

Droitwich Spa Neighbourhood Plan 2025-2041

Strategic Environmental
Assessment (SEA) and Habitats
Regulations Assessment (HRA)
Screening Opinion

March 2025

CONTENTS

1. INTRODUCTION

- 1.1 BACKGROUND
- 1.2 DRAFT DROITWICH SPA NEIGHBOURHOOD PLAN SUMMARY
- 1.3 DROITWICH SPA DESIGNATED NEIGHBOURHOOD AREA MAP
- 1.4 DRAFT DROITWICH SPA NEIGHBOURHOOD PLAN POLICY SUMMARIES
- 1.5 STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) PROCESS
- 1.6 HABITATS REGULATIONS ASSESSMENT (HRA) PROCESS

2. SEA SCREENING

- 2.1 SEA SCREENING ASSESSMENT
- 2.2 SEA SCREENING OPINION

3. HRA SCREENING

- 3.1 HRA SCREENING ASSESSMENT
- 3.2 HRA SCREENING OPINION

4. CONCLUSIONS

5. STATUTORY ENVIRONMENTAL BODIES CONSULTATION RESPONSES

1. INTRODUCTION

1.1 BACKGROUND

This screening report is designed to determine whether the content of the consultation draft of the Droitwich Spa Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.

Whether a Neighbourhood Development Plan requires a SEA, and if so the level of detail needed, will depend on what is proposed in the draft Neighbourhood Development Plan. The National Planning Practice Guidance (NPPG) states that a SEA may be required, for example, where:

- the Neighbourhood Development Plan allocates sites for development.
- the Neighbourhood Development Plan Area contains sensitive natural or heritage assets that may be affected by the proposals in the plan;
- the Neighbourhood Development Plan may have significant environmental effects that have not already been considered and dealt with through the SEA of the Local Plan in the area.

The screening report also examines the potential impact of the draft Droitwich Spa Neighbourhood Plan on internationally designated wildlife sites and determines if the plan requires a Habitats Regulations Assessment (HRA).

When deciding on whether the proposals are likely to have significant effects, the local authority is required to consult Historic England, Natural England and the Environment Agency. Where the local planning authority determines that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment) it should prepare a statement of its reasons for the determination.

1.2 DRAFT DROITWICH SPA NEIGHBOURHOOD PLAN SUMMARY

The draft Droitwich Spa Neighbourhood Plan is a community-led framework for guiding future development and growth of the parish to the year 2041. The Neighbourhood Plan has been prepared against the policies in the submitted South Worcestershire Development Plan Review (SWDPR) rather than the adopted South Worcestershire Development Plan and will be examined and 'made' (adopted) against the newly adopted local plan. Consequently, Droitwich Spa Town Council intend to publish the Neighbourhood Plan for the Regulation 14 consultation in early 2025.

The Neighbourhood Plan includes 17 draft policies have been proposed, focusing on topics including the Built and Natural Environment, Housing, Community Facilities, the Town Centre, and Jobs and Active Travel.

1.3 DROITWICH SPA DESIGNATED NEIGHBOURHOOD AREA

The Neighbourhood Area was designated by Wychavon District Council on the 11 January 2017 (Figure 1).

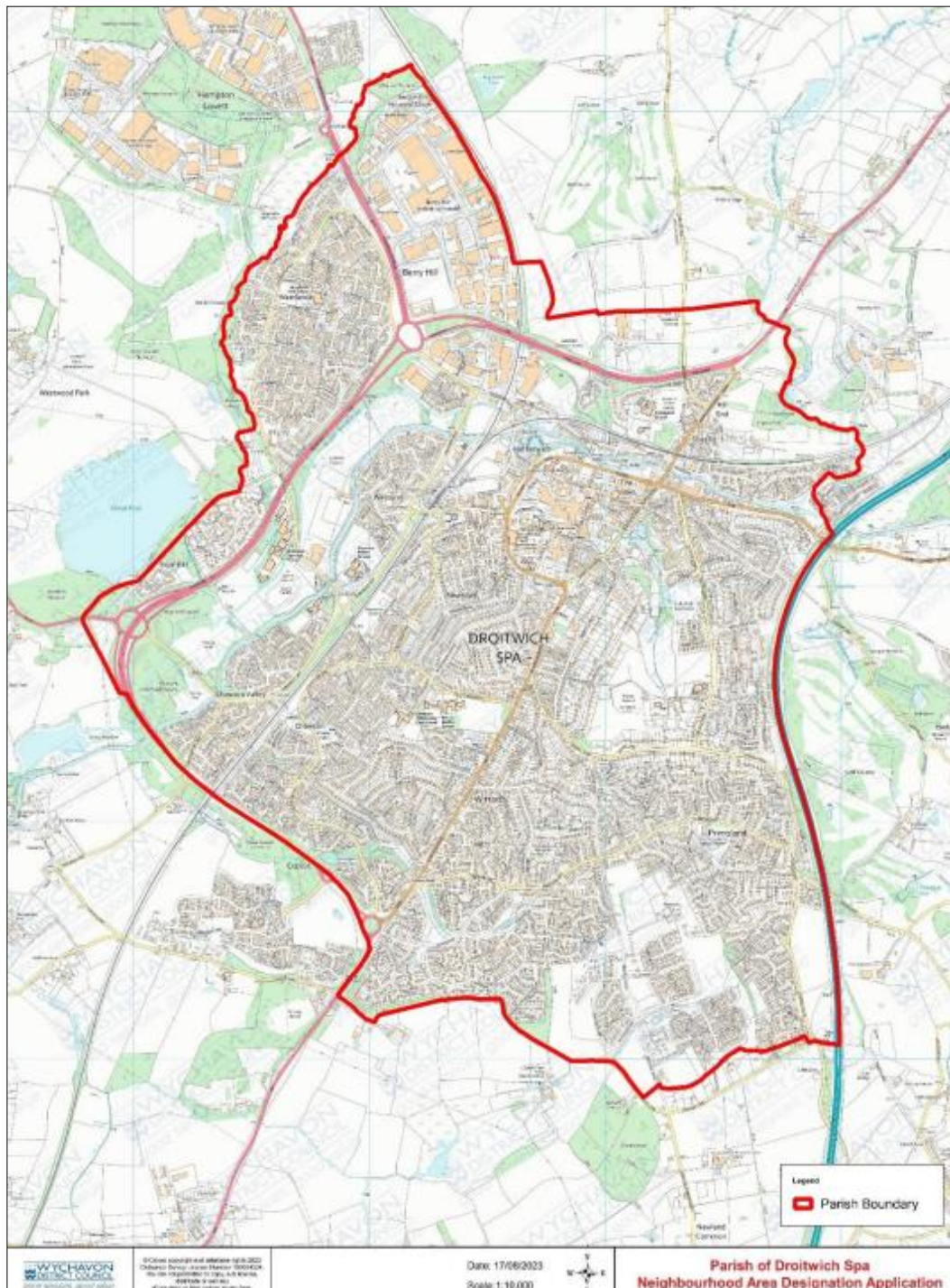


Figure 1. Designated Droitwich Spa Neighbourhood Area

1.4 DRAFT DROITWICH SPA NEIGHBOURHOOD PLAN POLICY SUMMARIES

Seventeen policies are proposed in the draft Droitwich Spa Neighbourhood Plan (DSNP); they are summarised below.

DRAFT POLICY	SUMMARY
SPA1 Design	Policy SPA1 states that development proposals should maintain and enhance the local distinctiveness of the Droitwich Spa Neighbourhood Area and achieve a high quality of design by: • Demonstrating adherence with the Droitwich Spa Design Guidance/codes and other relevant SPDs through a Design and Access Statement (DAS); • Respecting the locality's character and street scene through sensitively designed schemes; • Retaining natural site features; • Providing landscaping and open space that provides for wildlife that is in keeping with the local townscape character; • Being accessible from the local road network (including sufficient off-road vehicle parking); • Avoid creating unacceptable polluting impacts (including nuisance, traffic generated, and dust and odour).
SPA2 Historic Environment	Policy SPA2 sets out that development proposals should protect, conserve and where possible enhance the historic environment of the Neighbourhood Area and its contribution to local character via a range of design elements, particularly within the historic core of Droitwich Spa. The impact of proposed development on heritage assets will be assessed by each assets' significance via the following criterion: • Giving weight to designated heritage assets; • Balancing the scale of harm or loss against the significance of non-designated heritage assets; • Acknowledging the value of sensitively repurposing heritage assets to viable uses that contribute to the regeneration of the town centre and tourism; • Development proposals should be accompanied by a Heritage Impact Assessment and/or an appropriate desk-based assessment/field evaluation for proposals potentially impacting the significance of heritage assets or archaeological interests.
SPA3 Droitwich Spa	Policy SPA3 states that development proposals within the Droitwich Spa Conservation Area or affecting its setting should preserve or

DRAFT POLICY	SUMMARY
Conservation Area	enhance its character or appearance, having regard to the significance and special interest of the Conservation Area, as stipulated in the Appraisal and Management Plan. Proposals will be supported if they adhere to the criteria set out encouraging sensitive development through elements such as choice of materials, location, overall design, height, scale and massing, signage, and street furniture.
SPA4 Droitwich Canals Conservation Area	Policy SPA4 sets out that development proposals within the Droitwich Canals Conservation Areas or their setting should preserve or enhance their character or appearance, having regard to the significance and special interest of the Conservation Areas including as set out in the Conservation Management Plan. Proposals will be supported if they adhere to a list of criteria set out encouraging: sensitive development through appropriate built environment design measures, avoiding unsuitable demolition practices, repair work with traditional/vernacular techniques, suitable boundary treatments, and inclusive access to towpaths.
SPA5 Biodiversity	Policy SPA5 supports development that protects, conserves, or enhances the biodiversity of the Neighbourhood Area, including its Local Wildlife Sites, Priority Habitat Inventory Sites, and other natural features (particularly ancient and veteran trees). Proposals with adverse impacts on the nearby SSSIs will not be supported unless the benefits demonstrably outweigh the likely impacts to such sites. Criteria is set out to measurable net gains for biodiversity regarding existing site features, native species, and biodiversity corridors.
SPA6 Local Green Spaces	Policy SPA6 sets out 8 sites that will be designated Local Green Spaces. Development will be managed in a manner consistent with that applicable to designated Green Belt.
SPA7 Key Views	Policy SPA7 sets out key viewpoints and states that proposals that would have a significant visual impact on such viewpoints should be accompanied by a Townscape/Landscape and Visual Impact Assessment or similar study to mitigate any potential negative impacts.
SPA8 Housing Mix	Policy SPA8 requires development proposals for new housing of five or more units to demonstrate market dwellings of a size and type that positively contribute to meeting the latest assessment of housing needs (particularly 2- and 3-bedroom dwellings and housing for older

DRAFT POLICY	SUMMARY
	people such as bungalows and retirement housing). On sites proposing affordable housing, the following indicative tenure breakdown should be followed: • 65% as social rent/and or affordable rent • 25% as First Homes • 10% as shared ownership Both market and affordable housing proposals should have regard to design, character, and density of the surrounding built environment as well as site and building-specific factors, and viability considerations.
SPA9 Housing Development	Policy SPA9 supports new housing development proposals provided they: • Provide reasonable provision of and siting of infrastructure; • Provide for water and energy conservation and the generation of renewable energy; • Incorporate sustainability measures (e.g. dwelling orientation, construction methods, materials, drainage); • Safeguard amenity of neighbouring dwellings/units; • Have safe active travel connections to community and public transport facilities where practicable; • Are sited to avoid adverse impacts to the amenity of future occupants from the operation of existing uses (inc. business and community uses) to avoid the unreasonable restriction of potential future occupiers.
SPA10 Householder Development	Policy SPA10 supports proposals for alterations/extensions and/or ancillary development within residential curtilages provided they accord with SPA9, and that development is in keeping with existing built form in terms of massing, height, use of materials, landscaping, and amenity value of surrounding land use.
SPA11 Land north/south of Union Lane	Policy SPA11 sets out that development proposals for land north and south of Union Lane must demonstrate they: • Are providing, quality and sustainable design (taking account of SPA1); • Improve active travel connectivity between key areas of the town and the development site; • Conserve or enhance the significance of nearby designated heritage assets, or assess to potentially include sites of archaeological interest;

DRAFT POLICY	SUMMARY
	• Enhance the value of local biodiversity and wildlife corridors; • Can provide sufficient site mitigation and remediation if required; and • Mitigate against nuisance impacts arising from neighbouring amenities on future residents.
SPA12 Criteria for other allocated housing sites	Policy SPA12 sets out criteria that development proposals for new housing on listed housing allocations must demonstrate to be supported. This includes matters relating to mitigating impacts on amenity, heritage, and biodiversity arising from nuisance and pollution issues, as well as ensuring delivery of appropriate active travel infrastructure, design quality, and land remediation measures (where required). Flood risk management is also mentioned.
SPA13 New or Expanded Community Facilities	Policy SPA13 supports development proposals for new or expanded community facilities provided that such facilities are made accessible via sustainable modes of transport and are adapted to cater for individuals with restricted mobility. Proposals will also need to be appropriately sited and designed to avoid negative impacts on historic and natural assets as well as residential amenity. Developer contributions (via CIL and s106 agreements) will be sought to mitigate any additional demands placed on existing service provision by new proposals.
SPA14 Town Centre Vitality	Policy SPA14 states that development proposals for main town centre and residential uses in the town centre will be favourably considered based on the extent to which they contribute to aspects such as public realm improvements, provision of active travel infrastructure (particularly between key areas of the town), town centre vitality and character, and the beneficial re-use of vacant upper floor uses, and heritage assets such as the Brine Baths. Proposals for the sensitive and viable (re)development and/or restoration of suitable sites within the Droitwich Spa Town Centre Investment Prospectus and The Raven Hotel for main town centre uses/residential use will be supported in principle.
SPA15 Netherwich Canal Basin	Policy SPA15 sets out criteria that proposals for mixed-use development at the Netherwich Canal Basin would need to meet to be supported. Development will need to take account of considerations such as the provision of high quality/sustainable design, improved active travel infrastructure (between key areas of the town), public realm improvements, and community, tourist, and heritage-based uses. Proposals will also need to conserve/enhance; heritage assets, biodiversity and wildlife corridors, and mitigate against impacts on residential amenity / quality of land arising from transport corridors and former and adjoining uses.

DRAFT POLICY	SUMMARY
SPA16 Economic Development	Policy SPA16 states that proposals for employment uses of an appropriate scale and design will be supported provided traffic generation created as a result of the development is minimised/can be accommodated on the local road network, and that there are no unacceptable adverse impacts on neighbouring amenity. The development must also be accessible via active travel/public transport routes. The re-use of existing land/buildings, and development for the purposes of flexible workspace (for local enterprises) and that benefit village tourism and heritage are encouraged.
SPA17 Walking and Cycling (Active Travel)	Policy SPA17 requires new development to reduce the reliance on the private car and increase opportunities for active travel and public transport with provision for supporting infrastructure. The policy is supported by specific Local Transport Schemes. Proposals should avoid creating impacts on the utility and enjoyment of public rights of way.

1.5 STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) PROCESS

The basis for Strategic Environmental Assessment (SEA) legislation is European Directive 2001/42/EC which was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed guidance on these Regulations can be found in the Government publication “A Practical Guide to the Strategic Environmental Assessment Directive” (OPDM 2005).

The SEA process aims to ensure that likely significant environmental effects arising from a Plan are identified, assessed, mitigated, communicated and monitored, and that opportunities for public involvement are provided. It enables environmental considerations to be accounted for in decision-making throughout the production of a Plan in an integrated manner.

Figure 2 sets out the screening procedure and how a plan should be assessed against the SEA Directive criteria. This outline procedure has then been applied to the draft Droitwich Spa Neighbourhood Plan in Table 1.

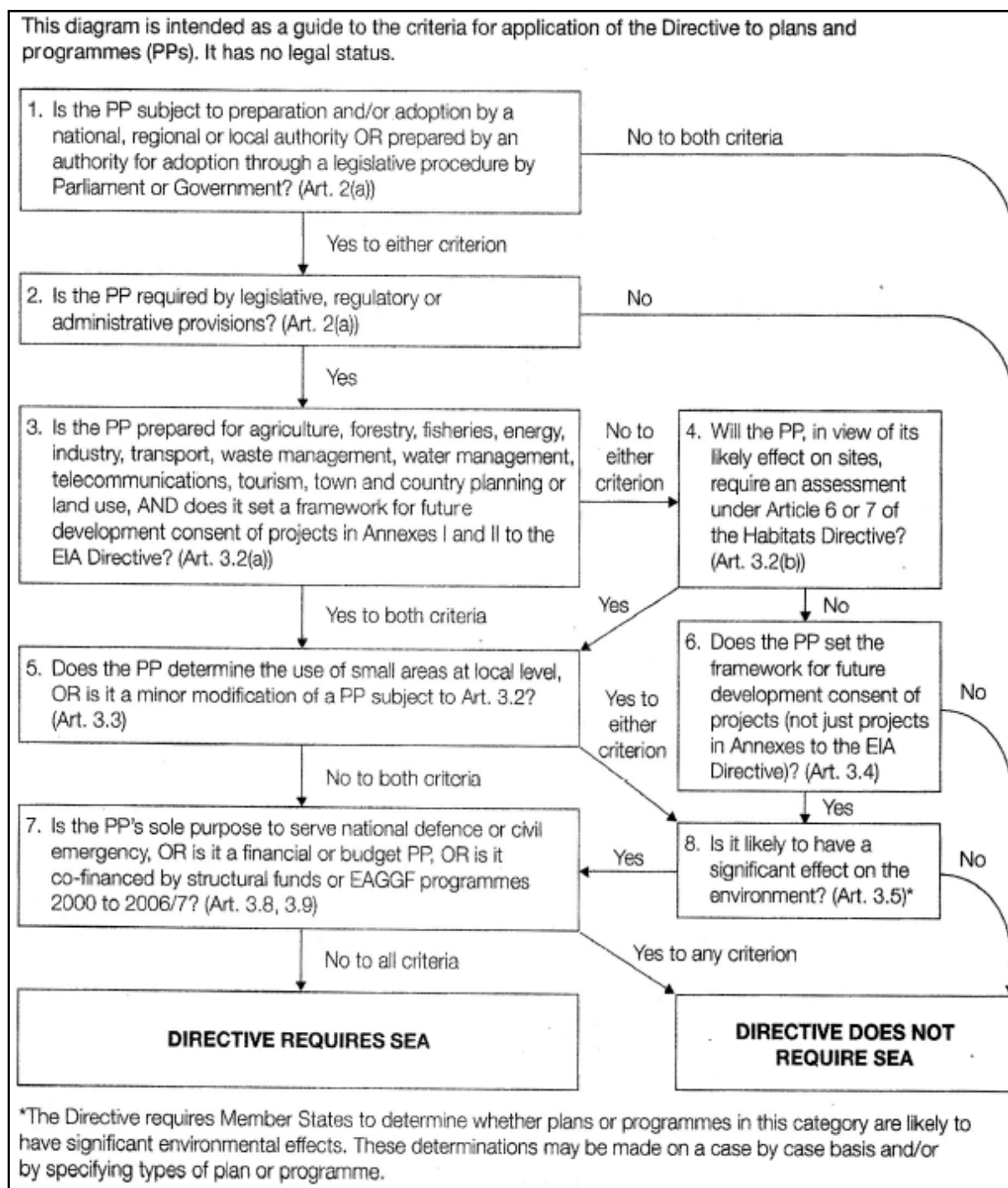


Figure 2 – Application of the SEA Directive to Plans and Programmes

Table 1: Assessment of the draft Droitwich Spa Neighbourhood Plan using SEA Directive Criteria

Stage	Y/N	Reason
1. Is the Droitwich Spa Neighbourhood Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	This is a Neighbourhood Plan is being prepared by a qualifying body the Localism Act 2011. If the Plan is passed by means of an either Examination and/or Referendum, it will be formally adopted by the Local Planning Authority. It will then form part of the local development framework and be afforded significant weight in planning decisions.
2. Is the Droitwich Spa Neighbourhood Plan required by legislative, regulatory, or administrative provisions? (Art. 2(a))	N	The Droitwich Spa Neighbourhood Plan is being prepared voluntarily by the local qualifying body in line with the provisions of the Localism Act. If the Plan is adopted or 'made' it will form part of the statutory development plan, and it is therefore considered necessary to answer the following questions to determine if an SEA is required.
3. Is the Droitwich Spa Neighbourhood Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Y	The Plan is prepared for town and country planning and sets out a framework for future development consent of projects, including design policies for the proposed housing allocations included in the submitted SWDPR.
4. Will the Droitwich Spa Neighbourhood Plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	See Screening Opinion for HRA in Section 3 of this report.
5. Does the Droitwich Spa Neighbourhood Plan determine the	Y	The Droitwich Spa Neighbourhood Plan is made up of several policies which, when

use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)		adopted, will form part of the Local Development Framework, and so will have significant weight in planning decisions. The Droitwich Spa Neighbourhood Plan includes design policies for the proposed housing allocations in the submitted SWDPR.
6. Does the Droitwich Spa Neighbourhood Plan set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	When readopted, the Droitwich Spa Neighbourhood Plan will be a statutory planning document. It will form part of the Local Development Framework and so will have significant weight in planning decisions. The responsibility for issuing development consent will remain with the Local Planning Authority.
7. Is the Droitwich Spa Neighbourhood Plan sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	Not Applicable
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	?	The Droitwich Spa Neighbourhood Plan may have a significant effect on the environment. To investigate the likelihood of potential impacts further a case-by-case assessment has been conducted, the full results of which can be found in Table 2.

Based upon the initial screening carried out against the criteria in Table 1 above, the draft Droitwich Spa Neighbourhood Plan may have a significant effect on the environment. To explore these potential effects further, a case-by-case assessment has been conducted. The criteria used in the undertaking of such an assessment are drawn from Article 3.5 (Annex II) of the SEA directive, and the results are shown in Table 2.

1.6 HABITATS REGULATIONS ASSESSMENT (HRA) PROCESS

The Habitats Regulations Assessment (HRA) refers to the assessment required for any plan or project to assess the potential implications for European wildlife sites. The HRA therefore looks at whether the implementation of the plan or project would harm the habitats or species for which European wildlife sites are designated. The relevant European wildlife site designations are Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), which together form part of the Natura 2000 network.

In addition to SPAs and SACs, Ramsar sites are also designated areas which, as a matter of government policy, are to be treated in the same way as European wildlife sites (although they are not covered by the Habitats Regulations). European wildlife sites and Ramsar sites are collectively known as internationally designated wildlife sites.

The legislation sets out a process to assess the potential implications of a plan on internationally designated wildlife sites. The first stage of this process is a screening exercise where the details of nearby internationally designated sites are assessed to see if there is the potential for the implementation of the plan to have an impact.

2. SEA SCREENING

2.1 SEA SCREENING ASSESSMENT

European Directive 2001/42/EC requires a full Strategic Environmental Assessment to be undertaken for certain types of plans and programmes that would have a significant environmental effect.

Table 2 below provides the screening determination of the need to carry out a full Strategic Environmental Assessment for the draft Droitwich Spa Neighbourhood Plan. This has been made in accordance with the Regulations and will be subject to consultation with the strategic environmental bodies before Wychavon District Council makes its determination on the necessity for a full Strategic Environmental Assessment.

Table 2 – The Environmental Assessment of Plans and Programmes Regulations 2004: Schedule 1 - Criteria for determining the likely significance of effects on the environment.

Criteria for determining the likely significance of effects (SEA Directive, Annex II)	Likely to have significant environmental effects?	Summary of significant events
1(a) the degree to which the draft Droitwich Spa Neighbourhood Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	NO	The Droitwich Spa Neighbourhood Plan would, if adopted, form part of the statutory Development Plan and as such would contribute to the framework for future development consent of projects.
1(b) the degree to which the draft Droitwich Spa Neighbourhood Plan influences other plans and programmes including those in a hierarchy;	NO	The draft Droitwich Spa Neighbourhood Plan, when 'made', will be used alongside the South Worcestershire Development Plan Review (SWDPR), once adopted in 2025, for the determination of planning applications.
1(c) the relevance of the draft Droitwich Spa Neighbourhood Plan for the integration of environmental considerations in particular with a view to promoting sustainable development;	NO	The policies of the draft Droitwich Spa Neighbourhood Plan are not considered to have a significant impact on the integration of environmental considerations.
1(d) environmental problems relevant to the draft Droitwich Spa	NO	The draft Droitwich Spa Neighbourhood Plan is more likely to promote environmental sustainability

Criteria for determining the likely significance of effects (SEA Directive, Annex II)	Likely to have significant environmental effects?	Summary of significant events
Neighbourhood Plan:		than create any environmental problems.
1(e) the relevance of the draft Droitwich Spa Neighbourhood Plan for the implementation of community legislation on the environment (for example, plans and programmes linked to waste management and water protection);	NO	The policies of the draft Droitwich Spa Neighbourhood Plan are not considered to be relevant to the implementation of EC legislation.
2(a) the probability, duration, frequency and reversibility of the draft Droitwich Spa Neighbourhood Plan;	NO	It is considered unlikely that there will be any irreversible damaging environmental impacts associated with the draft Droitwich Spa Neighbourhood Plan. The Plan features policies which seek to protect and enhance the natural and built environment, and the plan is therefore likely to result in beneficial rather than damaging effects.
2(b) the cumulative nature of the effects of the draft Droitwich Spa Neighbourhood Plan;	NO	The policies of the draft Droitwich Spa Neighbourhood Pan are unlikely to have any significant cumulative negative environmental impacts.
2(c) the transboundary nature of effects of the draft Droitwich Spa Neighbourhood Plan;	NO	The draft Droitwich Spa Neighbourhood Plan is unlikely to have any significant negative environmental impacts on adjoining parishes.
2(d) the risks to human health or the environment (for example, due to accidents) due to the draft Droitwich Spa Neighbourhood Plan;	NO	It is considered that there will be no risk to human health or the environment as a result of the draft Droitwich Spa Neighbourhood Plan.
2(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	NO	The policies of the Neighbourhood Development Plan apply to the entirety of Droitwich Spa Town Council's administrative area and are unlikely to significantly affect

Criteria for determining the likely significance of effects (SEA Directive, Annex II)	Likely to have significant environmental effects?	Summary of significant events
		areas beyond the Neighbourhood Area boundary.
2(f) the value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use; and	NO	The draft Droitwich Spa Neighbourhood Plan will not have any substantial impact on these factors.
2(g) the effects on areas or landscapes which have a recognised national, community or international protection status.	NO	The policies of the draft Droitwich Spa Neighbourhood Plan are unlikely to have a negative impact on any environmental designations in the Neighbourhood Area.

2.2 SEA SCREENING OPINION

Droitwich Town Council have decided to draft the Neighbourhood Plan against the submitted policies in the SWDPR and then submit for the Regulation 15 stage once the SWDPR is adopted later in 2025. Therefore, it is the intention that the Neighbourhood Plan will be consulted at Regulation 16 and examined under the newly adopted local plan in late 2025 or early 2026.

The draft Droitwich Spa Neighbourhood Plan includes design policies for seven proposed housing allocations which are included in the submitted SWDPR local plan, which has been subject to a Sustainability Appraisal incorporating a Strategic Environmental Assessment. The assessment shown in Table 1 above identifies no potential significant negative effects arising from the draft Droitwich Spa Neighbourhood Plan and as such, will not require a full SEA to be undertaken. This determination is pending the findings of consultation and the formal views of the statutory environmental bodies. This view is taken as the policies in the Droitwich Spa Neighbourhood Plan seek to reinforce and do not deviate from the remit of the submitted policies of the South Worcestershire Development Plan Review.

3. HRA SCREENING

3.1 HRA SCREENING ASSESSMENT

There are no internationally designated wildlife sites within the Droitwich Spa Neighbourhood Area. For the purposes of this screening assessment, sites that fall within a 20km radius are also considered. There is one site identified within this range – Lyppard Grange SAC - which is approximately 10km south south-west of the Droitwich Spa Neighbourhood Area.

Lyppard Grange Ponds SAC is located on the eastern outskirts of Worcester, situated amongst a recent housing development on former pastoral farmland. The site comprises two ponds in an area of grassland and scrub (public open space). The site provides habitat for Great Crested Newts *Triturus Cristatus*, which are dependent on both the existing terrestrial habitat (to provide foraging areas and refuge) and on the aquatic habitat (for breeding).

The potential impact of development on Lyppard Grange SAC was examined by a full HRA as part of the production of the South Worcestershire Development Plan (SWDPR). The HRA screening of the SWDPR (ref. CD31) concluded that there was uncertainty with regard to the potential for significant effects on the site as a result of increased disturbance, in particular due to increased recreational activity. Concerns were raised specifically relating to the Lyppard Grange SAC and the potential impact of proposed development on water levels and quality.

As a result of the concerns raised, an interim Appropriate Assessment (AA) has been conducted (this can be viewed on the SWDPR website – [017f5b 885065667fa8420c836d4f1181dfb7ac.pdf](https://www.southworcestershire.gov.uk/017f5b885065667fa8420c836d4f1181dfb7ac.pdf)). The AA concluded that the policies of the SWDPR (including land allocations) were not likely to have adverse effects on the integrity of Lyppard Grange SAC. In addressing concerns relating to possible increased disturbance at the SAC, it was concluded that the location of the site in relation to proposed developments and also the availability of more suitable areas of open space for recreation in close proximity would keep potential impacts to a minimum. It was also considered that the policies of the SWDPR would sufficiently mitigate the potential impact of proposed developments on the water environment, leading to minimal effect on the SAC site.

The policies in the draft Droitwich Spa Neighbourhood Plan are considered to be in general conformity with the strategic policies in the SWDPR, and, therefore, it can be considered that the draft Droitwich Spa Neighbourhood Plan will have no negative impact on internationally designated wildlife sites.

3.2 HRA SCREENING OPINION

As a result of the above assessment, it is considered that the policies of the draft Droitwich Spa Neighbourhood Plan are in general conformity with those contained in the SWDPR. It is therefore concluded that the draft Droitwich Spa Neighbourhood Plan is unlikely to have a negative impact on any internationally designated wildlife sites and as such, the recommendation is made that a full AA is not required.

4. CONCLUSIONS

The preceding assessment exercises have examined whether the draft Droitwich Spa Development Plan is likely to require a full Strategic Environmental Assessment or a Habitats Regulation Assessment Appropriate Assessment.

The SEA screening exercise featured in Section 2 concludes that the draft Droitwich Spa Neighbourhood Plan will not require a full Strategic Environmental Assessment to be undertaken. This is because the Droitwich Spa Neighbourhood Plan is in general conformity with the SWDPR and does not deviate from the proposed land allocations for development made in the SWDPR. The Neighbourhood Plan is not proposing any housing allocations to meet the community need.

The HRA screening exercise featured in Section 3 concludes that the draft Droitwich Spa Neighbourhood Plan does not require a full Habitats Regulation Assessment Appropriate Assessment to be undertaken. There are no internationally designated wildlife sites within the Droitwich Spa Neighbourhood Area, with only the Lyppard Grange SAC falling within a 20km radius. The impact on this site and others because of the land allocations contained within the SWDP has been assessed in the SWDP HRA AA, and as the Droitwich Spa Neighbourhood Plan is considered to be in general conformity with the SWDPR and does not deviate from the land allocations for development made in the SWDPR, the recommendation is made that a full AA is not required.

Both of the above-mentioned recommendations were subject to consultation with the statutory environmental bodies (i.e., the Environment Agency, Historic England and Natural England); the five-week consultation period ran from 25 November 2024 until midnight on 6 January 2025. All three consultation responses are attached to this report, however in short, all three statutory environmental bodies agreed that neither a full SEA nor HRA AA are required.

5. STATUTORY ENVIRONMENTAL BODIES CONSULTATION RESPONSES

Natural England – 23 January 2025

Date: 23 January 2025
Our ref: 494818
Your ref: Droitwich Spa Neighbourhood Plan



Mr Ernie Edwards
Wychavon & Malvern Hills District Councils

BY EMAIL ONLY

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Crewe Business Park
Electra Way
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CW1 6GJ

T 0300 060 3900

Dear Mr Edwards

Droitwich Spa Neighbourhood Plan - Pre-submission Regulation 14 Consultation

Thank you for your consultation on the above dated and received by Natural England on 25 November 2024 and 17 January 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)

It is Natural England's advice, on the basis of the material supplied with the consultation, that:

- significant effects on statutorily designated nature conservation sites or landscapes are unlikely; and,
- significant effects on Habitats sites¹, either alone or in combination, are unlikely.

The proposed neighbourhood plan is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.

Guidance on the assessment of Neighbourhood Plans, in line with the Environmental Assessment of Plans and Programmes Regulations 2004 is contained within the [Planning Practice Guidance](#). This identifies three triggers that may require the production of an SEA:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Natural England does not hold information on the location of significant populations of protected

¹ Habitats sites are those referred to in the [National Planning Policy Framework](#) (Annex 2 - glossary) as "any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites".

species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require an SEA. Further information is included in Natural England's [standing advice](#) on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant an SEA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a SEA is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

Please send any new consultations, or further information on this consultation to consultations@naturalengland.org.uk

Yours sincerely

Sally Wintle
Consultations Team

Wychavon District Council
Planning Policy
Civic Centre Queen Elizabeth Drive
Perschore
Worcestershire
WR10 1PT

Our ref: SV/2018/110042/OT-
09/IS1-L01
Your ref:
Date: 03 January 2025

FAO: Ernie Edwards

Dear Ernie,
Email Cc to: neighbourhoodplanning@wychavon.gov.uk

Draft Droitwich Spa Neighbourhood Plan - Strategic Environment Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Opinion Consultation

I refer to your email of 25 November 2024 with regard to the Droitwich Spa SEA/HRA Screening Opinion for the Neighbourhood Development Plan (NDP). We have reviewed the submitted documentation and offer the following comments for your consideration at this time.

Flood Risk

We note that the River Salwarpe (statutory main river) flows in from the Northeast through central areas of the parish boundary and out to the Southwest. The Elmbridge Brook (statutory main river) then flows along the Western border of the plan boundary where it connects to the River Salwarpe. Based on our indicative Flood Map for Planning (Rivers and Sea) we note these two watercourses have associated Flood Zones 3 and 2 (the high and medium risk zones respectively) within the plan area.

It should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Wychavon District Council as the Lead Local Flood Authority (LLFA).

Site Allocations

The NDP includes the submission of three policies which contain several site allocations within the development plan boundary. We note that the allocated sites mirror some of those allocated within the South Worcester Development Plan (SWDP) and the forthcoming South Worcester Development Plan Review (SWDPR). We have previously made representations on both the adopted SWDP and forthcoming SWDPR.

SPA11: This site allocation under Policy SPA11 is labelled as 'Land North/South of Union Lane'. We have not reviewed any additional assessments associated with this

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site at this time but note the conclusions made in paragraph 6.22 of the NDP that *“The site assessment undertaken for the SWDPR identifies potentially significant issues of land contamination because of former uses including chemical works, coal yard, and railway, with risk assessment and site investigation required as a result. However, the assessment concludes that these are brownfield sites in a sustainable location near to the facilities and services in the town centre and adjacent to the railway station, suitable to be proposed for a mixed-use allocation”*.

The National Planning Policy Framework (NPPF) Paragraph 187 states that: *‘Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’*

We note that part of the site is affected by potentially significant issues of land contamination. We would therefore recommend that in discussion with the SWDPR team and their Environmental Health Officer that the sites have been appropriately assessed to ensure that the allocation is deliverable in the context of the previously identified contamination. It would be appropriate to consider this at the planning policy stage to ensure robustness and deliverability of the policy.

SPA12: This policy contains six site allocations and is labelled as ‘Criteria for other allocated housing sites.’ We note that four of these allocations are located in Flood Zone 1 with unlikely contamination on site and thus would not require further comment from ourselves, this includes:

- ‘Land at Keppers Cottage, Newland Road’ (2.001ha, 34 dwellings).
- ‘Boxing Club, Kidderminster Road’ (0.11ha, 10 dwellings).
- ‘Oakham Place’ (0.16ha, 6 dwellings).
- ‘Acre Lane’ (0.38ha, 20 dwellings).

‘Willow Court, Westwood Road’ contains 10 dwellings. As such, we would consider this proposal as major development. We note that the Northwest corner of the site boundary and the entire road access route onto and off the site falls within Flood Zone 2 of the Elmbridge Brook. We would recommend policies take into account that any built development should be sequentially arranged so that all development is located in Flood Zone 1 and the safe access and egress is considered satisfactory by your local Emergency Planners and Emergency Services in accordance with guiding principles detailed within the National Planning Policy Guidance (NPPG). If any ground level raising is proposed within the areas of Flood Zone, this will also need to be compensated for appropriately to ensure that there are no third party flood risk impacts as a result of the development.

‘Land at Mayflower Road’ is allocated for 5 dwellings. We note that this site falls entirely on top of a historic landfill that predates any of our records. As there is no land available within the allocation that is not outside of the landfill area, it is important to ensure that the site is appropriate and deliverable at this stage in the planning process. We would also like to reiterate Paragraph 187 of the NPPF as

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above and would also recommend that you ensure that the Environmental Health Officer at the council has been consulted upon the human health impacts upon developments atop historic landfills.

SPA15: This policy contains an allocation labelled as 'Netherwich Canal Basin' (0.95ha, mixed use with 60 dwellings). We note this falls almost entirely in Flood Zone 1, neighbouring the southern side of the Droitwich Canal.

However, please note that other potential development areas may also be at flood risk given the presence of many 'ordinary watercourses' which are un-modelled based on the scale and nature of the stream and receiving catchment (less than 3km²).

Water Framework Directive (WFD)

We note that the plan area falls within the Salwarpe river operational catchment being divided into three sub catchments, with two of these being considered as having 'poor ecological status' and one having 'moderate ecological status', the aim is to achieve 'good' status by 2027.

The Water Framework Directive and the Groundwater Directive set out objectives for groundwater including aiming for good chemical and quantitative status; reverse upwards trends in pollution; and preventing or limiting the entry of certain substances to waterbodies. Local Planning Authorities (LPAs) must have regard to these objectives and therefore should ensure their decisions help achieve these goals. Dealing with land contamination can help contribute to achieving the objectives of the Water Framework Directive.

SEA / HRA Screening Opinion

To assist your determination of the SEA and HRA Screening Opinion (dated July 2024), we note the conclusions achieved:

- The SEA Screening Opinion concludes that there are *"no potential significant negative effects arising from the draft Droitwich Spa Neighbourhood Plan and as such, will not require a full SEA to be undertaken."*
- The HRA Screening Opinion concludes that *"the draft Droitwich Spa Neighbourhood Plan is unlikely to have a negative impact on any internationally designated wildlife sites and as such, the recommendation is made that a full AA is not required."*

Whilst we have not reviewed these documents in detail, we agree that based on the Screening Report submitted and in consideration of matters within our remit that the NDP is considered unlikely to have significant environmental impacts and or significant effects on European designated sites, based on the above conclusions we do not believe a full Appropriate Assessment will be required.

Furthermore, we do not offer detailed bespoke advice on policy but advise you ensure conformity with the local plan and refer to guidance within our area neighbourhood plan "pro-forma guidance", I have attached an updated version for your consideration. Notwithstanding the above, for example it is important that these plans offer robust confirmation that development is not impacted by flooding and that there is sufficient wastewater infrastructure in place to accommodate growth.

I trust the above is of assistance at this time.

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3

Yours faithfully

Mr. Ewan Burvill
Planning Officer

Direct e-mail [REDACTED]

Historic England – 28 November 2024



Historic England

Mr Ernie Edwards

Direct Dial: [REDACTED]

Wychavon and Malvern Hills District Councils

Civic Centre

Our ref: PL00797521

Queen Elizabeth Drive

Pershore

WR10 1PT

28 November 2024

Dear Mr Edwards

**DROITWICH SPA NEIGHBOURHOOD PLAN SEA & HRA SCREENING OPINION
CONSULTATION**

Thank you for your consultation and the invitation to comment on the SEA Screening Document for the above Neighbourhood Plan.

For the purposes of consultations on SEA Screening Opinions, Historic England confines its advice to the question, "Is it likely to have a significant effect on the environment?" in respect of our area of concern, cultural heritage.

Our comments are based on the information supplied with the screening request. On the basis of the information supplied and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of the 'SEA' Directive], Historic England concurs with your view that the preparation of a Strategic Environmental Assessment is not required.

Regarding HRA Historic England does not disagree with your conclusions but would defer to the opinions of the other statutory consultees.

The views of the other statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made. If a decision is made to



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undertake a SEA, please note that Historic England has published guidance on Sustainability Appraisal / Strategic Environmental Assessment and the Historic Environment that is relevant to both local and neighbourhood planning and available at: <https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

I trust the above comments will be of help in taking forward the Neighbourhood Plan.

Yours sincerely,



Peter Boland
Historic Places Advisor



CC:



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