

Further statement in response to Matter 6, Issue 3, Qu 96 (MIQs)

This statement is supplemental to our original submission and comments on Policies CC4 and CC5.

1.1 Since the original representations, the Strine Internal Drainage Board (IDB) has undertaken investigations into potential drainage solutions to address the requirements of policies relating to water reuse, conservation efficiency and water quality (CC4), together with flood risk management and sustainable drainage systems (CC5). An integrated approach to addressing both water scarcity and flood risk is considered essential to enabling development in northern Telford, and in particular to enable the effectiveness and soundness of Policies CC5 and HO2. In this regard, the Strine Internal Drainage Board is of the view that the provision of significant strategic drainage infrastructure will be necessary in order to secure sustainable and viable development.

1.2 In collaboration with Cranfield University, the Strine IDB is exploring strategic, catchment-scale approaches to water management*. The objective is to facilitate access to high-flow water for non-public water supply abstractors and the efficient use of land for housing on development sites, whilst moderating peak flows to reduce downstream flood risk and addressing low-flow conditions within the river system. Current modelling indicates that suburban expansion in the sustainable community locations increases peak discharges by an average of 4%, rising to up to 22% during significant rainfall events, and reduces base-flow stability by an average of 2%, with reductions of up to 7%.

1.3 One of the solutions currently under consideration by the board is the provision of large-scale attenuation through for example a balancing pool on the Crow Brook. The Crow Brook site offers the potential to deliver a multi-functional green infrastructure asset capable of attenuating and improving the quality of urban surface water runoff and highway drainage through the integration of a constructed wetland design. The proposed approach could contribute positively to the delivery of Biodiversity Net Gain through the creation and enhancement of priority habitats, ecological connectivity, and help address low flow issues in the Strine. In addition, the site could provide accessible green space, supporting wider green infrastructure objectives, and contributing to the effectiveness of Policies NE1, NE3, NE4, NE5 and C14. Its location offers a strategically well-connected asset in close proximity to the key development sites.

1.4 These comments are equally relevant in response to Matter 5, Issue 2, Qu 53 (MIQs). We do not believe that the impacts of growth planned in the SCs on infrastructure and flood risk, individually and cumulatively have been assessed sufficiently.

1.5 Whilst we note and support the additional provisions inserted in the wording of Policy CC5 by the Council in its Submission version of the Draft Plan, we would strongly suggest the language of Para 1.d. of the Policy be amended to read:

“Investigation of the capacity of existing drainage assets serving a site must be undertaken prior to finalisation and agreement of any relevant Masterplan, including detailed plans for the construction, adoption and maintenance of attenuation assets”.

(Modelling land and water interactions in the Strine Catchment to assess urban, agricultural and environmental trade-offs. Prof Jerry Knox, Azizullah Jahish, Dr Andrea Momblanch, Prof Ian Holman and Dr Bob Grabowski. Cranfield University).*

(529 words)