

ENVIRONMENT AGENCY REPRESENTATION TO MATTERS ISSUES AND QUESTIONS – EXAMINATION OF THE TELFORD AND WREKIN LOCAL PLAN REVIEW

Representor: Environment Agency

Contact: Mark Davies (Planning Specialist)

Representor ID: E126,

Date: 20 January 2026

I refer to the Matters, Issues and Questions. We appreciate that all questions should be answered by the Council, but we provide some cross reference to our previous comments, in response to a couple of key issues relevant to points made in our earlier representations, to assist decision making.

Matter 6 – Development Management Policies

The below rates to questions under Matter 6 – Development Management Policies:

Issue 3

Policy CC4 – Water re-use, conservation, efficiency and quality

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

With regard to **water efficiency**, our statement of common ground (dated 12 September 2025) agreed an amendment to be made to point 2 of the policy – to change 110l/p/d to **100l/p/d**. Suggested modification to supporting text in 6.30 was also proposed. Our statement of common ground provides detail on the evidence, reasoning and justification for this, including with reference to viability considerations (see SOCG Annex A, EA comment).

Additional Evidence: Other plans are responding to this similarly nationally e.g. South Oxfordshire and Vale of White Horse Joint local plan is currently at examination. The publication version has the following policy. The ‘Water Efficiency Topic Paper’ that goes with that explains the situation. Their conclusion being - Given the strong local evidence of, amongst other things, serious water stress in our districts, and in conjunction with the Future Homes Hub recommendations actively advising the government for tighter standards the requirement for of no more than 100 litres per person per day as set out by policy CE7 in the JLP is considered entirely justified. It is further justified by the viability assessment outcomes which demonstrate the costs of achieving this standard still leads to viable schemes.

References: [Water Efficiency Topic Paper](#), and [Policy CE7 southandvale.gov.uk/app/uploads/2024/12/CSD01-Joint-Local-Plan-2041-Publication-Version.pdf](#)

For information, the latest draft NPPF consultation (December 2025) also has useful text:

“PM13: Setting standards 1. Quantitative standards set through development plan policies should be limited to infrastructure provision...Such standards should: a. Be justified, drawing upon relevant evidence of local characteristics and needs... Evidence in support of standards

should be proportionate, ..., especially where relevant national standards already exist; b. Not cover matters which are already addressed by Building Regulations, other than in relation to: ...
ii. **water efficiency**, for which it may be appropriate to apply the tighter Building Regulations optional requirement where justified, or exceptionally **a more stringent local standard in areas of serious water stress**".

Issue 9

Policy ML5 – Land contamination

154. Do the stated purposes of policy ML5 need to include protection of Controlled waters, to be consistent with national policy?

We would draw your attention to our statement of common ground. This presents amendments to 14.41 and point 2 within Policy ML5. 14.41 - The purpose of Policy ML5 is to protect **controlled waters**, the health and wellbeing of existing and future occupiers and, at the same time, to make effective use of land and buildings consistent with the NPPF.

155. To be effective, does the policy need to include a requirement to remediate and subsequently monitor contaminated land?

Our statement of common ground and previous representations advised that the policy could be stronger and would be more effective if it secured appropriate remediation of sites (this could include verification and monitoring of, where necessary) where contamination is present.

156. Is the meaning of the first sentence in paragraph 14.48 clear and unambiguous?

We would draw your attention to our statement of common ground. To improve 14.48, we suggested that the text should state "In some instances further site investigation may be required before planning permission can be granted". Rather than "Planning permission will only be granted subject to conditions requiring a site investigation, assessment and agreed remedial measures before any development takes place ...". This amendment was agreed and we feel it would make this section of the plan effective.

Yours faithfully,

M. Davies

Mark Davies (Planning Specialist)