

Job Name: Bath Road, Warminster

Client Greatworth

Date: 05 2026

Job N^o: IMA-20-058

Covering Note in Response to LLFA comments dated 17/02/2026

1 Introduction

- 1.1 This covering letter has been written in response to LLFA comments received on 17/02/2026 and noted below. The Drainage statement has been updated to suit the responses noted below:

LLFA Comments

Recommendation

Following a review of the information provided, the LLFA have no comments on conditions 9, 10, 12, 13 & 16.

Condition 15 cannot be discharged until the following information is submitted and accepted by the LLFA:

- a) Surface Water Discharge: Wiltshire Council Betterment Policy:

The applicant must clarify the sewer type that surface water will be disposed to. The LLFA will not accept flows being discharged to a highway sewer.

IMA Comments

As noted in section 3.2 of the drainage statement existing highway manholes are located within Bath Road. From a site inspection the highway drainage appears to discharge into a surface water drainage system for the new residential development to the southwest of the development site. Our proposals are to therefore provide a connection into the existing Highway manhole, subject to a S102 application.

Wiltshire Highways have been contacted regarding a possible connection into the existing Highway manhole under a Section 102 application and there most recent correspondence can be found within Appendix E. A Section 102 will be subject to their requirements.

We understand from correspondence with Wessex Water that the surface water drainage that discharges to the west of the new roundabout (for the new housing development) will be adopted under a Section 104 agreement by Leep Networks as a NAV.

We have made further contact with Leep Networks and they have provided indicative plans of drainage located to the west of the existing roundabout. Refer to Appendix E for Leep Network correspondence. Asset maps will only be available once the drainage has been formally adopted.

LLFA Comments

It is noted the applicant in Section 3.2.6 of the Condition 15,16 - Drainage Statement (Part 1) that “it is noted that modern flow restriction devices are now able to restrict flows to as low as 2l/s without introducing additional risk of blockage, therefore, flows for all storm events will be restricted to a maximum 2l/s subject to consent from the Highway authority”.

In the LLFA’s experience, flow can be restricted to 1l/s without increasing the risk of blockages, with an appropriate maintenance regime.

Noting the greenfield rates at the site, the LLFA accepts it is not feasible for the applicant to achieve betterment in line with Wiltshire Council’s Betterment Policy, however the applicant must demonstrate that the discharge rate is restricted to as low as possible.

IMA Comments

A discharge rate of 2l/s was previously accepted in a previous approved drainage statement. However, we have reduced the discharge rate to 1.5l/s for all storms up to and including the 1:100 + 45% climate change event. The drainage strategy utilises SuDS and an attenuation tank to provide attenuation. This is the minimum achievable discharge rate for the site within the site constraints.

LLFA Comments

- b) National Standards for SuDS: Standard 3: management of extreme rainfall and flooding:

It is noted the applicant has provided exceedance routes along the highway within drawing 503, however further detail is required.

The applicant must provide overland exceedance routes across the extent of the site, not just along highways, to demonstrate there is no increased flood risk to people or property as a result of the development.

Additionally, it is noted the roundabout on Bath Road to the south of the site is situated in Flood Zone 3. To prevent increasing flood risk on the highway, the applicant must demonstrate how exceedance will be managed onsite, without flowing onto the highway.

IMA Comments

Drawing 503 has been updated to show flow exceedance routes for the site including the dwelling driveways. This demonstrates there is no increased flood risk to people or property. The drainage network has been designed to accommodate the 1:100 year + 45% climate change event and is restricted to a low rate of 1.5l/s. Flows will be directed along the access road where they will be collected by road gullies. The current design therefore provides a betterment over the existing situation due to the allowance for climate change.

LLFA Comments

- c) National Standards for SuDS: Standard 2: interception:

The applicant must provide calculations to demonstrate that the runoff from each positively drained surface, for at least 5mm of rainfall, is either collected for use,

infiltrated into the ground, or else captured, conveyed and stored within SuDS features, in accordance with Standard 2 of the National Standards for SuDS.

In accordance with the National standards for SuDs the two raingardens have been sized to provide 20% of the catchment area to allow for water quality treatment. Please also refer to the NNAMMS Report.

- d) National Standards for SuDS: Standard 4: water quality: The applicant is required to submit calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment to mitigate pollution risk.

IMA Comments

A Water quality section has been provided within Section 4 of the report.

LLFA Comments

- e) National Standards for SuDS: Standard 5: amenity & Standard 6: biodiversity: AtkinsRéalis - Baseline / Référence It is noted the applicant has proposed permeable paving and an attenuation tank, however to enhance the amenity value and potentially biodiversity benefit of the development, the applicant must outline why blue/green SuDS features cannot be implemented at the development. The LLFA would encourage the applicant to consider proposing blue/green SuDS in adherence to the National Standards for SuDS.

IMA Comments

We have provided Blue/green SuDS in the form of Raingardens below Plot 1 and 9. We have considered the use of Swales adjacent to the access road however these have been discounted due to the road gradients/levels/available space.

LLFA Comments

- f) National Standards for SuDS: Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity: It is noted the applicant has provided a maintenance plan, however further detail is required outlining the frequency of each maintenance activity undertaken and who is responsible.

IMA Comments

Further information has now been provided within Section 6.1.6 of the report providing frequency of maintenance activities for the individual SuDs.

LLFA Comments

- g) National Standards for SuDS: Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity: The applicant is required to provide a construction management plan to demonstrate how flood risk to people & property, and pollution to groundwater & watercourses will be mitigated throughout construction.

IMA Comments

We would suggest that the construction management plan could be undertaken as a pre-commencement condition by the contractor.