INDEPENDENT EXAMINATION OF THE SOUTH LENCHES NEIGHBOURHOOD DEVELOPMENT PLAN

Wychavon District Council and South Lenches Parish Council
To Christopher Collison BA(Hons) MBA MRTPI MIED IHBC

By email to Christopher Collison, Independent Examiner to The South Lenches Neighbourhood Development Plan.

cc. Andrew Ford, Principal Planning Policy Officer, Wychavon District Council; Carolyn Hodges, South Lenches Parish Councillor: and Kate Lee, South Lenches Parish Clerk

Dated 2 November 2026

Dear Chris,

South Lenches Neighbourhood Development Plan Independent Examination – Joint Response to Examiner Letter Dated 26 October 2026

This letter has been compiled to provide further clarity, in response to the Examiner Letter dated 26 October 2026. These will be addressed in turn.

Policy 1 South Lenches Development Boundaries

Maps 5 and 6 of the South Lenches Neighbourhood Development Plan were intended to reflect the same development boundaries shown at the district-level in the latest adopted Local Plan. However, following further consideration, the boundaries in the maps contained in the Neighbourhood Plan reflect those in the now superseded South Worcestershire Development Plan 2016, and were not updated following the adoption of the South Worcestershire Development Plan Review (SWDPR) in March 2026.

Therefore, the boundaries need to be redrawn to reflect the revised development boundaries now contained within the South Worcestershire Development Plan Review. This includes the removal of the development boundary around Atch Lench and minor alterations to the Church Lench boundary.

Subject to the above amendments, the inclusion of development boundaries in the Neighbourhood Plan is consistent with the recently adopted SWDPR and helps define the settlement in accordance with the definition of a ‘settlement’ in the latest version of the Framework (2026). In that respect it is not consider that the alteration would prejudice compliance with the Basic Condition cited.

Policy 7 Protection of Historic Environment

No specific evidence has been prepared, in conjunction with the preparation of the Neighbourhood Plan, to support Policy 7 in relation to the protection of ridge and furrow land.

It is further acknowledged by South Lenches Parish Council that the policy has not been written with clarity to explain that the geographical areas referred to as ‘south of Atch Lench, south of Church Lench, west of Farm Lane, Sheriffs Lench and Ab Lench’

were included to identify the locations of known ridge and furrow earthworks.

There is no map showing these areas currently included within the evidence and the Parish Council acknowledges that the specific Ridge and Furrow earthworks referred to by their geographical location are small, fragmented and not immediately obvious. Should you consider modifications necessary to improve the clarity and effectiveness of the policy, the Parish Council would welcome any changes that help to reflect its intended purpose.

Policy 13 Local Green Spaces

South Lenches Parish Council has confirmed that the boundaries of the proposed Local Green Spaces are accurately drawn on Policies Map 6 and Policies Map 7.

However, the area figures (expressed in hectares) for each of the eight proposed Local Green Spaces require correction as set out below:

Table titled 'Area 1 Church Lench Orchard-Low Road'	'2.74 ha.' to be replaced with '0.659 ha.'
Table titled 'Area 2 Church Lench School grounds'	'0.34 ha.' to be replaced with '0.268 ha.'
Table titled 'Area 3 Church Lench Village Pool'	'0.4 ha.' to be replaced with '0.014 ha.'
Table titled 'Area 4 Church Lench Cricket Ground'	'1.3 ha.' to be replaced with '2.005 ha.'
Table titled 'Area 5 Church Lench The Yates Community Orchard'	'2.27 ha.' to be replaced with '2.403 ha'
Table titled 'Area 6 Church Lench Church and Church Yard'	'0.22 ha' to be replaced with '0.205 ha.'
Table titled 'Area 7 Atch Lenches Heritage Orchard'	'5.5 ha.' to be replaced with '4.527 ha.'
Table titled 'Area 8 Atch Lench Churchyard'	'0.11 ha.' to be replaced with '0.101 ha.'

Policy 14 Valued Landscapes

South Lenches Parish Council have confirmed that the locations, from which each of the valued views listed in Table 5 of the Neighbourhood Plan, are public locations and are therefore freely accessible and visible to members of the public.

Policy 15 Flood Mitigation

South Lenches Parish Council's planning consultant supporting the preparation of the Neighbourhood Plan, Liz Bourne, has provided a response to this question that is included at Annex 1.

Please refer to that response for the detailed position, which also proposes modifications to the policy for your consideration. Wychavon District Council has considered the professional opinion set out in the response and believe that it provides

a full answer to your question. We would support any modifications to the policy that you consider appropriate and consistent with that response.

Yours sincerely,

Wychavon Planning Policy Team
South Lenches Parish Council Neighbourhood Plan Group

Annex 1

Answers to examiners questions Policy 15

Criterion One

- The Parish Council recognises that paragraph 182 of the December 2024 NPPF, as amended in February 2025, already states that applications which could affect drainage on or around a site should incorporate Sustainable Drainage Systems (SuDS), proportionate to the nature and scale of the proposal.
- The purpose of criterion 1 is to emphasise the importance of managing surface-water runoff from new development throughout the Neighbourhood Plan area, including smaller developments. As explained in the supporting text, the parish has experienced surface-water flooding, and incremental development can cumulatively increase impermeable surfaces and place additional pressure on existing drainage infrastructure.
- The Neighbourhood Plan does not allocate sites for development. It is therefore important that surface-water drainage is appropriately addressed in development proposals wherever they come forward within the parish. Criterion 1 also recognises that SuDS may not always be appropriate or feasible and expressly allows for this to be demonstrated.
- South Lenches Parish Council's records, including previous planning representations identify[1] that flooding, surface-water runoff and drainage have been longstanding concerns within the parish. Previous planning representations have identified flooding associated with Whitsun Brook, surface-water runoff from steeply sloping land around Church Lench and Atch Lench, and drainage difficulties affecting existing properties and roads. Historical flooding incidents have been reported at Atch Lench Road, including occasions when the road became impassable. The Parish Council has also raised concerns about the potential for additional development to increase impermeable surfaces and place further pressure on existing drainage infrastructure.
- These records provide local evidence of the importance of managing surface-water runoff from new development, including smaller developments which may contribute cumulatively to existing drainage problems. They support the Parish Council's view that appropriate surface-water management should be considered wherever development comes forward within the Neighbourhood Plan area.
- For these reasons, the Parish Council considers that criterion 1 serves a locally justified purpose and requests that it be retained.

Criterion Two

- The Parish Council accepts that criterion 2 largely duplicates criterion 1, which already requires new development to incorporate Sustainable Drainage Systems (SuDS) unless it can be demonstrated that these would be inappropriate or unfeasible.
- The Parish Council therefore agrees that criterion 2 can be deleted without weakening the intention of Policy 15.

[1] *Parish Council Minutes 03/072017 / 08/07/2024*

Criterion three

- The Parish Council accepts that the requirement to incorporate SuDS into new development is already addressed by criterion 1, while paragraph 182 of the NPPF addresses arrangements for their long-term maintenance.
- The Parish Council therefore agrees that criterion 3 can be deleted without weakening the intention of Policy 15.

Criterion four

- The purpose of criterion 4 was to ensure that surface-water drainage arrangements were considered at an early stage in the design of new development, particularly given the history of flooding and drainage problems within the parish. Requiring developers to demonstrate how surface water would be discharged was intended to help ensure that new development would not exacerbate existing problems or increase flood risk elsewhere.
- However, the Parish Council recognises that criterion 6 already requires a proportionate drainage strategy demonstrating the method of surface-water discharge. It therefore accepts that criterion 4 can be deleted to avoid duplication within Policy 15, without losing the original intention of the requirement.

Criterion five

- The purpose of criterion 5 was to ensure that developers considered the most sustainable means of surface-water disposal before relying on existing drainage infrastructure. This was particularly important given the history of surface-water runoff, flooding and drainage problems within South Lenches, and the Parish Council's concerns about the potential cumulative effects of new development.
- The Parish Council recognises that the National Standards for Sustainable Drainage Systems, published in June 2025, establish a drainage hierarchy and require justification where lower-priority drainage options are proposed.
- As these standards were in place when the Neighbourhood Plan was submitted in May 2026, the Parish Council accepts that criterion 5 largely duplicates existing national guidance and can be deleted without losing the original intention of the policy.

Criterion six

- The purpose of criterion 6 was to ensure that new development provides sufficient information to demonstrate how surface water will be managed and that appropriate measures will be incorporated to avoid exacerbating existing flooding and drainage problems within the parish.
- The Parish Council considers this necessary given the history of surface-water flooding, runoff from sloping land and concerns about the capacity of existing drainage infrastructure within South Lenches.
- The requirement for a proportionate drainage strategy was intended to ensure that drainage arrangements are considered at an early stage and that the potential cumulative effects of smaller developments are taken into account. The reference to proportionality recognises that the level of information required should reflect the nature and scale of the development.

- The requirement to control runoff to greenfield or equivalent rates was intended to prevent development from increasing the rate at which surface water enters existing drainage systems, while the provisions concerning long-term management and maintenance seek to ensure that drainage measures remain effective.
- The final sentence, concerning opportunities to reduce flood risk and create betterment, reflects the Parish Council's intention that development should, where possible, contribute to improving existing drainage conditions rather than simply avoiding additional harm.
- The Parish Council recognises that aspects of criterion 6 overlap with paragraphs 181 and 182 of the December 2024 NPPF, as amended in February 2025. However, it considers that criterion 6 provides a locally justified and proportionate means of addressing the particular surface-water drainage concerns within South Lenches and requests that it be retained.
- The Parish Council also notes that paragraph 182(c) of the NPPF specifically addresses arrangements for the long-term maintenance of SuDS associated with major development, whereas criterion 6 seeks to ensure that appropriate drainage and maintenance arrangements are considered proportionately for smaller developments, reflecting the particular circumstances of South Lenches.
- The Parish Council also recognises the examiner's concern about overlap and inconsistency between criteria 2, 4, 5, 6 and 8. It considers that the proposed deletion of criteria 2, 4, 5 and 8 would address these concerns while allowing criterion 6 to retain its intended purpose of ensuring that surface-water drainage arrangements are appropriately considered in new development.

Criterion seven

- The purpose of criterion 7 was to ensure that ground conditions are properly considered when designing surface-water drainage arrangements, particularly given the sloping land, reported clay soils, natural springs and drainage difficulties within parts of South Lenches.
- The intention was to encourage developers to check whether the ground could absorb surface water before deciding how drainage would be managed. Where there is uncertainty about this, the policy seeks to ensure that enough space is allowed for alternative measures to store water and release it slowly, helping to prevent additional surface-water runoff and flooding.
- The Parish Council recognises the examiner's concern that the phrase "are advised" does not provide a clear basis for determining planning applications. However, it considers that the underlying purpose of criterion 7 is locally relevant and would welcome the examiner's consideration of whether the criterion could be retained with appropriate modification.

Criterion eight

- The purpose of criterion 8 was to prevent new development from placing additional pressure on existing sewerage infrastructure, particularly given the Parish Council's longstanding concerns about drainage and sewerage problems within South Lenches.

- The intention was to ensure that developers explored other ways of managing surface water before considering discharge into foul or combined sewers, helping to avoid making existing problems worse.
- The Parish Council recognises that the National Standards for Sustainable Drainage Systems, published in 2025, already establish a hierarchy for surface-water disposal, with discharge to combined sewers being a lower-priority option.
- As this requirement is already addressed through national guidance, the Parish Council accepts that criterion 8 can be deleted without losing the original intention of the policy.

Conclusion

- The Parish Council recognises that the proposed deletion of certain criteria may require consequential amendments to the supporting text of Policy 15, to ensure that it remains consistent with the policy as modified. The Parish Council would be content for the examiner to recommend any necessary consequential amendments.