

Telford & Wrekin Council – Responses to Matters, Issues and Questions

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Matter 6, Issue 3

Issue 3: Whether the climate change (CC) policies are justified, effective and consistent with national policy.

Q89. Is the relationship between Policy Strategic S5 part 4 and the CC policies clear enough to be effective?

Policy S5 is a strategic policy which lays out a broad overview of the Council's approach to mitigating and adapting to the impacts of climate change. Policy S5.4 requires new development applications to be accompanied by a Sustainability Statement which lays out how the development is positively contributing to the Council's Net Zero goals.

It is considered that a minor modification to the wording, replacing '*achieve*' with '*contribute to*' may be beneficial to the clarity of the policy.

Strategic Policies are designed to act as an overview of the Council's approach and development management policies put in place the guide to achieving these strategic objectives. The plan is expected to be read as a whole, as such, consistent wording between policy S5 and CC1 and CC2 is important for continuity and clarity. In short, policy S5 sets out the Council's goals and the Climate change policies set out how we expect to achieve them.

Paragraph 4.47 states that the required sustainability statement will be expected to show what positive design decisions have been made to address issues such as, for example, energy consumption. Policies CC1 – CC6 give further clarity on exactly what policy requirements will need to be met.

The Council finds that Policy S5.4 in conjunction with paragraphs 4.47 and 4.48 are clear enough to be effective with regards to their relation to policies CC1 – CC6.

Policy CC1 – Sustainable construction and carbon reduction

Q90. Are the requirements in Policy CC1 intended to exceed standards in current and/or future Building Regulations? If yes, is this clear, and are the requirements justified and consistent with national policy? What effect will they have on development viability?

Policy CC1 encourages a “*fabric first*” approach to energy efficiency, use of low/zero carbon technologies, and aims for net zero carbon emissions. The policy references the Future Homes Standard (which became part of Building Regulations in 2025) as a benchmark, but does not set a rigid standard above this. Instead, it asks developers to go further and allows for viability evidence to justify a lower standard.

This means that while CC1 aspires to exceed Building Regulations where possible, it does not mandate this in every case. The policy’s flexibility (should) and explicit reference to viability report (6.12) means that, in practice, CC1 will not require standards above Building Regulations if this would make development unviable. This is in line with NPPF paragraph 164, which states *that “any local requirements for the sustainability of buildings in plans should reflect the Government’s policy for national technical standards.”* Local plans can only require higher standards where national policy allows, and only if such requirements are justified and do not undermine development viability (see also NPPF paras 35, 58–59).

The Council do however suggest the following minor modification to CC1.2 would be appropriate to clarify this fact:

“2. All new buildings should, where practicable and viable:”

Policy CC2 – Renewable energy in development

Q91. Is part 1 justified and realistic for all development? Is there any unnecessary duplication with Policy CC1?

set minimum energy performance standards but do not require on-site renewables for all developments. However, CC2 is worded to ensure that it does not impose an absolute requirement; instead, it allows for site-specific flexibility and viability considerations (6.15). This approach is consistent with NPPF paragraphs 165–166, which encourage a positive strategy for renewable and low carbon energy, but also recognise the need for flexibility. In addition, the Council would note that this approach is also consistent with Chapter 10 of the Draft NPPF December 2025, though this document does not yet carry weight it is a sign of the government’s goals regarding renewable energy in development.

The Council do not consider the continuity of requirements for on site or local renewable energy usage across policies CC1 and CC2. However, following consultation the Council does consider the following suggested modifications to the policy to be appropriate for improving clarity.

Modification 1 – CC2.1 to read as follows:

“1. Where feasible, viable and appropriate having regard to the development requirements on the site, all new development will incorporate renewable energy production and storage onsite.”

Modification 2 – CC1.1 to read as follows:

“All new development must follow a fabric first approach, aiming to maximise energy efficiency at the outset.”

These changes would address any concern with regards to unnecessary duplication and flexibility for developments which may not be able to incorporate renewable energy completely in line with CC2.

Q92. Are the policy's other requirements justified and effective, and do they include sufficient flexibility to be deliverable?

The Council consider that policy CC2 is justified and in line with national policy guidance, specifically section 14 Meeting the challenge of climate change, flooding and coastal change.

The policy has been informed by the Councils Climate change SPD and VS01 – Whole plan Viability assessment (section 8) as is required by PPG paragraph 009.

The Council consider that with the above suggested modifications to policy CC2 the requirements are suitably justified and would be effective.

The requirements for heat networks, heating/cooling strategies, and renewables in CC2 are all subject to feasibility and viability. This ensures the policy is not only ambitious but also realistic and deliverable, in line with NPPF paragraph 166. The justification for these requirements is rooted in the need to decarbonise heating and cooling, and the approach is consistent with national policy.

The Council consider that it may be beneficial to include further reference to viability within supporting text 6.21 (see CD08).

Policy CC3 – Strategic renewable energy development

Q93. Is the policy justified and consistent with national policy? Policy CC4 – Water re-use, conservation, efficiency and quality

Policy CC3 supports strategic scale renewable energy where there are no significant adverse impacts on landscape, biodiversity, heritage, amenity, highway safety, or health, and requires community engagement and decommissioning strategies. This is entirely consistent with NPPF paragraphs 165–169, which require a positive strategy for renewables, significant weight to their benefits, and appropriate mitigation of adverse impacts. However, paragraph 165 does not require the allocation of specific sites unless there is specific and evident support.

Accordingly, the Council do not consider it either necessary or practical to allocate specific sites for renewable energy development at this stage, primarily due to

current grid connectivity constraints and absence of proposals. By not prescribing site allocations, the policy enables a market-led approach, allowing proposals that are both feasible and practicable to come forward. This flexibility also supports community-led initiatives, ensuring that projects are locally acceptable and responsive to community needs. Furthermore, this approach provides the adaptability required to accommodate innovative solutions as technology and infrastructure continue to evolve rapidly.

Q94. Are the requirements in Policy CC4 part 2 justified and deliverable?

Policy CC4 part 2 states new residential development will be required to demonstrate that water consumption will not exceed 110 litres per person per day. In line with the highest building regulations at the time.

Policy CC4.2 is justified by the evidence provided in the following documents:

- Telford and Wrekin Water Cycle Study Phase 2 - February 2025 (WF06)
- Telford and Wrekin Stage 1 Scoping Water Cycle Study - July 2021(WF05)
- Telford and Wrekin Local Plan Review Viability Study - October 2023 (VS01)

The Council considers these documents to serve as sufficient justification for the inclusion of this policy.

It is however considered that following consultation with the Environment Agency, the standard could be raised further. This would be justified by the Water Cycle Study Phase 2 and advice from the Environment Agency.

This is further justified by The Environmental Improvement Plan (2025) which includes a commitment to 100lpd for areas such as Telford and Wrekin.

Q95. Is the policy effective in its approach to water quality management?

Policy CC4.1, 3 and 4 relate specifically to the protection and enhancement of water quality within the borough and its surroundings. The Council consider this approach to be consistent with NPPF paragraph 187. Government Guidance for Water supply, wastewater and water quality lays out three key areas of consideration for plan making.

The first of these considerations is the protection and enhancement of local surface and ground water. The surface water aspect of this is covered within CC4.1 with groundwater covered by CC4.3.

The second consideration relates to location of development, the Council finds its site selection process to be thorough and robust with regard to flood risk, shown in the SFRA L2 (WF02a).

The third relates to opportunities for improving water quality whilst mitigating flood risk through design, covered in CC4.1 and 3.

The Council consider that the following modification to supporting text could aid further in the policies effectiveness and clarity:

“6.34 Development should demonstrate they separate foul and storm drainage and restrict surface water connections to reduce pressures on the wastewater network, improve water quality and reduce flood risk.”

As well as signposting the government’s Water Framework Directive and environment agency guidance:

“6.35 Where development has the potential to increase abstraction from groundwater and surface water sources this should not have an adverse impact on the Water Framework Directive (15). The Environment Agency provides further technical guidance regarding groundwater protection which should be considered in advance of an application (16).”

(footnotes):

- 15 <https://www.legislation.gov.uk/ukxi/2017/407/contents>
- 16 <https://www.gov.uk/government/publications/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance>

Policy CC5 – Flood risk management and sustainable drainage systems

Q96. To be effective, does the policy need to include (a) reference to flood risk evidence (such as the Strategic Flood Risk Assessment); and/or (b) consideration of existing drainage assets?

(a) - Whilst the Council consider that the policy as written will be effective in delivering suitable flood risk management and sustainable drainage systems in development across the borough. The Council propose the following modification to the supporting text to provide further clarity for applicants and decision makers:

CC5.3 – “Surface Water Drainage Strategies and site Flood Risk Assessments are required for developments within areas of high cumulative flood risk as identified in the SFRA.”

Paragraph 6.39 – “The Strategic Flood Risk Assessment (Level 1 and 2) provides a key evidence base document that developers should refer to when bringing forward proposals for new development. The Level 2 SFRA provides details of when site specific flood risk assessments would be required, and developers should use this section to understand requirements for FRAs and what conditions / guidance documents should be followed. Further to this, Site Summary tables are located within Annex A of the document which developers should use to understand flood risk, access and egress requirements, climate change, SuDS, and FRA requirements for site-specific assessments.”

(b) - Similarly, the Council consider the following inclusion to be a suitable modification to policy CC5.1

“d. Investigation of the capacity of existing drainage assets serving a site would need to be undertaken to ensure that development will not overload the asset;”

Q97. Is the requirement to design Sustainable Drainage Systems in accordance with the Council’s SuDs Handbook soundly based?

Policy CC5.5 requires all developments which require use of sustainable drainage systems (SuDs) to comply with relevant national standards as well as the Councils SuDs handbook. The Councils 2019 SuDs Handbook has acted as a long-standing guidance document for both departments and decision making in the borough. The Handbook provides clear direction to take account of important local considerations, e.g. the impact of mine water / groundwater risks associated with the historical works in the area. As such, the Council consider inclusion of the document within policy to be justified, positively prepared and effective. Furthermore, the Handbook has been directly informed by national policy and explicit reference within CC5 is made to accordance with government guidance. Considering all this, the Council finds this aspect and policy CC5 as a whole to be soundly based.