



1. Introduction

This paper presents an initial review of the vision, objectives and emerging policy ideas prepared for the Neighbourhood Plan thus far, drawing on reported findings and feedback from consultation events undertaken in 2022 and 2024. It considers the ideas against the evolving policy context which, since consultation was undertaken, includes publication of the most recent version of the National Planning Policy Framework (NPPF) in December 2024 and, as far as information is available, the review of the Local Plan being prepared by Folkestone & Hythe District Council.

2. Previous consultation

The consultation reported upon in February 2024 presented a set of objectives for the Parish and sought feedback from these. It also sought views on a vision for the area as well as feedback on specific interventions (including 'non-policy' ideas) to be taken forward.

The report presents the feedback on the objectives but does not use these to create an overarching vision for the Parish. Establishing a vision is important. This, combined with the objectives, is the foundation of the Neighbourhood Plan. Policies which respond to the vision and objectives will thus respond to consultation feedback and be a clear expression of the community's ambitions for the Parish.

This initial review seeks to use the feedback presented in the consultation report to present a vision for the Parish. This should be consulted upon at the next opportunity.

3. A Vision for Lyminge

Using the feedback from the previous round of consultation a vision, as presented below, has been drafted. This is for the period up to 2045. This is the time period to be covered by the new Local Plan being prepared by the District and will align the Neighbourhood Plan with the strategic direction of the Local Plan, helping to satisfy the 'tests' of the Basic Conditions.

The suggested vision statement is:

"The Parish thrives as a vibrant, sustainable, and inclusive place. The rural setting has been enhanced, with important green spaces preserved and new and improved areas of biodiversity provided."

The heritage and character of the Parish and identity of separate villages has been celebrated through the thoughtful design of new development that has taken place. Where new homes have been provided these have met the specific needs of the local community, with a strong focus on matters such as affordability, adaptability and sustainable design.

Village centres provide a mix of uses that support village life and home-based working. A diverse range of facilities and recreational activities strengthen well-being and foster a friendly, inclusive community. Sustainable tourism contributes to a thriving rural economy.

Improving accessibility and movement within the Parish has been prioritised, with enhanced walking and cycling routes, better public transport and safer roads provided that enable safe and easy access for people of all ages and abilities.

Overall, the vision for the Parish is one of a well-preserved rural charm combined with modern sustainability and inclusivity, ensuring a high quality of life for all residents.”

The Consultation presented six main objectives for comment. These appear to have been broadly supported, with comments received identifying potential opportunities for policies and wider projects. These are considered below.

4. Objectives and policies

In this section we present the emerging ideas for the Neighbourhood Plan ordered by the objectives. Commentary is then provided against each of these.

Objective 1: Protecting and enhancing our rural setting and enhancing opportunities for biodiversity

Possible policy area	Commentary
Protect and enhance existing valued green spaces	<p>Paras 106 – 108 of the NPPF provide scope for Neighbourhood Plans to identify and designate land as Local Green Spaces.</p> <p>Policy C4 of the Places and Policies Local Plan states that the District Council will support groups looking to designate Local Green Spaces in Neighbourhood Plans.</p> <p>For a site to be successfully designated it will need to be demonstrated that the sites meet certain criteria and they have been subject to consultation with landowners and the wider public. A review of existing designations, including environmental designations, should be undertaken alongside this as it will not be necessary to designate sites that already benefit from some form of protection.</p> <p>Proposals for development on designated sites will be treated in the same way as Green Belt land.</p>

	<p>Summary: Potential sites for designation to be reviewed against criteria and subject to consultation. This can be taken forward as a policy in the Neighbourhood Plan. This will require production of a supporting Topic Paper to be submitted alongside the Neighbourhood Plan.</p>
Provide new green spaces	<p>Policy CSD4 of the Core Strategy requires development proposals to deliver biodiversity netgains and improvements to green infrastructure assets.</p> <p>Policy C3 of the Places and Policies Local Plan requires delivery of new open space in line with standards of provision which are related to the scale of development that comes forward.</p> <p>The above stop short of establishing design criteria which can be used to influence the location and type of open space provided, such that it is well integrated with development, provides a range of open space typologies and safe, attractive spaces that can be used for by people of different ages and for different purposes. This is touched upon in Policy HB1 but could be expanded further.</p> <p>Summary: This idea can be taken forward as a policy and have a focus on establishing design criteria, avoiding duplication of existing policy requirements in respect of the scale of provision required.</p>
Maintain and enhance connectivity of wildlife corridors	<p>The importance of creating connected wildlife corridors is reflected in the NPPF. Para 192 for example says that plans should take the opportunity to identify, map and safeguard wildlife habitats and networks.</p> <p>The Core Strategy (at Figure 5.2) maps the district-wide green infrastructure network. This identifies some very broad corridors in and in close proximity to the Parish. The Neighbourhood Plan could take the opportunity to provide more local definition of the corridors, supplementing Policy CSD4 of the Core Strategy. This will likely require review of supporting evidence, including the District Green Infrastructure Study, the type and location of designated sites and habitats to justify the location and extent of any corridors identified. This would benefit from liaison with the local ecology centre and the Kent Downs National Landscape authority.</p> <p>Scope may also exist to direct biodiversity net gains to the corridors (in the event that applicants for development demonstrate that delivery of on-site gains impracticable).</p>

	Summary: Take forward as a policy subject to mapping of corridors and review of supporting evidence.
Safeguard important local views	<p>Views can contribute towards the sense of place and identity of an area. Policy NE3 of the Places and Policies Local Plan seeks to protect landscapes and countryside across the District, albeit that it does not identify specific views of importance.</p> <p>Where views are identified these will need to be of specific 'receptors' and supported by analysis of their significance. This may draw on evidence to the Local Plan as well as material published by the Kent Downs National Landscape authority.</p> <p>Given the landscape quality of the Kent Downs it may be that there are numerous views that are considered to be important. Consideration should thus be given to those which are most significant and where a policy is needed to help manage the impacts of development on that (i.e.: which are under most risk).</p> <p>Summary: Take forward as a policy subject to review of the significance of the views. This will likely require production of a supporting Topic Paper for submission alongside the Neighbourhood Plan.</p>
Limiting light pollution	<p>Para 198 states that planning policies and decisions should minimise the impact of light pollution.</p> <p>The Core Strategy, at Policy SS7, establishes principles for new garden settlements and cross references the Kent Downs National landscape Management Plan in respect of light pollution. This does not however extend to smaller sites and developments. Policy NE5 of the Places and Policies Local Plan however outlines criteria in respect of Dark Skies and Light Pollution, drawing on the National Landscape Management Plan and best practice guidance established by the Institution of Lighting Professionals.</p> <p>Summary: There is no need to take this idea forward as a policy in the Neighbourhood Plan as it would duplicate existing Local Plan policies.</p>

Objective 2: Celebrating our unique heritage and local character

<i>Possible policy area</i>	<i>Commentary</i>
Identify and conserve local heritage assets	The NPPF notes at para 216 that the impacts of development on non-designated heritage assets (i.e.: those which are not Listed at the national level) need to be taken into account when determining planning

	<p>applications. Policy HE3 of the Places and Policies Local Plan effectively repeats the NPPF and cross-refers to productions of a Local List identifying non-designated heritage assets in the District. The Local Plan states that the District will prepare a Local List but it does not appear that this has yet been published.</p> <p>The Neighbourhood Plan could identify buildings for inclusion on the Local List to be referenced in policy. Identification of specific assets would need to be justified against the criteria set out in the Local Plan and subject to consultation with landowners.</p> <p>Summary: This can be taken forward as a policy but would require justification against Local Plan policy and consultation. It is likely that a Topic Paper in support of the Neighbourhood Plan would need to be prepared.</p>
Design guidance (through production of a guide / code)	<p>The importance of design and the use of tools, including Design Codes, is supported through the NPPF. Policy HB1 of the Places and Policies Local Plan supports well-designed new development and Policy NB2 requires applications for major development to demonstrate how they met best practice design principles.</p> <p>The opportunity exists through the Neighbourhood Plan to identify and illustrate what is meant by good design within the Parish, drawing on the qualities that characterise it. Policy HB1 of the Local Plan would support this approach as it makes specific reference to the use of design policies in Neighbourhood Plans.</p> <p>Production of a local set of design criteria or principles would be most effective where they are informed by a Design Guide or Code, and which could be supplemented by reference to information published by the Kent Downs National Landscape authority and in the Etchinghill Conservation Area Appraisal.</p> <p>Summary: Policies on local design criteria can be taken forward in the Neighbourhood Plan but would have more weight if supported by production of a Code or Guide or similar. This would supplement and expand on the Local Plan, establishing design expectations making specific to the Parish.</p>
Celebrate the history of the area and communities who have settled there	<p>It is unclear how this would translate into a policy, but could be taken forward as a project and potentially involve use of public art, information or interpretation boards or similar.</p>

	Summary: To potentially be developed as a project subject to further understanding of the aspiration and what this might involve.
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Objective 3: Providing homes to meet the needs of the local community

<i>Possible policy area</i>	<i>Commentary</i>
Support provision of affordable homes	<p>The Core Strategy (at Policy CSD1) sets out the approach to affordable housing in the District. Within the Kent Downs National Landscape area it is stated that proposals for five or more homes will trigger a need for provision of affordable homes. It is not necessary for the Neighbourhood Plan to supplicate this. Indeed, affordable housing thresholds and requirements are often determined at the District -wide level and with consideration given to matters of viability and delivery. Seeking to establish an alternative approach in the Neighbourhood Plan may be viewed as frustrating Local Plan policy and consider, by the Examiner, to fail the tests of the Basic Conditions.</p> <p>The Neighbourhood Plan could express support for applications that deliver affordable homes in perpetuity, and which may include rural exception sites and or proposals from Community Land Trusts or similar. However, this is also covered by the Core Strategy and the Places and Policies Local Plan. The Neighbourhood Plan could seek to allocate a site purely for affordable housing, but this would be dependent on a site owner or promoter being willing to deliver 100% affordable homes on site. Equally, and as an alternative way to home ownership, sites could be allocated for self and custom build homes (and which is supported in Policy HB4 of the Places and Policies Local Plan). As above, this would require an assessment of sites and discussions with landowner to secure their agreement to this approach.</p> <p>Summary: This would duplicate the Local Plan and does not need taking forward in the Neighbourhood Plan. A site could be allocated for affordable homes (if a specific need for affordable housing can be justified) but would be dependent on landowner intentions and suitability of any site proposed.</p>
Influence the mix, size and tenure of homes	<p>Policy CSD2 of the Core Strategy sets out the breakdown of house sizes and types required to meet district-wide needs. A percentage range is given for each house size that should be provided. This is quite wide. Scope exists within the Neighbourhood Plan to refine this, drawing on</p>

	<p>evidence of the local stock of homes and demographic change, for example. This would typically be set out in a Housing Needs Assessment which will form evidence to the policy.</p> <p>Summary: A policy can be included in the Neighbourhood Plan which provides a more granular assessment of local housing need, but this will need to be evidenced by productions of a Housing Needs Assessment.</p>
Consider flooding and drainage	<p>The approach to flood risk is set out in the NPPF. The Core Strategy (At Policy CSD5) expands upon this and establishes standards in respect of water use and efficiency as well as requiring use of sustainable drainage to minimise the impact of flooding, particularly in terms of surface water runoff. The policy also addresses impacts of flooding and drainage on protected sites and the capacity of wastewater treatment works discharging into this.</p> <p>Furthermore, changes to the Flood Management Act which are due to come into effect later this year will establish a national requirement for development to mitigate flood risk through provision of sustainable drainage. Policy C3 of the Places and Policies Local Plan establishes a set of criteria to be used to inform the design of sustainable drainage.</p> <p>There is little more that the Neighbourhood Plan can add to this, although it could potentially identify locations where existing streets and spaces might be retrofitted to introduce sustainable drainage, and which could take the form of biodiverse raingardens and similar, bringing amenity and biodiversity benefits to the area. This would most likely be a project rather than a policy as the retrofitting of existing streets and spaces is not specifically tied to a development proposal.</p> <p>Summary: Consider where opportunities might exist to retrofit existing spaces to introduce sustainable drainage and present this as a project. This will avoid a policy from unnecessarily duplicating existing policies.</p>
Require sustainable design to mitigate impacts of climate change	<p>Sustainability and energy efficiency standards are established at the national level and the Government has made clear, through Written Ministerial Statements, that it is not the place of Neighbourhood Plans to add to this through introductions of new standards and requirements. This is a rapidly changing area, with the Future Buildings Standards due to be adopted in the</p>

	<p>foreseeable future, and which will require new homes to be almost or net zero standard.</p> <p>Policy CC2 of the Places and Policies Local Plan sets out local level guidance. The Neighbourhood Plan could seek to introduce a policy that encourages (rather than requires) development to meet the highest standards, and establish a set of design criteria that will help support implementation of this. The question is then how much this would add to the existing policy framework and how effective it would be. It could be included a statement of intent but may have limited application.</p> <p>Summary: This could be taken forward as a policy in the Neighbourhood Plan but may have limited effectiveness, with national standards and requirements applying instead.</p>
Direct new homes to sustainable locations	<p>Lyminge is identified as a 'rural centre' in the settlement hierarchy outlined in the Core Strategy and Etchinghill is a 'secondary village'. It is expected that some, albeit limited development, primarily to meet local needs, will take place in these settlements. Three sites were allocated for development in the Places and Policies Local Plan and criteria established for each off these.</p> <p>In addition to allocated sites the Core Strategy (at Policy SS1) states that in development, as agreed by the local community in neighbourhood plans, will be encouraged where well-related in scale and location to settlements, and where contributing to sense of place and sustainable design. The Core Strategy does not establish a housing requirement figure for neighbourhood plan areas. A housing figure can be requested and planned for in the Neighbourhood Plan. Alternatively, a criteria-based approach could be taken that outlines what might be considered appropriate, sustainable locations for development. This could support effective and efficient use of land through the reuse of previously developed sites within the settlement boundary or, where outside the boundary, encourage development where it is in closest proximity to services and facilities, where the site is accessible to all by foot, and where impacts on sensitive landscapes and environmental designations are limited. This could also potentially be linked to design policies (under Objective 2) that set out principles for good design and development in different locations.</p> <p>Summary: A criteria based approach could be developed in a policy in the Neighbourhood Plan to direct future</p>

	development to the most sustainable locations in the Parish. Should there be a desire to allocate development sites, the criteria could be used to help support that process.
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Objective 4: Enabling a thriving rural economy

<i>Possible policy area</i>	<i>Commentary</i>
Revitalise village centres	<p>Lyminge is designated as a local centre in the Core Strategy and the Places and Policies Local Plan. These are defined as places where it is important to protect crucial services and to accommodate development that maintains the viability of the centre for residents and visitors.</p> <p>Policy RL7 outlines the approach to development in Local Centres. The Neighbourhood Plan could seek to expand upon this by defining the extent of the centre and outlining the mix of uses that would be appropriate (though care would need to be taken not to frustrate national policy which allows for changes of use and thus limits the ability to specify what may or may not be an appropriate use in the centre) and, alongside this, to establish appropriate design principles and a suite of possible public realm improvements that would help enhance the quality of the centre.</p> <p>It appears from consultation feedback that concern was expressed about the potential loss of services, including pubs and the Post Office. Policy C2 of the Places and Policies Local Plan seeks to safeguard such uses. Para 88 of the NPPF clarifies that, in rural areas, facilities such as pubs and local shops, which provide accessible local services and community facilities, should be retained. Text in the Neighbourhood Plan could make clear what the important facilities are in the centre (and wider Parish) that should be protected, and state that proposals for these should be managed in a way consistent with the Local Plan.</p> <p>Summary: Take this forward as a policy on the Neighbourhood Plan, setting out appropriate uses, design principles and wider public realm improvements (which could also be presented as a separate project).</p>
Support sustainable rural tourism	Policy CSD3 of the Core Strategy supports proposals for tourist, recreation and rural economic uses in appropriate locations. This is expanded upon in the Places and Policies Local Plan. Policy E3 and E4 relate to tourism related

	<p>development, hotels and guest houses, and Policy E5 relates to caravan and camping sites. Criteria are established under each policy against which proposals will be determined. It is unclear what more the Neighbourhood Plan could add to this without duplicating existing policy, unless there is a specific site or proposal that should be promoted for development. Alternatively, this could be framed as a project which seeks to promote the attractions of the area for visitors, including or example accessible walks and access to the countryside.</p> <p>Summary: A policy that supports tourism related uses would duplicate the existing policy framework and is thus not needed in the Neighbourhood Plan, unless a specific site is to be promoted for development. This could instead be framed as a project idea identifying interventions that would attract visitors to the area.</p>
Safeguard existing employment areas	<p>Policy CSD3 says that 'rural economic uses will be appropriately protected and Policy E2 of the Places and Policies Local Plan states that existing employment sites are protected for those purposes. Beyond defining, on a map, which existing sites this policy applies to, there may be little more to add to existing policies in the Neighbourhood Plan. However, Policy E1 of the Places and Policies Local Plan does state that proposals for new employment uses in the Kent Downs National Landscape will need to be of a high quality of design having regard to the setting. It could be that the Neighbourhood Plan expands upon this to set out what the design expectations are for employment uses in the Parish.</p> <p>Summary: This policy idea would appear to duplicate the existing Local Plan policy and does not need taking forward in the Neighbourhood Plan. Alternatively, and subject to support material, it could be framed around design expectations for new employment related development in the Parish (and thus related to ideas presented under Objective 2).</p>
Provide a supportive environment for home working	<p>It is not necessary for planning permission to be sought for people to work at home, unless the home becomes incidental to the use of the house for business (i.e.: it represents a change of use), or where outbuildings are of a certain scale or may have impacts on amenity as a result of noise or other disturbances. A policy could be included in the Neighbourhood Plan to this effect. Where reference is made to an outbuilding or annex to be used for employment purposes, consideration should be given to the criteria in Policy HB9 of the Policies and Places</p>

	<p>Local Plan. This relates to annexes for residential purposes but may also include criteria that would also be applicable for home-working purposes.</p> <p>Summary: A policy can be taken forward for inclusion in the Neighbourhood Plan but may need to be couched in terms of ‘insofar as planning permission is required...’ to recognise that it will not apply in all instances.</p>
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Objective 5: An accessible neighbourhood

<i>Possible policy area</i>	<i>Commentary</i>
Encourage walking and cycling for local journeys	<p>Policy T1 of the Places and Policies Local Plan supports a street hierarchy that prioritises walking and cycling. This does not need expanding although the Neighbourhood Plan could integrate reference to best practice guidance as set out by the Department for Transport in LTN 1/20 and other similar documents. This might also extent to matters related to sustainable locations for growth, supporting sites which are well connected with or can be connected with the foot and cycle network. This however might be included in policies under Objective 3. Alongside a policy the opportunity exists within the Plan to identify specific new routes or improvements to existing routes that should be taken forward and, where possible, integrated within new development.</p> <p>Summary: A policy could be taken forward that requires development to be designed in line with best practice. Alongside this, projects could be identified that identify new or improved walking routes to be delivered in the Parish.</p>
Enhance the network of walking and cycling routes	<p>This would be covered by policies and projects as outlined in the entry above. The existing network should be mapped alongside various destinations to help identify gaps in the network which may need improving. The District has prepared a Local Cycling and Walking Infrastructure Plan but this does not extend to the Parish. Projects identified in the Neighbourhood Plan can thus help fill this gap and be used for discussion with the County to identify interventions that should be taken forward.</p> <p>Summary: Identify projects for delivery in partnership with the County</p>

Improve the bridleway network	<p>As above, this is likely to comprise a project in the Neighbourhood Plan, identifying specific improvements that are sought.</p> <p>Summary: Identify projects for delivery in partnership with the County</p>
Support initiatives to tackle congestions	<p>The Neighbourhood Plan could explore possible traffic management measures that should be introduced and which might help address congestion but wider behavioural change is likely to be needed alongside this, including efforts that make use of other modes (walking, cycling and public transport) a safe, attractive and compelling proposition for short everyday journeys. For longer journeys which will likely require use of a car (particularly given the location of the Parish, services and facilities available) wider initiatives will most likely need exploring in partnership with the County. These will comprise a project as opposed to a policy and could include support for improved public transport provision.</p> <p>Summary: Prepare a project for inclusion in the Neighbourhood Plan that identifies traffic management and other measures that should be explored in partnership with the County Council to help manage the impact of traffic congestion (and speed).</p>

Objective 6: Celebrating and supporting our communities

<i>Possible policy area</i>	<i>Commentary</i>
Provide facilities, services and recreational activities to meet needs of all	<p>Policy CSD3 of the Core Strategy seeks to protect existing community services and facilities in rural areas from loss. This is also reflected in Policy C2 of the Places and Policies Local Plan. It is not however clear what specific policy would apply to proposals for new community facilities. Although delivery of facilities is often complex, the Neighbourhood Plan could express support for proposals for new (and improved) community facilities and establish criteria that should be satisfied by these (i.e.: being accessible to all, supporting multi-functional use etc). The Neighbourhood Plan should set out what facilities there are in the Parish, whether there are any gaps or needs for improvement to existing facilities. If the later, projects could be identified in the Plan that support improvements.</p> <p>Summary: Take forward a policy and potentially supporting project in the Neighbourhood Plan that establishes criteria for new facilities and supports</p>

	specific interventions and improvements to existing facilities as appropriate.
Encourage a friendly and involved community	<p>This is inferred as relating to provision of facilities for people of all ages (e.g.: play equipment suitable for the young and old) as well as the hosting of events that supports community cohesion and social inclusiveness. This is more likely to form the basis of a project within the Neighbourhood Plan as opposed to a project.</p> <p>Summary: Develop a project in the Neighbourhood Plan that outlines possible events and activities that could be hosted to support community life in the Parish.</p>

5. Summary

The Neighbourhood Plan should look to include policies where it can effect positive change. There is no need to duplicate existing policies established at the national or District-level. Indeed, the Examiner will recommend these are removed. This may mean preparing a shorter Plan that is focussed on fewer policies but which are specifically related to the locality. To this end, policies associated with designating Local Green Spaces, understanding local housing needs and establishing design criteria are very locally specific. It is important to note that there are no requirements dictating the length of a Neighbourhood Plan or range of policies it should include: a short Plan can be just as effective, if not more so, than one that tries to do many things.

There is a question as to whether a site or sites should be allocated for future housing development. This is not a requirement and instead a criteria based approach could be taken that directs growth to the most sustainable places. This would not give you the same level of ‘protection’ as you might get if allocating a site, but would represent a simpler and potentially less contentious process. However, the location of the Parish within the Kent Downs National Landscape does already afford some degree of protection from future development, with the NPPF, at Para 190, stating that permission for major development within a National Landscape should be refused other than in exceptional circumstances. This may allow you to proceed with a ‘simpler’ Plan.

At the current time the District is in the process of beginning to review and update the Local Plan. One of the first stages is the ‘Call for Sites’, inviting landowners and others to put sites forward for consideration and which may be allocated in the Local Plan so that housing requirements can be met. The Call for Sites closed at the end of April. Submissions will now be assessed by the District. The Call for Sites may include land in the Parish. This does not mean that those sites will be allocated for development. The suitability of all sites will be assessed, with consideration also given to the settlement hierarchy and wider environmental constraints. Criteria outlined in the Neighbourhood Plan in respect of sustainable development locations could help influence the assessment process to be undertaken by the District Council. Equally, and should there be a desire to allocate a site in the Neighbourhood Plan area – because there is a

specific local need for housing for example – the sites included in the Call for Sites could be used as a basis for this.

Alongside the policies a series of projects and wider community aspirations can be identified. These will help respond to issues and ideas raised through consultation and indicate how and where future funds might be directed, including any funds payable by developers or interventions that delivery partners, such as highways and the County, may take forward.