

South Lenches Neighbourhood Plan 2015 -2041
Regulation 14 Consultation
Wychavon District Council Officer Comments
22 December 2025

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 14 draft South Lenches Neighbourhood Plan for consideration by the Independent Examiner. The consultation ran from 11 November to 23 December 2025.
- 1.2 The draft Neighbourhood Plan has been prepared during a period of transition in local plan making from the adopted SWDP (2016) to the reviewed SWDP. The replacement Local Plan, referred to as 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 most of the hearing sessions being held over March-April 2025. The examination concluded with a final hearing session on 4 September 2025. It is anticipated that the SWDPR will be adopted in March 2026.
- 1.3 The Inspectors published their interim letter (EXAM99) on 7 July and their post hearing letter (EXAM118) on 10 October 2025 determined that the Plan is likely to be capable of being found legally compliant and sound. WDC will be consulting on Main Modifications to the Plan, arising from the hearings, from 6 January 2026, allowing the Inspectors to then issue their final report and subsequent adoption of the SWDPR by late March 2026.
- 1.4 The Inspectors have determined that Annex E, relating to housing numbers for Neighbourhood Areas, of the SWDPR, is unsound and directed that it should be removed from the Plan as a Main Modification. This means the housing supply position in respect of the Neighbourhood Plan area set out in Annex E is no longer relevant. WDC has determined the housing requirement for designated Neighbourhood Areas to be zero, as the total housing requirement for the SWDPR is being met through sites allocated in the Local Plan and this is included as a Main Modification to SWDPR03 The Spatial Development Strategy and Settlement Hierarchy.
- 1.5 However, it should be stressed that Neighbourhood Plans should be positively prepared and, therefore, the Parish Council could consider allocating a site in accordance with NPPF para 74 and of a size that reflects the requirements in NPPF para 73a. In doing so, the Neighbourhood

Plan would also benefit from NPPF para 14 if WDC is unable to demonstrate a 5-year housing land supply in the future.

- 1.6 In the event of the Parish Council choosing to allocate a site at this stage it would be necessary to undertake a Call for Sites exercise and ask WDC to update the SEA/HRA screening opinion.
- 1.7 Further to this, the Neighbourhood Plan would also have to retain policies in relation to housing requirements, including the location of residential development, in addition to an allocation to fully benefit from the provisions of NPPF paragraph 14.
- 1.8 The Government published a consultation draft of the NPPF on 16 December 2025, with the consultation period closing on 10 March 2026 [National Planning Policy Framework: proposed reforms and other changes to the planning system - GOV.UK]. There are several changes set out in the NPPF that now have implications for neighbourhood plans. In particular, these include a stronger direction for neighbourhood plans to allocate sites for development to meet the needs of their designated area, along with details of the types of policies that neighbourhood plans should include (PM5.1). In addition, dependent on the timing of the publication of the final version of the NPPF, submitted neighbourhood plans after that date will be examined against the latest version of the NPPF, alongside the adopted SWDPR.

There are also implications for the identification of housing need for neighbourhood areas with the requirement that Local Planning Authorities provide an indicative figure in cases where the Local Plan figure is zero (H02.5) as is the case with the soon to be adopted SWDPR. In these instances, Local Planning Authorities i.e. WDC will now be required to provide an indicative neighbourhood area housing requirement figure to parish councils. Therefore, the Parish Council will need to have regard to these changes and address them in the Regulation 15 submitted version of the Neighbourhood Plan. WDC officers will be able to discuss this further with the Neighbourhood Plan group.

2.0 Meeting the Basic Conditions

- 2.1 It is not for WDC to say whether the Regulation 14 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 developed with consideration of the latest National Planning Policy Framework (NPPF). It should be noted that the Government has published an update to the NPPF on 16 December 2025 for consultation. Consequently, the Neighbourhood Plan will need to be amended accordingly, if post publication of the latest NPPF, to reflect any changes to national planning policy prior to the Regulation 15 submission stage later in 2026.

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. WDC is satisfied that the Qualifying Body has considered these policies in the drafting of the Neighbourhood Plan. However, some specific points and observations are raised in the table below for the consideration of the Examiner.

4.2 WDC can provide an updated list of strategic policies ahead of the SWDPR adoption. However, given that the strategic policies between the SWDP and SWDPR are broadly similar, then the draft Regulation 14 version of the Neighbourhood Plan should be broadly in alignment with the SWDPR.

4.3 References to SWDPR policies are as they will appear in the adopted SWDPR, as this Neighbourhood Plan will be examined against the new Local Plan.

5.0 Table of Contents

Chapter/Section	Comments
Chapter 1: Introduction	This chapter outlines the Neighbourhood Plan process and how it can form a part of the overall development plan for the district. The document is logically set out, and the contents are clearly signposted. There is opportunity in this section to clarify: - Please amend the Neighborhood Development Plan period to align with the SWDPR plan (2025-2041). - Paragraph a: The reference to LDS and SWLDS is not required. - Paragraph C and D – formatting – an extra line is required here. - Paragraph H – note that an updated NPPF is out for review in December 2025 and this document may need to be referenced in the neighbourhood plans depending on the timescales for the plan to be made. - Also note, paragraph H and I refer to SWDP (2026) and make no reference to the SWDPR. This should be reviewed and amended accordingly. - Paragraph H – reference to Wychavon and South Worcestershire LDS not required.
Chapter 2: Local Context	This chapter provides a clear outline about the Neighbourhood Area, outlining the socio-economic and environmental profile, as well as the settlement layout and history. The context provided is useful and supported by WDC.
Chapter 3: Profile of the Community Today	The chapter outlines the socio-economic profile of the Neighbourhood Area. The context provided is useful and supported by WDC. The graphs and keys should be repositioned and the text made clearer for the reader.
Chapter 4: Local Infrastructure	This section does not make reference to local infrastructure within South Lenches, instead it contains three paragraphs about the SWDP entitled the 'Local Plan'. It may be advisable to either retitle or relocate this section within the document, e.g. the introduction. Also, please note that the SWDPR should be adopted by March 2026 and therefore this section of the report will need to be updated to reflect this information.
Chapter 5: Visions and Objectives	This section clearly outlines the visions for South Lenches up to 2041. Objective 2 (16) appears in bold, suggest this is changed in line with formatting of other objectives.

Chapter 6: Policies Development	Introduction: This section outlines the aims of the Neighbourhood Development Plan and the associated policies. Suggest that the formatting is reviewed so that it aligns with the rest of the document. A full stop is also required at the end of the paragraph of point 1 (page18).
Chapter 7: Policies	Policy 1: South Lenches Development Boundaries: This policy reflects the principals outlined within SWDPR 20, 23 and 24. A clearer key should be provided for the map on page 20, and this key should also reference the brown shaded area on the map. Housing Policies: Under the SWDPR the housing requirement for the neighbourhood area is zero (it should be noted that this is a minimum figure) as set out in the Main Modification to SWDPR03. Furthermore, the current NPPF explains that neighbourhood plans should be positively prepared, and to benefit from paragraph 14 of the NPPF, there must, at a minimum, be an allocated site within the neighbourhood plan. Please note however that a revised NPPF is likely to be adopted in the spring of 2026 onwards and the above information may be subject to change as described above. Following review of the latest draft NPPF, WDC officers will be available to discuss any updates that may materially impact the Neighbourhood Plan prior to the Reg 15 submission. Policy 2: Housing Growth, Infill and Design: This policy is consistent with policies in the SWDPR and is supported by South Lenches (SL) community survey results. Query the use of the word 'limited' in policy two. The word 'appropriate' or 'small scale' may be better suited here, or if the originally word retained then a definition would need to be provided if any of these words are chosen. In paragraph two of 'policy evidence' reference is made to South Lenches not making any housing site allocations. Please note that this is not correct or consistent with the development strategy, especially as Church Lench is a Category 2 settlement. This should be addressed. Policy 3: Density of Development: This policy is consistent with policy SWDPR 16 in the submitted review. The policy is supported by SL community survey results. A 'k' should be added to 'erbing' on point 3 of the policy. Policy 4: Affordable Housing Mix: WDC 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 SL community survey results and the housing need survey (carried out by Warwickshire Community Council in 2023). Suggest the orange text box is formatted to be consistent with other policy texts boxes in the document. Policy 5: Market Housing Mix: WDC 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 SL community survey results and the housing need survey carried out by Warwickshire Community Council (2023).

Policy 6: Design Guide and Local Character: This policy is aligned with SWDPR policies relating to design, South Lench Design Guide (Appendix A) and Wychavon Landscape Character Assessment. The policy is supported by SL community survey results.

Policy 7: Protection of the Historic Environment: This policy is aligned to SWDPR 9 and SWDPR 33. Please note that any designated heritage assets would be protected through their own designation for example listed buildings.

It may be beneficial to provide a list and map of non-designated heritage assets/ locally important sites to accompany the neighbourhood development plan.

Note: extra lines are needed between sites in the orange policy text box.

Policy 8: Small – Scale Sustainable and Renewable Energy: This policy is supported by WDC, and it reflects District Council's objectives in the 2020 Destination Zero strategy. It is also consistent with SWDPR 37. The policy is supported by community survey results.

Policy 9: High Quality Agricultural Land: WDC note the contents of this policy, and it is consistent with SWDPR 16.

A clearer and larger map may perhaps be beneficial to support Policy 9.

Policy 10: Trees, Hedges and Woodland: The policy is aligned to SWDPR 29. WDC supports the aims of this policy to preserve and enhance the trees, hedges and woodland within the area.

Policy 11: Wildlife and Biodiversity: The policy is aligned to SWDPR 29 and 30 in the SWDPR. WDC supports the aims of this policy to preserve and enhance Biodiversity.

Reference to SWDP in the policy wording needs to be updated to SWDPR.

Policy 12: Public Rights of way: The contents of the policy is noted, and the policy wording is supported by SL community survey results.

The wording of sentence," Such opportunities include where planning permission is granted for development near to the existing networks", included in Policy 12 is questioned and this could be restructured to make the sentence clearer for the reader.

Policy 13: Local Green Spaces: The local green spaces identified are supported and justified.

As noted in the neighbourhood plan, the map and numbering of the Local Green Spaces will need to be updated as soon as the maps have been updated.

Policy 14: Valued Landscape: The key views outlined within this policy are supported and justified WDC supports the aims of this policy to preserve and enhance the landscape character within the neighbourhood area.

Policy 15: Flood Mitigation. The policy is aligned to SWDPR 38 in the emerging SWDP review. WDC supports the aims of this policy to mitigate flooding.

	Note that an 'picture insert' has been included under the policy evidence on page 46 and this will need to be addressed. Policy 16: Dark Skies. The contents of this policy have been noted. Policy 17: Community Facilities: WDC support this policy and consider that the identified community facilities cover important services and facilities within the neighbourhood area and aligns with SWDPR 47. Policy 18: Business and Employment. This policy is supported and aligns with policy SWDPR 15. Policy 19: Camping and Caravan Sites: The contents of the policy is noted and aligns with policy SWDPR 46. Additional Comments: The formatting is different throughout the document; this should be addressed. Also suggest that each section Housing, Environment, Historic and Social in the Policy chapter is formatted differently with its own chapter/ heading so that it is clearer for the reader. Note that the contents page also only shows Housing (page 19) under a separate header, but there are no similar sections for Environment, Historic or Social. It may be advisable to review Harvington Parish Council Neighbourhood Plan Review for specific details relating to the layout of the document. Note that the policy evidence sections are all considerable in length and wonder if these sections can be reduced at all. Suggest maps included in the neighbourhood plan document are also referenced. Also, no further chapters are provided to bring the document to a conclusion and to summarise it.
Appendix A: South Lenches Neighbourhood Plan Design Guide	The evidence base is proportionate to and supportive of the draft policies.
Appendix B: Parish Character Assessment	The evidence base is proportionate to and supportive of the draft policies.
Appendix C: Public Rights of Way	Noted. OS references may be required for these maps.
Appendix D: Wild Corridors	Noted. Suggest the key also includes the area for the Wildlife Corridor. Please note a reference may be required for this map.

5. Conclusion

- 5.1 Overall, WDC considers that the South Lenches Neighbourhood Plan (Regulation 14 consultation draft version) aligns with the South Worcestershire Development Plan (2016), as well as the draft policies in the SWDPR, and the 2024 NPPF. Although, it is acknowledged that it is for the Independent Examiner to consider whether the Neighbourhood Plan meets the Basic Conditions and to make any recommendations accordingly. It should be noted that the Government has published a revised draft of the NPPF in December 2025 and it may be that it is the final version of the NPPF that the Neighbourhood Plan will be examined against later in 2026.
- 5.2 It is understood that it is the intention of the Parish Council to adopt the draft South Lenches Neighbourhood Plan against the SWDPR, once adopted in March 2026. Therefore, prior to the Regulation 15 submission stage and Regulation 16 consultation version of the draft Neighbourhood Plan should be updated to reflect the final policy text and numbers of the adopted SWDPR, by referring to the SWDPR Main Modifications consultation document, and also the latest version of the NPPF that pertains at the time.