

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

Our ref: SV/2018/110042/OT-
16/IS1-L01
Your ref:

Date: 16 July 2026

Dear Planning Policy Team,
Email: neighbourhoodplanning@wychavon.gov.uk

Droitwich Spa Neighbourhood Plan Regulation 16 Consultation

I refer to your email of 05 June 2026 with regard to the Droitwich Spa Neighbourhood Development Plan (NDP) Regulation 16. We have reviewed the submitted documentation and offer the following comments for your consideration at this time.

We previously provided comments at the Regulation 14 stage in July 2025, offering comments on the proposal whereby we acknowledged several site allocations present.

Site Allocations

Upon review of the NDP we note that the six site allocations previously proposed under Policy SPA12 are no longer included in the NDP, but two large site allocations remain.

SPA11: This site allocation under Policy SPA11 is labelled as 'Land at Union Lane' and we recognise this forms part of the South Worcester Development Plan Review (SWDPR) under policy SWDPR 64 which highlights this covers a site area of 2.74ha and proposes 200 new homes.

We have not reviewed any additional assessments associated with this site at this time but note the conclusions made in paragraph 6.21 of the NDP that *"The SWDPR's site assessment 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

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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.

SPA14: This policy contains an allocation labelled as 'Netherwich Canal Basin' which is referenced as 'WYPHM07' in Section 71, Table 19 of the SWDPR and is a 0.95ha mixed use allocation with 60 dwellings.

Upon review of this site on our Flood Map for Planning, we note this falls largely within Flood Zone 2 (medium risk zone) and partly within Flood Zone 3 (high risk zone) from the nearby River Salwarpe (Statutory main river). Table 19 of the SWDPR references specific policy requirements for this site noting that a "*Site specific SFRA is required as part of the planning application*". We would agree that a Flood Risk Assessment should accompany any forthcoming planning application and should consider the following.

Residential dwellings are considered a More Vulnerable use in 'Annex 3: Flood risk vulnerability classification' of the National Planning Policy Framework (NPPF). We would class developments of 10 or more dwelling houses as 'major' development.

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).

We would advise modelled data is secured to be able to calculate a Design Flood Level on site. This would be beneficial to then confirm Finished Floor Levels are appropriately set to the 1 in 100 year plus climate change plus 600mm freeboard level to ensure the safety of the dwellings for their lifetime.

We would anticipate no raising of ground levels on land below the 1% AEP plus climate change floodplain (Design Flood Level). We recognise a significant portion of the site is located within Flood Zones 2 and 3, if any development is proposed here we would expect no ground level raising and existing ground levels to be maintained in order to prevent further fluvial flood risk impacts. If any ground level raising is proposed within areas at risk of flooding then level for level and volume for volume floodplain compensatory storage should be sought, which we would expect to see calculated in an appropriate report.

We also note other allocations are mentioned within Table 19 of the SWDPR for Droitwich Spa that are not mentioned in the NDP, you may wish to make reference to these.

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.

Yours faithfully

Mr. Ewan Burvill

Planning Officer

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