

Crowle Neighbourhood Plan 2024-2041
Regulation 16 Consultation
Wychavon District Council Officer Comments
20 July 2026

1.0 Overview

- 1.1 These officer comments are made on behalf of Wychavon District Council (WDC), as the Local Planning Authority, on the Regulation 16 Crowle Neighbourhood Plan for consideration by the Independent Examiner. The consultation ran from 8 June to 20 July 2026. WDC officer comments made for the Regulation 14 consultation are provided for information at Appendix 1. WDC is pleased to see that many of the changes and updates that were suggested have been implemented by the Qualifying Body, Crowle Parish Council, when drafting the Regulation 15 submission version of the Neighbourhood Plan.
- 1.2 WDC is supportive of the Parish Council's preparation of the Neighbourhood Plan and of the plan period from 2024 to 2041. The Neighbourhood Plan has been prepared during a period of transition in local plan making from the adopted SWDP (2016). The South Worcestershire Development Plan Review (SWDPR) was submitted to the Planning Inspectorate for examination in September 2023. The Examination in Public began in March 2025, with the Inspector's final report received in early March 2026 and the SWDPR adopted by the South Worcestershire Councils on 26 March 2026.
- 1.3 The Regulation 15 submission version of the Neighbourhood Plan has been drafted to reflect the policies in the recently adopted SWDPR and has been able to consider those strategic policies identified by WDC published on the district council's Planning Policy webpage here: [South Worcestershire Development Plan Homepage - South Worcestershire Development Plan](#)

2.0 Meeting the Basic Conditions

- 2.1 It is not for WDC to say whether the Regulation 15 version of the Neighbourhood Plan has met the basic conditions, however, the following points are made for consideration as part of the independent examination.

3.0 Having Regard to National Planning Policy

- 3.1 The Neighbourhood Plan has been prepared against the latest NPPF published in December 2024. As the Neighbourhood Plan was submitted at Regulation 15 prior to the publication of the latest draft version of the NPPF it will continue to be examined against the policies in the 2024 NPPF.

4.0 Being in General Conformity with the Strategic Policies Identified in the SWDP

- 4.1 WDC has identified a list of strategic policies in the adopted SWDP which Neighbourhood plans should be in conformity. The District Council is satisfied that the Qualifying Body has considered these policies in drafting the Neighbourhood Plan with these strategic policies in mind. However, some specific points and observations are raised in the table below for the consideration of the examiner.

5.0 Table of Contents

Chapter/Section	Comments
Chapter 1: Setting the Scene	This chapter outlines the Neighbourhood Plan process and how they can form a part of the overall plan for the district. The document is logically set out, and the contents are clearly signposted.
Chapter 2: Crowle Neighbourhood Area	This chapter provides a clear outline about the Neighbourhood Area, outlining the socio-economic and environmental profile, as well as the settlement layout. Further to our comment at the Regulation 14 stage, we note that the typo has subsequently been corrected. Minor typo correction required at para 2.7 relating to Froxmere Road.
Chapter 3: Vision and Objectives	The chapter is concise and clearly signposts to relevant policy areas of the Neighbourhood Plan that will support and deliver the vision.
Chapter 4: Built Environment	Policy CRW1: Design. This policy is supportive of the SWDPR policies relating to design and NPPF chapter 12. Para 4.4 should delete reference to the South Worcestershire Design Guide SPD as this has not been readopted against the SWDPR. Reference to the Wychavon Design Code SPD requires updating to reflect that it was adopted in June 2026. Policy CRW2: Conservation Area. This policy is consistent with SWDPR 09 and the NPPF chapter 16.
Chapter 5: Natural Environment	Policy CRW3: Landscape character. The policy is aligned with SWDPR 34 in the adopted local plan. WDC supports the aims of this policy to preserve and enhance the landscape character within the neighbourhood area. Policy CRW4: Crowle/Crowle Green Local Gap. The inclusion of the Local Gap in this location is supported by policy SWDPR 08 Significant Gaps. Although the Significant Gap was not carried forward from the 2016 SWDP to the SWDPR, it is appropriate for a neighbourhood plan to consider relevant local designations that are supported by the community. The reinstatement of the Local Gap in this location is supported and justified in the reasoned justification to the policy. Policy CRW5: Key views. The key views outlined within this policy are supported and justified. They are easy to interpret with the use of plan 4: Key views. Policy CRW6: Local Green Space. The Local Green Spaces identified are supported and justified.
Chapter 6: Housing	Policy CRW7: Neighbourhood Area Housing Requirement. WDC confirm that the housing requirement for the Neighbourhood Area is nil as set out in para. 2.3 of the Reasoned Justification to Policy SWDPR 02 of the adopted SWDPR. This policy has regard to housing allocations set out in the SWDPR and historic planning permissions when discussing the parish's local housing requirement. The district council supports this policy. Policy CRW8: Housing development. This policy is aligned with relevant development management policies in the SWDPR and is robustly justified as it references SWDPR evidence base documents.

	Policy CRW9: Housing mix. Overall, we support the aims for this policy, and the focus on ensuring that there is greater provision for housing that reflects the communities' requirements. The policy is supported by community survey results and the 2021 SHMA update prepared for the SWDPR. Policy CRW10: Householder development. This policy is supportive of SWDPR policies relating to design and the recently adopted Wychavon Design Code SPD.
Chapter 6: Jobs, Services and Infrastructure	Policy CRW11: Small-scale employment. This policy is supported and justified. Policy CRW12: Community facilities. We support this policy, and we consider that the identified community facilities cover important services and facilities within the Neighbourhood Area. In particular, Jubilee Fields has been highlighted for improving quality and exploring improving onsite parking within the playing pitch and outdoor sports strategy evidence base in support of the SWDPR. Policy CRW13: Renewable and low carbon energy. This policy is supported by the district council and reflects the Wychavon District Council objectives in the 2020 Wychavon Intelligently Green Plan (2020-2030).
Chapter 7: Delivering the Neighbourhood Plan	The contents of this chapter are noted and supported.
Chapter 8: Community Actions	The contents of this chapter are noted and supported. WDC supports the further inclusion of Bus on Demand services in CA6, following our Regulation 14 comment.
Plans	Noted.
Evidence Base	The evidence base is proportionate to and supportive of the draft policies. We note that the national level evidence has been updated to include the latest revision of the NPPF, and we consider that the required changes have been made throughout the Neighbourhood Plan to reflect the NPPF.

6.0 Conclusion

- 6.1 Overall, WDC considers that the submitted Crowle Neighbourhood Plan aligns with the adopted SWDPR and the NPPF. The modifications made to the Regulation 15 version of the Neighbourhood Plan are welcomed, and it is felt that these reflect the comments we raised at the Regulation 14 consultation, and the additional updates made to the Neighbourhood Plan to reflect the latest NPPF.
- 6.2 WDC considers that the policies and relevant explanatory text are supportive of the requirements under the LURA. Although it is acknowledged that it is for the Examiner to consider whether the Neighbourhood Plan meets the basic conditions and make any recommendations accordingly.
- 6.3 Finally, it is recognised that the text has been revised to reflect the intention of the Parish Council to have the Neighbourhood Plan made against the recently adopted SWDPR.

Crowle Parish Council Neighbourhood Plan 2024-2041 Regulation 14 Consultation draft

Wychavon District Council Officer Response

1. Overview

- 1.1 These officer comments are made on behalf of Wychavon District Council (WDC), as the Local Planning Authority and Relevant Body, on the Crowle Neighbourhood Plan (CNP) as part of the Regulation 14 Consultation. The consultation was undertaken between the 4th of November and 17th of December 2024. WDC received formal notification of the consultation from the parish council in advance of the commencement date.
- 1.2 WDC is supportive of the parish council's preparation of the neighbourhood plan and of the plan period from 2024 to 2041. This means that the neighbourhood plan period reflects the reviewed South Worcestershire Development Plan (SWDPR) extended plan period from 2021 to 2041. The below comments relate to specific policies where clarification or changes are recommended. If the parish council wish to query any points raised below or any other policies in the neighbourhood plan, WDC would be happy to discuss further.
- 1.3 As noted above the neighbourhood plan has been prepared during a period of transition in local plan making from the 2016 SWDP to the reviewed SWDP. The latter referred to as the South Worcestershire Development Plan Review (SWDPR) was submitted to the Planning Inspectorate for examination on the 27th of September 2023 with a date now being set for the hearing sessions to commence in early March 2025. An update to the Local Development Scheme (LDS) is being considered by the Wychavon Executive Board on 8th January 2025. The LDS sets out the timetable for development plan preparation and supporting documents. The reviewed SWDP is anticipated to be adopted by December 2025.
- 1.4 It is noted that the SWDP review is covered in the draft CNP from para 1.3 and that as the neighbourhood plan goes through the statutory stages, i.e. Regulation 15, Regulation 16, examination and referendum regard should be had to the corresponding progress of the SWDPR and adoption. A neighbourhood plan can only be examined and made against the adopted local plan, currently the 2016 SWDP. However there seems little benefit in adopting the CNP against the extant local plan and, therefore, WDC will need to discuss with the parish council the appropriate stages of timings of the Regulation 15 submission, Regulation 16 consultation and examination of the CNP over the course of 2025.

2. General Conformity with the NPPF

- 2.1 The draft CNP demonstrates that regard has been had to the National Planning Policy Framework (NPPF, December 2023), particularly in its commitment to sustainable development. The plan effectively balances economic, social, and environmental objectives, providing a clear framework for development decisions that supports the NPPF's emphasis on a plan-led system.
- 2.2 In July 2024 the Government consulted on a revised draft NPPF which is expected to be published in late 2025. The new NPPF was published on 12th December 2024 and therefore the CNP will need to be amended to reflect any relevant changes arising from the NPPF before it is submitted to WDC at the Regulation 15 stage.

3. Table of Officer Comments on Plan Content

Chapter 1: Setting the Scene	This chapter clearly sets out the Neighbourhood Plan process and how they form part of the overall development plan for the district. The document contents are clearly signposted and logically set out. Further to comments above relating to the new NPPF the relevant text in this section can be updated accordingly.
Chapter 2: Crowle Neighbourhood Area	This chapter provides a clear socio-economic, historic, and environmental profile of the neighbourhood area. A syntax error needs correcting at para 2.16 to read “habitats which are identified and protected in <u>the</u> Local Plan policy ”.
Chapter 3: Vision and Objectives	The Objectives set out a clear articulation of the Vision and the chapter is concise and clearly signposts to relevant policy areas of Neighbourhood Plan to support and deliver on the Vision. In the Vision box (pg. 13), the ‘and’ at the end of bullets 1 and 3 can be removed. Additionally, a semicolon can be inserted at the end of bullet 2 for coherency.
Chapter 4: Built Environment	Policy CRW1: Design. This policy is supportive of SWDP and SWDPR policies and local design guidance relating to design and sets out criteria that development proposals should follow to maintain and enhance the local distinctiveness of and design quality in Crowle. WDC is supportive of the preparation of a draft design code alongside the CNP as this reflects the district council’s commitment to achieving high quality design in all types of development within Wychavon. Policy CRW2: Crowle Conservation Area. This policy is supportive of SWDP and SWDPR policies relating to the historic environment, as well as the District Council’s Appraisal and Management Plan. It outlines that development proposals should either preserve or enhance the character and/or appearance of the Crowle Conservation Area.
Chapter 5: Natural Environment	CRW3: Landscape Character. This policy is aligned to the relevant policy in the current local plan SWDP 25 and SWDPR 30 in the submitted review. The policy reinforces the importance of the setting of the village and the quality of the landscape within the neighbourhood area. CRW4: Crowle/Crowle Green Local Gap. This policy is aligned with the objectives of SWDP 2 of the adopted local plan, and SWDPR 3 of the submitted review and, therefore, is supported by the district Council. The SWDPR is proposing to remove the Significant Gap in this location under Annex F and supported by the 2022 update to the Significant Gap Appraisal Report. However, neighbourhood plans are able to identify local gaps, where supported and evidenced. Therefore, the district council is also supportive of the local gap designation being included in the CNP. CRW5: Key Views. The key views set out in this policy are supported and clearly justified. Plan 4 and photographs allow for the views to be interpreted when applying the policy to any future planning application. CRW6: Local Green Spaces. The LGS identified are supported and justified against the selection criteria with Table 3 providing the evidence base. Plan 5 clearly shows the proposed LGS designations.

Chapter 6: Housing	Policy CRW7: Neighbourhood Area housing requirement. This policy has regard to housing allocations set out in the SWDPR and historic planning permissions when discussing the parish's local housing requirement. The district Council supports this policy. Policy CRW8: Housing development. This policy is aligned with relevant development management policies in the SWDP and SWDPR and is robustly justified as it references SWDPR evidence base documents. Policy CRW9: Housing mix. The policy requirements in terms of the mix are supported by the community survey results and refer to the 2021 SHMA update prepared for the SWDPR local plan update. Wychavon DC housing team can conclude a housing needs survey on request, and this may help provide extra evidence to underpin the policy and refine the mix requirement further. Officers would be happy to discuss this further with the parish council. Reference to self-build units is noted, and this reflects SWDPR 16 (E). The local plan policy sets out percentage thresholds that development proposals will need to meet for the provision of self-build plots to be considered, with reference to the demand outlined in the latest version of the district council's Self-Build and Custom Housebuilding Register. Policy CRW9, in terms of self-build units, does not repeat the local plan wording, however, perhaps some consideration could be given to developing this aspect of the neighbourhood plan policy to reflect local requirements to assist the decision maker further when the neighbourhood plan is eventually made and to make the neighbourhood plan more locally distinctive. Policy CRW10: Householder development. This policy is supportive of SWDP and SWDPR policies relating to design and Annex Note 1 of the South Worcestershire Design Guide SPD (2018) and emerging draft Wychavon Design Code SPD.
Chapter 7: Jobs and Facilities	Policy CRW11: Small-scale employment. This policy is supported and justified. Policy CRW12: Community facilities. The identified community facilities cover the important services and facilities in the village. Therefore, the policy is supported, and the parish council may wish to consider designating some/all as an Asset of Community Value, although, this may be better placed under section nine. Policy CRW13: Renewable and low carbon energy. This policy is supported by the district council and reflects the Wychavon District Council objectives in the 2020 Wychavon Intelligently Green Plan (2020-2030).
Chapter 8: Delivering the Neighbourhood Plan	The contents of this chapter are noted and supported.
Chapter 9: Community Actions	The contents of this chapter are noted and supported. At CA6 perhaps reference could be made to Bus on Demand services.
Plans	Noted
Evidence Base	The evidence base is proportionate to and supportive of the draft policies. The NPPF published in December 2024 will need to be reflected in this section and changes where applicable reflected in revised policies for the Regulation 15 version of the Crowle Parish Neighbourhood Plan.

4. Conclusions

- 4.1 The Regulation 14 version of the neighbourhood plan is well presented and clearly set out in a concise manner. Wychavon District Council is content that the policies are in general conformity with the strategic policies in the adopted SWDP and submitted SWDPR local plan policies and have regard to the latest version of the NPPF.
- 4.2 Wychavon District Council looks forward to receiving the Regulation 15 version of the Crowle Parish Council Neighbourhood Plan 2024-2041 in due course and is happy to work with the parish council on any matters arising from the Regulation 14 consultation and preparing the final draft.