

Supporting Rural Communities

Summary of Regulation 18 consultation responses (March 2026)

Question 69 – Do you agree with Policy R1: Rural Exception Sites?

Total Number of responses received: 32					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
0	9	3	11	6	3

The comments made for this question reflects a wide spectrum of views, highlighting both strong support for affordable rural housing and significant concerns about development pressures in the countryside. Overall, the comments illustrate a clear tension between the urgent need for affordable rural housing and the community's desire to safeguard local landscapes, identity, and infrastructure capacity.

Summary of issues raised

Although no respondents selected strongly agree, those selecting agree generally supported the policy.

The key themes from the comments are:

- Strong support for affordable rural housing to retain local families, key workers and younger residents as well as help maintain village vitality.
- Recognition of the need for high-quality, locally sympathetic design that respects local character, materials and respects environmental considerations.
- It is essential that there are legal provisions in place to secure affordability in perpetuity.
- Support for enabling sites where local housing need is evidenced.
- Support for the inclusion of a policy to help guide the delivery of small-scale affordable housing schemes.

For those who selected a neutral response, respondents generally accepted the policy but raised conditional concerns or considered that clarifications would be helpful.

Comments made fell under these key themes:

- The policy is acceptable if it is made clear that it should not be used to justify grey belt applications and all affordable dwellings must be allocated for local needs and not sold to social providers outside the borough.
- Reference to Quality Traditional Design Codes.

The majority of those responding to this question were those who disagreed or strongly disagreed. The key themes raised related to impacts on rural character, infrastructure and the potential for overdevelopment. Key themes included:

- The control on development is not adequate and that new houses are not needed in rural areas.
- Concern about over development of the countryside, as well as concern about Green Belt loss.
- That the policy is too restrictive. Some rural areas in Tonbridge and Malling face population decline and some broader development could support local economies.
- Strong concern about the impact of development and the coalescence of villages, and through traffic especially Kings Hill, Leybourne area and now Borough Green.
- Empty properties underused by councils.
- Strong concern about the loss of Green Belt, the countryside and rural character including cumulative impacts of development.
 - Concern that rural areas are already overdeveloped and that this policy could further intensify rural development.
- Concern about rural development and infrastructure capacity (traffic, roads, health, schools, services).
- It was considered by some that more rural housing is unnecessary or that existing housing is under-used.
- Concern that housing in rural areas will impact on the countryside, wildlife and local amenity.
- Some respondents considered the policy to be too restrictive and may prevent essential growth in villages, which without growth will result in population decline within villages.

For those respondents who did not answer the sentiment question, the following key themes included:

- A request for clearer wording as well as explicit reference to impacts on nearby uses.
- Concern about infrastructure capacity and long-standing infrastructure capacity constraints. Borough Green / Wrotham were highlighted in relation to road, sewer capacity and healthcare.

Summary of feedback from Statutory Consultees

There were no comments from Statutory Consultees.

Summary of feedback from District / Boroughs

There were no comments from District or Boroughs

Summary of feedback from Parish Councils

- **West Malling Parish Council** is satisfied with the policy. WMPC commented that affordable housing in rural parishes is vital for the continued wellbeing and vitality of those communities. Key workers and local families need to be able to obtain accommodation close to their employment. It is essential that there are legal provisions in place to secure affordability in perpetuity. The provision of affordable housing in rural parishes enables villages to be sustainable and reduce pressure on larger local centres.
- **Ightham Parish Council** would be willing to consider such sites and, in the past, have allocated land for affordable homes on Fen Pond Road.

Summary of feedback from other organisations

- **High Weald National Landscape Team** consider that the supporting text para 12.11 should include reference to the High Weald National Landscape (as well as the Kent Downs National Landscape), for consistency. It is also considered that policies in the rural chapter would benefit with cross-reference to Policy NE2.

Officer response to the consultation feedback

The Regulation 18 consultation invited comments on Policy R1: Rural Exception Sites, which set out the proposed approach for enabling small-scale affordable housing schemes to meet identified local needs in rural areas. A wide range of responses were received. These comments have provided valuable insight into how the policy is interpreted, how deliverable it is likely to be, and how it can be refined to ensure compliance with national policy and associated Planning Practice Guidance.

Policy R1 is intended to provide a targeted mechanism for addressing affordable housing needs in rural areas where opportunities for delivery are limited. It is not intended to act as a vehicle for general housing growth, nor to override other relevant policies relating to settlement boundaries, heritage, Green Belt or landscape for example. Instead, the policy sits alongside the wider spatial strategy to ensure that rural communities can bring forward rural exception sites.

Overall, consultation feedback confirms that the principle of rural exception sites remains important and is broadly supported by parish councils, Registered Providers and some residents. However, a significant proportion of respondents raised concerns related to rural character, Green Belt protection, cumulative development pressures, and local infrastructure capacity. Other stakeholders also highlighted areas where the policy should be strengthened or clarified to ensure that it is effective, deliverable, and fully aligned with national planning policy.

Reflecting the feedback received, a number of refinements will be made to Policy R1 and its supporting text as the Local Plan moves to Regulation 19. These will ensure

clarity, NPPF alignment, policy consistency and improved deliverability. Proposed updates include:

- a) Revising supporting text to clarify the purpose of the policy and its relationship with national policy including the evidence required for how local need can be demonstrated;
- b) Considering refining locational criteria in how sites relate to rural settlements;
- c) Consider enhancing the policy to account for design matters and local character as well as considering whether locational criteria in how sites relate to rural settlements can be defined;
- d) Further clarify the circumstances in which market housing may be acceptable, where essential for viability reasons;
- e) Confirm in supporting text that other policies within the Plan will also be relevant.

Question 70 - Do you agree with Policy R2: Housing For Rural Workers?

Total Number of responses received: 30					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	11	12	4	2	0

A total of 30 responses were received in response to this question reflecting a diverse set of perspectives who were mostly concerned about how the policy will operate in practice. Themes ranged from support for meeting agricultural needs to concerns over long term use, enforceability, and landscape impacts.

Summary of issues raised

Respondents who agreed with the policy generally supported the principle of enabling rural workers to live close to their place of work. Minimal comments were received and included:

- ‘if it is in keeping with existing rural setting’;
- Green Belt protection is essential. Green belt land should be protected at all costs;
- query when ‘is this type of housing honesty used’.

Respondents who expressed a neutral sentiment tended to agree with the principle of housing for rural workers but raised concerns about how the policy will be applied. Key comments included:

- welcome the policy, but much stronger legal agreements need to be put in place to prevent such housing becoming separated from the business in the future and being turned into large rural housing with no connection to the adjoining land.

- the criterion for the business to have been operating for a minimum of only three years is insufficient to measure the long-term viability of any business for which the housing is required, and it is essential that any criteria for assessing future financial viability needs to be detailed and set out in the policy.
- this policy is required to meet the needs of local agriculture. Further provision for seasonal temporary workers is required, and standards need to be set to ensure adequate standards are maintained.
- question how the policy will be managed. Local social housing does not currently prioritise local low paid workers.
- question whether special mortgages to be given to rural workers.
- reference to Quality Traditional Design Codes.

Neutral responses generally sought clarity, safeguards, and better-defined criteria to ensure the policy is deliverable and resistant to misuse.

A total of 6 respondents either disagreed or strongly disagreed with the policy. The comments emphasised scepticism about the need for the policy and concerns regarding landscape protection and development pressure. Key themes included:

- Assertions that there are few rural workers left in some areas, or that agricultural change may reduce long term demand for these dwellings.
- Fears that Government policy changes, including those relating to inheritance tax and agricultural land, could lead to more farms being lost and land being built on, undermining the premise of the rural worker dwelling policy.
- Perceptions that the policy is not necessary or not aligned with local issues.

No comments were submitted by respondents who neither indicated support or disagreed with the Policy.

Summary of feedback from Statutory Consultees

There were no comments from Statutory Consultees.

Summary of feedback from District / Boroughs

- **Maidstone Borough Council** submitted a neutral sentiment; no commentary was provided.

Summary of feedback from Parish Councils

- **West Malling Parish Council** - stronger legal agreements need to be put in place to prevent such housing becoming separated from the business in the future and being turned into large rural housing with no connection to the adjoining land. The requirement at 1d for the business to have been operating for a minimum of only three years is insufficient to measure the long-term viability of any business for which the housing is required, and it is essential that any criteria for assessing

future financial viability needs to be detailed and set out in the policy. Planning enforcement needs to be greatly increased if the policy is to have the desired effect.

- **Stansted Parish Council** is happy with the policy; no commentary was provided.

Officer response to the consultation feedback

Policy R2 sets out a framework for providing housing for rural workers where it is essential for the functioning of agricultural and land-based enterprises. Respondents raised a mixture of supportive, neutral and critical views, focusing on issues of policy rigour, enforcement, long-term need, and the safeguards necessary to ensure appropriate use of rural-worker dwellings.

In response to consultation feedback, the Council will review Policy R2 and its supporting text. We will consider the following:

- a) clear, enforceable criteria for demonstrating essential need and long-term business viability;
- b) safeguards preventing separation of worker dwellings from associated enterprises;
- c) improved enforcement and monitoring clarity;
- d) recognition of seasonal worker needs, where appropriate;
- e) protection against speculative or inappropriate use of the policy.

Question 71– Do you agree with Policy R3: Replacement Dwellings Outside Settlement Confines?

Total Number of responses received: 27					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
0	7	13	5	2	0

A total of 27 respondents provided views on Policy R3: Replacement Dwellings Outside Settlement Confines. Responses demonstrated a broad response, ranging from supportive to strongly opposed, with a significant number of respondents adopting a neutral position. The majority of respondents were residents.

Summary of issues raised

7 respondents supported the Policy. The key themes from their comments are:

- strongly agree that any replacement development is restricted;
- Green Belt protection is essential. Green belt land should be protected at all costs.

A total of 13 respondents selected Neutral for their sentiment toward Policy R3. Their comments included:

- disparity between the ‘endless rings’ to get a smaller development footprint; note that larger developments ‘get off light’ in comparison;
- greater protection is required to retain isolated historic dwellings where these have not been included on the statutory list as their loss reduces the heritage and identity of the area;
- opportunist developers are building huge and intrusive houses by amalgamating the footprint of dispersed and non-viable sheds and outbuildings - the policy is being abused and is not contributing to a net increase in the available dwellings to meet local needs;
- Reference to Quality Traditional Design Codes.

A total of 7 respondents expressed negative sentiment toward Policy R3 and the key themes in those responses are:

- the need for replacement dwellings to be comparable in size is not justified/evidenced;
- countryside is countryside.

No comments were submitted by those who neither indicated support or disagreement with the policy.

Summary of feedback from Statutory Consultees

There were no comments from Statutory Consultees.

Summary of feedback from District / Boroughs

- **Maidstone Borough Council** submitted a neutral sentiment; no commentary was provided.

Summary of feedback from Parish Councils

- **West Malling Parish Council** is happy with the policy and strongly agree that any replacement development is restricted.
- **Stansted Parish Council** is happy with the policy; no commentary was provided.

Officer response to the consultation feedback

Detailed feedback on Policy R3, which addresses the sensitive issue of replacement dwellings in the open countryside is welcomed. The consultation shows broad understanding of the purpose of the policy but highlights concern around size controls, heritage protection, consistency in decision-making, and loopholes relating to footprint calculations.

As part of the drafting of the Regulation 19 consultation document, Policy R3 will be reviewed and the following considered:

- a) justification for scale and size restrictions;
- b) heritage and rural-character protections;
- c) Improve supporting text to clarify policy matters.

Question 72 - Do you agree with Policy R4: Conversion of an Existing Building to Residential Use Outside Settlement Confines?

Total Number of responses received: 35					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	12	13	1	3	4

The majority of all responses to Question 72 agreed with Policy R4. Whilst the majority of respondents were residents, the majority of written comments were from statutory consultees, whose full responses are indicated below.

Summary of issues raised

Of the 14 respondents who indicated support for Policy R4, the policy was welcomed as a pragmatic way to reuse existing buildings in the countryside while keeping appropriate safeguards. A couple of comments were received:

- the policy correctly strikes the balance of restricting development while recognising that some conversion of existing buildings would be appropriate.
- there is already a building, therefore no land is being lost.

Of the 13 respondents who indicated a neutral response, the following key themes were raised:

- a suggestion to use the buildings for rural workers, that only need temporary houses as farms are being destroyed by current policy.
- windfall development will contribute to housing need and surplus rural structures can be usefully repurposed, but now structures are being deliberately made redundant to fit this loophole for profit.
- if a building exists, no objection to its conversion.
- Green Belt protection is essential and Green belt land should be protected at all costs.
- Reference to Quality Traditional Design Codes.

Of the small number of respondents who did not support Policy R4, comments included a mixture of policy-principle concerns, fear of over-development, and objections to procedural requirements in the wording:

- the policy should not impinge on the permitted development rights under the General Permitted Development Order (England) Order 2015. As currently written, this policy would add unnecessary restrictions on the conversion of existing buildings and fails to support the reuse of existing buildings as set out in the NPPF paragraph 84c. The need to advertise a building for non-residential uses is outdated;
- any stable yards and barns are being developed due to this. It changes the landscape and way of life for equestrians.

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **West Malling Parish Council** - The policy correctly strikes the balance of restricting development while recognising that some conversion of existing buildings would be appropriate.

Summary of feedback from other organisations

- **English Rural Housing Association** – some amendments to the policy are suggested that would improve consistency with the NPPF.

Officer response to the consultation feedback

Consultation responses to policy R4 reveal broad recognition of the value of re-using existing buildings, alongside concerns regarding potential conflicts with national permitted development rights, landscape impacts, and opportunities for policy manipulation.

In drafting the Regulation 19 consultation document, Policy R4 will be reviewed to ensure that consultation comments are considered including the following:

- a. Ensure that the policy aligns with the GPDO and national policy;
- b. Consider marketing requirements;
- c. Consider strengthening the policy where possible to prevent policy misuse;
- d. Ensure the connections with other policies is clear such as safeguards for landscape character, equestrian settings and rural identity;

- e. Consider how the policy can align to potentially support rural-worker accommodation;
- f. Ensure that the Policy is clear on Green Belt expectations that proposals within the Green Belt must demonstrate no greater impact on openness than the existing building.

Question 73 - Do you agree with Policy R5: Residential Parks?

Total Number of responses received: 28					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	7	11	3	5	0

The responses to Question 73 were very mixed in terms of support or dissatisfaction. The majority of all responses were from residents.

Summary of issues raised

Of the 9 respondents who indicated that they supported Policy R5, or the principles behind it, only a small number provided written comments:

- need green spaces.
- keep Kent green.
- the restriction of new residential parks to areas within settlement confines, or where small-scale extensions to existing sites can be justified is essential to preserving the generally rural nature of the borough.

Of those who provided a neutral answer to the question, only a few comments were received. This included:

- it is hard to see how new residential parks will contribute to local housing need better than permanent housing within settlement boundaries.
- new sites in green areas should be restricted.
- residential parks are not designed to be long term; they come with ground rent which is not capped and are not eco-friendly.
- reference to Quality Traditional Design Codes.

5 written responses were received from resident respondents who did not support Policy R5. The key points included:

- residential parks devalue property in the surrounding areas and cause issues.
- include environmental protections (e.g., ancient woodland) and ensure proper management of public parks.

- policy needs to be strengthened to limit the numbers of residential parks in each Parish. Our Parish already has three and the numbers of people living in the parks outweighs the numbers of parishioners.
- Green Belt protection is essential. Green belt land should be protected at all costs.
- ‘depends who is living’ in these residential parks.

No comments were received from those who did not answer the sentiment question.

Summary of feedback from Statutory Consultees

None received

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **West Malling Parish Council** - The restriction of new residential parks to areas within settlement confines, or where small-scale extensions to existing sites can be justified is essential to preserving the generally rural nature of the borough.
- **Stanstead Parish Council**- This needs to go further to limit the numbers of residential parks in each Parish. Our Parish already has three and the numbers of people living in the parks outweighs the numbers of parishioners. Please add something around limiting numbers in each area.

Summary of feedback from other organisations

- **English Rural Housing Association** - some amendments to the policy are suggested that would improve consistency with the NPPF.

Officer response to the consultation feedback

Responses to Policy R5 reflect a broad range of views, from support for the principle of managing residential park development, to concerns relating to environmental impacts, Green Belt protection, long-term site suitability, and the cumulative effects of multiple sites within particular parishes.

In preparing the Regulation 19 consultation document, consultation comments and the Policy will be reviewed to ensure Policy R5 is robust alongside strengthening supporting text. This will include considering:

- a) Green Belt clarity to reinforce national policy requirements;
- b) Whether cumulative impacts can be addressed more explicitly to prevent harmful clustering;

- c) Whether environmental protections, including ancient woodland and biodiversity safeguards can be made clearer;
- d) Whether site management and maintenance plans for long-term stewardship can be included;
- e) the justification for residential parks within the housing strategy;
- f) improve supporting text to aid applicants and decision-makers.

Question 74 - Do you agree with Policy R6: Employment Development Outside Existing Settlement Confines?

Total Number of responses received: 32					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
0	7	13	5	4	3

The majority of respondents to Question 74, were residents. Feedback indicates broad support for enabling rural employment opportunities, alongside consistent calls for clearer wording, better alignment with national policy, and improved explanation of the scope of R6. Further detail is indicated below.

Summary of issues raised

Key themes from those respondents that indicated that they broadly supported policy R6 included:

- emphasised the continued provision of business/employment uses, particularly where existing employment buildings are involved, with a preference to retain employment rather than convert to housing.
- parts of the Policy notably section 3) feel restrictive, and that proposals for business purposes should be supported unless clearly unsuitable.

Those respondents that provided a neutral response, indicated 4 issues:

- uncertainty due to broader economic or political conditions.
- need to protect agricultural land and avoid conflict with rural food production.
- strong emphasis on environmental and Green Belt protection.
- desire for more detailed design guidance – design codes.

Those respondents that did not support Policy R6, cited a number of reasons including:

- employment opportunities within the rural community should be supported.
- concern that the policy places unnecessary restrictions on rural businesses.
- concerns related to agricultural viability and rural land use.

A number of comments and wording changes to Policy R6 were suggested by those who did not respond to the sentiment question including:

- expand policy to take account of any nearby residential use as neighbours may be materially affected by extensions or intensifications of employment sites and this is not specifically addressed elsewhere in the policy.
- further clarification of whether Policy R6 applies to allocated employment sites outside defined settlement boundaries.
- replace the traffic test in Policy R6(d) with an NPPF-aligned wording.

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **East Malling and Larkfield Parish Council** - The policy refers to the character of the area but not specifically to any nearby residential use / potential impact on neighbours. Suggestion made to the end of paragraph 2(a) to reflect this.

Officer response to the consultation feedback

In response to consultation feedback, Policy R6 and its supporting text will be reviewed as part of the process of drafting the Regulation 19 Consultation document. This will consider:

- a. a review of the scope of Policy R6 and its relationship with other employment policies; potentially strengthening neighbouring amenity considerations;
- b. amendments to make clear Policy R6 remains supportive of rural employment, including re-use of existing buildings; ensure that the consideration of highways is aligned with the NPPF; and
- c. review wording on agricultural land protection, HGV impacts, and the needs of rural industries and to reinforce Green Belt and other protections where applicable in the plan.

These changes will ensure that Policy R6 is effective, consistent with national policy, responsive to local rural economy needs, and clearer for applicants, communities and decision-makers.

Question 75 - Do you agree with Policy R7: Agriculture, Forestry and Horticulture?

Total Number of responses received: 30					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
3	13	9	3	1	1

Of the responses received, the majority indicated support for Policy R7. The highest number of responses were received from residents.

Summary of issues raised

The majority of respondents supported Policy R7. Several respondents expressed clear satisfaction with Policy R7 because it supports agricultural, forestry and horticultural development and recognises these sectors as vital components of the rural economy. The following comments were made:

- recommended that the policy is amended to acknowledge that development may be for welfare, environmental or husbandry reasons rather than purely financial reasons, in such instances, there should not be a requirement to provide a robust business case. Agriculture often produces low financial yields over long periods of time and as such a purely financial measure should be seen in the round and judged against environmental or social impacts that could also result from the development proposals.
- food not housing.
- Green Belt protection is essential - the use of grey belt should be outlawed, as it is in fact green belt land i.e. not brown field sites. Green belt land should be protected at all costs.
- This industry needs all the help it can get, but unfortunately, I don't think the policy will bring the anticipated growth.

There were few neutral responses that provided additional comment. Some that did, indicated:

- Agriculture policies need to encourage food production and recognise the need for intensive production with poly tunnels and pack houses.
- The policy needs to protect existing productive land and encourage better use of low intensity pastureland or the return of land to productive use to retain/plant hedges or planting belts between polytunnels and to safeguard the use of pesticides and water.
- Forestry should incorporate policies for replanting and regeneration and use of native species. Haul route impact needs to be a consideration. This policy

requires significant expansion to recognise the importance of retaining a vibrant and productive agricultural economy.

- Reference to Quality Traditional Design Codes.

Respondents who did not support Policy R7, indicated that an in-perpetuity clause should be included.

Those respondents who did not answer the sentiment question, commented:

- it is important that wider matters, such as agricultural security, is given due consideration.
- whilst we support the acknowledgement of the importance of agricultural operations, the policy remains unduly negative in its drafting and seeks to impose unreasonable restrictions on agricultural expansion.
- modern farm businesses must be able to evolve and respond to economic, environmental, welfare and regulatory pressures. Requiring applicants to exhaust all options to re-use, adapt or convert existing buildings is neither realistic nor aligned with current best practice.
- criterion e) does not reflect modern farming practice - the need to extend cropping seasons and productivity means that polytunnel covers are often needed to be left up over winter as plants are planted and cropped earlier and later in the season.
- improvements in tunnel design mean that the structures are stronger and can be usefully employed through more months of the year. Modern opportunities also exist to combine polytunnels with agrivoltaics using flexible solar panels creating dual use fields generating food and electricity year-round. Poly cover life is extended by 2-3 years if left in situ and this significantly reduces the need to replace the polythene - which reduces the amount destined for recycling.
- criterion e) requires deletion and the wider policy needs to be more supporting of modern needs and technology. Modern farming often relies on sector specific, purpose-built facilities that deliver efficiency, enhanced environmental performance and reduced carbon emissions. The importance of food production and the competitiveness of the agricultural sector is such that the Council should positively support the delivery of modern, bespoke infrastructure where a clear operational need has been demonstrated.
- guidance from the NFU, CLA and other industry bodies consistently emphasises that farm businesses require flexibility to invest in resilient, fit-for-purpose buildings and infrastructure. This includes not only livestock, crop storage and machinery buildings, but also essential ancillary infrastructure such as water harvesting systems, waste and fertiliser management facilities, on-site reservoirs, renewable energy installations, and improved internal access networks. Such infrastructure is fundamental to climate resilience,

environmental stewardship and long-term farm viability. Policies that unnecessarily constrain the delivery of this infrastructure risk undermining local food security and the broader aims of sustainable rural economies.

- the policy should expressly recognise the operational requirement for seasonal and temporary agricultural workers’ accommodation, which forms an essential component of many modern farming businesses.
- the design, scale and siting of agricultural buildings must be dictated by operational need rather than prescriptive aesthetic considerations.
- agricultural planning policy must adopt a supportive, enabling approach that recognises the realities of contemporary farming.

Summary of feedback from Statutory Consultees

Non received.

Summary of feedback from District / Boroughs

- **Maidstone Borough Council** – neutral, no further comment.

Summary of feedback from Parish Councils

- **West Malling Parish Council** - The Parish Council strongly supports all policies to promote agriculture, forestry and horticulture as part of the wider stewardship of the environment.

Officer response to the consultation feedback

Feedback on Policy R7 was detailed and constructive, including both general comments and a proposed alternative draft from a key agricultural stakeholder.

In preparing the Regulation 19 consultation document, the policy and its supporting text will be reviewed to:

- ensure requirements are proportionate and practical and better reflect modern agricultural operations;
- clarify the balance between functional design and rural character; and
- strengthen references to sustainability and national priorities.

Question 76 - Do you agree with Policy R8: Farm Diversification?

Total Number of responses received: 30					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	12	10	3	3	1

The majority of respondents (residents) indicated support for Policy R8. Feedback reflects not only broad support for the principle of farm diversification but also highlights areas where clarification, strengthening or improved alignment with other policies would be beneficial.

Summary of issues raised

Those that supported the Policy commented:

- support farm diversification to ensuring that the wider rural business community is sustainable. We recognise that farm shops should not be to the detriment of other local businesses and residents, including the number of Farmers' Markets in West Malling and beyond and welcome the policy on limiting such diversification.
- maintenance of food security.
- support providing it's not industrial or inappropriate to environment.
- support for farmers as they are struggling.

Respondents whose support was neutral, generally did not object to Policy R8.

Comments included:

- broadly supported, but policies should promote more productive agricultural use and ensure food production is maintained and promoted.
- Green Belt protection is essential. Green belt land should be protected at all costs.
- Reference to Quality Traditional Design Codes.

Those respondents who objected to policy R8 raised a number of key concerns:

- the policy needs to be effective and in general conformity with the NPPF.
- the current approach is quite restrictive and potentially conflicts with other policies which combine to form a suite of policies relating to the re-use of buildings (R4, R7 and R10).
- Policies should be cohesive and avoid conflicting provisions.
- Keep Kent farms.

Of those that did not answer the sentiment question, one comment indicated support for the inclusion of specific wording that ensures that developments avoid the loss of best and most versatile agricultural land.

Summary of feedback from Statutory Consultees

- **Natural England** - Support the inclusion of specific wording that ensures that developments avoid the loss of best and most versatile agricultural land.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **West Malling Parish Council** - We strongly support farm diversification to ensuring that the wider rural business community is sustainable. We recognise that farm shops should not be to the detriment of other local businesses and residents, including the number of Farmers' Markets in West Malling and beyond and welcome the policy on limiting such diversification.

Officer response to the consultation feedback

Based on the feedback received, Policy R8 and its supporting text will be reviewed as part of preparing the Regulation 19 consultation document. The following will be considered:

- a) clarify the definition and expectations relating to 'ancillary' development;
- b) wording relating to the protection of Best and Most Versatile agricultural land;
- c) food security and the role of diversification in supporting resilient farm businesses;
- d) ensure Policy R8 is fully aligned with Policies R4, R7 and R10, reducing overlap or contradiction;
- e) reinforce expectations regarding landscape, rural character, and environmental protection.

These amendments will ensure Policy R8 is clearer, more robust, and fully aligned with national planning policy while supporting the economic resilience of the rural sector.

Question 77 - Do you agree with Policy R9: Sustainable Tourism and Visitor Accommodation?

Total Number of responses received: 28					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	9	10	4	1	2

The majority of responses received for Question 77, were supportive. Most respondents were residents. The feedback demonstrates broad recognition of the importance of supporting a sustainable rural tourism economy, while highlighting areas where additional clarity and safeguards would strengthen the policy.

Summary of issues raised

Respondents who supported Policy R9 commented that

- section 1b of the Policy needs to be the overriding requirement;
- there are too many Air B&Bs.
- need visitors to spend money in the town.
- welcome measures to support economic growth.

A few respondents who indicated a neutral response, commented:

- Quality Traditional Design Codes.
- tourism use of land should not be allowed to reduce the extent of agriculturally productive land.
- recognise the impact of Air B&B type accommodation and support the provision of good quality holiday homes recognising the economic benefits these can bring.
- to a moderate amount but not as large development.

Respondents who indicated that they did not support Policy R9 raised the following concerns:

- question the rural character of the area.
- the area is not a tourist destination.
- Green Belt protection is essential. Green belt land should be protected at all costs.

Respondents that did not provided an answer to the sentiment question included comments on:

- East Malling has seen continued growth over the last c10 years of mobile holiday home accommodation. None of the sites currently have any secondary facilities such as leisure facilities, a shop etc. Question when saturation point will be reached and how the policy can deal with this.
- Equestrianism is the second largest rural employer after agriculture and equestrian tourism grows in popularity as riders seek to find places to stay where they can enjoy good off-road routes;
- Diversification in some areas has provided horse friendly B&Bs and park & ride facilities. With a lack of horsebox parking across much of the district, farms close to good off-road routes could find providing horsebox parking produces a good return on a comparatively small piece of land.
- Pubs can extend their clientele by offering parking and/or tie up rails for riders. Including equestrians in proposals for sustainable tourism and visitor accommodation is likely to be of benefit to the Council..

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **West Malling Borough Council** - Although we agree with the policy, we believe that section 1b needs to be the overriding requirement. Given the issues elsewhere in the country with self-catering accommodation destroying the vitality and viability of rural settlements, this requirement will need strong enforcement action.

Summary of feedback from other organisations

- **British Horse Society** have commented in relation to paragraph 12.67 noting that equestrianism is the second largest rural employer after agriculture and equestrian tourism grows in popularity as riders seek to find places to stay where they can enjoy good off road routes. Diversification in some areas has provided “horse friendly B&Bs” and park & ride facilities. (See Cholsey Farm as an example which is used as a business model for others). With a lack of horsebox parking across much of the district, farms close to good off-road routes could find providing horsebox parking produces a good return on a comparatively small piece of land. Pubs can extend their clientele (and provide interest for other visitors) by offering parking and/or tie up rails for riders. In Hucking (Kent) the Hook & Hatchet pub provides both and is popular with local riders. Including equestrians in proposals for sustainable tourism and visitor accommodation is likely to be of benefit to the Council. Equestrian events too are very popular with many visitors, including non-equestrians. Kent County Show, Oxted & Edenbridge Show, Felbridge and many others are testament to this.

Officer response to the consultation feedback

Overall, responses indicate general support for the principle of sustainable tourism. We will consider the following in a review:

- a. enhanced clarity in supporting text;
- b. recognition of specialised tourism sectors (e.g., equestrian tourism);
- c. stronger statements on cumulative impacts and supporting infrastructure;
- d. careful management of short-term lets and protection of rural character.

These issues will be considered in drafting revisions to Policy R9 and its supporting text for the Regulation 19 consultation document.

Question 78 - Do you agree with Policy R10: Equestrian Facilities in the Countryside?

Total Number of responses received: 30					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	9	12	2	2	3

The majority of respondents indicated that they were residents. Respondents broadly recognised the importance of equestrian activity within Tonbridge and Malling’s rural economy, landscape, and cultural identity, whilst also highlighting areas where additional clarity or safeguards would strengthen the policy.

Summary of issues raised

11 respondents expressed clear support for Policy R10, noting that equestrian uses are already an integral part of the rural environment. Comments included:

- ‘Keep it green’.
- equestrian land goes hand in hand with our rural community, so it has little or no impact to the rural aspect of the area.

Neutral respondents generally neither supported nor opposed Policy R10 outright. Their comments tend to highlight procedural concerns, high-level observations, or broader planning principles rather than strong views on equestrian facilities themselves.

- Green Belt protection is essential. Green belt land should be protected at all costs.
- Reference is made to Quality Traditional Design Codes.

Unhappy and dissatisfied respondents tended to raise concerns about other matters rather than objecting to equestrian uses in principle. Concerns included:

- over provision of equestrian leisure facilities which severely reduce the land available for agricultural production and ecology.
- better use of the green areas for food production should be promoted and the increase of land for equestrian use strictly controlled
- equestrian uses undermine food production and rural environmental quality.
- difficulty in finding equestrian yards to rent
- Green Belt protection concerns.

Respondents who did not answer the sentiment question still provided substantive comments. These tended to be detailed, technical, or stakeholder-specific submissions relating to:

- welcome the inclusion of a requirement to consider the National Landscape Management Plans and suggested wording to strengthen green infrastructure principles in landscaping as well as landscape character.
- welcome the acknowledgment of the importance of equestrianism to the borough;
- the policy limitations must be commensurate with other rural businesses or developments if they are not to be considered discriminatory against equestrian businesses.
- urge the Council to read submitted information which explains why the inclusion of equestrians is beneficial to everyone.
- suggest additional wording for this policy to help protect the quality of the water environment.

Summary of feedback from Statutory Consultees

- **Natural England** commented that further detail was required:
Welcome the inclusion of a requirement to consider the National Landscape Management Plans but advise that criterion 1e could be strengthened by including a reference to green infrastructure principles in landscaping as well as landscape character.
- **Southern Water**. Suggest additional wording for this policy to help protect the quality of the water environment (*b. the scale of the facility is no more than is reasonably required for the proper functioning of the enterprise or the use of the land to which it is associated compatible with the surrounding landscape character, features, biodiversity and type/location of any sensitive groundwater zones (source protection zones in particular)*).

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

None received.

Summary of feedback from other organisations

- **British Horse Society** welcome the acknowledgment of the importance of equestrianism to the borough and support in particular 12.80 and 12.81 and in relation to Policy R10 welcome the limitations in the Policy must be commensurate with other rural businesses or developments if they are not to be considered discriminatory against equestrian businesses.

Officer response to the consultation feedback

Overall, respondents indicated support for the principle of Policy R10, with the majority of comments seeking greater clarity, environmental safeguards, or equitable treatment of equestrian businesses. Proposed amendments to policy wording and supporting text, particularly around SPZ protection, green infrastructure, cumulative impacts, and proportionality, will be carefully reviewed so as to provide:

- a. clearer expectations for applicants;
- b. alignment with environmental and drinking water protection objectives;
- c. consistency and fairness across rural business types;
- d. improved clarity on landscape, infrastructure, and cumulative impact considerations.

This balanced approach will support the delivery of well-designed equestrian facilities that contribute positively to the borough’s rural character, economy, and environment.

Question 79 - Is anything missing from Rural Communities policies?

Total Number of responses received: 30			
Yes	Not sure	No	Not stated
7	11	9	3

Most respondents (residents) confirmed that they felt there wasn’t anything missing from the Rural communities Chapter. However, respondents highlighted several important themes relating to heritage, landscape, infrastructure, settlement identity, rural classifications, and flexibility within the rural policy framework.

Summary of issues raised

Respondents that indicated that they felt there was nothing missing from the Rural communities’ policies, or that they were not sure, chose not to provide any further comment.

For those respondents who indicated that, yes, in their opinion, there was something missing from the polices, their comments highlight several key areas where they feel additional policy content, clarity, or protection is required around the following:

- better integration of heritage and historic settlement patterns.
- reference to Quality Traditional Design codes.
- concern about the housing numbers expected to be achieve by 2042 and a hope that they can be stalled.
- request clarification as to which areas are considered rural. For example, ONS classifies Kings Hill as rural.

- several rural policies are overly restrictive and do not adequately respond to areas experiencing population decline. A more flexible approach could support rural vitality while still protecting environmental assets, including ancient woodland.
- protection of Green Belt land from all development as insufficient infrastructure to support further housing.
- the proposed site allocations are concentrated into the centre of the village and would have the effect of joining up Hamlets that should remain distinct. This risks losing the identity of the village (East Peckham) and compromising the anti-coalescence that defines the design of the Parish and its rural area.

Other comments recorded, in cases where no opinion was expressed about anything missing from the policies:

- a number of policies in this section would benefit with cross-reference to the High Weald National Landscape.
- Infrastructure.
- developers should be made to put in the ‘extras’ ie playground, community centre etc. before they start building.

Summary of feedback from Statutory Consultees

- **Kent County Council** – With reference to paragraph 12.64 (Heritage Conservation), the County Council would like it noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. English Heritage, the County Council and the Kent Downs National Landscape team have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **East Peckham Parish Council** – The parish is made up of nine distinct hamlets. The proposed allocations are concentrated into the centre of the village and would have the effect of joining up Hamlets that should remain distinct. This risks losing the identity of the village and compromising the anti-coalescence that defines the character and design of the Parish.

Officer response to the consultation feedback

Consultation feedback highlights several opportunities to improve the clarity, consistency, and effectiveness of the Rural Communities policies. In preparing the Regulation 19 draft, further consideration will include:

- a. strengthening supporting text;
- b. improving alignment with related landscape and environmental policies;
- c. providing clearer guidance on rural character and settlement roles;
- d. potentially greater flexibility to support changing community needs, and
- e. reinforcing links to infrastructure delivery.

Question 80 - Overall, how satisfied are you with the Supporting Rural Communities?

Officer response to the consultation feedback

Of the 33 respondents to this specific question, the majority indicated a degree of overall dissatisfaction with the policies. Proposed amendments to individual policies and supporting text have been set out under the question responses under Questions 69-79.

