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Our ref: WCC003605 R1/FRM/SL/002
Your letter received: 18/11/2025



SENT BY EMAIL

Ms Nicola Smith
Head of Growth and Investment
Rugby Borough Council
Town Hall
Evreux Way
Rugby CV21 2RR

Flood Risk Management
Warwickshire County Council
Shire Hall
Warwick
Warwickshire
CV34 4RL
Tel: 01926 412982

FRMPlanning@warwickshire.gov.uk
www.warwickshire.gov.uk

FAO Lucy Davison

09 December 2025

Dear Ms Smith

PROPOSAL: Outline application with some matters reserved for the demolition of all buildings and the residential development of up to 160 dwellings, and creation of associated vehicular access off Rugby Road, pedestrian/cycle access points, parking, landscaping, drainage features, open space, childrens play area and associated infrastructure (all matters reserved except for vehicular access off Rugby Road)

LOCATION: Land South East Of, Rugby Road, Clifton Upon Dunsmore

Warwickshire County Council as the Lead Local Flood Authority (LLFA) has reviewed the application which was received on the 18 November 2025. Based on the information submitted the LLFA has **No Objection** subject to the following conditions.

Condition

The development shall be built in accordance with the approved Flood Risk Assessment and Drainage Strategy (as detailed below) and in particular the following mitigation measures detailed:

1. Limit the discharge rate generated by all rainfall events up to and including the 1 in 100 year (plus climate change) critical rain storm to the QBAR Greenfield runoff rate of 4.3l/s/ha.
2. Implementation of the proposed surface water drainage strategy including at minimum, attenuation basins and swales.

Reason

To secure the satisfactory drainage of the site in accordance with the agreed strategy, the NPPF and Local Planning Policy.

Condition

No development shall take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles has been submitted to and approved in writing by the Local Planning



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Authority in consultation with the LLFA. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme to be submitted shall:

1. Limit the discharge rate generated by all rainfall events up to and including the 1 in 100 year (plus an allowance for climate change) critical rain storm to the QBar Greenfield runoff rate of 4.3l/s/ha for the site in line with the approved Sustainable Drainage Statement (revision P03 dated 11.07.25).
2. Provide drawings / plans illustrating the proposed sustainable surface water drainage scheme. The strategy agreed to date may be treated as a minimum and further source control SuDS should be considered during the detailed design stages as part of a 'SuDS management train' approach to provide additional benefits and resilience within the design.
3. Provide detail drawings including cross sections, of proposed features such as attenuation features, and outfall structures. These should be feature-specific demonstrating that such the surface water drainage system(s) are designed in accordance with 'The SuDS Manual', CIRIA Report C753.
4. Provide detailed, network level calculations demonstrating the performance of the proposed system. This should include:
 - a. Suitable representation of the proposed drainage scheme, details of design criteria used, including consideration of a surcharged outfall due to the surface water flood extents at the point of outfall, and justification of such criteria where relevant.
 - b. Simulation of the network for a range of durations and return periods including the 1 in 2 year, 1 in 30 year and 1 in 100 year plus 40% climate change events
 - c. Results should demonstrate the performance of the drainage scheme including attenuation storage, flows in line with agreed discharge rates, potential flood volumes and network status. Results should be provided as a summary for each return period.
 - d. Evidence should be supported by a suitably labelled plan/schematic (including contributing areas) to allow suitable cross checking of calculations and the proposals.
5. Provide plans such as external levels plans, supporting the exceedance and overland flow routing information provided to date. Such overland flow routing should:
 - a. Demonstrate how runoff will be directed through the development without exposing properties to flood risk.
 - b. Consider property finished floor levels and thresholds in relation to exceedance flows. The LLFA recommend FFLs are set to a minimum of 150mm above surrounding ground levels.
 - c. Recognise that exceedance can occur during any storm event due to a number of factors therefore exceedance management should not rely on calculations demonstrating no flooding.

Reason

To prevent the increased risk of flooding; to improve and protect water quality; and to improve habitat and amenity;

Condition

No occupation shall take place until a Verification Report for the installed surface water drainage system for the site based on the approved Flood Risk Assessment (revision P03 dated July 2025) has been submitted in writing by a suitably qualified independent drainage engineer and approved in writing by the Local Planning Authority. The details shall include:

1. Demonstration that any departure from the agreed design is in keeping with the approved principles.
2. Any As-Built Drawings and accompanying photos.
3. Results of any performance testing undertaken as a part of the application process (if required / necessary).
4. Copies of any Statutory Approvals, such as Land Drainage Consent for Discharges etc.

5. Confirmation that the system is free from defects, damage and foreign objects.

Reason

To secure the satisfactory drainage of the site in accordance with the agreed strategy, the NPPF and Local Planning Policy.

Condition:

No occupation and subsequent use of the development shall take place until a detailed, site specific maintenance plan is provided to the LPA in consultation with the LLFA. Such maintenance plan should

1. Provide the name of the party responsible, including contact name, address, email address and phone number.
2. Include plans showing the locations of features requiring maintenance and how these should be accessed.
3. Provide details on how each surface water relevant feature shall be maintained and managed for the life time of the development.
4. Be of a nature to allow an operator, who has no prior knowledge of the scheme, to conduct the required routine maintenance.

Reason:

To ensure the future maintenance of the sustainable drainage structures.

Notice to LPA / Applicant regarding the conditions

Whilst the applicant has demonstrated the principles of an acceptable surface water management strategy at the site, further information is still required as detailed above.

The applicant may prefer to provide these additional details at a later date during the detailed design stage and therefore we have recommended an appropriate pre-commencement condition to ensure that these details will be provided for review and approval by the LPA and LLFA before the development commences.

Alternatively, the applicant may wish to avoid any pre-commencement conditions therefore the information set out above should be provided at this stage prior to the determination of the planning application. Subject to the approval of such details, the LLFA would subsequently seek the agreed plans to be included within any 'built in accordance with' type condition.

Informatives for the next stage of design

Section 23 of the Land Drainage Act 1991 requires that before the erection or alteration of any obstruction to the flow in an ordinary watercourse, a written consent is obtained from the Lead Local Flood Authority (LLFA) for the area. These obstructions include, but are not limited to; culverts, mill dam, weir or like obstruction, or other similar structures. Further information on how to obtain Ordinary Watercourse Land Drainage Consent from Warwickshire County Council can be found [here](#).

As outlined within the condition, the strategy should be treated as a minimum at this stage of the design. Further consideration should be given during the next stage of the design to incorporate additional, localised source control SuDS such as green roofs, rain-gardens and tree pits as part of a 'SuDS management train' approach to provide water quality, amenity and bio-diversity benefits and increase the resilience within the design. Reference is also made to our *Flood Risk Guidance for Development* (updated June 2023) with more details and examples of SuDS which can be incorporated at later stages of design.

At the 'discharge of condition' stage proposals for surface water drainage should be approaching a level of detail suitable for tender or construction. Documentation should show the drainage scheme including SuDS features, specific details (e.g. standard details or cross sections) and demonstrate the performance and of the system through calculations and exceedance management respectively. Such scheme should be in line with the original planning application/permission and where significant changes are made, justification should be provided.

Yours sincerely

Sophie Lynes

Sophie Lynes
Flood Risk Management Engineer

cc: Adrian Warwick - Fosse

Approved Documents:

- WRC-BWB-ZZ-XX-T-W-0004_Response to LLFA
 - Topographical Survey Drawing Number 53046_T Revision 1
 - Flood Risk Assessment Revision P03 dated 31 July 2025
 - Land Use and Access Parameter Plan Drawing Number SK-02 Revision G
 - Location Plan Drawing Number P10-001 Revision E
 - Sustainable Drainage Statement Revision P03 dated 11 July 2025
 - Planning Statement dated June 2025
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N.B. On 10th January 2023, the Defra publishedⁱⁱ "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>

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

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