

Your ref: R24/0111  
Our ref: WCC003088/FRM/MB/001  
Your letter received: 02/09/2024



## SENT BY EMAIL

Ms Nicola Smith  
Head of Growth and Investment  
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## FAO Ella Casey

28 February 2024

Dear Ms Smith

**PROPOSAL:**            **Redevelopment of the former football pitch and tennis courts associated with the adjacent employment use, including demolition of the existing pavilion and all other remaining structures and enclosures relating to the previous use of the site; and the erection of 134 dwellings, accesses, landscaping, parking, drainage features and associated works**

**LOCATION:**            **Land North of Rounds Gardens, Rugby**

Warwickshire County Council as the Lead Local Flood Authority (LLFA) has reviewed the application which was received on the 09 February 2024. Based on the information submitted the LLFA currently recommends **objects** to the development based on the following reasons.

### Reason

The information submitted with this application does not comply with the requirements set out in the National Planning Policy Framework<sup>i</sup> (NPPF) and supporting Flood Risk & Coastal Change guidance<sup>ii</sup>. Specifically:

- The Flood Risk Assessment may be considered insufficient in assessing the flood risk to or from the proposed development.

The submitted information does not therefore allow a suitable assessment of the proposed development, considering flood risk and surface water drainage matters.

### Overcoming our objection

You can overcome our objection by submitting further information which is detailed below. This information should provide a suitable assessment of the flood risk both to and from the development to ensure the site will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application.

At the 'full' planning stage proposals for surface water drainage should be well developed and this should be reflected in the level of detail provided. A surface water drainage scheme should be provided



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based on SuDS principles demonstrating how the development attenuates surface water runoff, improves water quality and provides amenity and biodiversity. This should be supported by network level calculations demonstrating the performance of the system.

Given the above, the following comments are made and further information required is outlined. This forms the basis of our current objection:

1. The LLFA note a discharge rate of 25.5 is proposed from the development, comprised of flows entering the development from outside of the red line boundary and from the development itself. This is based on the site area of 5.1ha discharging at 5l/s/ha to the surface water sewer. All development should discharge at the greenfield runoff rate, and whilst the complexity of the site may warrant a degree of pragmatism from the LLFA, the LLFA is of the opinion that further consideration is needed. Namely the LLFA is concerned that post development discharge rates may be higher than the predevelopment scenario and that further consideration should be given to reducing the discharge rate from the site and justification of the approach taken provided.
2. The LLFA acknowledges that ground investigations have been undertaken in the vicinity of the proposed storage basin. However insufficient information has been provided to draw a direct comparison between the depths/levels of the trial pits and the proposed basin. Given that the basin is proposed to be ~6m deep, the LLFA is concerned regarding the risk of groundwater ingress compromising the storage capacity of the basin. The LLFA therefore requires further clarity to demonstrate that the risks from groundwater have been appropriately assessed with regard to the proposed design.

We ask to be re-consulted with the results of any additional information. We will provide you with bespoke comments within 21 days of receiving formal reconsultation..

### Informative

- a) Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management. Sustainable Drainage Systems (SuDS) are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on-site as opposed to traditional drainage approaches which involve piping water off-site as quickly as possible.
- b) The LLFA does not consider oversized pipes or box culverts as sustainable drainage. Where such attenuation is considered necessary, this should be supplemented with suitable above ground features such as green roofs, rain-gardens and tree pits to provide water quality, amenity and biodiversity benefits.
- c) Reference is made to the LLFA's *Flood Risk Guidance for Development<sup>iii</sup>*. This was updated in June 2023 and provides further advice and guidance as to how surface water drainage proposals should be designed.

Yours sincerely

*Mark Banning*

Mark Banning  
Planning & Sustainable Drainage Engineer

cc: Sarah Feeney, Barbara Brown - Benn ED, New Bilton & Overslade ED

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Documents Reviewed:

05554/FRA/001 Flood Risk Assessment and Drainage Strategy Rev P0  
R9112-PJA-23-XX-DR-C-0120 External Levels (Sheet 1 of 4) Rev P1  
R9112-PJA-23-XX-DR-C-0121 External Levels (Sheet 2 of 4) Rev P1  
R9112-PJA-23-XX-DR-C-0122 External Levels (Sheet 3 of 4) Rev P1  
R9112-PJA-23-XX-DR-C-0123 External Levels (Sheet 4 of 4) Rev P1  
R9112-PJA-23-XX-DR-C-0128 Drainage Layout (Overview) Rev P1  
R9112-PJA-23-XX-DR-C-0124 Drainage Layout (Sheet 1 of 4) Rev P1  
R9112-PJA-23-XX-DR-C-0125 Drainage Layout (Sheet 2 of 4) Rev P1  
R9112-PJA-23-XX-DR-C-0126 Drainage Layout (Sheet 3 of 4) Rev P1  
R9112-PJA-23-XX-DR-C-0127 Drainage Layout (Sheet 4 of 4) Rev P1  
R9112-PJA-23-XX-DR-C-0129 Flood Exceedance Plan Rev P1  
R9112-PJA-23-XX-DR-C-0130 Surface Water Catchment Plan Rev P1  
R9112-PJA-23-XX-DR-A-3000 Site Location Plan Rev C01  
R9112-PJA-23-XX-DR-A-3001 Existing Site Plan Rev C01

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N.B. On 10th January 2023, the Defra published<sup>iv</sup> “the Review for implementation of Schedule 3 to the Flood & Water Management Act 2010;” this recommended implementation of Schedule 3 which the government has accepted. Warwickshire County Council will take on the role of the SuDS Approval Body (SAB), you can read more about this on our website which we will be updating periodically.

<https://www.warwickshire.gov.uk/severe-weather/planning-and-sustainable-drainage/2>

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<sup>i</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

<sup>ii</sup> <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

<sup>iii</sup> <https://api.warwickshire.gov.uk/documents/WCCC-453486374-170>

<sup>iv</sup> <https://www.gov.uk/government/publications/sustainable-drainage-systems-review>