

Droitwich Spa Neighbourhood Plan 2024-2041
Regulation 16 Consultation
Wychavon District Council Officer Comments
20 July 2026

1.0 Overview

- 1.1 These officer comments are made on behalf of Wychavon District Council (WDC), as the Local Planning Authority, on the Regulation 16 Droitwich Spa Neighbourhood Plan for consideration by the Independent Examiner. The consultation ran from 8 June to 20 July 2026. For information, the WDC officer's comments on the Regulation 14 consultation are provided in Appendix 1. WDC is pleased to see that many of the changes and updates that were suggested were implemented by the Qualifying Body, Droitwich Spa Town Council, when drafting the Regulation 15 submission version of the Neighbourhood Plan.
- 1.2 WDC is supportive of the Town Council's preparation of the Neighbourhood Plan and of the plan period from 2024 to 2041.
- 1.3 The Neighbourhood Plan has been prepared during a period of transition in local plan making from the adopted SWDP (2016). 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 the Inspector's final report received in early March 2026 and the SWDPR adopted by the South Worcestershire Councils on 26 March 2026.
- 1.4 The Regulation 15 submission version of the Neighbourhood Plan has been drafted to reflect the policies in the recently adopted SWDPR and has been able to consider those strategic policies identified by WDC published on the WDC planning webpage [[Neighbourhood Planning in Wychavon - Wychavon District Council](#)].

2.0 Meeting the Basic Conditions

- 2.1 It is not for WDC to say whether the Regulation 15 version of the Neighbourhood Plan has met the basic conditions, however, the following points are made for consideration as part of the independent examination.

3.0 Having Regard to National Planning Policy

- 3.1 The Neighbourhood Plan has been prepared against the latest NPPF published in December 2024. As the Neighbourhood Plan was submitted at Regulation 15 prior to the publication of the latest draft version of the NPPF it will continue to be examined against the policies in the 2024 NPPF.

4.0 Droitwich Spa Design Code and Guidance

- 4.1 The preparation of the Droitwich Spa Design Code and Guidance is welcomed and reflects WDC's own emphasis on achieving good design outcomes from new development via the district wide Wychavon Design Code SPD which was adopted in June 2026. In addition, the Droitwich Spa Design Code and Guidance reflect the Droitwich Town Centre Investment Prospectus prepared by WDC in 2022. Therefore, once adopted alongside the Neighbourhood Plan, the Design Code and Guidance will carry significant weight as a supplementary document as well as strengthening the relevant Neighbourhood Plan design policies when determining planning applications.

5.0 Table of Contents

Chapter/Section	Comments
Chapter 1: Setting the Scene	This chapter outlines the neighbourhood plan process and how they can form a part of the overall planning framework for the district. The document is logically set out, and the contents are clearly signposted. It is noted the text has been updated to reflect the adoption of the SWDPR.
Chapter 2: Droitwich Spa Neighbourhood Area	This chapter provides a comprehensive overview of the Neighbourhood Area, and how the town has developed over time in respect of areas including Community, Environment and Economy. Further to our comment at the Regulation 14 stage, we note that the typos have subsequently been corrected.
Chapter 3: Vision and Objectives	This chapter outlines the clear vision for Droitwich Spa by the end of the plan period. It also outlines how the neighbourhood plan policies will achieve this vision. Further to our comment at the Regulation 14 stage, we note that the typos have subsequently been corrected.
Chapter 4: Environment	SPA1: Design: This policy is supportive of the SWDPR policies, specifically SWDPR 05 and SWDPR 28 and local design guidance relating to design. It sets out criteria that development proposals should follow to maintain and enhance the local distinctiveness of and design quality in Droitwich Spa. Since the Regulation 15 submission the Wychavon Design Code SPD was adopted in June 2026. The text in para. 4.5 and footnote 6 should be amended to reflect this and the link updated to the SPD. Reference to the South Worcestershire Design Guide SPD should be deleted as it has not been readopted against the SWDPR. SPA2: Historic Environment: This policy is supportive of SWDPR policies relating to the historic environment, specifically SWDPR 09 and SWDPR 33 outlining that development proposals should protect, conserve, and where possible enhance the historic environment of the Neighbourhood Area. The policy also sets out specific criteria that proposals will be assessed against in relation to the impact of proposals on the historic environment of the town. SPA3: Droitwich Spa Conservation Area: This policy is supportive of SWDPR policies relating to the historic environment, as well as the WDC Conservation Area Appraisal and Management Plan. It outlines that development proposals should either preserve or enhance the character and/or appearance of the Droitwich Spa Conservation Area. Point six of SPA3 which references the Shopfront Design Guide SPD should be deleted as the SPD has not been readopted against the SWDPR. Likewise, para 4.16 bullet 5 and footnote 12 also should be deleted accordingly.

	SPA4: Droitwich Canals Conservation Areas: This policy is supportive of SWDPR policies relating to the historic environment, as well as the Canal & Rivers Trust Droitwich Canals Conservation Management Plan. It outlines that development proposals should either preserve or enhance the character and/or appearance of the Droitwich Spa Canals Conservation Areas.
Chapter 5: Natural Environment	SPA5: Biodiversity: This policy builds on the criteria behind the relevant policy within SWDPR 29 in the adopted SWDPR. The policy focuses on the preservation and enhancement of biodiversity within the neighbourhood area reinforcing national and locally designated natural characteristics. WDC considers that the policy and supporting text are supportive of the requirements under the LURA. SPA6: Local Green Spaces: The Local Green Spaces identified are supported and justified against the selection criteria in Table 1, which provides the evidence base. Plan 5 illustrates the locations of each proposed Local Green Space within the Neighbourhood Plan. SPA7: Key views: The key views outlined within this policy are supported and clearly identified utilising the map provided at Plan 6 and the images and descriptions set out in Table 2.
Chapter 6: Housing	Housing requirement WDC confirm that the housing requirement for the Neighbourhood Area is nil as set out in para. 2.3 of the Reasoned Justification to Policy SWDPR 02 of the adopted SWDPR. The NP references that dwellings may come forwards as windfall completions or opportunities to be provided on appropriate town centre sites. This will be required to be consistent with SWDPR 16, criteria H in that windfall housing developments should be assessed against the density criteria relevant to their locality and the character of the built and natural environment context. SPA8: Housing Mix: It is noted and welcomed that the policy requirements in terms of the mix are supported by the community survey results and refer to the 2021 SHMA update prepared for the SWDPR. Where affordable homes are proposed, the Neighbourhood Plan policy requires an indicative 65% should be provided as affordable housing for rent (social rent and/or affordable rent); 25% as First Homes, and 10% as shared ownership properties. This differs to the adopted SWDPR as First Homes are no longer a required affordable tenure in the NPPF, and consequently the policy wording in SWDPR 17 was amended to: <i>"E. 70% of the affordable housing shall be Social Rented, and the remaining 30% shall be for affordable home ownership, unless it can be demonstrated that this mix is not viable, or local need has demonstrated a need for a different affordable housing tenure for the site".</i>

	It is suggested that the NP should be amended to reflect this and omit specific reference to First Homes, Affordable Rent and Shared Ownership. Affordable Rent is more expensive than Social Rent and is therefore less affordable, or indeed unaffordable, to many people on the housing register in need of affordable housing. Therefore, the district council's preference is always for social rent. Shared ownership is one form of affordable housing purchase but not solely limited to this option and the policy as drafted may be overly restrictive if schemes within Droitwich Spa are only for shared ownership. SPA9: Housing development: This policy is aligned with relevant development management policies in the SWDPR and the requirements justified through reference to supporting evidence and the community survey. SPA10: Householder development: This policy is supportive of SWDPR policies relating to design. SPA11: Land north/south of Union Lane: This policy is aligned with the SWDPR allocation policy for this site, SWDPR 64. It sets out further design and planning criteria for positively shaping development on the site shown in Plan 7, which aligns with the Wychavon Design Code SPD. Whilst acknowledging that neighbourhood planning can play an important role in design policy (NPPF paragraph 132), in due course will also have to be considered what impact this may have on the potential viability of both sites at the application period.
Chapter 7: Community Facilities	SPA12: New or expanded community facilities: This policy sets out criteria that proposals for new or expanded community facilities will need to adhere to be supported and aligns generally with the SWDPR.
Chapter 8: Droitwich Spa Town Centre	SPA13: Town centre vitality: It is also acknowledged within paragraph 8.4 reflects the changing role and character of town centres as envisaged over the next 20 years. Droitwich Spa is well-placed to benefit from these trends which will make a positive contribution to the overall vitality and viability of the town centre. This is also consistent within SWDPR 2 Settlement Hierarchy with Droitwich Spa categorised as an Urban Area 2, which is only below Worcester City within South Worcestershire. This policy also aligns with Wychavon's focus on public realm improvement works within Droitwich Spa. The policy is robustly justified, having referenced SWDPR and local evidence base documents and covers a range of issues such as public realm improvements, accessibility and safety, amenity, the historic environment, effective use of space, and tourism. Overall, the policy is comprehensive and well-written. SPA14: Netherwich Canal Basin: This policy is aligned with relevant development management policies in the SWPDR as well as local design guidance/codes. The policy is also consistent with the mixed-use allocation in SWDPR 71 referenced as WYPHM07, whilst also stating further design and planning criteria for positively shaping development on the site.

	Whilst acknowledging that neighbourhood planning can play an important role in design policy (NPPF paragraph 132), in due course will also have to be considered what impact this may have on the potential viability of both sites at the application period.
Chapter 9: Jobs and Active Travel	SPA15: Economic development: This policy is aligned with the SWDPR. WDC support the focus of sustainable development, and this also aligns with the NPPF and Planning Practice Guidance. WDC also supports the focus of promoting tourism focused on the town's heritage and environment. As with SPA13: Town centre vitality it is suggested that reference is made in the supporting text to the Droitwich Spa Town Centre Investment Prospectus. In both instances although not a statutory planning document when determining planning applications, the document seeks to guide investment in the town over the next two decades and help shape the nature of future development proposals. SPA16: Walking and cycling (active travel): WDC support the aims of this policy in promoting active travel where possible. It aligns with SWDPR 06, as well as the NPPF aims of promoting patterns of sustainable development and movement.
Chapter 10: Delivering the Neighbourhood Plan	This chapter clearly outlines the role that the Neighbourhood Plan will have in future decision making.
Chapter 11: Community Actions	The contents of this chapter are noted and supported.
Appendix A: Evidence Base	The evidence base is comprehensive and up to date and clearly supports the policies in the Neighbourhood Plan.
Appendix B: Windfall Housing Completions	The details within this chapter have been taken from the South Worcestershire Councils (SWC) Five-Year Housing Land Supply reports. It is suggested the table could benefit from being updated to reflect the latest 5 Year Housing Land Supply position for 2025/26 and delivery of residential in the town as set out in the latest report published on 1 July 2026.
Plans, Figures & Tables	Noted.
List of Policies	Noted.

6.0 Conclusion

6.1 Overall, officers consider that the submitted Droitwich Spa Neighbourhood Plan Regulation 15 version aligns with the policies in the SWDPR, whilst also having regard to the NPPF. Although it is acknowledged that it is for the examiner to consider whether the Neighbourhood Plan meets the basic conditions and make any recommendations accordingly. WDC welcome the modifications made to the

Regulation 15 version of the Neighbourhood Plan, and it is felt that these reflect the comments raised at the Regulation 14 consultation, and the additional updates made to the Neighbourhood Plan to reflecting the latest NPPF and adoption of the SWDPR.

Droitwich Spa Parish Council Neighbourhood Plan 2024-2041

Regulation 14 Consultation draft

Wychavon District Council Officer Response

1. Overview

- 1.1 These officer comments are made on behalf of Wychavon District Council (WDC), as the Local Planning Authority and Relevant Body, on the Droitwich Spa Neighbourhood Plan as part of the Regulation 14 Consultation. The public consultation ran from 9 June to 22 July 2025.
- 1.2 WDC is supportive of Droitwich Town Council's preparation of the Neighbourhood Plan and of the plan period from 2025 to 2041. The end period reflects that of the South Worcestershire Development Plan (SWDP) reviewed to 2041, although it is noted it differs from the SWDPR which commences from 2021. The comments below relate to specific policies where clarification or changes are recommended. Should Droitwich Spa Town Council wish to query any points raised below, officers would be happy to discuss further ahead of the Regulation 15 submission.

2. General Conformity with the Strategic Local Plan

- 2.1 It is not for WDC to determine whether the Neighbourhood Plan meets the Basic Conditions, rather than the role of the examiner once a final draft of the Neighbourhood Plan has reached that stage. However, officers are content that the Neighbourhood Plan content aligns with the identified strategic policies in the SWDP and the relevant policies in the submitted SWDPR.
- 2.2 The Neighbourhood Plan has been prepared during a period of transition in local plan making from the adopted SWDP (2016), to the reviewed SWDP. The latter, referred to as the South Worcestershire Development Plan Review (SWDPR), was submitted to the Planning Inspectorate for examination in September 2023. The main examination hearings commenced in March and concluded in April 2025, with the aim to adopt the revised SWDP in late 2025.
- 2.3 The Inspectors published their interim letter (EXAM99) on 7 July 2025 and determined that the Plan is likely to be capable of being found legally compliant and sound. The examination remains open, and a further site-specific hearing day has been set aside in early September. However, WDC will be able to consult on Main Modifications to the Plan in the autumn, allowing the Inspectors to then issue their final report and subsequent adoption of the new SWDP around the turn of the year.
- 2.4 However, the Inspectors have found 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 is no longer relevant. WDC has yet to determine how the housing requirement for neighbourhood areas is to be determined, although further directions to this may be provided in the Inspectors' final examination report.
- 2.5 The draft Droitwich Spa Neighbourhood Plan within paragraph 1.18 acknowledges the period of transition in terms of the local plan making process. Due to the expected adoption of the SWDPR in late 2025, the Droitwich Spa Neighbourhood Plan would therefore be examined against the reviewed local plan. Therefore, whilst the neighbourhood plan has been drafted having regard to the SWDPR,

further revisions to Neighbourhood Plan policies may be required, reflecting either new local plan policies or references, once the SWDPR examination is concluded, to ensure that the Droitwich Spa Neighbourhood Plan conforms with the new local plan.

3. Regard to the NPPF

The draft Droitwich Spa Neighbourhood Plan demonstrates that regard has been had to the latest December 2024 National Planning Policy Framework (NPPF), particularly its focus on sustainable development. The plan effectively balances economic, social and environmental objectives, providing a clear framework for development decisions that supports the emphasis on a plan-led system, which is championed by the NPPF.

4.0 Droitwich Spa Design Code and Guidance

4.1 The preparation of the Droitwich Spa Design Code and Guidance is welcomed and reflects WDC's own emphasis on achieving good design outcomes from new development via the district wide design code SPD. In addition, the Droitwich Spa Design Code and Guidance reflect the 2022 Droitwich Town Centre Prospectus and the specific draft development brief that is being prepared by Wychavon covering the Union Lane and Netherwich Basin sites. The latter will be consulted on later in the year. Therefore, once adopted alongside the Neighbourhood Plan, the design code and guidance will carry significant weight as supplementary documents and will strengthen relevant Neighbourhood Plan design policies when determining planning applications.

5.0 Table of Officer Comments on Plan Content

Chapter 1: Setting the Scene	This chapter outlines the neighbourhood plan process and how they can form a part of the overall planning framework for the district. The document is logically set out, and the contents are clearly signposted
Chapter 2: Droitwich Spa Neighbourhood Area	This chapter provides a comprehensive overview of the Neighbourhood Area, and how the town has developed over time in respect of areas including Community, Environment and Economy. There are several minor typos/syntax errors that need correcting within this chapter, these are as follows: 2.9 – “the town’s population has aged somewhat” change to “the town’s population has aged moderately”. 2.16 – “... which run the ...” change to “... which are situated along the ...”. 2.18 – “... present city centre ...” change to “... present town centre ...”.
Chapter 3: Vision and Objectives	This paragraph outlines the clear vision for Droitwich Spa by the end of the plan period. It also outlines how the neighbourhood plan policies will achieve this vision. There are a couple of minor typos/syntax errors that need correcting within this chapter, these are as follows: 3.4 – on last bullet point – “improvements by sustainable modes”. change to “improvements by sustainable modes of transport”.

	3.6 – removal of dash after “energy” in bullet point 4.
Chapter 4: Built Environment	SPA1: Design: This policy is supportive of SWDP and SWDPR policies and local design guidance relating to design and sets out criteria that development proposals should follow to maintain and enhance the local distinctiveness of and design quality in Droitwich Spa. SPA2: Historic Environment: This policy is supportive of SWDP and SWDPR policies relating to the historic environment, outlining that development proposals should protect, conserve, and where possible enhance the historic environment of the Neighbourhood Area. The policy also sets out specific criteria that proposals will be assessed against in relation to the impact of proposals on the historic environment of the town. SPA3: Droitwich Spa Conservation Area: This policy is supportive of SWDP and SWDPR policies relating to the historic environment, as well as the WDC Appraisal and Management Plan. It outlines that development proposals should either preserve or enhance the character and/or appearance of the Droitwich Spa Conservation Area. SPA4: Droitwich Canals Conservation Areas: This policy is supportive of SWDP and SWDPR policies relating to the historic environment, as well as the Canal & Rivers Trust Droitwich Canals Conservation Management Plan. It outlines that development proposals should either preserve or enhance the character and/or appearance of the Droitwich Spa Canals Conservation Areas. There is one minor typo/syntax error that needs correcting within this chapter, these are as follows: 4.5 – change “... as SPD to ...” to “... as an SPD to ...”.
Chapter 5: Natural Environment	SPA5: Biodiversity: This policy builds on the ethos behind the relevant policy within SWDP 22, and SWDPR 27 in the submitted SWDP review. The policy focuses on the preservation and enhancement of biodiversity within the neighbourhood area and reinforcing national and locally designated natural characteristics. The policy aligns well with the aims of the local plan, and national policy. SPA6: Local Green Spaces: The Local Green Spaces identified are supported and justified against the selection criteria in Table 1, which provides the evidence base. Plan 5 illustrates the locations of each proposed Local Green Space within the Neighbourhood Plan. SPA7: Key views: The key views outlined within this policy are supported and clearly identified utilising the map and Table 2. To assist decision making further, WDC recommend that photographs of each key view are appended to the neighbourhood plan. A revised map showcasing the directions of each viewpoint would also provide clarity for readers and planning officers when considering development proposals against this policy. The Key Views are also not clearly evidenced. Therefore, it is suggested that Table 2 is updated to include a column justifying the location of each key view.
Chapter 6: Housing	SPA8: Housing Mix: The policy requirements in terms of the mix are supported by the community survey results and refer to the 2021 SHMA update prepared for the SWDPR update. The policy also sets out that the proposed mix of any given scheme should consider aspects such as design, character, and density of the surrounding built environment,

	as well as other site and building-specific factors and viability considerations. It is also noted that the policy is supportive of affordable housing provision, setting out indicative percentage breakdowns for tenure types. Additionally, it should be noted that the Inspectors have found Annex E, relating to housing numbers for Neighbourhood Areas, of the SWDPR to be 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 is no longer relevant. Further details on an alternative approach may be addressed in the Inspectors final examination report. SPA9: Housing development: This policy is aligned with relevant development management policies in the SWDP and SWDPR and is robustly justified as it references SWDPR evidence base documents. SPA10 Householder development: This policy is supportive of SWDP and SWDPR policies relating to design. SPA11: Land north/south of Union Lane: This policy is aligned with relevant development management policies in the SWDP and SWDPR as well as local design guidance/codes. The policy is also consistent with housing allocations set out in the SWDPR, stating further design and planning criteria for positively shaping development on the site. The SWDPR submitted allocation figure of 400 dwellings has been revised downwards as a Main Modification arising from the SWDPR examination hearings to 190 dwellings. In addition, the car park figure is now 105 spaces. The Neighbourhood Plan needs to be amended to reflect this. SPA12: Criteria for other allocated housing sites: This policy is aligned with relevant development management policies in the SWDP and SWDPR, as well as the housing allocations in the SWDPR. The policy expands on design criteria to positively shape development on the detailed allocations.
Chapter 7: Community Facilities	SPA13: New or expanded community facilities: This policy sets out criteria that proposals for new or expanded community facilities will need to adhere to be supported. This criterion covers areas such as site accessibility, residential amenity, and siting and design considerations. The policy encourages proposals that will benefit younger and older age groups. Additionally, it sets out that developer contributions will be sought to mitigate additional demands on service provision that are necessitated by development. This policy is supported, however, the town council could build on their focus of community facilities by allocating a site for a future community facility, such as an Asset of Community Value. Although, this may be more suited to Section 11.
Chapter 8: Droitwich Spa Town centre	SPA14: Town centre vitality: This policy aligns well with Wychavon's focus on public realm improvement works within Droitwich Spa. The policy is also robustly justified, having referenced SWDPR and local evidence base documents and covers a range of issues such as public realm improvements, accessibility and safety, amenity, the

	historic environment, effective use of space, and tourism. Overall, the policy is comprehensive and well-written. SPA15: Netherwich Canal Basin: This policy is aligned with relevant development management policies in the SWDP and SWDPR as well as local design guidance/codes. The policy is also consistent with the mixed-use allocation set out in the SWDP and SWDPR, stating further design and planning criteria for positively shaping development on the site.
Chapter 9: Jobs and Active Travel	SPA16: Economic development: This policy is aligned with the local plan, and emerging SWDPR. WDC support the focus of sustainable development, and this also aligns with the NPPF and Planning Practice Guidance. WDC also supports the focus of promoting tourism focused on the town's heritage and environment. SPA17: Walking and cycling (active travel): WDC support the aims of this policy in promoting active travel where possible. It aligns well with the relevant policy in the adopted local plan, SWDP 4, and the emerging review, SWDPR 06, and it also aligns with the NPPF aims of promoting sustainable development.
Chapter 10: Delivering the Neighbourhood Plan	This chapter clearly outlines the role that the Neighbourhood Plan will have in future decision making.
Chapter 11: Community Actions	Whilst it is clearly understood from paragraph 11.3 that the community actions do not constitute to the planning policy aspect of a neighbourhood plan, the Neighbourhood Plan could refer to specific community actions that are relevant to the policies, by utilising the community action reference, within the reasoned justification under each policy. This will further ensure their relevance in the future.
Appendix A: Evidence Base	It is clear that there is a comprehensive evidence base behind the Neighbourhood Plan, including the latest 2024 NPPF and Planning Practice Guidance. It is noted that the Neighbourhood Plan currently references the SWDPR Regulation 19 document. It is expected that the neighbourhood plan will be updated once the SWDP has been readopted in late 2025.
Appendix B: Windfall Housing Completions	The details within this chapter have been taken from the South Worcestershire Councils (SWC) Five Year Housing Land Supply reports. The SWCs are currently undertaking the housing and employment land completions survey and will be providing an updated Five Year Housing Land Supply position in the early autumn. The Regulation 15 version of the Neighbourhood Plan will need to reference the 2024/25 update to the Five-Year Housing Land Supply report to ensure it reflects the latest evidence.
Plans, figures and tables	Noted.
List of Policies	Noted

5. Conclusions

Overall, officers consider that the Droitwich Spa Neighbourhood Plan Regulation 14 version aligns with the adopted South Worcestershire Development Plan (2016) and the policies in the SWDPR, whilst also having regard to the latest NPPF. The Neighbourhood Plan is set out in a logical manner to ensure that it is easy to follow and understand. The Neighbourhood Plan will be required to be updated to reflect the SWDP once readopted later in 2025, and any further possible changes to national planning policy before the Regulation 15 submission stage.