

South Lenches Neighbourhood Plan 2015-2041



Consultation Statement Appendix CS4

Regulation 14 Responses to Wychavon District Council

ref	Name	Details of grounds for supporting or objecting	SG response	NP action
General	WDC	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 4th September 2025. It is anticipated that the SWDPR will be adopted in March 2026. 1.3 The Inspectors published their interim letter (EXAM99) on 7th July and their post hearing letter (EXAM118) on 10th 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 6th 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 Area to be zero, as the total housing requirement for the SWDPR is being met through sites allocated to the Local Plan and this is included as a Main Modification to SWDPR03 The Spatial Development Strategy and Settlement Hierarchy	1.2 noted 1.3 noted 1.4 noted the zero allocation is noted together with the proviso that the housing supply position is no longer relevant	1.2 updating of introduction to read: a. This document represents the Neighbourhood Plan for South Lenchies Parish. It represents one part of the development plan for the Parish over the period 2015 to 2041, the other part being the emerging South Worcestershire Development Plan Review. 1.3 Plan updated to be in conformity with the SWDPR 1.4 no action taken.

	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 do, 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 16th 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 NPPF, submitted neighbourhood plans after that date will be examined against the latest version of the NPPF, alongside the adopted SWDPR. 1.9 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 (HO2.5) as is the case with the soon to be adopted SWDPR. In these instances, Local Planning Authorities ie 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.	1.5 noted The SG recognises the requirements of NPPF para 73a, however it has taken the decision that no site will be allocated through the Neighbourhood Plan 1.6 noted The SG have decided not to allocate a site 1.7 noted The SG has decided not to allocate a site and is aware there is no benefit to them from para 14 of the NPPF 1.8 noted The NP is being submitted prior to the publication of the 2025 amendments; therefore, it is required to be commensurate with the 2024 NPPF updates. 1.9 noted	1.5 no action taken. 1.6 no action taken. 1.7 no action taken. 1.8 no action taken. 1.9 no action taken as the Steering Group have made the decision not to allocate sites through the Neighbourhood Plan
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		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 Having Regard to National Policy 3.1 The Neighbourhood Plan has been developed with consideration of the latest NPPF. It should be noted that the Government has published an update to the NPPF on 16th 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 General Conformity 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 as they will appear in the adopted SWDPR, as this Neighbourhood Plan will be examined against the new Local Plan.	2.1 noted Where appropriate actioned in response to comments below 3.1 noted update not required as submission prior to publication of 2025 NPPF 4.2 noted 4.3 noted	2.1 action taken where appropriate 3.1 no action taken 4.2 no action taken 4.3: all references updated and text updated where appropriate to conform to the SWDPR (more detailed changes are at the end of table)
Intro	WDC	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 Neighbourhood Development Plan period to align with the SWDPR plan (2025-2041). Paragraph a) The reference to LDS and SWLDS is not required.	Intro The Neighbourhood Plan is required to have a start date based on the date of designation which in this case is 2015. Para A) noted and actioned	Intro: End date amended to 2041 Para A) References to LDS and SWLDS have been removed

		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 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 is not required	Para C & D not found Para H) noted NP being submitted before the publication of the 2025 amendments to the NPPF Para H & I) noted Paragraph H has been updated	Para C&D) no action taken Para H) No action taken Para H) new wording: ‘These policies accord with higher level planning policy, principally the National Planning Policy Framework (NPPF, updated December 2024) and the adopted South Worcestershire Development Plan Review (SWDPR).’
Chap 2	WDC	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	Chap 2 noted	Chap 2 no action taken
Chap 3	WDC	This 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	Chap 3 noted	Chap 3 Action taken to clarify graphs and keys repositioned. Graphs clarified

Chap 4	WDC	This section does not make reference to local infrastructure within South Lenchies, instead it contains three paragraphs about SWDP entitled “Local Plan”. It may be advisable to either retitle or relocate this section within the document eg the Introduction	Chap 4 Noted	Chap 4: Heading changed to read “Strategic Context” with subheadings added and updates made to context. See table below for more detailed wording changes (<i>ref DET1</i>)
Chap 5	WDC	This section clearly outlines the visions for South Lenchies up to 2041. Objective 2 (16) appears in bold, suggest this is changed in line with the formatting of other objectives	Chap 5 Noted	Chap 5: Corrections made
Chap 6	WDC	Policy 1 Development Boundaries i) This policy reflects the principals outlined with SWDPR 20, 23 and 24 ii) 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 iii) 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 Modifications to SWDPRO3. Furthermore, the current NPPF explains that neighbourhood plan 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	Policy 1 i) noted ii) noted iii) The South Lenchies Neighbourhood Plan Steering Group has made the decision to not allocate housing through the Neighbourhood Plan	Policy 1 i) no action ii) maps have been and are all numbered now Page 3 has been inserted with a list of these new maps and numbers iii) no action

		iv) 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 able to discuss any updates that may materially impact the Neighbourhood Plan prior to the Reg 15 submission. Policy 2: Housing Growth, Infill and Design: i) This policy is consistent with policies in the SWDPR and is supported by South Lenches (SL) community survey results. ii) 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. iii) 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.	iv) noted. Submission of SLNP will be prior to NPPF updates being adopted Policy 2 i) noted ii) noted ... original text <i>Limited infilling within the settlement boundary areas of South Lenches and limited affordable housing for local community needs will be supported where those developments:</i> iii) original text: <i>“The Neighbourhood Plan does not make any housing site allocations as to do so would be inconsistent with adopted and emerging strategic policies, given the status of the settlements in the district settlement hierarchy. However, the local community recognises the potential value that small scale, infill housing</i>	iv) no action Policy 2 i) no action ii) Wording updated to <i>Appropriate, small-scale infilling within the Settlement Boundary areas of South Lenches and limited affordable housing for local community needs will be supported where those developments:</i> iii) updated text: the whole evidence has been updated as follows: <i>1. Neighbourhood plans can indicate where the settlements are located in within the parish and demonstrate that they are appropriate for smaller scale, organic</i>
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			<i>development and entry-level homes may have in enabling access to homes in The Parish suited to younger people and ‘downsizers’.”</i>	<i>growth of open market housing by defining a Settlement Boundary in their NP. The SWDPR retains a settlement hierarchy and directs the majority of development to the most sustainable locations, whilst allowing for limited and proportionate growth in rural settlements.</i> <i>2. The purpose of defining Settlement Boundaries for Sheriffs Lench, Ab Lench and Atch Lench is to provide a clear and locally appropriate framework for managing future development in accordance with the SWDPR spatial strategy. The Lenches are small rural villages with a strong historic character, a sensitive landscape setting and limited services. It is therefore important that growth is carefully directed to the most sustainable locations and remains proportionate to the</i>
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				<i>size and function of each settlement.</i> <i>3. The defined boundaries reflect the existing built form of the villages and distinguish the compact settlement areas from the surrounding open countryside. This approach provides clarity and certainty for residents, landowners and decision-makers about where development is acceptable in principle. It also helps to prevent sporadic or piecemeal development that could erode rural character, harm important views, or lead to the gradual coalescence of the villages.</i> <i>4. Focusing development within the existing built-up areas supports the efficient use of land and makes best use of existing infrastructure and community facilities. Small-scale infill can contribute to maintaining a balanced</i>
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				<i>and sustainable community, helping to support local services while respecting the established pattern of development.</i> <i>5. Outside the defined settlement areas, the countryside forms an essential part of the parish's character and setting. Strict control of development in these areas is necessary to protect landscape quality, heritage assets and the intrinsic character and beauty of the countryside. Limited exceptions are appropriate where they support identified local needs or the functioning of the rural economy, provided that proposals remain consistent with the wider objectives of the Plan.</i> <i>6. Overall, this approach ensures that change is managed positively while safeguarding the distinct identity, landscape setting and</i>
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		Policy 3: Density of Development: i)This policy is consistent with policy SWDPR15 in the submitted review. This policy is supported by SL community survey results. Policy 4: Affordable Housing Mix: i)WDC support the aims for this policy and the focus on ensuring that there is greater provision for housing that reflects the communities’ requirements. This policy is supported by SL community survey results and the housing need survey (carried out by Warwickshire Community Council in 2023) Policy 5: Market Housing Mix: i)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 needs survey carried out by Warwickshire Community Council (2023)	Policy 3 i)noted Policy 4 i)noted Policy 5 i)noted	<i>historic character of the South Lenches throughout the Plan period.</i> <i>7. The South Lenches Housing Survey clearly indicated that development boundaries are important to the community to help prevent coalescence between villages to maintain the identity of each village.</i> Policy 3 i)no action required Policy 4 i)no action required Policy 5 i)no action required
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	Policy 6: Design Guide and Local Character: i)This policy is aligned with SWDPR policies relating to design, South Lenches 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: i)This policy is aligned to the SWDPR 9 and SWDPR 33. Please note that any designated heritage assets would be protected through their own designation, for example listed buildings. ii)It may be beneficial to provide a list and map of non-designated heritage assets / locally important sites to accompany the neighbourhood development plan. iii) Note: extra lines are needed between sites in the orange policy text box. Policy 8: Small – Scale Sustainable and Renewable Energy: i)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 the community survey results. Policy 9: High Quality Agricultural Land: i)WDC note the contents of this policy, and it is consistent with SWDPR 16 Policy 10: Trees, Hedges and Woodland: i)This policy is aligned to SWDPR29. WDC supports the aims of this policy to preserve and enhance the trees hedges and woodland within the area. Policy 11: Wildlife and Biodiversity: i)The policy is aligned to SWDPR and 30 in the SWDPR. WDC supports the aims of this policy to support and enhance biodiversity. Policy 12: Public Rights of Way: i)The contents of the policy are noted, and the policy wording is supported by SL community survey results.	Policy 6 i)noted Policy 7 i)noted ii)noted iii) noted Policy 8 i) noted Policy 9 i)noted Policy 10 i)noted Policy 11 i)noted Policy 12 i)noted	Policy 6 i)no action required Policy 7 i)no action ii)provided as Appendix 5 iii) formatting changes made Policy 8 i)no action required Policy 9 i)no action required Policy 10 i)no action required Policy 11 i)no action required Policy 12 i)no action required
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		ii) 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.	ii) noted original wording: <i>“Such opportunities include where planning permission is granted for development near to the existing networks.”</i> Remainder of policy wording updated for clarity Original wording <i>Developers will be expected to seek opportunities to develop, extend and improve the existing footpath and cycleway networks (shown on map Appendix C) to provide better connectivity within the village and to the surrounding countryside. New development will be expected to contribute towards the provision of cycle and pedestrian links that connect the different areas of South Lenches. Movement routes which provide non-vehicular access to natural greenspace- e.g., woodland or fields should be strongly safeguarded. Any opportunity to enhance these will be supported. All new movement routes are expected to be appropriate for</i>	ii) wording changed to read: <i>“..link to existing networks where planning permission is granted for development”</i> Updated wording <i>Where proportionate to the scale and nature of the development, proposals will be expected to:</i> <i>i) seek opportunities to develop, extend and improve the existing footpath and cycleway networks (shown on Policies Map 5) to provide better connectivity within the village and to the surrounding countryside.</i> <i>ii) contribute towards the provision of cycle and pedestrian links that connect the different areas of South Lenches.</i> <i>iii) Safeguard movement routes which provide non-vehicular access to</i>
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		<i>wheelchair users and those with limited ability for walking. Such opportunities include where planning permission is granted for development near to the existing networks. Where new developments may severely impact upon movement routes appropriate mitigation measures will be expected.</i>	<i>natural greenspace, e.g. woodland or fields and any opportunity to enhance these will be supported.</i> <i>iv) ensure new movement routes are appropriate for wheelchair users and those with limited mobility.</i> <i>v) link to existing networks where planning permission is granted for development</i> <i>vi) provide appropriate mitigation where development would impact upon movement routes.</i>
	Policy 13: Local Green Spaces: i)The local green spaces identified are supported and justified. ii)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: i)The key views outlined within this policy are supported and justified WDC support the aims of this policy to preserve and enhance the landscape character within the neighbourhood area. Policy 15: Flood mitigation: i)The policy is aligned to SWDPR 38 in the emerging SWDP review. WDC supports the aims of this policy to mitigate flooding.	Policy 13 i)noted ii) noted Policy 14 i) noted Policy 15 i)noted	Policy 13 i) no action required ii) maps and numbering updated Policy 14 i)no action required Policy 15 i)no action required

		ii)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: i)The contents of this policy have been noted. Policy 17: Community Facilities: i)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: i)This policy is supported and aligns with policy SWDPR 15 Policy 19: Camping and Caravan Sites: i)The contents of the policy are noted and aligns with Policy SWDPR 46 Additional Comments i)The formatting is different throughout the document, this should be addressed ii)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. iii)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. iv)Note that the policy evidence sections are all considerable in length and wonder if these sections can be reduced at all.	ii)not found Policy 16 i)noted Policy 17 i)noted Policy 18 i)noted Policy 19 i)noted Additional Comments i)noted ii)noted iii)noted iv)noted	ii)no action taken Policy 16 i)no action required Policy 17 i)no action required Policy 18 i)no action taken Policy 19 i)no action taken Additional Comments i)formatting addressed ii)formatting of sections addressed iii) these issues have been corrected with new layout and formatting iv)evidence sections altered to be more
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		v)Suggest maps included in the neighbourhood plan are also referenced. vi)Also, note further chapters are provided to bring the document to a conclusion and summarise it.	v)noted vi)noted	appropriate and numbering added v)new maps have been inserted with appropriate referencing vi)summary page added Conclusion <i>The South Lenches Neighbourhood Plan provides a clear, locally tailored framework to guide sustainable development, protect the distinctive rural character of the parish, and support the needs of its community. The Plan balances environmental, social, and economic objectives, ensuring that new development respects the landscape, historic features, and biodiversity while contributing positively to the quality of life for residents. Key policies safeguard valued landscapes and views, require sensitive design, and promote</i>
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				<i>the use of Sustainable Drainage Systems to manage flood risk. Dark skies are protected through careful control of artificial lighting, supporting both wildlife and the rural character of the area. The Plan also identifies and protects essential community facilities, including schools, village halls, sports clubs, and community orchards, recognising their critical role in fostering social cohesion and local well-being. Economic vitality is supported through policies encouraging small-scale rural businesses, agricultural improvement, and the sensitive reuse of historic buildings, while ensuring that development does not harm the parish's heritage, landscape, or traffic conditions. Sustainable tourism is promoted through controlled</i>
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				<i>expansion of camping and caravan sites, balancing visitor opportunities with the preservation of the local environment. Finally, the Plan includes community aspirations, such as the sensitive expansion of Church Lench Village School, reflecting locally identified priorities that, while non-statutory, guide future parish initiatives and reinforce community engagement. Overall, the South Lenches Neighbourhood Plan provides a robust, evidence-based, and proportionate approach to guiding development, conserving the parish's distinctive character, and enhancing the social, environmental, and economic resilience of the area for current and future generations.</i>
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App A	WDC	i)The evidence base is proportionate to and supportive of the draft policies	i)noted	i)no action required
App B	WDC	i)The evidence base is proportionate to and supportive of the draft policies	i)noted	i)no action required
App C	WDC	i)Noted. OS references may be needed	i)noted	i)noted
App D	WDC	Noted i)Suggest the key also includes the area for the Wildlife Corridor. Please note a reference may be required for this map	i)noted.	i) References added to all maps
	WDC	Conclusion: i)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. ii)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 that time.	Conclusion i)noted ii)noted	Conclusion i)no action required ii)no action required