Droitwich Spa Neighbourhood Development Plan

Examiner's Clarification Note

This Note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt, matters of clarification are entirely normal at this early stage of the examination process.

Initial Comments

The Plan provides a clear and concise approach for the neighbourhood area. The Vision and the objectives provide a context for the resulting policies. This is best practice.

The presentation of the Plan is excellent. The difference between the policies and the supporting text is very clear. In addition, the Plan makes good use of various high-quality maps.

Points for Clarification

A revised NPPF was published on 17 August 2026. It includes transitional arrangements for the examination of neighbourhood plans that are already submitted. For clarity, any references in this note refer to the NPPF of December 2024 against which the Plan will be examined.

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now able to raise issues for clarification with the Town Council.

The comments made on the points in this Note will be used to assist in the preparation of the examination report and in recommending any modifications that may be necessary to the Plan to ensure that it meets the basic conditions. I set out specific policy clarification points below in the order in which they appear in the submitted Plan:

Policy SPA1

This is an important policy in the Plan. It is helpfully underpinned by the Design Guidance and Codes. In addition, the criteria in the policy are locally-distinctive.

The Design Guidance and Codes also provide design principles for two sites which are allocated in the Local Plan. These site-specific principles have been reflected in the respective Plan policies (SPA11 Land at Union Lane and SPA14 Netherwich Canal Basin). This is best practice.

In general terms, the approach taken is a first-class response to Section 12 of the NPPF.

In this context I have two comments/questions. The first relates to the general application of the policy to different types of development. I agree with the Town Council's comments in paragraph 4.4 of the Plan that the Design Guidance and Codes should apply to all development. However, should the opening element of the policy comment about maintaining and enhancing the local distinctiveness of the neighbourhood area as appropriate to the scale, nature and location of the development proposal concerned?

The second relates to the final part of the policy. Should 'welcomed' be replaced with 'supported' to allow its application by the District Council in the development management process?

Policies SPA2/3

These are excellent policies which reflect the distinctive nature of the various Conservation Areas.

Policy SPA5

In the second paragraph of the policy should the first 'likely to' be replaced by 'which would' to bring the necessary clarity for the District Council in the development management process?

Policy SPA6

I looked at the proposed local green spaces carefully during the visit. This is an excellent policy which is underpinned by the details in Table 1. The policy takes the matter-of-fact approach set out in paragraph 108 of the NPPF.

Policy SPA11

This is a well-considered policy which adds local value to Policy 64 of the South Worcestershire Development Plan Review.

Plan 7 is very helpful.

Policy SPA13

I looked carefully at the town centre during the visit.

The policy takes a flexible approach towards land uses which has regard to Section 6 of the NPPF.

I note the relationship between the final part of the policy and the supporting text. For clarity, is the intention of this part of the policy to offer general approach to the implementation of the various proposals in the District Council's Investment Prospectus through the development management process?

Policy SPA14

This is another well-considered policy. In this case, it adds local value to policy 71 of the South Worcestershire Development Plan Review.

Plan 8 is very helpful.

Policy SPA16

This is a very positive and locally-distinctive policy which will assist in the local delivery of Sections 8, 9 and 12 of the NPPF and its wider approach towards sustainable development.

Delivering the Plan

Section 10 of the Plan addresses this matter in a very positive way. Paragraph 10.5 properly acknowledges the way in which the planning policy landscape will alter in the Plan period.

Community Actions

Section 11 includes a healthy package of community actions. I note that in some cases they overlap with relevant policies.

Representations

Does the Town Council wish to comment on any of the representations made to the Plan?

I would find it helpful if the Town Council commented on the representations from:

- Canal and River Trust;
- Environment Agency; and
- Forestry Commission (on the Worcestershire LNRS).

Wychavon District Council suggests a series of refinements to the Plan. The Town Council's comments on these suggestions would be helpful.

Protocol for responses

I would be grateful for responses and the information requested by 10 September 2026. Please let me know if this timetable may be challenging to achieve. It is intended to maintain the momentum of the examination.

If certain responses are available before others, I would be happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled, please could it come to me directly from Wychavon District Council. In addition, please can all responses make direct reference to the policy concerned.

Andrew Ashcroft

Independent Examiner

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20 August 2026