

Achieving high quality design

Summary of Regulation 18 consultation responses (March 2026)

Question 52 - Do you agree with Policy D1: Achieving High Quality Design?

Total Number of responses received:					
Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not stated
6	14	7	2	4	30

Summary of issues raised

The comments provided by respondents to this question ranged from strong support to broad support for the principles within D1. Of the 63 responses received, around two thirds provided detailed comments. Several suggestions to cross reference national and local design guidance to strengthen the policy were received. Responses from some developers, although supporting the need to ensure development incorporates principles of good design, included concerns that specific requirements, requirement thresholds and the extent of justification required, created unnecessary burdens for applicants. Some developers also stated that the policy should be simplified and made less ambiguous.

A significant majority of respondents who expressed a view supported Policy D1 (strongly agree or satisfied). Key themes from these responses included:

- Stated aims and objectives are extremely valid.
- Support approach to pre-application discussions and criteria for development proposals to address.
- Support for approach to delivering higher density developments in sustainable locations where appropriate.
- Support need for high quality and responsive design that protects historic/prevaling character and promotes good street design, walkability, safe and accessible environments, and sustainable, energy efficient construction.
- No reference to the character and appearance of the area, which are important considerations, to ensure that development proposals are appropriate to the surroundings.
- Concern about garden infilling and harm to character of local estates and advocating minimum garden depths and a presumption against the loss of garden land, unless a comprehensive redevelopment.
- Support as long as requirements do not create additional cost.

Some respondents expressed a neutral view of the policy. Key themes included:

- Design must be considered at an appropriate stage with parameters embedded in the planning process, with the design response proportionate to the size of the development.
- Need attractive, non-formulaic, eco-friendly properties, preferably on brown field, with infrastructure and green space with trees.
- Density must be maximised in sustainable locations close to railway stations or inside settlement boundaries to avoid sprawl.
- Aims are good but there is no clear direction on what features contribute to local character, so we get developer standard house types and layouts.

Some respondents disagreed or strongly disagreed with the policy. This includes one response from the 'Residents of East Peckham' group, which was also supported by 653 residents. Key themes included:

- Difficult to disagree with this Policy, since it is written in broadly generic terms.
- Terminology, such as 'major development' should be defined.
- 'Manual for Streets' should be referenced and the policy strengthened taking account of research findings on 20mph schemes and low traffic neighbourhoods.
- Suburban-density estates conflicted with the rural character of East Peckham, where existing housing density is approximately 25-27 dwellings per hectare. New development should be in keeping with this.

For those with no answer against the sentiment question, key themes included:

- Broad support for the aim of high-quality design, including context led design, landscape integration, active travel and walkable neighbourhoods, sustainable construction and the protection of local character and heritage.
- Objection to Community Engagement Requirement (Criterion 3) as requirement is overly onerous, especially for SMEs and schemes of 10–50 dwellings and should only apply to very large schemes (500+ dwellings). Engagement requirements already exist through the Statement of Community Involvement (SCI). Unclear when engagement is "appropriate," leading to inconsistent decision making.
- Pre application advice is discretionary and cannot be made mandatory.
- Policy is unwieldy, duplicating content found in other policies and includes an overly long list of design criteria. Meeting every criterion is unrealistic, requiring subjective balancing by officers.
- Policy requires too much supporting evidence and a level of detail that is not proportionate to many applications, creating an unnecessary burden.
- Have realistic housing density assumptions been applied to sites in semi-rural/Green Belt areas, where high density development may be inappropriate?

- Calls for specific guidance to be referenced including the High Weald Housing Design Guide, Kent Downs Landscape Design Handbook, local green & blue Infrastructure strategies and the Nature Recovery Strategy (LNRS),
- Preference for brownfield over greenfield and protecting Green Belt and landscape character.
- Need for stronger policy wording on healthy place making, ensuring development supports active lifestyles, mental health, air quality, etc.
- Design considerations should address entire settlement impacts, not just the new development, including existing parking shortages, integration of old and new communities and ensuring community assets serve both new and existing populations.
- Tension between high quality and construction costs.

With regard to criterion q), equestrians must not be excluded from PROW and any other provision for vulnerable road users.

Summary of feedback from Statutory Consultees

- **Natural England** supported the policy but advised that criterion 4l could be strengthened by ensuring that green open spaces and public spaces are integrated into, and help strengthen, the wider green and blue infrastructure network, and have regard to the borough's Green and Blue Infrastructure Strategy. Criterion 4m could be strengthened by ensuring that habitat creation aligns with the emerging Kent and Medway Local Nature Recovery Strategy (LNRS).
- **Sport England** were happy with the policy.

Summary of feedback from District / Boroughs

- **Tunbridge Wells Borough Council** were satisfied with the policy, supporting the approach to pre-application discussions, the criteria for development proposals to address and the approach to delivering higher density developments in sustainable locations where appropriate and complementary to prevailing character.
- **Maidstone Borough Council** expressed a neutral view of the policy.

Summary of feedback from Town and Parish Councils

- **Aylesford Parish Council** were satisfied with the policy unless the requirements created additional cost.
- **East Peckham Parish Council** were unhappy with the policy, stating that suburban-density estates conflicted with the rural character of East Peckham, where existing housing density is approximately 25-27 dwellings per hectare. New development should be in keeping with this and the policy must seek to

ensure that development reflects existing vernacular and supports the character of the area.

- **Stansted Parish Council** were happy with the policy.
- **West Malling Parish Council** were satisfied with the policy, supporting the need for high quality and responsive design that protects historic character and promotes good street design, walkability, safe and accessible environments, and sustainable, energy efficient construction.

Summary of feedback from other organisations

- **Kent Downs National Landscape** supported the policy, welcoming reference to the Kent Downs Management Plan. Reference to the Kent Downs Landscape Design Handbook was requested.
- **High Weald National Landscape** were generally supportive of the policy but requested reference to the High Weald Housing Design Guide be added to policy D1 (part 2) and to supporting text paragraph 9.8, with explanatory text on the guide added to paragraph 9.13.

Officer response to the consultation feedback

The Regulation 18 consultation invited comments on Policy D1. A number of representations were received from residents, land promoters, parish councils, statutory bodies and other stakeholders. The comments have provided valuable feedback on the clarity, appropriateness and deliverability of the policy.

Policy D1 is intended to set out the borough's approach to achieving high quality design in new development. Officers consider that Policy D1 remains appropriate and balanced.

However, a number of refinements will be made to the supporting text to address concerns about clarity, interpretation and application and also to the policy itself to ensure matters raised are included. This will include:

- Amending the policy and supporting text based on responses where this is consistent with national policy, for clarity and to reflect best practice, such as the scale at which some requirements should be applied.
- Ensuring the policy and supporting text is aligned with national policy and appropriate evidence.

Question 53 - Do you agree with Policy D2: Design Codes and Masterplans?

Total Number of responses received:					
Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not stated
1	13	8	3	4	19

Summary of issues raised

The comments provided by respondents to this question reflect a range of views on D2, from broad support to objections regarding how requirements would be applied. Of the 48 responses received around four fifths of respondents provided detailed comments. Although there was general agreement that Design Codes, masterplans and design review panels could improve the quality of new development, there were differing views on the development thresholds or circumstances in which requirements should be applied. There was also disagreement between developers on whether requirements should be applied to all applications, only outline applications or only reserved matters and full applications.

Almost half of the respondents who expressed a view supported Policy D1 (strongly agree or agree). Key themes from these responses included:

- Support for emphasis on community engagement.
- Agreement that design codes, masterplans and design review panels will ensure new development is high quality, well integrated and respectful of a settlement's distinctive character.
- Support for principles and need for a design review panel but design codes may not be necessary for all sites,
- Support provided a robust pre-application design process is undertaken and permission granted based on a design framework document (developer/site promoter).
- Policy provides a supportive framework for Neighbourhood Plans, ensuring that local design codes carry weight and can guide development that reflects community expectations.

Some respondents expressed a neutral view of the policy. Key themes included:

- Amend policy to reflect NPPF medium developments. Master plans fine for large developments but there is a need to reflect the offsite and infrastructure impacts of huge new developments.
- Amend policy to apply to all developments not just larger ones.
- Design codes do not deliver much more than design and access statements and can be too tailored for the developer. A separate agency should create the design code prior to the application coming in.

Some respondents disagreed or strongly disagreed with the policy. Key themes included:

- Where a scheme is below 500 dwellings a design code should not be required (developer/site promoter).
- The requirement for specific design codes should be substituted for design principles to inform future design coding and not unduly restrict the application process and delivery options/timescales (developer/site promoter).
- In relation to self-build/custom build schemes, while a design code may be appropriate, this may not be suitable to individual plot holders.
- The thresholds for masterplans and design codes are too high and should be reduced to 50 and 200-250 dwellings respectively.
- Good design should be baked into policies, so that good design is maintained and not undermined.
- Policy should clearly define what is meant by a design code and distinguish between outline and detailed-stage application formats, better reflecting how the planning system functions. Preparing detailed Design Codes at the outline stage often causes problems, as the level of detail available is inherently less than what can be achieved later in the planning process. These changes are required for the policy to be considered 'effective' and 'positively prepared', as tests of soundness.

For those who did not answer the sentiment question, key themes include:

- Masterplans and design codes were generally supported, for example to coordinate development of multi-phase or multi-ownership sites.
- Some developers/land promoters thought that Design Codes should not be required at the outline stage, as this is too early and lacks sufficient detail. Detailed codes at outline are ineffective, costly, and risk being outdated once more detailed work is done. However, other developers/site promoters expressed the opposite point of view, based on the NPPF definition.
- Some developers/site promoters considered the requirement for Design Review Panels (DRPs) was unclear, ambiguous and overly burdensome. Mandatory DRPs for large schemes (e.g., 500+ dwellings) could cause delays. DRPs should be case-by-case, moved to Policy D1, or replaced with independent design consultants.
- Some developers/site promoters were concerned that the policy, for example the extent of community engagement and design code requirements, may slow down the delivery of much-needed housing, especially large sites critical to maintaining supply. Design Codes could also deter SME builders or affect viability.

- Policy should be flexible, particularly for sites that can deliver early phases independently, and Design Codes should be optional, not mandatory.
- Other respondents considered that Design Codes and Design Review Panels should be required for all schemes over 50 dwellings to ensure a consistent, high-quality approach to placemaking, architectural character, layout, and landscape integration.

Summary of feedback from Statutory Consultees

- No responses were received.

Summary of feedback from District / Boroughs

- **Maidstone Borough Council** expressed a neutral view of the policy.

Summary of feedback from Town and Parish Councils

- **Aylesford Parish Council** were satisfied with the policy, stating that the local council should have influence and overall control of design for any development.
- **East Peckham Parish Council** were unhappy with the policy, commenting that there were no Design Codes, Character Assessments, or Landscape Impact Assessments supplied.
- **Hildenborough Parish Council** considered that Design Codes should be required for all applications over 50 dwellings to ensure a consistent, high-quality approach to placemaking, architectural character, layout, and landscape integration. Design Reviews should be mandatory for all schemes over 50 dwellings.
- **Stansted Parish Council** expressed a neutral view of the policy, stating that design codes do not deliver much more than design and access statements and can be too tailored for the developer. A separate agency should create the design code prior to the application coming in.
- **West Malling Parish Council** were satisfied with the policy, stating that design codes and masterplans will ensure new development is high quality, well integrated and respectful of a settlement's distinctive character. The policy provides a supportive framework for Neighbourhood Plans, ensuring that local design codes carry weight and can guide development that reflects community expectations.

Officer response to the consultation feedback

The Regulation 18 consultation invited comments on Policy D2. A number of representations were received from residents, land promoters, parish councils and other stakeholders. The comments have provided valuable feedback on the clarity, appropriateness and deliverability of the policy.

Policy D2 is intended to set out the borough’s approach to design codes and masterplans. Officers consider that Policy D2 remains appropriate and balanced.

However, a number of refinements will be made to the supporting text to address concerns about clarity, interpretation and application and also to the policy itself to ensure matters raised are included. This will include:

- Amending the policy and supporting text based on responses where this is consistent with national policy, for clarity and to reflect best practice, such as the scale at which some requirements should be applied.
- Ensuring the policy and supporting text is aligned with national policy.

Question 54: Is there anything missing from the Design Quality chapter?

Total Number of responses received: 27		
Yes	Not sure	No
14	8	5

Summary of issues raised

The comments provided by respondents to this question reflect a range of views, from broad support for the chapter policies to concerns regarding the length of D1 and the ease of implementation. Of the 27 responses received, around three fifths were supported by detailed comments. Statutory consultees recommended including planning and healthy lifestyles into relevant policies and other respondents suggested amendments, including measures for supporting wildlife and increasing the scope or level of detail for design considerations.

The majority of respondents expressed a view that there were matters that should be addressed in the chapter. Key themes from these responses included:

- Adding references to specific additional guidance related to the planning system and encouraging healthy lifestyles.
- Setting out a Health Impact assessment to help implement its strategic objective on healthy communities, for example to focus on major developments with potential for significant health impacts.
- Supporting the use of expert design review panels, particularly for large site allocations.
- The design policies provided an overall approach to design, but important and more detailed considerations raised were not reflected and their inclusion would strengthen the policies. The production of a separate Urban Design SPD was recommended.

- Policy D1 would benefit from being split into different policies or rewritten to make it more concise and easier to implement.
- Need for a clear or credible delivery mechanism to ensure coordinated design, layout and infrastructure on sites in multiple ownership.
- No specific requirement preventing developers from sub-dividing sites to avoid complying with the overall requirement for a masterplan or design code.
- A query on how will developers be compelled to meet the policy objectives?
- A Swift bricks and nesting sites policy should be added in line with the NPPG.
- There should be a traditional design code emphasis.

A number of respondents were not sure whether there was anything missing from the chapter. The key theme expressed was as follows:

- New development should meet requirements for solar panels, EV charging points etc.

A number of residents did not consider there was anything missing from the chapter. No comments were submitted.

Summary of feedback from Statutory Consultees

- **Kent County Council** recommends applying specific additional guidelines to the National Model Design Code and Building for a Healthy Life that prioritise health and place. The Council also strongly supports measures aimed at reducing reliance on private car use and promotes active travel and believe that provision for suitable bike storage facilities could be emphasised especially within employment and new development sections. Reference to Kent Design Guide in paragraph 9.8 should be updated to reflect the most current guidance and standards. Expert Design Review Panels should be considered to assess design quality, particularly on development of larger strategic site allocations.
- **NHS Property Services Ltd** stated that Planning Practice Guidance supports the use of health impact assessments and recommend the Council to set out its own HIA requirement to help implement its strategic objective on healthy communities, for example to focus on major developments with potential for significant health impacts. Further guidance is provided by the Office for Health Improvement and Disparities in its 2020 guidance.
- **Sport England** recommended cross reference to Active Design (2021) guidance which supports the creation of healthy communities through the land use planning system by encouraging people to be more physically active through the design and layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and physical activity and active lifestyles.

Summary of feedback from District / Boroughs

- No responses received.

Summary of feedback from Town and Parish Councils

- **Aylesford Parish Council** commented that they were not sure there was anything missing from the chapter policies.
- **Stansted Parish Council** considered that the design policies were limited, for example there were no detailed design requirements for shop fronts or preventing the use of poor-quality materials. The production of a separate Urban Design SPD was recommended.
- **West Malling Parish Council** stated that while the chapter policies provided a good overall approach to design, important issues raised by residents were not reflected and their inclusion would strengthen the policies. The issues were protection of town centre fine grain, public realm and streetscape quality, walkability and safe movement, green infrastructure, shopfront and High Street design, protection of key views, parking design quality and sensitive settlement edges and gateways. The Parish will be producing a Neighbourhood Plan with detailed design codes.

Summary of feedback from other organisations

- **RSPB** advised there should be provision in the plans for LNRS Priority Species Swift, to ensure Swift bricks are incorporated into new builds and renovations to help secure the future of this declining species. Suggested policy wording was provided.

Officer response to the consultation feedback

The Regulation 18 consultation invited comments to enable respondents to set out whether they considered there was anything missing from the Design Quality chapter. A number of representations were received from residents, parish councils, statutory consultees and other stakeholders. The comments have provided valuable feedback on the clarity, appropriateness and deliverability of the chapter.

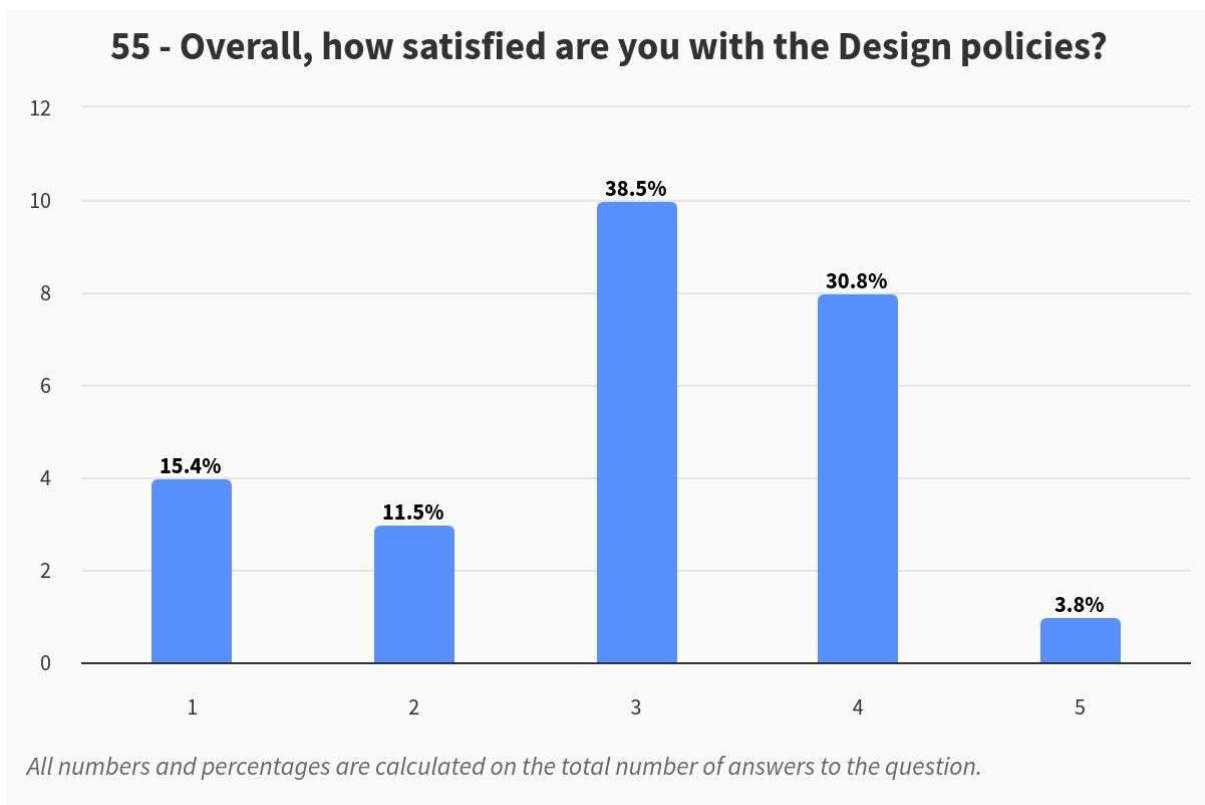
Refinements will be made to the supporting text to address concerns about clarity, interpretation and application and also to the policy itself to ensure matters raised are included. This will include:

- Amending the policy and supporting text based on responses where this is consistent with national policy, for clarity and to reflect best practice including the appropriate level of detail for design considerations.
- Add references to best practice guidance and cross-references to other policies in the Plan, for example climate change.

- Ensuring the policy and supporting text is aligned with national policy and guidance.
- Considering policy approaches and accompanying supporting text to embed health and health impact assessments to support the creation of healthy communities.

Question 55 - Overall, how satisfied are you with the Design policies?

The Regulation 18 consultation invited respondents to set out their overall level of satisfaction with the policies in the design chapter, with 1 being not satisfied at all and 5 being very satisfied. Around 34% of respondents were satisfied or very satisfied. With only around 27% not being satisfied. Responses were received from residents/members of the public, parish councils, a statutory consultee and other stakeholders.



Refinements will be made to the policies and supporting text to address concerns raised in response to the consultation questions, where these would reflect national policy and guidance and best practice and as detailed under the officer response to the consultation.