

Job Name: Bath Road, Warminster

Client Greatworth

Date: 26th August 2026

Job N^o: IMA-20-058

Covering Note in Response to LLFA comments dated 29/05/2026

1 Introduction

- 1.1 This covering letter has been written in response to LLFA comments received on 29/05/2026 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:

Assessment It should be noted that our comments below are reliant on the accuracy and completeness of all documents submitted by the applicant, we do not take any responsibility for incorrect data or interpretation made by the authors.

LLFA Comment

It's noted in Appendix F of the Condition 15,16 - Drainage Statement - Part 2 that infiltration will not be a feasible means of surface water discharge. The LLFA accept that the infiltration rate calculated suggests that the rates are not appropriate for an infiltrating drainage strategy, however we would note the infiltrating testing is not compliant to BRE365 methodology, notably 3 tests at each trial pit, and assessing over the course of 1440 minutes (National Standards for SuDS Standard 3: management of extreme rainfall and flooding, paragraph 3.14).

IMA Response

Comment is noted and with reference to the Forge Environmental Management Ltd In-situ infiltration and percolation Testing report dated 14th June 2023 in Appendix F of the Drainage Statement it is noted on Page 2 that in terms of the BRE 365 - Infiltration Results

'Attached are copies of the infiltration record sheets that unfortunately, as summarised in table below, show the soils are not to be suitable for a soakaway drainage solution as none of the tests were completed in the time available'

'Also based upon the rate the pits were draining none of them would drain within 24 hours, which is a requirement for a soakaway design. Although, the soils did allow some water to infiltrate, which based upon the surface area of the test pits and

recorded level drop of infiltration rates were within the region of 2×10^{-7} m/s to 6×10^{-7} m/s'

Therefore given the insitu testing completed as witnessed and recorded by Forge Environmental Management Ltd as included in the FRA report the first test clearly failed to infiltrate into the ground within the prescribed time for soakaway design solution to be considered of 1440 minutes being 24 hours (National Standards for SuDS Standard 3: management of extreme rainfall and flooding, paragraph 3.14) the test were abandoned as no viable.

Indeed 3.15 indicates that Discharge of runoff using point infiltration features shall not be fully relied on to discharge all runoff where the rates of infiltration are less than 1×10^{-6} m/s.

LLFA Comment

The applicant should note, the LLFA will not accept surface water flows being discharged into a highways drain. The applicant must ensure the drainage strategy is applying the surface water disposal hierarchy, outlined in the National Standards for SuDS: Standard 1: runoff destinations, paragraph 1.2.

IMA Response

The standard indicates differing levels of hierarchy can be considered subject to site constraints being as defined below.

1.2 Runoff from the development shall be discharged to the following final destinations, to the maximum extent practicable, in accordance with the below hierarchy:

priority 1: collected for non-potable use

priority 2: infiltrated to ground

priority 3: discharged to an above ground surface water body

priority 4: discharged to a surface water sewer, or another piped surface water drainage system

priority 5: discharged to a combined sewer

As laid out in the Drainage Statement Soakaways will not function and there are no available groundwater bodies local to the site to discharge into and hence the option proposed is to utilise attenuation across the development drainage system and an attenuated discharge rate to a surface water sewer or other piped surface water drainage system.

The developer proposes that they will enter into a Section 102 Agreement under the 1991 Water Industries Act.

It was noted in the previous consultation response that the developer has been in contact with Wiltshire Highways, Wessex Water and the LEEP company controlling downstream sewer systems for copies of their existing network and requirements and has also recently undertaken CCTV surveys of the recently installed drainage system on the Bath Road Roundabout, connecting sewers to the Lepp system with a view to confirming the existing condition of these sewers and suitability to take a connection from the new 9 unit development site of an attenuated 1.5l/s flow. The down stream

sewers being of suitable size (600mm) and in a good condition as to be considered as part of the S102 Agreement application process and supporting information when applied for by the developer - This would be post condition sign off as part of the development progression and future legal agreements (This could be conditioned) Copies of the CCTV sewer survey are included in Appendix H of the Drainage Statement.

It is noted from the 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 so the Section 102 Agreement sewers will only be the upstream two lengths of sewers from the roundabout with new connection from the proposed development once S102 Agreement applied for.

LLFA Comment

The applicant states in section 3.2.6 of the Condition 15,16 - Drainage Statement - Part 1 that flows will be restricted to 2l/s to mitigate risk of blockages. In the LLFA's experience, flows can be restricted to 1l/s with appropriate maintenance. Noting the greenfield rate, while betterment will not be realistically achievable, the applicant will be required to restrict flows to 1l/s

IMA Response

As previously noted a discharge rate of 2l/s was originally indicated in the Drainage Statement dated 24th October 2024 Ref DS 1-3 to restrict risk of blockages which was subsequently accepted and approved at Outline Planning Approval PL/2021/10503.

It is noted that the LLFA commented at the time that a reduced discharge rate should be achieved if possible and with the current application we have now reviewed this and sought to do so as previously indicated and we have reduced this to a 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 features and an attenuation tank to provide attenuation flows to this discharge rate. This is the minimum achievable discharge rate given the site constraints and below that previously accepted in line with the decision notice.

LLFA Comment

The applicant is required to provide further information regarding Condition 15. The applicant is required to demonstrate greater adherence to the National Standards for SuDS, and restrict the discharge rate to as low as feasible possible.

IMA Response

Please note the above comment and that the provision of blue/green SuDS in the form of Raingardens below Plot 1 and 9 combined with attenuated permeable paving around the plots. We have also noted the use of 200l Rainwater Butts be utilised on Rainwater Down Pipes. We have considered the use of Swales adjacent to the access road however these have been discounted due to the road gradients/levels across the site not complying with guidance.

If we introduce the use of Rainwater Butts on garages as well as the individual plots this will provide an additional attenuated volume of water for re-use of a maximum 3,600l across the development.

LLFA Comment

It's noted in section 4.2.3 of the Condition 15,16 - Drainage Statement - Part 1 that Wessex Water have confirmed they will accept foul flows into Roman Way foul sewer.

IMA Response

Comment noted as accepted

LLFA RECOMMENDATIONS

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. It is noted the applicant points towards Appendix E, however it is not clear there is an agreement in place for acceptance. The applicant must also confirm the highways drain connects into a surface water sewer.

IMA responses to recommendation in red for ease of reference

Please refer to notes above and it is the intention of the developer to enter into a S102 Agreement with either Wessex Water or Leep to adopt the existing highway sewers as public sewers under the 1991 Water Industry Act and to this end they have subsequently now undertaken the Sewer Surveys and CCTV of the downstream sewers (See Appendix H) taking the attenuated discharge from the 9 unit development. The legal process will be commenced once developer progresses with the site with either of these companies (This could be conditioned)

The applicant has provided infiltration testing results, but this is not compliant with BRE365 testing methodology.

IMA Response

Please refer to above notes and Forge Environmental Management Ltd In-situ infiltration and percolation Testing report dated 14th June 2023 in Appendix F of the Drainage Statement indicating failure of original test pits to drain in the required 24 hour period and hence compliance with BRE365 in terms of Soakaways proven not to be viable and testing abandoned.

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".

Previously the applicant had stated flows will be restricted to 2l/s. The applicant now proposes 1.5l/s discharge into the highways sewer. This is not acceptable to the LLFA as 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 1l/s, and that the surface water disposal hierarchy (Standard 1) is complied with.

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

The roundabout on Bath Road to the south of the site is situated in Flood Zone 3.

The applicant has stated gullies will intercept overland flow towards the highway, however the applicant must outline why a filter drain across the extent of the road is not preferred to more effectively mitigate increasing flood risk on the highway.

Infiltration has proven not to be a viable option for surface water drainage given the soil type by Soakage testing to BRE 365 which proved the infiltration rate failed to comply with 24 hour drain down time and were within the region of 2×10^{-7} m/s to 6×10^{-7} m/s'

The National Standard indicating under 3.15 that Discharge of runoff using point infiltration features shall not be fully relied on to discharge all runoff where the rates of infiltration are less than 1×10^{-6} m/s.

We have noted that the surface water drainage system is therefore in accordance with the National Standards for SUDS paragraph 3.12 as it incorporates attenuation at multiple points across the development, rather than a single attenuation feature located prior to the point of discharge.

b) National Standards for SuDS: Standard 2: interception

See note above

It's noted the applicant has stated their proposals are compliant with Standard 2, however 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.

d) National Standards for SuDS: Standard 5: amenity & Standard 6: biodiversity:

It is noted the applicant has proposed raingardens to enhance the amenity value and potentially biodiversity benefit of the development. The applicant must provide detailed cross & long section drawings of the proposed raingardens.

Please see detail added to Drainage Strategy Plan in Appendix B

Also as previously noted in earlier correspondence 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.

e) National Standards for SuDS: Standard 7: design of drainage for construction, operation, maintenance, decommissioning and structural integrity:

We can agree with the applicant that the construction management plan can be provided as a pre-commencement conditions. The CMP must demonstrate how flood risk to people & property, and pollution to groundwater & watercourses will be mitigated throughout construction.

Noted