p> <p><b>2. Scale of housing proposed in the draft Local Plan:</b></p> <p>Is too high. It will adversely impact on the character of the borough, on the quality of life of existing residents, on air pollution and on wildlife habitats. It will result in the loss of greenfield land and agricultural land. Traffic impacts have not been fully assessed.</p> <p>Is too low. It does not meet the objectively assessed need. Overriding infrastructure and/or environmental constraints have not been sufficiently demonstrated.</p> <p>Windfall developments have not been given sufficient allowance in the housing figures</p> <p>Has been based on the availability of land rather than following a 'place-led' assessment of capacity.</p> <p>Gypsy and Traveller pitch requirement is too high</p> <p><b>3. Spatial distribution of housing:</b></p> <p>Dispersed strategy will result in urban sprawl</p> <p>Too much growth has been allocated to the rural areas. There should be more growth in Maidstone where the jobs are.</p> <p>Development should be more evenly spread to include a wider range of smaller rural settlements</p> <p>Development to the NW and SE of Maidstone will adversely impact on transport and local character.</p>

					More brownfield sites should be found in the town centre and in Maidstone urban area. Brownfield sites should be used before greenfield sites.
					A new town should be proposed along A20 corridor.
					Support for the dispersed pattern of development
					A systematic evaluation of alternative options is lacking
					Better protection for villages adjacent to the AONB and to areas of Local Landscape Value
					<b>4. Infrastructure:</b>
					Infrastructure provision is insufficient to match the scale of development. There will be adverse impacts on schools, health facilities, water supply and sewerage. Infrastructure should be provided before the new homes. There is a lack of clarity about infrastructure requirements.
					There is no Integrated Transport Strategy in support of the Local Plan
					<b>5. Employment/Retail</b>
					There is insufficient employment land identified to match the scale of proposed housing
					More employment land is needed in the Rural Service Centres
					More employment land is needed at motorway junctions
					The characteristics of the identified employment sites do not meet the full range of needs
					The economic forecasting approach is flawed and results in a higher employment land requirement than is needed.
					Junction 7 is not an appropriate location for any development and/or for retail
					Convenience and comparison retail needs should be met in full
					<b>6. Countryside</b>
					The countryside should be protected for its own sake
					<b>7. Joint working:</b>
					KCC and MBC need to have meaningful agreement on housing numbers and infrastructure requirements
					There should be better co-operation with adjoining authorities to achieve a joined up approach to planning
					Better account should be taken of neighbourhood plans
SP1	Maidstone Town Centre	11	8	7	Retail offer needs strengthening to compete with out of town developments.

					Representations propose specific inclusions and exclusions from the town centre boundary.
					Offices: conversion of offices to residential use should be streamlined; provision of additional good quality office stock should be encouraged, not just the retention of existing good quality stock;
					Generalised support for the proposed redevelopment of The Mall and for leisure and cultural development in the town centre
					Additional housing in and at the edge of the town centre should be identified
					Sufficient, affordable car parking needed.
					The policy should be more explicit about how many additional houses and how much additional office and retail floorspace the town centre will deliver
					High Street/Gabriels Hill should be part of the primary shopping area
					Specific allocations at Baltic Wharf and Lockmeadow sought and amendments to the Maidstone East allocation
					Concerns that congestion and pollution will be worsened by development proposals. Pedestrian access is constrained.
					Better utilisation of the rivers, including their protection for wildlife.
SP2	Maidstone urban area	7	12	4	Some unconditional support.
					Object to developments in NW/Barming area on infrastructure grounds i.e. transport grounds and water supply/sewerage; cumulative impacts in NW area – also TMBC developments.
					Effect of development on North ward – traffic concerns.
					Coalescence of developments with Leeds, Langley and Langley Heath – environmental damage not considered here – pollution. Bus lane no improvement – Wheatsheaf is a bottle neck.
					Suggests implementation of a green belt style defendable edge to the urban area.
					Support for preference of sites at edge of urban area.
					Land at Orchard Spot should be included as a suitable urban extension site.
					Object to loss of parking spaces in town centre.
					Question if enough is being done to regenerate urban area – there are more areas of deprivation that are not addressed in this policy.
SP3	Rural service centres	12	447	9	<b>1. General Comments:</b>

	Plus petition (Harrietsham)		20		Unsustainable expansion of villages causing coalescence
	Plus petition (Coxheath)		869		Dwellings numbers are not balanced between the rural service centres, in fact ALL villages should take a proportion of housing
					Impact on other villages as a result of growth should be given greater consideration
					Community concerns have not been considered; more engagement should have taken place with parish councils
					Lack of an agreed transport strategy; increased journey times as a result of additional traffic generated
					40% affordable housing is unsustainable because of travel requirements to employment locations
					<b>2. Harrietsham:</b>
					Harrietsham has less services/employment than the other villages therefore should be re-classified as a larger village
					Highway safety and capacity concerns; poor public transport links
					Scale of proposed development is too large
					Lack of infrastructure; Infrastructure should be improved prior to development commencing
					A criterion for “appropriate contributions towards a highway improvement scheme for the section of the A20 Ashford Road that passes through Harrietsham” should apply to all site allocations in Harrietsham
					<b>3. Headcorn:</b>
					Proposed dwelling numbers are too high
					Headcorn should not be classified as a rural service centre
					Lack of infrastructure esp. sewerage; school places; Priorities conflict with those of PC
					Sites are too large - development driven, not place driven; At odds with emerging Neighbourhood Plan;
					Flooding issues; a strategic approach is required; no reference made to Water Cycle Study;
					Loss of village character; impact on local landscapes and ecology; loss of agricultural land;
					Increased traffic; poor public transport provision;
					Lack of local employment opportunities to support growth;
					Proposed percentage of affordable housing unsustainable
					<b>4. Lenham:</b>

					Support for Lenham as RSC
					Objection to Lenham taking any additional development;
					Impact on highway capacity and safety;
					Lack of infrastructure and services;
					Loss of character of village; loss of green space, open space; lack of protection for built heritage;
					<b>5.Marden:</b>
					Proposed dwelling numbers are too high; phasing required- too much development too quickly; should not be classed as an RSC
					Lack of infrastructure and facilities; need to manage increasing demand for parking at station and local shops / businesses.
					Impact of traffic on neighbouring villages; increased pollution;
					Loss of village character; loss of green fields; impact on countryside;
					Flooding concerns - a strategic approach required
					More consideration to be given to emerging Neighbourhood Plan
					<b>6.Staplehurst:</b>
					Proposed dwelling numbers are too high and disproportionate with other villages; should not be classed as an RSC
					Development is allocated outside the village boundary;
					Lack of infrastructure; increased traffic; highway capacity and safety concerns; poor public transport; increased pollution;
					loss of character of village;
					Impact on Low Weald landscape character area and countryside generally;
					Flooding issues; no reference to Water Cycle Study
SP4	Larger Villages	12	381	8	<b>1. Boughton Monchelsea</b>
	Plus petition (Boughton Monchelsea)		197		Delete Boughton Monchelsea as a larger village or housing numbers are too high
					Impact on local roads, increased traffic congestion, and impact on highway and pedestrian safety
					Inadequate bus service and poor transport links to the town centre
					Lack of infrastructure and facilities , including parking, dentist, doctors, shops, school and post office

				Loss of landscape, impact on the countryside, and coalescence with surrounding villages
				Some support for Boughton Monchelsea as a larger village
				<b>2. Coxheath</b>
				Delete Coxheath as a larger village or housing numbers are too high
				Proposed development does not constitute "limited" development - needs to be quantified
				Reclassify Coxheath as a rural service centre
				Impact on the highway network, increased traffic congestion, impact on air quality, and impact on highway and pedestrian safety
				Lack of infrastructure, including sewerage and water supply, and drainage/flooding problems
				Lack of village facilities, including medical facilities, and impact on school
				Loss of greenfield land and Grade 2 agricultural land, impact on wildlife and habitats
				Impact on quality of life, village character and coalescence with surrounding villages
				Some support for some growth in Coxheath with supporting infrastructure
				<b>3. Eyhorne Street</b>
				Support for Eyhorne Street as a larger village
				<b>4. Sutton Valence</b>
				Delete Sutton Valence as a larger village
				Lack of infrastructure and impact on highways
				Lack of shops and the imminent relocation of the post office, impact on school
				Impact on pedestrian safety
				Village adjacent to Greensand Ridge where protective policies apply
				Some support for Sutton Valence as a larger village
				<b>5. Yalding</b>
				Delete Yalding as a larger village
				Lack of facilities and impact on local school which has no room for expansion
				Increased traffic congestion and insufficient road structure, impact on highway safety, increased noise and air pollution, rail service is rural and remote, and bridges inadequate for growth
				A new cycle route would benefit commuting to Maidstone and Tonbridge
				Increased flood risk

					Impact on heritage, loss of countryside, and impact on village character
					Some support for Yalding as a larger village
					<b>6. General</b>
					Some support for this tier in the settlement hierarchy
					Major housing expansion at the villages is out of scale and character with existing villages and represents unsympathetic excursion into the countryside
					Include Hunton and other villages, or create a new tier of smaller settlements to address underprovision of housing land and rural decline, and to support local facilities.
					East Farleigh should be identified as a larger village
					Langley should be identified as a larger village
					Chart Sutton should be identified as a larger village
					Laddingford should be identified as a larger village or smaller settlement
					Re-direct development to villages closer to the motorway
					A reduction of allocations by around 20% should be made in each of the larger villages.
					The larger villages concept is ill considered and based on out-of-date information
					Lack of discussion and consent with villages involved prior to publication of draft plan
SP5	Countryside	8	29	15	<b>1. Landscape</b>
					Specific additional areas proposed as Landscapes of Local Value, and the enhanced protection them is sought, including areas currently identified as ALLI/SLAs in the adopted Local Plan
					Detailed landscape assessment is needed to underpin the Plan
					Concern that Landscape character guidelines will not be completed until after the Local Plan is adopted.
					<b>2. Development in the countryside</b>
					Smaller villages and the rural areas have capacity for some residential development, including 'green' homes
					Redevelopment of previously developed land in the countryside should be allowed for
					Re 'small scale economic development'; it is argued that 'small scale' should be defined and conversely that 'small scale' is an unnecessary caveat
					Clearer definition of local housing needs and criteria for Gypsy and Traveller development sought
					Question consistency with 'Planning for Traveller Sites' guidance

					<b>3. Countryside protection</b>
					The policy should be more prescriptive about how the countryside will be protected, akin to adopted Policy ENV28, and limit the loss of greenfield land
					Countryside should be protected for its intrinsic value; protection of public rights of way, land and soil and the greater protection of agricultural land is sought
					Criteria for Green Wedges should seek to reduce cumulative impacts
					There should be objective criteria for assessing development on land adjacent to the AONB.
DM1	Development on brownfield land	11	11	2	Some unconditional support.
					Policy should actively encourage brownfield, this would then comply with NPPF.
					Supports preference – should be stronger.
					Proportion of brownfield should be specified.
					Query text, define 'high environmental value'.
					Brownfield first should be applicable to all development types, not just housing.
					Policy should specify that brownfield resource is available at Detling.
					Clarification as to where the brownfield sites are located, in existing settlements only?
					Brownfield sites in non-identified settlements should be allowed to be developed.
DM2	Sustainable design standards	7	9	6	Some unconditional support.
					Criterion 4 is too weak/there are too many get out clauses.
					Flexibility of policy welcomed.
					Code level 5 should be required.
					Green wall technology should be included.
					CSH being superseded, elements being incorporated into Building Regulations.
					SPD should be produced to be able to react more quickly to newer design standards.
					Require PassivHaus standard.
					10% RE requirement does not add to policy and is difficult to assess.
					Policy should reflect move to zero carbon homes.
					Needs to incorporate flexibility for viability issues regarding Code level 4.

					Policy should allow for higher standards to be imposed at the end of the period, when technology improves.
DM3	Renewable and low carbon energy schemes	6	7	8	Should require that land is returned to agricultural use.
					Policy should be amended to reflect emerging government guidance from DCLG and DECC.
					Policy should be more balanced, currently considered too negative, should promote these uses more.
					Policy should promote solar panels on the roofs of industrial and agricultural buildings.
					Should include monitoring measures.
					Should have specific landscape criteria listed in policy.
					Object to loss of greenfield sites/BMV agricultural land.
					Cumulative impacts should be considered.
					Reference to AONB is welcomed.
					Ability to mitigate impacts through site selection and design is not emphasised enough.
DM4	Principles of good design	10	5	6	Should mention Part P of Building Regulations.
					Character area assessments should be produced in advance of applications for large scale development.
					Policy needs to be enforced.
					Incorporate biodiversity.
					Development should avoid flood zones 2 and 3.
					Relevant parts of Neighbourhood Plans should be incorporated/referenced.
					Reference to 'natural character' should be clarified.
					Policy should ensure that housing development and other sensitive development is separated from wastewater treatment facilities.
					SuDS should be incorporated as an element of good design.
					There should be a focus on landscape character as a key element of site choice.
					Quality of design is often more important than the size of a building.
DM5	Residential garden land	20	4	1	More precise criteria required.
					Policy should reference granny annexes.

					Safeguards needed to protect the character of an area.
					Construction of dwellings in residential gardens can be achieved without undue detriment to neighbouring properties.
					Leave gardens alone.
					Importance of urban biodiversity.
					Need for adequate on site car parking.
					Where is the evidence of a settlement's character? This policy will not be effective without this information.
					New development/redevelopment should always be sympathetic to the existing housing density and design in a given area.
DM6	External lighting	3	3	4	Lighting strategy should be included in the local plan.
					Account should be taken of other advisory documents.
					Needs monitoring measures to be included.
					Policy should address uplighting.
					Light pollution causes loss of wildlife.
					Intrusive lighting is always inappropriate for developments in the AONB.
DM7	Signage and shop fronts	2	0	4	Some unconditional support.
					Policy long overdue.
					To let/for sale signs should require planning permission.
					There should be an emphasis on traditional shop fronts.
					Illuminated shops signs should be avoided in conservation areas.
DM8	Residential extensions, conversions and redevelopment	5	0	3	Some unconditional support.
					Policy should reference need for granny annexes.
					Long overdue.
					Sufficient parking should be provided.
					Take account of any relevant adopted neighbourhood plan.

DM9	Non-conforming uses	3	0	3	Some unconditional support. Need to cross reference SP5. Long overdue. Need to consider removal of non-conforming uses where there is a material harm to local communities. Policy not needed as these topics are covered elsewhere in the plan – duplication.
DM10	Historic and natural environment	9	12	8	Supports protection of ancient woodland. Landscaping should make use of indigenous plants. Landscapes of highest value need to be referenced in glossary. Policy needs to be separated for built, natural and historic environments, green and blue areas – policy is not clear in current form. Questions validity of wildlife evidence used in applications. Requirements are not adequate for habitat compensation and new habitat creation. Hypogean fauna should be referenced. Account should be taken of any relevant adopted neighbourhood plan. Need to improve historic core along river and improve public access. Policy needs to make allowances for essential utility development. Policy should reference Kent Downs AONB management plan. Policy needs to be strengthened. Concern that landscape character guidelines will not be completed until after the plan is adopted.
DM11	Publicly accessible open space and recreation	9	4	4	Concern that MBC will not take responsibility to maintain new open spaces. Community should be able to decide if an alternative provision is of equivalent benefit. Some unconditional support. Plan does not take proper account of Green and Blue Infrastructure Strategy. More detail relating to green and blue corridor in Otham.

					There should be a specific mention of RSCs.
					Amendments suggested to open space types.
					Where areas are used for open space provision the housing density should be lower than 30 dwellings per hectare.
					Where appropriate, policy should allow for contributions to maintaining footpaths, boundaries and provision of GBI in Kent Downs AONB.
					New green space should also seek to reinforce landscape character.
DM13	Sustainable transport	8	27	15	Maidstone needs High Speed railway station.
					Roads at capacity, Leeds/Langley bypass needed.
					General disagreement with approach.
					Better bus service in rural areas/to and from Weald required.
					Policy is too aspirational.
					Travel through Maidstone town centre if travelling north-south and vice-versa is a big problem.
					Targets for modal split and journey times should be included.
					Integrated Transport Strategy not supported by KCC.
					Impact of development on A26 should be referenced.
					Policy is unclear.
					Rapid transit system required e.g. monorail.
					Bus lanes/bus priority measures take road space from other modes.
					Support SPD on parking standards, particularly for RSCs. Currently provision standards too low – need to be realistic.
					Use of Willington Street needs to be reduced, where are the measures for this?
					Plan is not yet based on the transport evidence.
					B2163 should be upgraded into a southern bypass.
					More cycle routes required.
					Linton Crossroads inappropriate location for park and ride – traffic, junction issues, landscape character, effect on Coxheath, Linton communities.
					Bus frequency should be referenced in policy.
					More car parking required in town centre.
					Infrastructure should be provided before development.

					Policy contrary to NPPF – with reference to residual development impacts being severe. Currently not worded this way. Air quality impacts need to be addressed proportionately, not as de facto requirement of all developments.
					Transport infrastructure improvements required on A249 at Detling Aerodrome.
					Policy parts 1 and 2 need to be reworded as these do not provide appropriate guidance for developers.
					Employment strategy is at odds with transport strategy because it will require HGV movements through town centre – should make use of motorway junctions, specifically junction 8.
DM14	Public transport	3	5	5	Object to bus priority measures.
					Need reference to timing of public transport provision in new development – it needs to be delivered early enough to be considered mode of first choice.
					Policy is too aspirational.
					No reference made to rural areas, needs commitment to increase public transport in these areas.
					Some unconditional support.
					Part 1 does not provide sufficient guidance to developers – policy should be reviewed.
					Wording of policy is too weak.
DM15	Park and ride	3	15	4	Need park and ride site on A274.
					Park and ride is unsustainable.
					Support in principle but Linton Crossroads is the wrong place – junction issues, effect on local communities at Coxheath and Linton, traffic issues, landscape issues, light pollution.
					Air quality impacts.
					Disagrees that there is evidence to support Linton Crossroads.
					Support for Linton Crossroads subject to careful landscaping. Should be used two way and transport commuters south to Marden – taking traffic off roads.
					Not enough road space for bus priority measures from south of Maidstone.
					Old Sittingbourne Road should not be included for park and ride, this is subject to a short term lease. Site has more value for economic development uses.
DM16	Air quality	1	2	6	Investment in low emission buses will continue where it supports a scheme being implemented by MBC (Arriva).
					All development has a negative impact on air quality – question how air quality can be improved.

					Policy needs to make reference to areas outside of Maidstone AQMA, in particular Watlingbury crossroads.
					Developments should address existing air quality issues (where there is an issue) before being permitted.
					Policy should define circumstances where development will not be acceptable.
DM17	Economic development	5	4	3	There is general support for the policy.
					Lack of green technologies being included.
					Detling Aerodrome Estate should be included.
					No evidence to support statements made in policy.
					J8 should be included.
					Policy should allow for use of sites at motorway junctions as this meets known demand and makes best use of road infrastructure.
					Wording should be amended as does not currently offer strong enough guidance to developers.
					Difficult to prioritise re-use of commercial buildings because of PD rights to convert to residential use.
DM18	Retention of employment sites	5	5	4	General support for the policy.
					Support for Eclipse Business Park inclusion.
					B1, B2, B8 is too restrictive and contrary to NPPF.
					Greater flexibility needed at RSCs.
					Greater regard to be given to Neighbourhood Plans.
					Significance of Detling Aerodrome not recognised; should be designated.
					Bredhurst Business Park (Westfield Sole Road) should be included.
					Springfield Mill should be included.
					Maidstone East / Sorting Office should be included.
					Invicta Barracks should be retained for employment.
					Brooklyn Park should be included.
					Policy should allow for use of sites at motorway junctions as this meets known demand and makes best use of road infrastructure.
					Recognition of Detling Aerodrome Estate being in the AONB should be given.
					Difficult to prioritise re-use of commercial buildings because of PD rights to convert to residential use.

DM19	Town centre uses	3	5	1	General support for the policy.
					No evidence to support assertion that Maidstone East / sorting office site can deliver retail development.
					Failure to carry out an NPPF/NPPG compliant assessment of whether retail needs exceed available sites.
					Existing former commercial sites should be emphasised for conversion to residential use.
DM20	District centres, local centres and local shops and facilities	3	8	3	Some unconditional support.
					Policy should reject developments outside the High Street, which is a significant asset.
					Doctors' surgeries should be included in centres.
					Reference should be made to local views and adopted neighbourhood plans.
					Insufficient parking in Coxheath.
					Include Church Green, West End, Maidstone Road and Albion Road (Marden).
					Policy does not address retail units not on the High Street.
					Part 4 should refer to community uses.
DM21	Residential premises above shops and businesses	3	0	3	Some unconditional support.
					Does not include/reference RSCs.
					Point 2 should be expanded.
DM22	Mooring facilities and boat yards	3	2	1	Some unconditional support.
					Provided adequate scale and short term.

					Policy encourages boats to moor along the River Medway which restricts river management, forcing flood water back to Yalding.
					Need to balance the increase in mooring facilities with sufficient stations to supply fuel and water needs.
DM23	Housing mix	5	3	12	References to SHMA should be omitted as it is an unreliable tool and is flawed.
					Consideration for older person needs to be addressed with specific mention of provision of bungalows.
					Reference to be made of the importance of 'local needs' housing.
					Policy should mention neighbourhood plans.
					Paragraph 11.124 is not carried forward into policy.
					Policy does not provide guidance for developers.
					Housing mix becoming unbalanced due to smaller properties being enlarged.
DM24	Affordable housing	7	34	9	The percentages proposed for the delivery of affordable housing should be amended.
					Affordable housing should be decided on a site specific basis.
					The new affordable housing provision percentage figures are too complicated.
					Policy should highlight reasonable and flexible approach.
					Ensure bungalows are part of any affordable scheme.
					Local needs housing should be on all developments.
					Adopted relevant neighbourhood plans should be taken into account.
					65% Affordable / Social Rented Housing – 35% Intermediate Affordable Housing split should be more even to address local needs.
DM25	Local needs housing	6	2	9	Criteria 1 is contradictory to meeting local needs.
					Important that housing mix and tenure is able to be progressed on a site specific basis responding to local need and aspirations.
					Local communities must initiate such rural exception sites.
					More consultation with Parish Councils needed.
					Majority of housing should be reserved for local people.
					A small supply of bungalows should be included in requirements for affordable and local needs housing.
					Policy should be extended to encourage self-build schemes.
					Provision of housing for ageing population needs to be considered.

					Need to recognise the local needs of each age group; regard should be paid to the provisions of any relevant adopted neighbourhood plan and the recommendations of the Integrated Transport Strategy.
					Consistency is needed – 4 “The scale of development must be sympathetic to the character of the settlement where it is located.” 5. Amend to reflect paragraph 116 NPPF – where it relates to major developments.
					Policy could be further improved using the model applied to DM26.
DM26	Gypsy, Traveller and Travelling Showpeople accommodation	4	11	5	Criteria are questionable.
					Proposals need to fit in with existing residents.
					There are enough sites at present.
					Loss of greenfield sites, and increased risk of anti-social behaviour.
					Support for point 4 of the policy.
					Policy should be stronger in encouraging sites to be spread across the borough.
					Need to recognise the significance of the connections to the local area.
					Sites should be spread across the borough, limit pitches per site, and harm to the countryside outside the AONB and greenbelt should be avoided – change policy wording to indicate the sensitivity of the AONB and necessity to ensure developments conserve and enhance the AONB.
					Propose additional development criteria in Policy DM26 that will guide planning decisions and ensure that (a) necessary wastewater infrastructure is provided in parallel with development, and (b) development is adequately separated from existing wastewater facilities such as wastewater treatment works and major pumping stations.
DM27	Primary shopping frontages	2	0	0	Some unconditional support.
					Add good design to criteria.
DM28	Secondary shopping frontages	2	0	0	Add good design to criteria.

					Could also allow residential development at these locations.
DM30	Design principles in the countryside	8	3	5	Some unconditional support.
					Criterion 2 is questionable/unenforceable.
					Criteria must be met before development is permitted.
					Policy should refer to all landscape in the countryside, delete reference to 'highest value' landscapes.
					Neighbourhood plans should be referenced as an aid to determining development proposals.
					Concern that the Landscape Character Guidelines will not be completed until after the local plan is adopted.
					Add criterion referencing impact on local roads.
DM31	New agricultural buildings and structures	4	1	2	Some unconditional support.
					Needs time limitation.
					More detail needed on polytunnels, can criteria be adjusted for seasonal use?
					Account should be taken of Kent Farmsteads Design Guidance.
DM32	Conversion of rural buildings	2	9	5	Some unconditional support.
					Permission should only be granted where the schemes form an integral part of the rural scene.
					Policy does not accurately reflect NPPF.
					Regard should be given to any relevant adopted neighbourhood plan.
					This is too restrictive where there is a need for housing.
					Buildings in need of reconstruction should be included.
					Policy should consider the need for protected species surveys.
					Policy should reference Kent Downs AONB landscape design hand book, KCC farmstead guidance and AONB farmstead guidance.
					Language needs to be more consistent.
					Policy should allow conversion to residential.

DM33	Rebuilding and extending dwellings in the countryside	4	1	4	Some unconditional support.
					Local views important, pay regard to relevant adopted neighbourhood plans.
					More consultation with parish councils.
					Consider the need for protected species surveys.
DM34	Change of use agricultural land to domestic garden land	17	4	1	Some unconditional support.
					Needs to set out sequence of changes.
					Some consider this a reasonable change of use.
					Policy should provide guidance on the scale of change.
					Too permissive and open ended.
					Should consult with parish councils.
DM35	Accommodation for agricultural and forestry workers	2	0	1	Some unconditional support.
					Dwelling should reflect landscape character.
					Suggest Kent farmsteads guidance is referenced.
DM36	Live-work units	2	0	3	Some unconditional support.
					Should consult with parish councils.
					May be too restrictive, there may be exceptional circumstances for permitting these developments outside of village boundaries.
DM38	Holiday caravan and camp sites	3	2	4	Some unconditional support.
					Sites should not be permanent, enforcement measures should be used to maintain this.

					Welcome the use of indigenous species and encourage plan to specify use of these.
					Each case should be considered on its own merits.
					Regard should be given to adopted neighbourhood plans.
					Policy should reference and be sensitive to the AONB.
DM39	Caravan storage in the countryside	2	2	2	Some unconditional support.
					Some unsupported objection.
					Specify planting of indigenous species.
					Lighting only if there is a demonstrable need and be restricted to an absolute minimum.
					Policy should be deleted, can be dealt with through NPPF.
DM40	Retail units in the countryside	4	0	2	Some unconditional support.
					These sites are needed.
					Question if this type of development is already covered as permitted development.
					These should be restricted to buildings already existing on farm holding.
DM41	Equestrian development	4	2	2	Some unconditional support.
					Concern that temporary buildings will be poor quality.
					Stable developments should be small.
					Policy should make clear distinction between domestic and commercial use.
					Reference should be made to AONB guidance where appropriate.
					Should also reference cumulative impact of equestrian development.
ID1	Infrastructure delivery	6	27	12	Disagreement that parishes have been adequately consulted, policy needs to reference neighbourhood plans and individual parish priorities.
					Developer contributions will not be able to fund all infrastructure.
					Broad range of infrastructure is required to support development.
					Adequate drainage should be in place for surface water and foul water, ahead of development.
					Considers list of priorities inappropriate, this is not one size fits all.

					Transport infrastructure should be first priority.
					Education, libraries, social services should be higher on the priority list.
					Pump priming for new bus services serving new developments should be addressed.
					Question if policy is consistent with NPPF promoting sustainable development.
					Flood defence should be primary infrastructure.
ID2	Electronic communications	5	2	2	Some unconditional support.
					Mobile network and wifi facilities need to be improved.
					Criterion 5 is overly restrictive i.e. accommodating future sharing of networks on all base stations.