



Notice of Meeting of

**SCRUTINY COMMITTEE - CLIMATE AND PLACE**

**Wednesday, 20 March 2024 at 10.00 am**

**Sedgemoor Room, Bridgwater House, King Square, Bridgwater, TA6 3AR**

To: The members of the Scrutiny Committee - Climate and Place

Chair: Councillor Martin Dimery  
Vice-chair: Councillor Adam Boyden

Councillor Steve Ashton	Councillor Alan Bradford
Councillor Bente Height	Councillor Edric Hobbs
Councillor Henry Hobhouse	Councillor Marcus Kravis
Councillor Dave Mansell	Councillor Matthew Martin
Councillor Harry Munt	Councillor Tom Power
Councillor Alex Wiltshire	

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For further information about the meeting, including how to join the meeting virtually, please contact Democratic Services [democraticservicesteam@somerset.gov.uk](mailto:democraticservicesteam@somerset.gov.uk).

All members of the public are welcome to attend our meetings and ask questions or make a statement **by giving advance notice** in writing or by e-mail to the Monitoring Officer at email: [democraticservicesteam@somerset.gov.uk](mailto:democraticservicesteam@somerset.gov.uk) by **5pm on Thursday, 14 March 2024**.

This meeting will be open to the public and press, subject to the passing of any resolution under the Local Government Act 1972, Schedule 12A: Access to Information.

The meeting will be webcast and an audio recording made.

Issued by (the Proper Officer) on Tuesday, 12 March 2024

# AGENDA

**Scrutiny Committee - Climate and Place - 10.00 am Wednesday, 20 March 2024**

**Public Guidance Notes contained in Agenda Annexe (Pages 7 - 8)**

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### **1 Apologies for Absence**

To receive any apologies for absence.

### **2 Declarations of Interest**

To receive and note any declarations of interests in respect of any matters included on the agenda for consideration at this meeting.

(The other registrable interests of Councillors of Somerset Council, arising from membership of City, Town or Parish Councils and other Local Authorities will automatically be recorded in the minutes: [City, Town & Parish Twin Hatters - Somerset Councillors 2023](#) )

### **3 Minutes from the Previous Meeting**

To approve the minutes from the previous meeting - to follow

#### **4 Public Question Time**

The Chair to advise the Committee of any items on which members of the public have requested to speak and advise those members of the public present of the details of the Council's public participation scheme.

For those members of the public who have submitted any questions or statements, please note, a three minute time limit applies to each speaker and you will be asked to speak before Councillors debate the issue.

We are now live webcasting most of our committee meetings and you are welcome to view and listen to the discussion. The link to each webcast will be available on the meeting webpage, please see details under 'click here to join online meeting'.

#### **5 Scrutiny Climate and Place Work Programme (Pages 9 - 18)**

To receive an update from the Service Manager, Governance Scrutiny. To assist the discussion, the following documents are attached: -

- (a) Outline of Approach to Forward Plan for Climate and Place Scrutiny
- (b) The Committee's Outcome Tracker

Please use the following link to view the latest Somerset Council Executive Forward Plan of planned key decisions that have been published on the Council's website:

[Somerset Council Executive Forward Plan](#)

#### **6 Annual report on the Trading Standards Service (Pages 19 - 28)**

To note the report.

#### **7 Section 19 Reports from 2020-2022 Flood Events (Pages 29 - 160)**

Covering report to follow

#### **8 Preliminary Report Section 19s 2023 Flood Events (Pages 161 - 176)**

Covering report to follow



**9 Somerset Energy Investment Plan - Report of the Task and Finish Group**

To follow

**10 2023-24 Budget Monitoring Report – Month 10 (Pages 177 - 184)**

To consider and comment on the report.

**11 Items for Information (Pages 185 - 188)**

This is a standing agenda item and refers to information that has been requested by the committee, that cover the Committee's policy areas.

Since the last meeting the following information has been supplied

*a) Background information on regeneration and UK Shared Prosperity Fund.*

If Committee members have any questions or comments on this information, please contact the Committee Administrator on [democraticservicesteam@somerset.gov.uk](mailto:democraticservicesteam@somerset.gov.uk) in the first instance.

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## Guidance notes for the meeting

### Council Public Meetings

The legislation that governs Council meetings requires that committee meetings are held face-to-face. The requirement is for members of the committee and key supporting officers (report authors and statutory officers) to attend in person, along with some provision for any public speakers. Provision will be made wherever possible for those who do not need to attend in person including the public and press who wish to view the meeting to be able to do so virtually.

#### Inspection of Papers

Any person wishing to inspect minutes, reports, or the background papers for any item on the agenda should contact Democratic Services at

[democraticserviceteam@somerset.gov.uk](mailto:democraticserviceteam@somerset.gov.uk) or telephone 01823 357628.

They can also be accessed via the council's website on [Committee structure - Modern Council \(somerset.gov.uk\)](#)

### Members' Code of Conduct requirements

When considering the declaration of interests and their actions as a councillor, Members are reminded of the requirements of the Members' Code of Conduct and the underpinning Principles of Public Life: Honesty; Integrity; Selflessness; Objectivity; Accountability; Openness; Leadership. The Code of Conduct can be viewed at: [Code of Conduct](#)

### Minutes of the Meeting

Details of the issues discussed, and recommendations made at the meeting will be set out in the minutes, which the Committee will be asked to approve as a correct record at its next meeting.

### Public Question Time

If you wish to speak or ask a question about any matter on the Committee's agenda please contact Democratic Services by 5pm providing 3 clear working days before the meeting. (for example, for a meeting being held on a Wednesday, the deadline will be 5pm on the Thursday prior to the meeting) Email

[democraticserviceteam@somerset.gov.uk](mailto:democraticserviceteam@somerset.gov.uk) or telephone 01823 357628.

Members of public wishing to speak or ask a question will need to attend in person or if unable can submit their question or statement in writing for an officer to read out, or alternatively can attend the meeting online.

A 20-minute time slot for Public Question Time is set aside near the beginning of the meeting, after the minutes of the previous meeting have been agreed. Each speaker will have 3 minutes to address the committee.

You must direct your questions and comments through the Chair. You may not take a direct part in the debate. The Chair will decide when public participation is to finish. If an item on the agenda is contentious, with many people wishing to attend the meeting, a representative should be nominated to present the views of a group.

### **Meeting Etiquette for participants**

Only speak when invited to do so by the Chair.

Mute your microphone when you are not talking.

Switch off video if you are not speaking.

Speak clearly (if you are not using video then please state your name)

If you're referring to a specific page, mention the page number.

There is a facility in Microsoft Teams under the ellipsis button called turn on live captions which provides subtitles on the screen.

### **Exclusion of Press & Public**

If when considering an item on the agenda, the Committee may consider it appropriate to pass a resolution under Section 100A (4) Schedule 12A of the Local Government Act 1972 that the press and public be excluded from the meeting on the basis that if they were present during the business to be transacted there would be a likelihood of disclosure of exempt information, as defined under the terms of the Act.

If there are members of the public and press listening to the open part of the meeting, then the Democratic Services Officer will, at the appropriate time, ask participants to leave the meeting when any exempt or confidential information is about to be discussed.

### **Recording of meetings**

The Council supports the principles of openness and transparency. It allows filming, recording, and taking photographs at its meetings that are open to the public - providing this is done in a non-disruptive manner. Members of the public may use Facebook and Twitter or other forms of social media to report on proceedings. No filming or recording may take place when the press and public are excluded for that part of the meeting.



**Somerset**  
Council

Somerset Council  
Climate and Place Scrutiny Committee  
– 20<sup>th</sup> March 2024

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## **Outline of Approach to Forward Plan for Climate and Place Scrutiny Committee**

Lead Officer: Mickey Green  
Executive Director: Mickey Green  
Author: Nichola Bown  
Contact Details: Nichola.Bown@somerset.gov.uk  
Executive Lead Member:  
Division / Local Member:

### **1. Summary**

- 1.1.** The creation of the new Somerset Council has produced an opportunity for Members and Officers to develop an innovative approach to identifying and agreeing future agenda items for consideration at Climate and Place Scrutiny Committees.
- 1.2.** This will enable the Climate and Place Leadership Team and the Members of the Scrutiny Committee to agree and flag issues of importance necessitating discussion.
- 1.3.** It is recommended that a formal Climate & Place (rolling 6 month) Forward Plan of strategic issues for consideration or information be published internally.

### **2. Issues for Consideration / Recommendations**

- 2.1.** Scrutiny Committee is asked to consider and respond to the proposed approach to the C&P Forward Plan.

### **3. Background**

- 3.1.** The creation of Somerset Council on the 1<sup>st</sup> April 2023 and the development of the new Climate and Place Directorate bringing a variety of new services together has resulted in a need for a new approach to governance.
- 3.2.** Both Members and Officers recognise the benefits of establishing a Forward Plan of upcoming issues for Committee consideration/information.

**3.3 Proposed Detail of Climate and Place Forward Plan**

March 2024	Dolores Riordan	Paul Hickson	Trading Standards	Progress Report from the Heart of the South West Trading Standards Service.
March 2024	Neil Ogilvie	Kirsty Larkins	S19 Flooding Reports	S19 reports on flooding in Chard (October 2021), Shepton Mallet (Oct 2020), Chard & Forton (Oct 2021) and Ilminster (Oct 2021)
March 2024	Neil Ogilvie	Kirsty Larkins	2023 Flooding preliminary report	Preliminary reports for May and September 2023 Flooding
March 2024	Mike Cowdell	Kirsty Larkins	Expansion of the collection of flexible plastics	Report will detail the trial areas, communication measures and outcomes – item for information only
March 2024	Christian Evans	Mickey Green	Finance	Finance update
June 2024	James Divall	Kirsty Larkins	Climate Vision document	Update on the draft Climate Vision document
June 2024	James Divall	Kirsty Larkins	Local Nature Recovery Strategy	Provision of information
June 2024	Christian Evans	Mickey Green	Finance	Finance update
June 2024	Sunita Mills	Mike O'Dowd-Jones	Bus Service Improvement Plan (currently awaiting information from DfT)	Somerset's Bus Service Improvement Plan (BSIP) originally created in Oct 2021 is due another review in-line with government requirements
June 2024	Sunita Mills	Mike O'Dowd-Jones	Local Transport Plan	To consider progress on the LTP and emerging policy proposals to advise planning and transport sub-committee
June 2024	James Divall	Kirsty Larkins	Future Climate/Ecology Vision/Strategy	Update on strategy refresh and collaborative approach

June 2024	James Divall	Kirsty Larkins	Biodiversity Net Gain	Trading and income-generating. Update
June 2024	Sunita Mills	Mike O'Dowd-Jones	Fleet purchase and utilisation review	Consider progress in reviewing and implementing controls for fleet purchase and utilisation and delivering agreed MTFP savings
June 2024	Sunita Mills	Mike O'Dowd-Jones	Active Travel Delivery	Review of progress in delivering Active Travel improvements
June 2024	Sunita Mills	Mike O'Dowd-Jones	Supported Bus Services Review and Bus Connectivity Assessment	Consider process for reviewing and consulting on how we meet our duties to meet a social need for transport in light of the financial emergency. Opportunity to discuss new DfT requirement for a 'bus connectivity assessment'
June 2024	James Gilgrist	Paul Hickson	LEP Integration	Examination of the evidence and emerging priorities and seek direction on priorities
September 2024	Andrew Turner	Mike O'Dowd-Jones	Maintenance Transformation Plan 23/24 & 24/25	New requirement from DfT to set out how uplift in maintenance funds for 23/24 and 24/25 financial years will be used

### 3.4 Issues to be Brought to Future Scrutiny Committees

Named Officer	Service Director	Subject	Issue	Comment
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Bev Norman	Mike O'Dowd-Jones	Road Safety	Increase in the number of killed or seriously injured (KSI) road users	A new Somerset Council Road Safety Strategy, aligned to the new Local Transport Plan being developed, will be brought to a future Scrutiny Committee
Alison Blom-Cooper	Paul Hickson	Planning	Development of Local Plan	The Local Plan has statutory consultation periods and these are the stages Scrutiny Committee will be invited to feed into the LP consultation. Member briefing sessions will be undertaken at various stages.
Sunita Mills	Mike O'Dowd-Jones	Highways Maintenance	New requirement from DfT to set out how uplift in maintenance funds (over next 11 years) will be used to transform road condition	Awaiting DfT Deadline
Andrew Turner	Mike O'Dowd-Jones	Highways Contracts	Update on effectiveness of new highways contracts following mobilisation stage and first two quarters of delivery	
Bev Norman	Mike O'Dowd-Jones	Parking Services	Update on delivery of the parking service following integration into unitary operation and more integrated approach with transport planning	Circa September 2024
James Gilgrist	Paul Hickson	LEP Integration	Review of draft strategy	Autumn 2024



**4. Consultations Undertaken**

**4.1** None required at this stage.

**5. Implications**

**5.1** At this stage there are no associated financial, equalities, health and wellbeing, climate change and sustainability or HR implications.

**6. Background papers**

**6.1** None

**Note:** For sight of individual background papers please contact the report author

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## Scrutiny Committee – Climate & Place - Outcome Tracker 2023 - 2024

Agenda item	Lead officer	Committee Request/Recommendation	Outcome	RAG Status
<b>17<sup>th</sup> May 2023</b>				
Approach to Climate and Place Scrutiny Committee	Jamie Jackson /Mickey Green	Members received a presentation on the principles of scrutiny and the approach being taken regarding scrutiny within the new Somerset Council, which would be reviewed after a year.		Awaiting Scrutiny Review 2024
Infrastructure and Transport: Highways Service Responsiveness Update	Mike O'Dowd-Jones	Members resolved to set up a task and finish group to review the Highways and Transport Services communication interfaces.		On Hold
Climate, Environment and Sustainability: EV Charging Update	Mike O'Dowd-Jones	The Committee was advised that the Council was looking at applying for additional funding from the Electric Vehicle Infrastructure (LEVI) fund in order to run a small scale Egully trial. The Egully enables the on-street charging of residential vehicles, where people do not have their own driveways, without trailing wires across pavements etc. After the trial they would then report back and develop a strategy based upon their findings.	An all-member briefing note will be issued following LEVI approval of the Stage 2 application.	Ongoing
<b>19<sup>th</sup> July 2023</b>				
Future Transport	Mike O'Dowd-Jones	The Committee was advised that a new Local Plan and Local Transport Plan will need to be in place by 2025. Members resolved that a Local Transport Plan Task & Finish Group be set up.		On Hold
Climate, Sustainability and Environment – Next Steps	Kirsty Larkins	Members received a report setting out the next steps of the Council's strategic approach to Climate, Environment and Sustainability, to ensure that the Council was committed to reducing carbon emissions, achieving Net Zero and supporting nature's recovery. Members resolved that a Climate Strategy Refresh Task	A Task and Finish group has been established and the first meeting will be held in April 2024. Date to be confirmed.	Ongoing

## Scrutiny Committee – Climate & Place - Outcome Tracker 2023 - 2024

		& Finish Group be set up.		
<b>20<sup>th</sup> September 2023</b>				
Approach to Local Plan and Statement of Community Involvement	Paul Hickson	<p>Members received a presentation on the development of a Local Plan and the Statement of Community Involvement (SCI) that was currently being developed and made the following recommendations to the Executive:</p> <ol style="list-style-type: none"> <li>1. That under the Pre-Applicant stage, paragraph 3.10 of the Statement of Community Involvement should be amended to encourage applicants to consult with their neighbours.</li> <li>2. That the Council should continue to serve both site notices and adjacent neighbour notifications and that the wording of 3.24 of the Statement of Community Involvement be amended to reflect this. The wording of the recommendation to the Executive to be delegated to the Executive Director – Climate &amp; Place in consultation with the Chair and circulated to the Committee.</li> <li>3. That a Climate Change Development Plan Document be created to advance the Council’s climate emergency objectives, in particular zero carbon energy standards, new developments and renewable energy generation siting. To be separate from the Local Plan and to an earlier time.</li> </ol>	<p>Recommendations 1 &amp; 2 – A response in the report to Executive stated that the pre-application stage should include consultation by applicants with the local community and that both site notices and neighbour notifications may be used to publicise an application.</p> <p>Recommendation 3 – The report to the Executive was amended and advised that:</p> <ul style="list-style-type: none"> <li>• As an initial estimate the production of a CCDPD may cost the Council at least a further £1m (evidence base, examination and additional staff resources).</li> <li>• The council does not have a statutory duty to produce a CCDPD.</li> <li>• Emerging policies for the Local Plan would gain further weight as it progresses through its production stages.</li> <li>• Scrutiny would have an opportunity to engage with the development of the</li> </ul>	<b>Complete</b>

## Scrutiny Committee – Climate & Place – Outcome Tracker 2023 – 2024

			<p>Local Plan through engagement on an ongoing basis and as part of the formal consultation process.</p> <ul style="list-style-type: none"> <li>• A Consultation and Engagement Plan is being developed which will consider how best to facilitate wider member engagement in the development of the Local Plan.</li> </ul>	
Task and Finish Group: Somerset Energy Plan	Kirsty Larkins	The Committee agreed to the request to set up a Somerset Energy Plan task and finish group which would be taking a fairly high-level approach to the subject.	The Task and Finish group work is complete and a Task and Finish report will be published at the meeting on 20th March 2024.	Complete
Award of Contracts for highway services	Mike O'Dowd-Jones	Members received details of the following 5 highways contracts that were to be considered by the Executive. A written response would be given on how long, under the contracts, a pot-hole repair would be guaranteed for.		Awaiting further information
<b>22<sup>nd</sup> November 2023</b>				
Uk Shared Prosperity Fund and Rural	Paul Hickson	A councillor requested more information in respect of the governance processes. The Impact of the fund distribution to communities would be covered in a fuller more detailed response to the councillor.	The information was emailed to the Councillor on 12 <sup>th</sup> January 2024, and will be shared as an information item at the meeting on 20 <sup>th</sup> March 2024.	Complete
Climate and Place Budget Monitoring Position Month 5	Christian Evans	The causes of the £800k climate overspend were questioned, which included the costs incurred as a result of the pay award in the waste collection service. It was questioned if there were full year impacts or if these were part year impacts and if this could be provided in		Awaiting further information

## Scrutiny Committee – Climate & Place – Outcome Tracker 2023 – 2024

		the next report.		
<b>17<sup>th</sup> January 2024</b>				
Forward Plan	Mickey Green/Jamie Jackson	Due to a publishing error the committee Outline of Approach to the Forward Plan report was not included in the agenda papers.	The Approach to the Forward Plan will be published for the meeting on the 20 <sup>th</sup> March 2024.	Complete
Minutes of the previous meeting	Kirsty Larkins	Members voted unanimously in favour of an additional meeting to look at Water Quality in Somerset.	A Special ‘Water Quality meeting in Somerset’ Scrutiny meeting will be held on 26 <sup>th</sup> April 2024.	Complete
Somerset Rivers Authority Draft Strategy and Flood Action Plan	David Mitchell	Members considered the item and sought clarity on how the SRA is funded.		Awaiting further information
Flex Collect Update	Mike Cowdell	Members considered the item and requested more information about what recycled flex plastics are used for.		Awaiting further information

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Completed	Action complete and will be removed from tracker for next meeting
Pending	Action on-going or plans in place to address.
Incomplete	No action currently in place with a minimum of 3 months since action agreed.

Somerset Council  
 Scrutiny Committee  
 – 20/3/2024



Trading Standards Update  
 Lead Officer: Dolores Riordan  
 Author: Dolores Riordan  
 Contact Details: dolores.riordan@devon.gov.uk  
 Executive Lead Member: Ros Wyke  
 Division / Local Member:

**1. Summary**

- 1.1.** Heart of the South West Trading Standards is a commissioned service by Somerset Council, Devon County Council (DCC), Plymouth City Council and Torbay Council and the remit is to protect consumers, support business communities and contribute to economic growth and resilience. It is hosted by DCC and has a representative Joint Service Review Panel (JSRP) who oversee performance and influence priorities. The JSRP consist of elected members and senior officers from each Council.
- 1.2.** The Service supports delivery of all four partner local authorities’ strategic goals. Although not identical, they can be grouped into a set of generic priorities expressed by four key outcomes which make up the Service Mission Statement:
  - 1. Economic growth is supported by ensuring a fair, responsible and competitive trading environment.
  - 2. Consumers, especially the more vulnerable, are protected and more confident; communities are safer, better informed and more fully engaged in the work of the Service.
  - 3. To help people live healthier lives by preventing harm, promoting individual health and supporting the creation of a healthier environment.
  - 4. To be recognised for innovation, excellent service and as a great place to work.
- 1.3.** We are also the delivery partner for the Heart of the South West Growth Hub which is the front door for business advice and signposting in the area and with DCC’s Business Support and Innovation Team (Economic Development) we provide business support programmes over various geographies.

**2. Trading Standards Issues for Consideration / Recommendations**

- 2.1.** Enforcement priorities are identified through an annual Strategic Assessment, which analyses the last three years of Service activity to identify key issues and likely trends. A law enforcement model of risk is then used to rank each service functional area by balancing threat and harm with the capabilities and resources of the joint Service. Threat factors assessed include reported physical harm, financial detriment and volume of complaints received. These are then prioritised and incorporated into a Control Strategy.

Our five priority areas for 2023/24 are:

- Scams.
- Doorstep crime and rogue trading.
- Animal health and welfare including disease control.
- Illicit tobacco and vapes.
- Food allergens and standards.

Intelligence has identified the same priorities for 24/25. Key cross-cutting priority for 2023/24 which receive intervention as required is the cost-of-living crisis and for next year it is e-crime and workforce issues.

### **3. Background**

- 3.1.** The Service operates from six offices, which are located in Barnstaple, Exeter, Kingsteignton, Plymouth, Torquay and Wellington. There are 0.03 Trading Standards Officers per 1,000 population and 0.54 Trading Standards Officers per 1,000 businesses. The TS service has 68 FTE staff. The revenue budget for TS is £2.16 million and we received an additional £543k last year in income generated from giving business advice or from government grants. Since the formation of the joint Service we have balanced the budget year on year and come in under spent at year end returning a proportional amount to each partner local authority.

### **4. Examples of Somerset work undertaken in Q1 – Q3 2023/2024**

#### **4.1. Supporting the Local Economy: Rural Business Surveillance and Support**

##### **Working Closer with the Animal and Plant Health Agency (APHA)**

The close working relationship continues between Trading Standards Officer's (TSO) and senior APHA vets. One of the positive outcomes of sharing intelligence and joint visits was to reduce the number of overdue TB tests in the Heart of the South West from over 100 down to single figures in the last 3 years. This approach enables a balance between supporting farmers, who are already under huge pressure, and enforcement action.

After working with APHA for two years, a farm in Somerset has finally had a clear TB test, allowing all restrictions to be lifted. Officers worked closely with them to get records straight, cattle identified and registered. He was put in touch with the farming support charity Farming Community Network and he is now able to use the online Cattle Tracing System. Officers attended the TB tests to give support and assist with cattle ID anomalies, as well as enforcing removal of TB reactors when needed. The farm is now clear to sell animals and the farmer has a positive outlook for the future.

##### **Rural Enforcement**

At the end of 2023, the Service took possession of a herd of cattle from a Somerset farm after being satisfied that they were likely to suffer if their circumstances did not change. The cattle are being cared for at an undisclosed location pending a court order to deal with their future and because of these ongoing proceedings, only limited information is being provided.

Taking animals into possession is not something that is undertaken lightly by Trading Standards or APHA and is rarely done due to the cost implications. It is also emotionally and physically challenging for all Officers and the farmer involved. However, the circumstances in this case warranted this course of action as advice and warnings had gone unheeded. TSO's ensured the appropriate welfare and safeguarding checks were in place for the farmer as a result of this action.



### **Monitoring Animal Welfare in Transit**

Trading Standards Officers took part in a multi-agency operation, Operation Rogue Trader at Cartgate Services in Somerset in November. These operations aim to address the issues of mobile criminality and road safety and focused on these areas: construction and agricultural plant theft, fuel theft, waste crime, vehicle roadworthiness and load security, trade licencing compliance for vehicle users, anti-social vehicle usage, disease control, welfare of animals in transit and denying criminals use of the road.

Officers stopped 2 horse trailers in which 4 horses were being transported without their passports, in breach of horse passport regulations. One owner was also found not to have updated ownership details and received formal written advice. The other person stopped with 3 horses on board is a member of a livestock theft organised crime group. Follow up action is being taken with this nominal. Neither owner could be found on the Central Equine Database. Owners and keepers of equines may be issued with fixed penalty notices or fines if they fail to comply with regulations.

TSO's also spoke with and gave advice to 4 traders with regards to consumer rights and fair trading.

TSO's carry out regular 'Operation Rogue Trader' days together with Avon & Somerset Police, Driver and Vehicle Standards Agency and the Environment Agency in the course of a year.

### **Working with Police**

Officers attended the Rural Affairs Forum meeting at Bridgwater Police Station which gave us the opportunity to talk about the Trading Standard's dedicated Rural Team and what we do. As a result of this meeting, we have been asked to go with them on an entry warrant to a suspected fraudulent animal charity.

### **Illegal Dog Breeding and Dangerous Dog Act**

Officers visited a dog rescue premises in Somerset, following a visit in March by Police and the RSPCA who had concerns about possible illegally imported dogs. One dog was taken into quarantine and the remaining 76 dogs were detained on the premises while further investigations were carried out, which included liaising with Heathrow Animal Reception Centre, quarantine kennels and their official quarantine veterinarian. Due to potential disease risk quick action was required. We are working with partners to try and improve notification times going forward.

A Somerset-based puppy breeding investigation led to a cash seizure in October of £3,897.34. The cash was seized by a TSO who is an Accredited Financial Investigator and detained under the Proceeds of Crime Act 2002.

## **4.2. Paid for Business Support**

### **Buy With Confidence (BWC) – Approved Trader Scheme**

The new Business Development Manager was appointed in Q2 and focusses on all paid work including BWC member acquisition/retention and Primary Authority Partnerships as well as assessing the way we work to increase innovation and save officer resource. The new Buy With Confidence website has been redesigned and due to launch on 3rd March 2024. Planning for the new updated BWC directory is underway. The directory covers Somerset, Devon, Cornwall and Dorset with costs shared between the different local authorities.

### **Primary Authority**

Primary Authority enables businesses to form a legal partnership with one local authority,

which then provides assured and tailored advice on complying with environmental health, trading standards or fire safety regulations that other local regulators must respect. There has been a radical change in our approach to Primary Authority Partnerships this year. Instead of charging an annual £180 per year to include 2 hours of advice, our offering is now a min of 10 hours of chargeable work at £90 per hour so a total of £900 per PA agreement. Of the 45 agreements we had in place, 30 have renewed at the new rate and so our predicted income for the year will now double to £27,000 and the partnerships are more active and valued by the businesses involved.

### **Metrology Laboratory**

In September, the Services metrology team undertook a large calibration order for a trader based in Yeovil. Over 250 metric weights were calibrated with an order value of £6,250. A contact at the business said: “My personal thanks to both you and your team for your (as always) excellent services to re-certify our dead weights.”

The Calibration Services team based in Chelston office continue to deliver its successful weights and measures training course to trainees from across the country who are preparing for their Chartered Trading Standards Institute exams. This initiative has made more than £21,000 profit in this calendar year which is double the target.

## **4.3. Supporting & Protecting the Most Vulnerable**

### **Scams Awareness and Prevention**

In August, a press release warning people to beware of investment scams was issued after a Somerset resident was left £40,000 poorer by a scam. After responding to a Facebook post, the resident became embroiled with a cryptocurrency investment scheme that she believed was backed by Martin Lewis, Money Saving Expert. In our press release, a money Saving Expert spokesperson reiterated: “Martin NEVER does adverts and never promotes investments. Anything you see suggesting otherwise is fraudulent and a scam.”

The Scams Lead Officer was on BBC Radio Somerset to give scams awareness advice and also facilitated an interview with the scam victim which the radio ran as their lead story.

In the run-up to Black Friday (24 November) a [press release](#) was issued alongside social media posts warning shoppers to be wary of scams when shopping online. The Scams Lead also took part in an interview about this topic on Radio Devon and received good feedback.

The Service supports Citizens Advice’s National Scams Awareness week in July during which a social media campaign to highlight scams is run, how to report them and where people can go for support if they fall victim to a scam. Posts were linked to a [press release](#) on the website.

### **Doorstep Crime Enforcement:**

On 6 November, a rogue trader was ordered to pay almost £40,000 after convincing a pensioner to let him carry out roofing work that wasn’t needed. The victim, from Somerset, used her life savings. Mervyn Rhys Richards, 43, of Swindon, was ordered to pay a fine of £6,500, £190 victim surcharge, £4,250 towards prosecution costs and £27,500 in compensation after pleading guilty at Taunton Magistrates Court.

[Rogue roofer found guilty of scam \(somerset.gov.uk\)](https://www.somerset.gov.uk/news/rogue-roofer-found-guilty-of-scam)

Builder Sam Harvey (who had pleaded guilty on 30 March 2023 to three offences under the Fraud Act and two offences under Consumer Protection from Unfair Trading Regulations) was sentenced at Exeter Crown Court on 16 November. The court heard that Mr Harvey had benefitted from his crimes to the tune of £214,684.11 – but because he had no assets available, he was ordered to pay a nominal £1, with the outstanding

£214,683.11 to be revisited ‘at any time’ in the future.

[‘Crime doesn’t pay’; Rogue builder told to pay back over £200,000 - Trading Standards Service \(devonsomersettradingstandards.gov.uk\)](https://devonsomersettradingstandards.gov.uk)

#### **Doorstep Crime Support:**

An investigation was opened after information was taken from different complainants in relation to poor quality work which the owner of a Somerset based roofing business refused to resolve. Potential offences were identified. In August 2023 a letter of advice was sent and it was suggested to the trader that he consider the contracts he had entered into and whether he should make amends resolving issues or reducing the price (refund / partial refund). After receiving the letter the trader contacted the service the same day and offered to resolve the issues as suggested and a number of payments were made.

- 2 partial refunds were paid as agreed (£3,600 or 56.3% and £3,000 or 60%).
- 1 full refund was partially paid (£6,000 or (79.2%).
- 1 agreed refund was partially paid, but it is unclear whether the rest was paid.
- 2 agreed refunds have not been paid at all.

Whilst payments were being made it was agreed that the investigation would not proceed. Unfortunately, as payments did not continue the investigation has been reopened.

TSO’s intervened to secure a refund for an elderly Somerset consumer who over several years has been sold solar panels, batteries and warranties from various companies. Recently she was sold a warranty at a cost of £4,000 and on another occasion the same company sold her two batteries for £4,000. We contacted the trader who subsequently agreed to refund her £7,000.

Officers ensured a Somerset consumer received their refund after a trader quoted £2,000 for decking work and who had received an initial payment of £1,400 but never started any work. The trader had agreed to refund the resident but hadn’t done so until the Trading Standards Officer intervened.

#### **4.4. Safety at Sports Grounds**

Yeovil Football Club contacted us as they had no Safety Officer for one of their games due to illness – matches cannot be held without a designated Safety Officer. We contacted the Sports Grounds Safety Authority (SGSA) on the club’s behalf and an appropriate person was put in place. We also advised the club to review their resilience plans for when this should happen again.

The Service has recently been audited by the SGSA and has received an excellent report categorising the Service as ‘low risk’ with a subsequent reduction in frequency of audits.

#### **4.5. Feed and Food**

##### **Agricultural Feed Project – Online Pet Food**

Ten samples were bought anonymously from online pet food sellers across Devon, Plymouth, Torbay and Somerset and sent off for sampling. All the results have been received back and there was a 100% non-compliance on labelling which is being followed up with each seller. Sellers are not always manufacturing the pet food but often buying in bulk and then repackage to sell on, sometimes claiming that the product is ‘home-made’, ‘free-from’, ‘natural’ etc. This is a large and growing business sector so we the project will continue into next year though with more focus on providing information on regulatory feed compliance to sellers. Information will be hosted on our website and via social media campaigns and events.

##### **Agricultural Feed Project – Animal Cereals**

This project sampled cereals grown for livestock to ensure they were within guidelines for animal consumption. Findings provided a wider view to the tough economic situation for farmers and points to potentially larger concerns over UK food security. Noticeably fewer farmers that were visited are growing cereal for livestock feed for multiple reasons including wet seasons and flooding, lower yields or rot before harvest, exacerbated by the difficulty in recruiting seasonal harvest workers. The high cost of oil (for farm machinery), fertilizers and transportation of harvested crops are also impacting and so some farmers are now choosing to buy in feed direct from mills and often from overseas. Some of the farmers met with have switched land over from growing agricultural feed to funded schemes such as planting trees as part of the Government's woodland creation (carbon capture), bio digesters or seeding meadows. Work on this project continues as sampling results are showing some contaminants in the feed.

### **Other Feed**

There has been an increase in the number of food factories sending waste/surplus products for animal feed which saves the businesses money on wastage costs. These businesses need to be registered with Trading Standards for feed production due to the risk of animal disease. The number of visits carried out is therefore increasing. Examples of food businesses we have visited include ice cream producers, fish processors, patisserie manufacturers and crisp manufacturers.

As part of National Trading Standards funded work, we carried out 4 mills visits to take samples of pig and poultry feed. All samples passed.

It is also worth noting that Trading Standards Officers provide added value to farmers when they visit. Officers provide a full inspection and advice where required and also can also provide vital information on agencies and schemes which offer farmers physical health checks, mental health support and financial support to an often isolated farmer and their family.

### **Food Standards (including Allergens)**

In July we published the results of a food sampling project carried out by TSO's at sandwich bars across the region. 56 out of 100 businesses in Devon, Plymouth, Somerset and Torbay were in breach of new Government rules which require full ingredient and allergen labelling on all food made on premises and pre-packed for direct sale. [Read our published article.](#)

Also carried out was a media campaign to urge businesses, such as delis or bakeries who prepare and then package food for sale, not to put their customers at risk and to read [Trading Standards guidance](#) to help them stay on the right side of the law. A TSO also went on BBC Somerset and BBC Spotlight to highlight the findings.

57 of our annual target of 75 allergen samples from food visits this year have been procured in the first three quarters of the year. We have received 19 results and eight of these have failed (current failure rate of 42%). Of these, six failed on the presence of milk.

Banned American additives in imported sweets is causing concern following the Services look at International Food Retailers. These products were largely procured from small corner shops close to schools. The Food Standards Agency are currently meeting regarding this issue as it's a nationwide problem.

No allergen reports were raised as a result of Glastonbury Festival this year which is notable given the scale of mobile catering facilities provided on site. The Festival Markets office circulated comprehensive guidance to all traders which appears to be

working, avoiding the need for any external intervention on allergen control.

#### **4.6. Helping People to Live Healthier Lives by Preventing Harm and Promoting Individual Health - Product Safety**

##### **Electric Scooter project**

In Quarter 3, 47 businesses that we know sell e-scooters and e-bikes in the Heart of the South West were contacted to remind them of their responsibilities around e-vehicle safety when selling these products. The Service applied to charity Electrical Safety First for a grant of £4,500 to raise awareness among consumers of e-bike and e-scooter safety. This money is being used in Quarter 4 to run a social media campaign and print stickers for sellers to put up in their premises. The stickers will have a QR code on them which will direct consumers to the [Electrical Safety First advice](#). Read the press release here: [Trading Standards safety message for e-bike or e-scooter owners or buyers](#)

##### **National OPSS working group on construction products**

In January 2021, the government announced that the Office for Product Safety and Standards (OPSS) would take on responsibility for the national regulation of construction products. This is in line with a recommendation made in the Independent Review of Building Regulations and Fire Safety led by Dame Judith Hackitt following the Grenfell Tower fire. Two of our Officers are now part of a national OPSS working group on construction products aimed at Trading Standards services which have Primary Authority Agreements with construction or tool companies.

##### **Flip flop project**

A market surveillance project on children's flip flops showed that all samples that TSO's took failed as they were found to contain unsafe carcinogenic chemicals. The lab has advised us that they will be reporting this directly to OPSS (the Office for Product and Safety Standards) and the issue has been escalated for national action.

##### **Explosives**

In total 47 fireworks visits were carried out across Devon and Somerset with eight premises committing minor offences. Corrective action was taken at the time of the Officer's visits.

##### **Other Product Safety**

We supported one of our Primary Authority businesses after they had a wooden toy suitable for age 12-months-plus tested and it was found to have small parts. We are working with them on the best course of action.

In the run-up to Christmas, we issued a [press release and videos](#) on social media highlighting what people should look for when buying toys and electrical products to ensure they are safe to use.

There was a recall of some bath seats across UK and EU. The business is based in Somerset and our Officer liaised with the Office for Product Safety and Standards (OPSS) for reporting on the Gov.uk product recall page.

Officers had detailed discussions with a Somerset based international shoe manufacturer, regarding a safety alert about a toy inserted in the sole of children's shoes. We referred the business to OPSS.

##### **Age Restricted Products & Illicit Tobacco**



### **Operation Joseph**

Operation Joseph is a project funded by National Trading Standards. The purpose of the project was to sample nicotine-containing vapes bought from retail premises across the area to gather intelligence for the Department of Health. Legal vapes are permitted to contain up to 2ml of nicotine and the samples would be submitted for lab testing to ensure that both the tank capacity and concentration of nicotine complied with regulatory standards. Sample results will be shared in due course.

### **Other Age Restricted Products & Illicit Tobacco Enforcement**

TSO's worked with Avon and Somerset Police to close down a shop in Taunton, which was selling vapes and drug paraphernalia to children and counterfeit and illegal tobacco. The closure was granted at Taunton Magistrates' Court on Tuesday 18 July. Following the closure order, Officers seized a small quantity of illegal vapes and over £2,000 cash.

[Shop selling vapes and drug paraphernalia to children closed down](#)

[Somerset Gazette: Closure order for shop selling illegal vapes in Taunton.](#)

In October, a Taunton shopkeeper pleaded guilty to selling counterfeit tobacco and was ordered to carry out 100 hours of community work. Allen Ahmadi, 31, proprietor of Wawel Polish shop, 5 Eastgate, Taunton, admitted selling counterfeit tobacco without the legal health warnings at Taunton Magistrates Court on Monday 10 October.

[Shopkeeper admits selling counterfeit tobacco](#)

On 16 October an extension of the Closure Order for the European Shop at 11 North Street, Taunton, was granted for a further three months. The night before the application for the extension, Avon & Somerset Police's Anti-Social Behaviour Coordinator asked one of our TSO's to provide a witness statement to express Trading Standards' concerns regarding the shop reopening. The Magistrate remarked that our Officer's statement was the most interesting part of the application and tipped it over the line.

In September, Operation Garnet took place at 3 premises in Brigwater. The enforcement visits were simultaneous with TSOs, Avon and Somerset Police and tobacco detection dogs present. Approximately 800 oversized vapes were seized from open display with an estimated value of £8,000. The oversize vapes are illegal as the legal tank capacity limit is 2ml or approximately 600 puffs and the items seized ranged between 3,500 and 10,000 puffs. E-cigarettes must also be approved by the MHRA which these cannot have been due to their size. 73 packets of cigarettes, 4 pouches of tobacco all in non-plain packaging or without UK compliant warnings with an estimated value of £600 were also found by a search dog in a magnetically sealed concealment. They were either non-duty paid (smuggled) or counterfeit and cannot be legally sold in the UK. The operation also yielded a significant quantity of intelligence identifying links with other premises and businesses.

### **Police National Database:**

HotSW Trading Standards used facial recognition to follow up a complaint. Traders were witnessed by members of the public selling tobacco and perfume (suspected to be non-duty paid, counterfeit and/or stolen) from carrier bags. The complainant provided photos of the three traders which were sent to Police National Database for facial recognition and five forces came back with positive identity from custody images of the traders – three of the forces for the same person. One current address was subsequently found.

#### **4.7. Fair Trading**

A cease and desist letter was sent to 2 individuals in December following a report from

HMRC that the couple was using a Facebook page set-up in their toddler daughter's name to sell counterfeit clothing, fragrance and electronics and potentially tobacco too.

Evidence was captured by our E-Crime Officer who then liaised with brand holders which confirmed that items listed on the Facebook page were counterfeit. Checks were made after the letters were sent out which confirmed that the links on the page were dead and no further activity had happened since the letters were sent.

### **Petroleum**

In October Officers visited a badly damaged forecourt in Somerset and advised if reparations were not made, an improvement notice would need to be issued. Following our recommendations, the business is now addressing the issue to the cost of over £40,000 of rectifications to ensure safety.

### **Good News**

We are delighted to announce that Service Officers were recognised for their work at the Trading Standards South West (TSSW) conference in October, held at Somerset Cricket Ground in Taunton. Winners were in the categories: Doorstep Crime and Scams, Metrology and Public Safety, Rising Star Award, Outstanding Project Award (work tackling the illegal trade in illicit tobacco and vapes)

**Note:** For sight of individual background papers please contact the report author

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# Flood Investigation Report

*Section 19 Flood and Water  
Management Act 2010*

**Croscombe, Bowlish  
& Shepton Mallet**  
**3<sup>rd</sup> & 4<sup>th</sup> October 2020**

<b>Organisation</b>	Somerset Council
<b>Title</b>	Flood Investigation Report: Croscombe, Bowlish & Shepton Mallet
<b>Author</b>	A. Lambart & C. Brammeier
<b>Owner</b>	Somerset Council LLFA
<b>Primary Legislation</b>	Flood & Water Management Act 2010

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## Executive Summary

Event summary	
<b>Date</b>	3rd & 4th October 2020
<b>Location</b>	Croscombe, Bowlish & Shepton Mallet
<b>Source of flooding</b> (surface run-off, river, groundwater, coastal)	Surface water runoff and fluvial flooding from the River Sheppey with associated groundwater flooding from raised groundwater levels and seepage from below-ground infrastructure.
<b>Number of properties flooded internally</b>	26 reported in total 10 in Croscombe 10 in Bowlish 6 in Shepton Mallet
<b>Maximum Depth of internal flooding</b>	380mm reported in one property in Croscombe 914mm reported in one property in Bowlish 457mm reported in one property in Shepton Mallet
<b>Duration of internal flooding to properties</b>	Predominantly up to 24 hours although one property in Shepton Mallet reported one week.
<b>Strategic infrastructure affected</b>	Highway
<b>Depth of flooding of strategic infrastructure</b>	Estimated up to 200mm in Croscombe 305mm in Shepton Mallet
<b>Duration of flooding to strategic infrastructure</b>	Unknown however it is assumed flood duration was similar to that reported of property flooding.

<b>Responsible Flood Risk Management Authority</b>	Lead Local Flood Authority
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### Disclaimer

This report summarises the findings of an investigation into a specific flood event based on information available to the Lead Local Flood Authority at the time of publication.

### Acknowledgements

Somerset County Council Lead Local Flood Authority and the other risk management authorities are grateful to the residents, businesses, and elected members of Croscombe Parish Council and Shepton Mallet Town Council who have come forward with information to support this investigation.

## Introduction

### Lead Local Flood Authority Duty to Investigate:

Under the Flood and Water Management Act 2010, Somerset County Council (SCC) is designated as the Lead Local Flood Authority (LLFA) for Somerset. This Act sets out a number of responsibilities for the County Council with regard to flooding, including a duty to investigate flood events within its area as it deems necessary:

*(1) On becoming aware of a flood in its area, a lead local flood authority must, to the extent that it considers it necessary or appropriate, investigate:*

*(a) which risk management authorities have relevant flood risk management functions, and*

*(b) whether each of those risk management authorities has exercised, or is proposing to exercise, those functions in response to the flood.*

*(2) Where an authority carries out an investigation under subsection (1) it must:*

*(a) publish the results of its investigation, and*

*(b) notify any relevant risk management authorities.*

SECTION 19, FLOOD AND WATER MANAGEMENT ACT 2010.

When considering if it is necessary or appropriate to investigate a flood event Somerset County Council (SCC) reviews the severity of the incident, the number of properties affected and the frequency of such an occurrence.

This report has been produced to comply with legislation and to determine the main causes of the flooding. It should be noted that SCC has opted to develop this report beyond the requirements of the Flood and Water Management Act to include actions that should be considered by the relevant Risk Management Authorities (RMAs) or in some cases, by the landowner or local community action group.

There are various levels of action that can be taken depending on the severity of the situation, availability of funding and the feasibility of practical solutions to reduce the risk of further flooding. This being the case the recommended actions will generally fall into one of the following categories:

**Short-term delivery of schemes or actions:** a measure that can be implemented quickly by a Risk Management Authority at relatively low cost.

**Further investigation/research:** Further investigations such as catchment studies and hydrological/hydraulic assessments to understand the flow rates and directional paths and extent of flooding. A study may also assess the options for and impact of mitigating measures.

**Long-term scheme or actions:** Where the risk of flooding cannot be mitigated by quick win measures then a larger scale flood alleviation scheme may be required, possibly identified by further investigations and research. The assessment, design and construction of larger flood alleviation schemes will be reliant on the availability of funding.

**Landowner action:** Members of the public who own land adjacent to watercourses have riparian responsibilities, which include a duty to maintain their section of watercourse to ensure there is no impediment of flow. Other works to protect the property may also need to be funded by property owners to ensure delivery where public funding is not available.

**Community action:** In some cases, the community may come forward to deliver and maintain their own local schemes. Whilst in some cases, this may generate further contributions from the Risk Management Authorities.

This flood investigation is a starting point in identifying and understanding a flooding problem and opportunities for mitigation.

## Scope

Somerset County Council in their role as Lead Local Flood Authority (LLFA) considered it necessary to complete and publish an investigation into the flood event at Croscombe, Bowlish and Shepton Mallet for the flood event occurring on the 3<sup>rd</sup> & 4<sup>th</sup> October 2020.

This report provides a summary of the event and probable causes based on the available evidence and next steps. This includes information gathered during the site walkover of Croscombe on the 4<sup>th</sup> December 2020 with representatives from the LLFA (SCC), Wessex Water (WW), Mendip District Council (MDC) and Croscombe Parish Council and community members / residents. The Croscombe Flood Committee was set up in response to Storm Alex and has aided in the information gathering.

An online Zoom meeting was held with Shepton Town Council on the 14<sup>th</sup> December 2020, in which the Town Council delivered a presentation about the flood event to the LLFA (SCC), MDC, EA, Wessex Water and community members / residents.

The report records the actions taken and/or proposed and the organisation or individuals responsible for completing them.



***It is important to note that the investigation was directly impacted by the Coronavirus-19 Pandemic, the associated lockdowns and restrictions on movement / travel and limitations on face-to-face meetings. All of which extended the timeframe to deliver this report to the communities.***

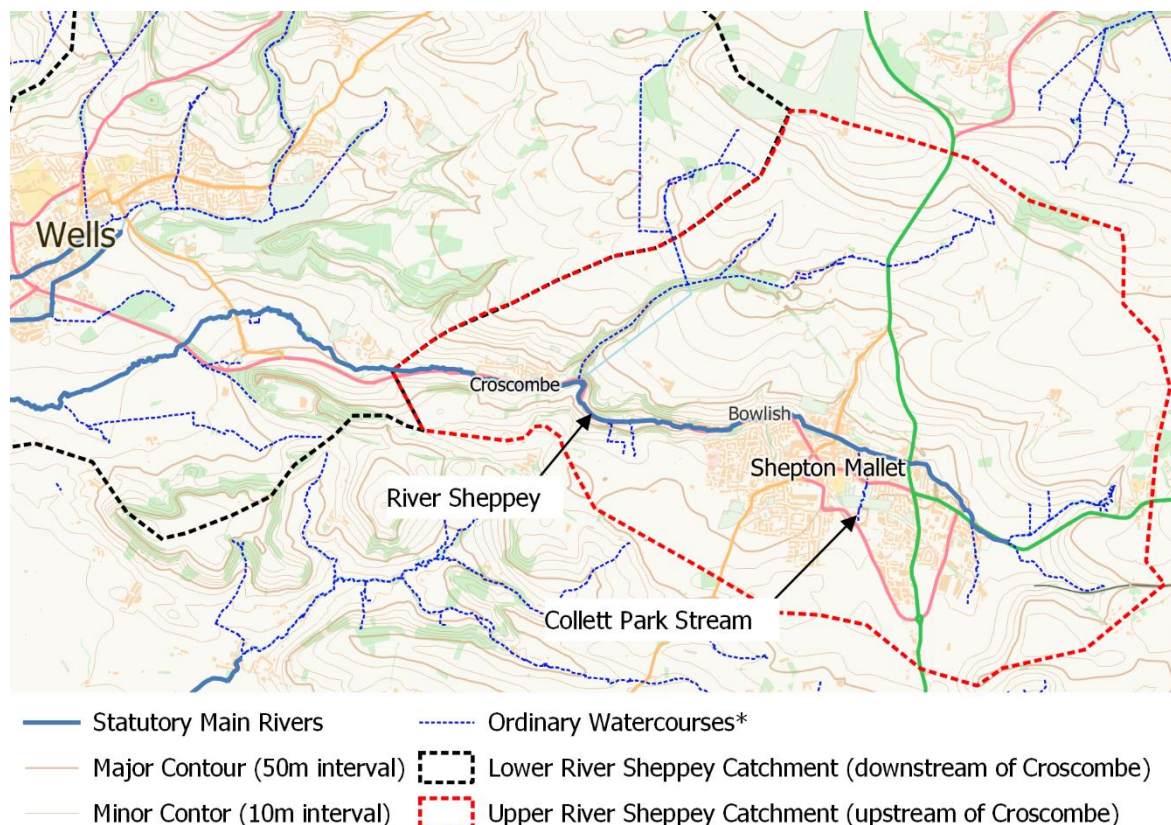
## Site Location and context

### River Sheppey and Catchment Characteristics

Croscombe, Bowlish and Shepton Mallet are collectively located within the River Sheppey catchment in the centre of Mendip District. The catchment is circa 25km south west of Bath and 4 to 8km west of Wells. The River Sheppey catchment is illustrated below in Figure 1.

The Sheppey catchment is steeply sided and topographic contours are illustrated within Figure 1; closer together contours indicate steeper topography.

Figure 1 - Study Area Location



\* Many ordinary watercourses are small and ephemeral, with unknown land drainage connections. These are therefore poorly mapped and shown here for illustration only.

The River Sheppey rises to the east of Shepton Mallet and west of Doultling and subsequently flows in a westerly direction towards the Somerset Levels. The river passes through Shepton Mallet along the northern side of the town before passing through Bowlish, a village on the edge of Shepton Mallet. 2km downstream from Shepton Mallet, the River Sheppey passes through Croscombe village.

The River Sheppey is classified as a Main River for much of its length which means the Environment Agency has the overarching responsibility for flood risk

management of the watercourse. It should be noted however riparian owners retain responsibility for maintenance and this is discussed further in Section 0.

The River Sheppey is supplemented with many other Ordinary Watercourses which drain into the Sheppey. The LLFA is responsible for managing flood risk associated with these watercourses however, as with Main Rivers, riparian owners retain responsibility for maintenance.

## Croscombe

Croscombe is contained within a very steep sided valley and the surface water drainage catchment lies predominantly to the east and north of the village. The sub-catchment is largely rural, consisting of a combination of arable, pasture and woodland. It should also be noted the area to the north of Croscombe is species-rich grassland.

Within Croscombe, this study focuses on the areas surrounding the A371, Long Street, Jack's Lane, and Old Street Lane. It is understood from the Croscombe Flood Committee during the site walk-over that no properties had flooded east of the junction of Rock Street and the A371 Long Street.

The River Sheppey has been highly modified by the historic construction of numerous mills that are now disused. The River Sheppey bifurcates at Jack's Bridge with the main river flowing adjacent to Long Street and a millstream (lead) passing under the Manor House, re-joining the River Sheppey before it passes into a culvert for 200m.

*Figure 2 - Croscombe - River Sheppey Watercourse*



In addition, a number of smaller Ordinary Watercourses discharge into the River Sheppey either upstream or in close proximity to Croscombe. A major tributary flows in a south-westerly direction through Hams Wood and valley, joining the River Sheppey upstream of Croscombe.



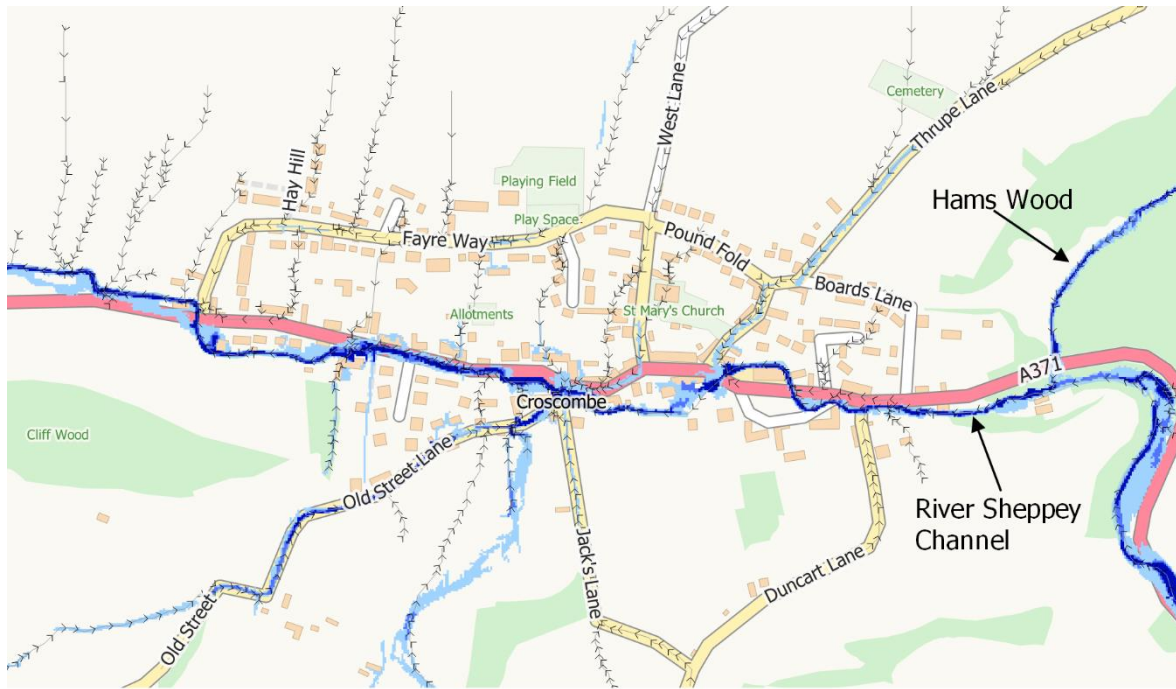
Many of these watercourses are ephemeral (i.e. seasonally dry out) and the only areas of standing water/flow were observed within the stream and ditch network in the upper area of the catchment.

As the River Sheppey is a Main River, this means the Environment Agency is responsible for flood risk management activities including any hydraulic modelling and mapping. The Environment Agency publishes this mapping in the form of the Flood Map for Planning and the Flood Risk from Surface Water maps which are shown below in Figure 3 and Figure 4.

Figure 3 - Crocombe - Flood Map for Planning



Figure 4 - Croscombe - Flood Risk from Surface Water Map



**Risk of Flooding from Surface Water**

- High Risk
- Medium Risk
- Low Risk

→ Other potential flow paths\*

\* From the 'South West Region Arc Hydro Rapid Response Catchment Analysis' undertaken by JBA Consulting on behalf of the Environment Agency, December 2012.

## Bowlish

Bowlish is located on the western side of Shepton Mallet and this study focuses on the areas in the vicinity of the A371 Pike Hill and A371 Wells Road. Like Croscombe, the surrounding topography is very steep and the River Sheppey has been heavily modified as a result of construction of numerous mills that are now disused along with the construction of the Wells to Shepton Mallet road (now the A371) which was initially constructed in the 1850s.

In addition to the River Sheppey which passes through Bowlish east-to-west, a number of other tributaries have been culverted over the years including along Coombe Lane running south to north and discharging into the River Sheppey.

As noted above, the River Sheppey is a Main River and the Flood Map for Planning and the Flood Risk from Surface Water maps are shown below in Figure 5 and Figure 6.

Figure 5 - Bowlish- Flood Map for Planning

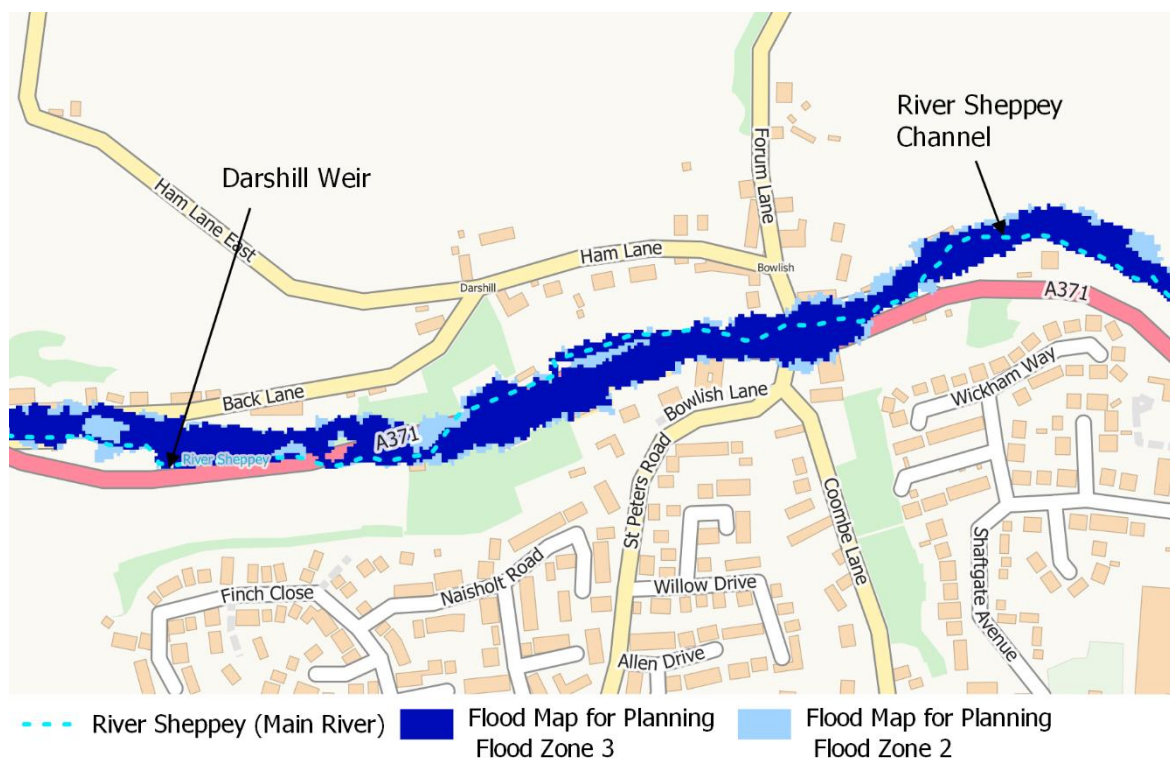
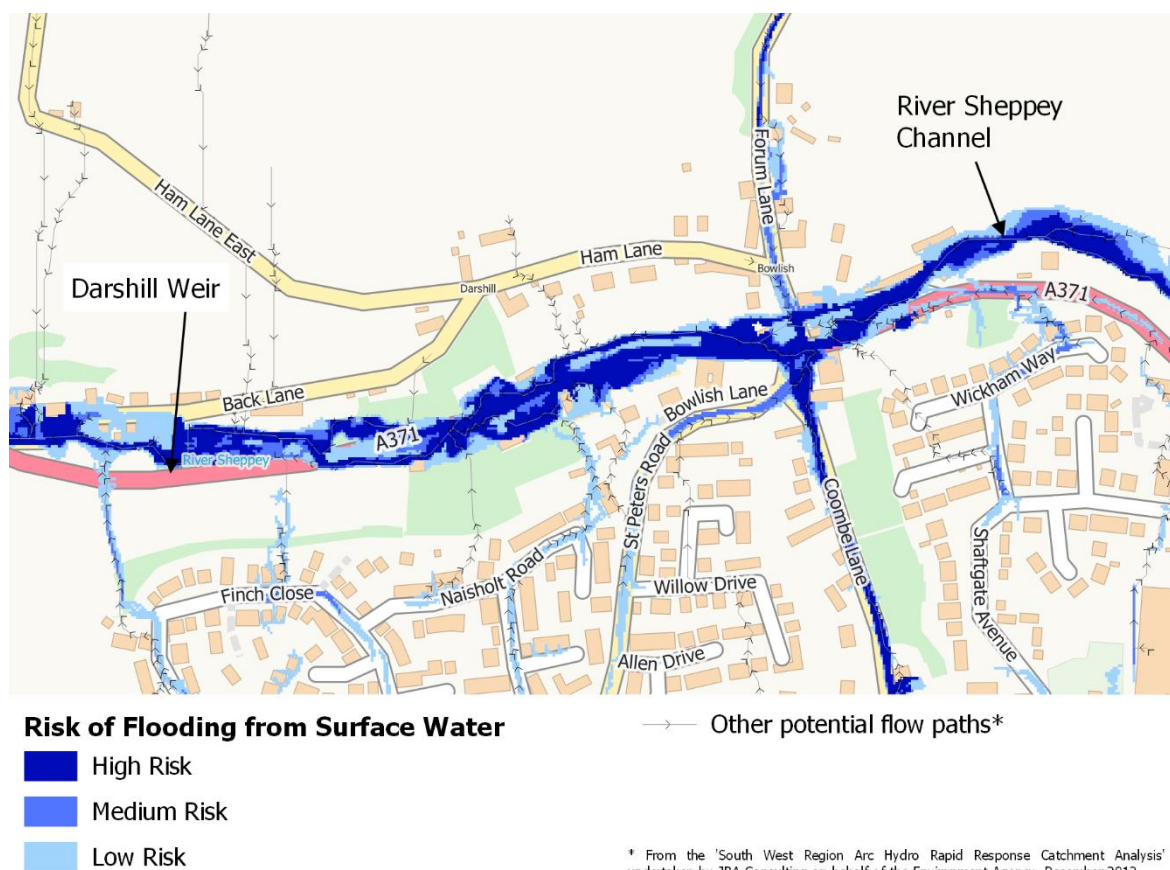


Figure 6 - Bowlish- Flood Risk from Surface Water Map



## Shepton Mallet

Shepton Mallet is located in the headwaters of the River Sheppey and the town is surrounded by largely rural land use, predominantly pasture with occasional arable intensively farmed land use (i.e. maize). Like both Croscombe and Bowlish, the watercourse has been heavily modified with a number of culverts and within Shepton Mallet, this study focuses on the area in the vicinity of Leg Square, Gaol Lane, Lower Lane, and Cornhill in the north-eastern side of Shepton Mallet.

There are also a number of Ordinary Watercourse tributaries that drain into the River Sheppey and of particular importance is the Collett Park Stream which flows in a northerly direction through Collett park and is culverted beneath the former HMP Shepton Mallet Prison, continuing along Leg Square, and discharging into the River Sheppey culvert to the north of Lower Lane, this is illustrated in Figure 7.

The Flood Map for Planning and the Flood Risk from Surface Water maps are also shown below in Figure 8 and Figure 9.



Figure 7 - Shepton Mallet Drainage Context Map

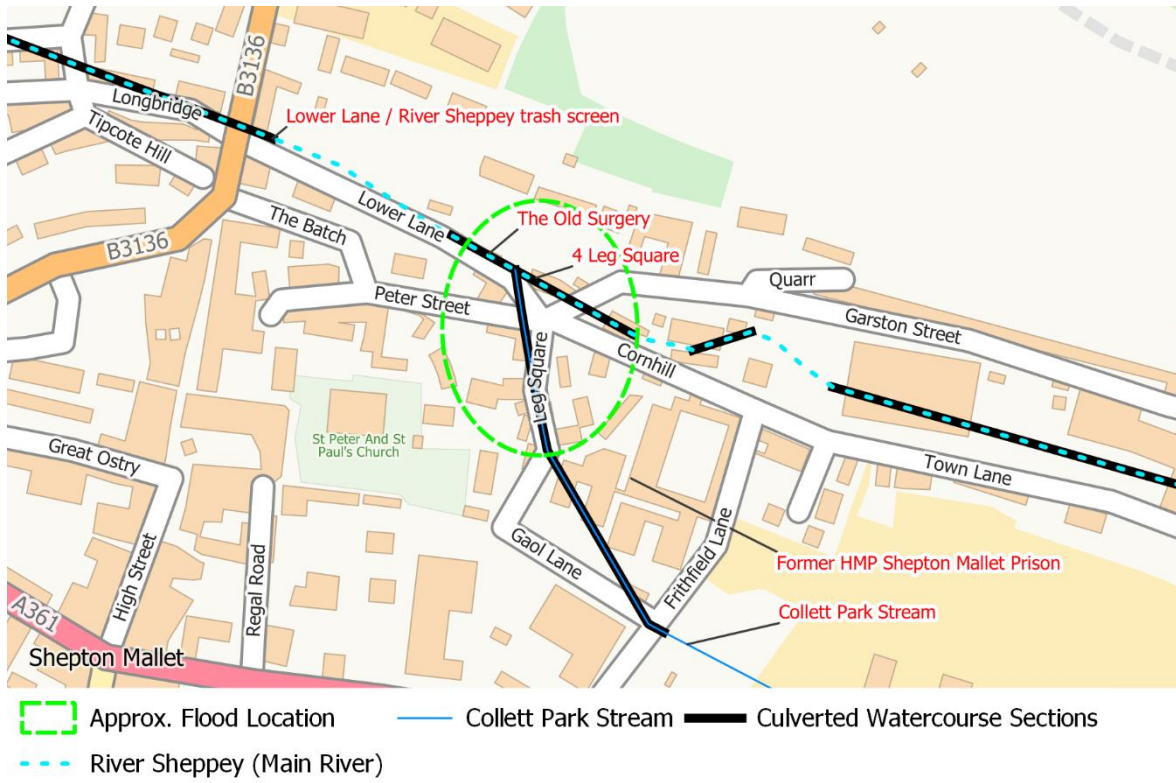




Figure 8 - Shepton Mallet - Flood Map for Planning

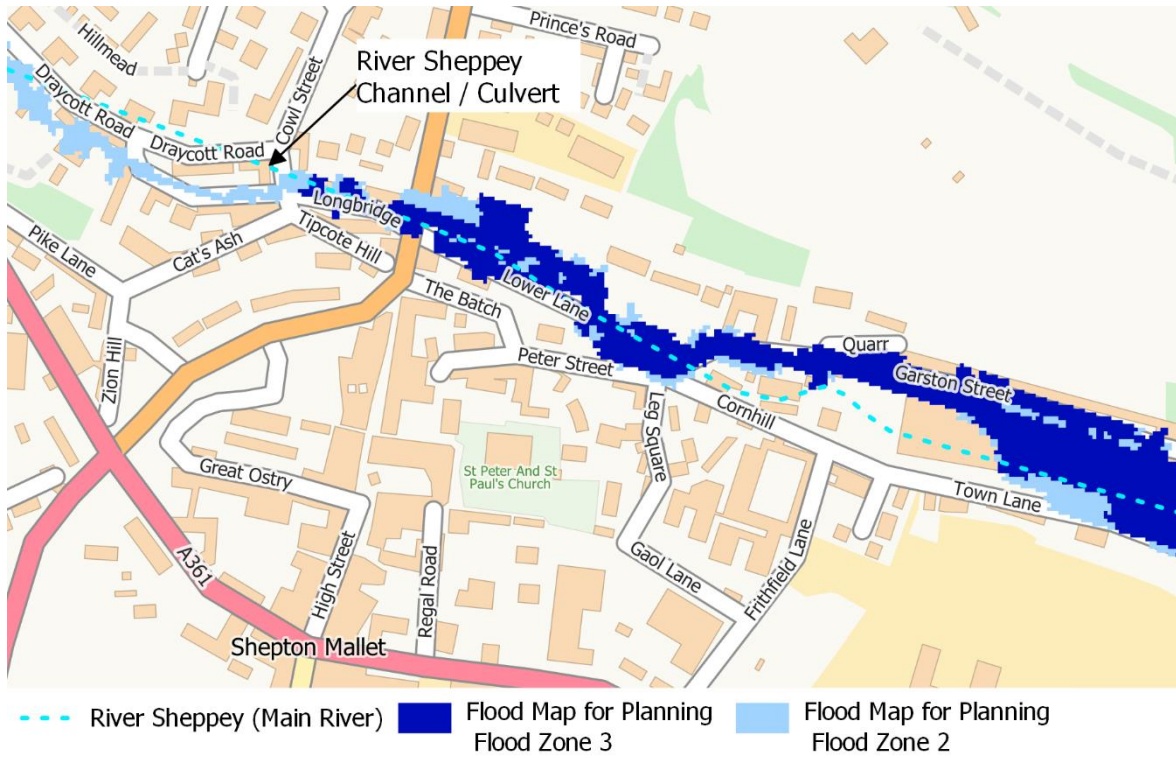
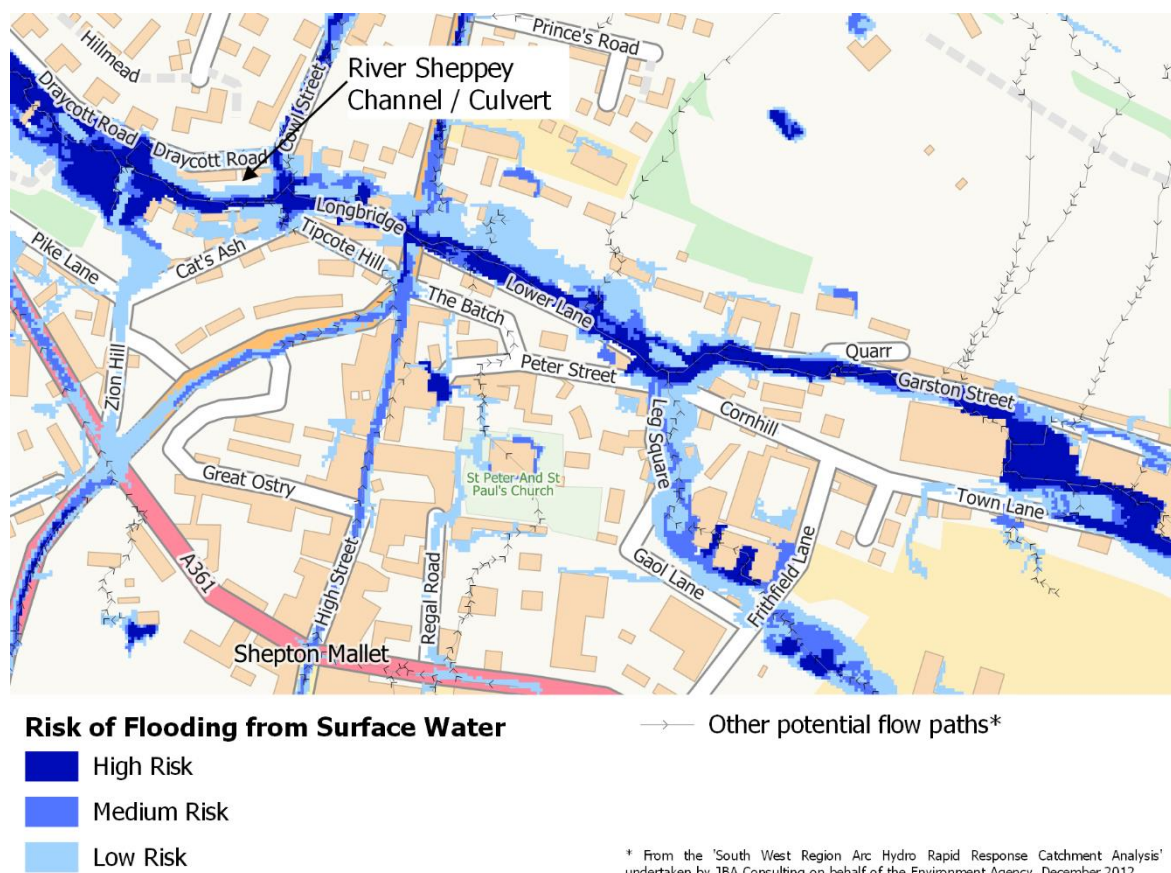


Figure 9 - Shepton Mallet - Flood Risk from Surface Water Map



## Flood History

Croscombe, Bowlish and Shepton Mallet have suffered numerous flood events in recent years, the most notable being February 1990, March 1996, August 1996, December 2008, November 2011, and July 2012.<sup>1</sup>

Table 1 below outlines the historic flood events reported to the LLFA and as illustrated below, the majority of historic events have occurred during the autumn and winter months, between October and February.

Historically properties have been flooded from surface water, blocked culvert / drainage issues and high levels in the River Sheppey. Some improvements to the surface water drainage system in the Croscombe area were carried out by Area Highways after the 2008 event with additional gullies being installed.

This list is not exhaustive. Not all flooding is reported to the LLFA, or indeed to other partners. Poor historic record keeping means some records are apparently lost. This list is to give a context of areas which flood repeatedly.

<sup>1</sup> The LLFA's Section 19 Flood Investigation Report for the 2012 flood event states "a number of properties" having flooded and the LLFA's historical flood database shows 4 properties having flooded. However, Section 19s are usually triggered by 5 or more properties flooding internally. It may therefore be reasonable to assume that the flood event of 2012 was the worst flood event in recent years that Croscombe has experienced prior to the flood event of the 3rd and 4th October 2020.

Table 1 - Table of historic events that have been reported to the LLFA RMA

Date	Location	Flooded	Flood Source(s)	Depth if known
12/07/1982	Lower Lane, Shepton Mallet	Property x15, school	River Sheppey	
01/02/1990	Long Street, Croscombe	Property x1	Surface	
22/03/1996	Long Street, Croscombe	Property x3	Surface	
21/08/1996	Long Street, Croscombe	Property x1	Surface	
?/10/1998	Upstream of Jacks Bridge, Croscombe	Details unknown	River Sheppey	
18/08/2006	Long Street, Croscombe	Property x3	River Sheppey	
21/08/2006	Long Street, Croscombe	Highway	Blocked drainage	
08/09/2006	Long Street, Croscombe	Highway	Surface	
20/10/2006	Wells Road, Bowlish	Property x3	River Sheppey	
27/10/2006	Long Street, Croscombe	Highway	Blocked drainage	
14/08/2007	Pike Hill, Bowlish	Property x3	River Sheppey	
24/10/2007	Long Street, Croscombe	Highway & Property x1	Surface	
06/12/2007	Wells Road, Bowlish	Highway	Drainage	
11/01/2008	Victoria Grove, Shepton Mallet	Property x1	Surface	
29/05/2008	Cannards Grave Rd, Shepton Mallet	Property x5, shops	River Sheppey	
10/11/2008	Long Street, Croscombe	Highway	Blocked drainage	
13/12/2008	Long Street, Croscombe	Property x4	River Sheppey	
04/11/2009	Wells Road, Bowlish	Highway	Surface	
12/11/2009	Long Street & Boards Lane, Croscombe	Highway	Drainage	
24/11/2009	Commercial Road, Shepton Mallet	Highway	Drainage	
29/01/2010	Long Street, Croscombe	Highway	Drainage	
16/02/2011	Long Street, Croscombe	Highway	Blocked drainage	
24/06/2011	Back Lane, Darshill	Property x1	Drainage	
19/07/2011	Charlton Road, Shepton Mallet	Highway	River Sheppey	
03/11/2011	Back Lane, Darshill	Highway	Drainage	
04/11/2011	Charlton Road, Shepton Mallet	Highway	Drainage	
04/11/2011	Wells Road, Bowlish	Highway	Surface	~150mm
04/11/2011	Long Street, Croscombe	Highway	Drainage	~130mm
06/11/2011	Old Wells Road, Darshill	Highway	Culvert	
18/11/2011	Wells Rd / Back Ln, Bowlish	Highway	Drainage	~150mm
03/01/2012	Charlton Road, Shepton Mallet	Highway	Surface	~600mm
03/01/2012	Charlton Road, Shepton Mallet	Highway	Surface	
03/01/2012	Cannards Grave Rd, Shepton Mallet	Highway	Surface	
03/01/2012	High Street, Shepton Mallet	Highway	Surface	
26/01/2012	Old Wells Road, Darshill	Highway	Surface	
02/05/2012	Old Wells Road, Darshill	Highway	Drainage	
23/06/2012	Old Wells Road, Darshill	Highway	Drainage	

11/07/2012	Wells Road, Bowlish	School	River Sheppey	
11/07/2012	Cannards Grave Rd, Shepton Mallet	Highway	Surface	
11/07/2012	Charlton Road, Shepton Mallet	Highway	Surface	
11/07/2012	Old Wells Road, Darshill	Highway	Surface	~1m
11/07/2012	Cannards Grave Rd, Shepton Mallet	Highway	Surface	
11/07/2012	Lower Lane, Shepton Mallet	Property x1	River Sheppey	
11/07/2012	West Shepton, Shepton Mallet	Highway	Drainage	~100mm
11/07/2012	Long Street & Church Street	Highway & Property x4	River Sheppey	~609mm
11/07/2012	Croscombe – details unknown	Details unknown	Details unknown	
09/10/2012	Frog Lane, Shepton Mallet	Highway	Drainage	
09/10/2012	Knowle Lane, Shepton Mallet	Highway	Drainage	
10/10/2012	Frog Lane, Shepton Mallet	Highway	Drainage	
04/11/2012	Cannards Grave Rd, Shepton Mallet	Highway	Surface	
04/11/2012	Shepton Road	Highway & Property x1	River Sheppey	
21/11/2012	Frog Lane, Shepton Mallet	Property x1, Highway	Surface	
21/11/2012	Cannards Grave Rd, Shepton Mallet	Property x3, Highway	Surface	
21/11/2012	Paul Street, Shepton Mallet	Highway	Drainage	
20/12/2012	Cannards Grave Rd, Shepton Mallet	Highway	Drainage	
29/12/2012	Cannards Grave Rd, Shepton Mallet	Highway	Drainage	
02/01/2013	Thrupe Lane	Highway & Property x1	Blocked culvert / drainage	
02/01/2013	Croscombe	Details unknown	Details unknown	
11/11/2013	Old Wells Road	Highway	Blocked culvert / drainage	
15/11/2013	West Shepton, Shepton Mallet	Highway	Surface	
24/12/2013	Long Street	Highway	Not recorded	
24/12/2013	Croscombe	Details unknown	Details unknown	
30/12/2013	Frithfield Lane, Shepton Mallet	Highway	Drainage	
06/01/2014	Cannards Grave Rd, Shepton Mallet	Highway	Surface	
14/01/2014	Back Lane, Darshill	Highway	River Sheppey	
12/02/2014	Long Street	Highway	Surface	
12/02/2014	Croscombe	Details unknown	Details unknown	
21/11/2016	Croscombe	Property x3, Highway	Surface, River Sheppey	
Recorded as 'various'	Long Street & western end of village	Property x4	Surface	
Recorded as 'various'	Croscombe	Details unknown	Details unknown	
Various	Charlton Road, Shepton Mallet	Highway	Surface	
03 & 04/10/2020	Long Street / Jack's Lane, Croscombe	Highway & Property x10	River Sheppey	



03 & 04/10/2020	Wells Road, Bowlish	Highway & Property x10	River Sheppey	
03 & 04/10/2020	Leg Lane and Leg Square, Shepton Mallet	Highway & Property x6	River Sheppey and drainage	

## Storm Alex

Storm Alex brought torrential downpours of rain between midnight on Friday 2<sup>nd</sup> October and 3am on Sunday 4<sup>th</sup> October 2020 to Croscombe, Bowlish and Shepton Mallet, and the wider region, causing widespread flooding, internal flooding of properties, road closures and some travel disruption.<sup>2</sup>

### Rainfall Analysis

Three Environment Agency rain gauges are located in the vicinity of the River Sheppey catchment, the locations of these are illustrated in Figure 10.

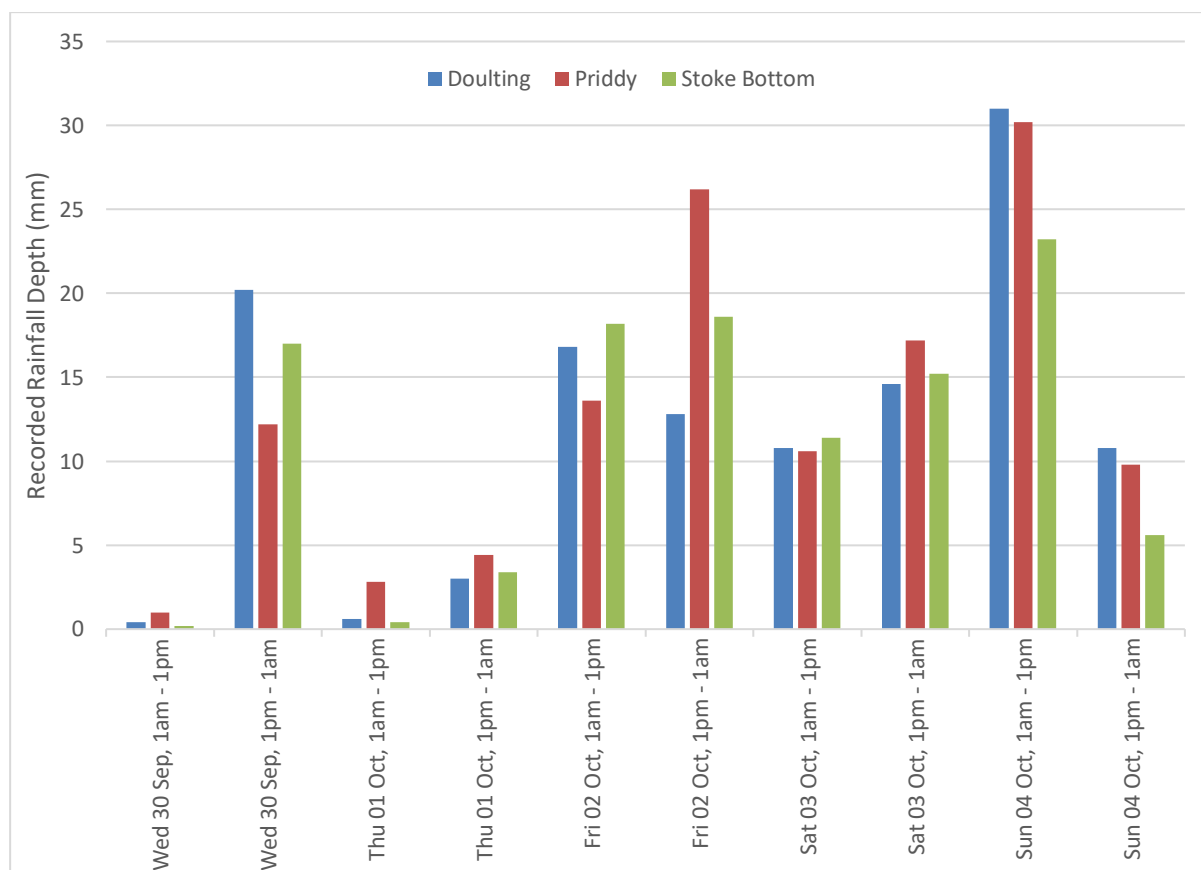
Figure 10 - Raingauge Locations



The rainfall data recorded preceding and during Storm Alex is presented in Figure 11 below. The three rain gauges record differing rainfall amounts as the storm passed through the area. However, as illustrated, similar rainfall patterns are experienced across all three gauges and rain occurred on all days leading up to the main rainfall event on Sunday 4<sup>th</sup> October.

<sup>2</sup> <https://www.itv.com/news/westcountry/2020-10-04/storm-alex-brings-months-worth-of-rain-fall-to-somerset-and-devon-in-just-two-days>

Figure 11 - Rainfall Data



Given the rainfall commenced on the 30th September and continued at various rates through to 4th October, it is believed that the wider catchment was saturated. Thus ground permeability capacity would have been reduced with the consequence of increased surface water run-off and high river levels.

To provide context, it is worthwhile comparing the storm event on the 3<sup>rd</sup> and 4<sup>th</sup> October to historical averages, recorded in the Sheppey catchment through the National River Flow Archive data<sup>3</sup>. Average October rainfall total is circa 92.3mm and a daily average of approximately 2.9mm per day.

Table 2 below summarises the rainfall totals in the week preceding and on Sunday 4<sup>th</sup> October. This also provides a comparison with the wider October average rainfall and daily average rainfall.

Table 2 - Rainfall Totals and Historic Comparison

	Doultling	Priddy	Stoke Bottom
30 <sup>th</sup> September - 4 <sup>th</sup> October Total rainfall depth	121mm 1.3x October Average	128mm 1.4x October Average	113.2mm 1.2x October Average
4 <sup>th</sup> October Daily total rainfall depth	41.8mm 14.4x Daily Average	40mm 13.8x Daily Average	28.8 9.9x Daily Average

<sup>3</sup> [NRFA Station Data for 52009 - Sheppey at Fenny Castle \(ceh.ac.uk\)](https://ceh.ac.uk/nrfa-station-data-for-52009-sheppey-at-fenny-castle)

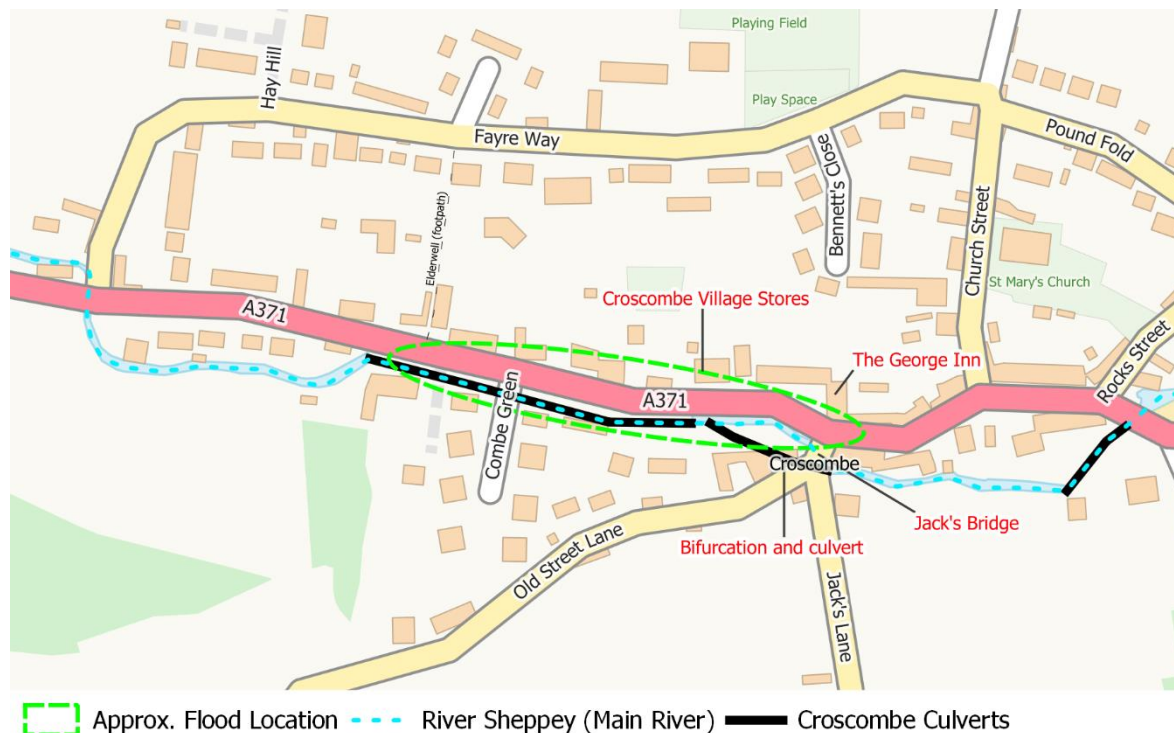
## Croscombe Flooding

In total, it is understood approximately 10 properties were flooded in Croscombe. An Environment Agency (EA) flood alert was issued at 10:21 a.m. on the 3<sup>rd</sup> of October.

As outlined above, the flooding occurred in the vicinity of the A371, Long Street, Jack's Lane, and Old Street Lane, as illustrated in Figure 12. Reports of flooding have been provided directly to the LLFA and sourced from others including Wessex Water<sup>4</sup>, Mendip District Council, Croscombe Parish Council, Croscombe Flood Committee, and community members including during the site visit on the 4<sup>th</sup> December<sup>5</sup>.

During the site visit, a further one to two properties were identified at the western end of Croscombe as potentially flooded but have not been reported / confirmed. It should be noted that flood incidents are typically under-reported due to the impacts on insurance and other perceived costs. This may subsequently impact any future funding or flood alleviation works<sup>6</sup>.

Figure 12 - Croscombe Flood Schematic



The Croscombe Flood Committee stated that the source of the flooding was from the River Sheppey which exceeded capacity; this was described by one resident as “filling up with one big surge.” The local residents stated that water levels had not risen as high in the last twenty years and that the increase in levels was very sudden.

Four properties were reported as having flooded internally on Long Street that had previously been fitted with Property Flood Resilience (PFR) products such as flood

<sup>4</sup> Incident report provided to the LLFA on 9<sup>th</sup> November

<sup>5</sup> Information obtained from site walk-over on the 4<sup>th</sup> December 2020 with the following attendees: LLFA, MDC, Wessex Water, Croscombe Flood Committee, and other local residents.

<sup>6</sup> The LLFA and other RMAs can only record properties that have flooded internally if reported and can only advise property owners that wish to engage.

boards, toilet bungs, non-return valves (NRVs) and pumps. These were fitted by the Environment Agency in 2017. Discussions with these property owners during the 4<sup>th</sup> December site visit outlined the flood water flow paths and ingress locations into and out of the properties.

Three of these property owners described how flood water came up through the flagstones of the floor. They believed this to be river water which had tracked underneath the road. One of the property owners reported internal flooding from underneath through the kitchen floor at the rear of the property and 300mm depth of flood water at the front door (facing on to A371 Long Street). The property owners also explained how the river level exceeded the height of some of the properties' private bridges in the rear gardens as illustrated in Figure 13.

*Figure 13 - Example of private bridge to the rear of properties on A371 Long Street*



Another property flooded internally and although previously fitted with a flood door privately purchased, the Local Planning Authority (LPA) required the flood door to be removed, prior to the flood event of the 3<sup>rd</sup> and 4<sup>th</sup> October, due to the property being a listed building. The property owner raised the concern and raised the question as to whether the flood gates in Shepton Mallet were opened during Storm Alex. Note there are 51 listed buildings in Croscombe.<sup>7</sup>

The property owners of Greyhound Farm, Saddlers, Old Mill Cottage, and Manor House indicated that Jack's Bridge was blocked / exceeded capacity and a drain directly outside and running adjacent to Greyhound Farm, Saddlers and Old Mill Cottage was identified as being blocked during the flood event. During the site walkover on the 4<sup>th</sup> December, the culvert adjacent to the A371 Long Street was observed as significantly vegetated and potentially blocked as illustrated in Figure 14. There is also local concern that this culvert has been damaged during the building of new houses just past Millrace.

<sup>7</sup> <https://britishlistedbuildings.co.uk/england/somerset#.YcJWyTFxeUk>



Surface water run-off has historically been a problem at the Old Street Lane, Jack's Lane and A371 Long Street junction with two steep roads converging at Jack's Bridge. In response to flooding in 2008, works were carried out by SCC Highways on Jack's Bridge in July 2009 to alleviate road run-off from Old Street Lane and Jack's Lane with discharge holes / spillways being cut into the bridge's parapet to allow the surface water to discharge into the River Sheppey, as shown in Figure 15. Flood water was seen to be flowing through these spillways on the 3<sup>rd</sup> and 4<sup>th</sup> October 2020.

*Figure 14 - Jack's Bridge showing the culvert adjacent to A371 Long Street blocked with vegetation*

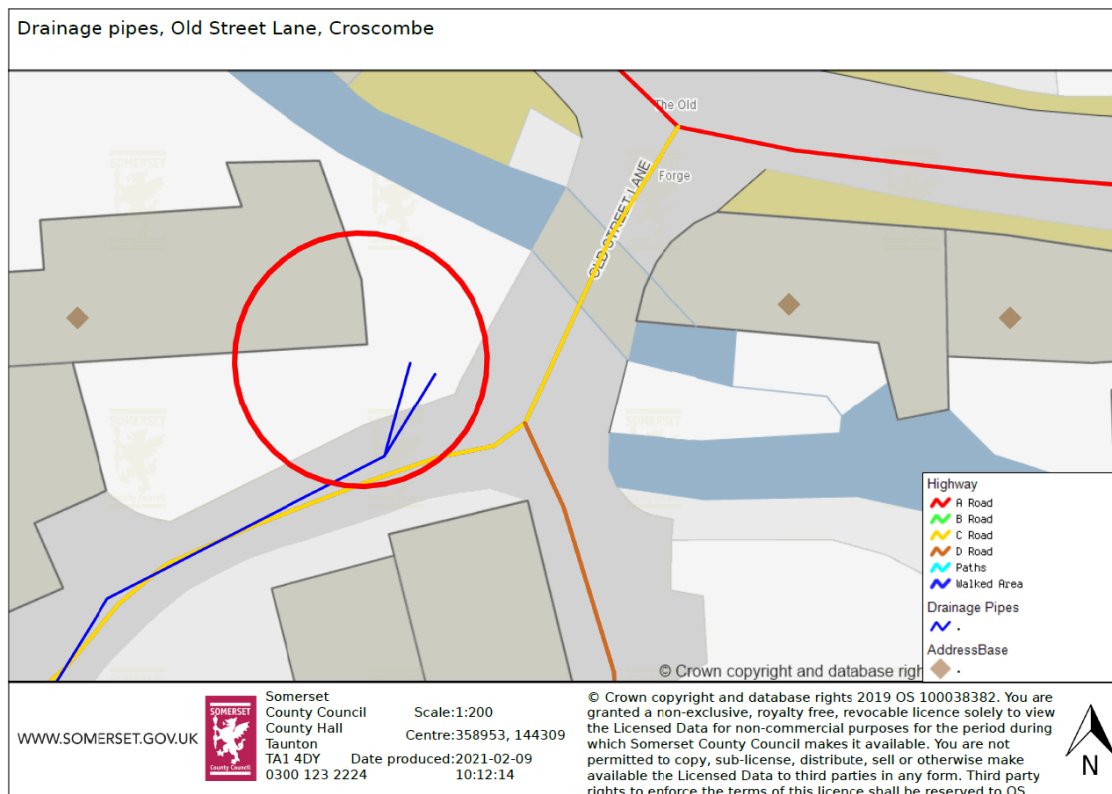


Figure 15 - Jack's Bridge downstream parapet with three spillways



In addition, a highway drain located within Old Street Lane, discharges into the River Sheppey downstream of Jack's Bridge and upstream of Manor House; this collects surface water runoff from Old Street Lane and is illustrated in Figure 15. These pipes were increased in size from 225mm to 300mm diameter 2009/10 on the back of the 2008 flood event.

Figure 16 - Old Street Lane surface water run-off drainage pipe outlets into the River Sheppey at Jack's Bridge.



It is understood from the Manor House property owner that this surface water run-off and the drainage pipes do not impact directly on any flooding to Manor House. The property owner went on to explain that "...these drainage pipes prevent surface water reaching Manor House directly but putting these drainage pipe's upstream of a pinch point i.e. where the River Sheppey narrows in front of Manor House is perhaps exacerbating the problem at Manor House."

The property owner of Manor House went on to suggest that the River Sheppey's bed level at Jack's Bridge as being at least 300mm higher than in 2008 with other residents, community members and CFG members also highlighting the perceived raised bed level. During discussion, this was raised as serious local concern with the belief that dredging the River Sheppey will increase the channel's capacity and aid flow through the village; residents have previously raised this issue with the EA.



## River Sheppey – Bed Levels and Dredging

Whilst the concerns of the community are noted, the photograph shown above in Figure 15 indicates the presences of large stones and cobbles forming the bed of the watercourse and these may be considered significantly larger than the carrying capacity of the River Sheppey. As such, significant changes to bed levels may be considered limited however this can be reviewed as part of the forthcoming Sheppey Catchment Study and further information is provide in Section 0.

Alongside this, dredging is often seen as a potential solution in increasing the capacity of watercourse however this is not normally a practicable and cost-effective solution. In the case of the river Sheppey through Croscombe much of the capacity is limited by the various culverts and crossings, and while dredging will provide localised increases in capacity, this will make the culvert restrictions an even greater pinch point. Alongside this, should any additional capacity be provided, this simply conveys water downstream faster potentially increasing flood risk to downstream properties and areas such as Wells.

Internal flooding entered Manor House through the floor of one of the ground floor's rooms, which sits directly above the mill leat flowing under the property and that this area of the property flooded to a depth of 100mm. However, a depth of 380mm was reached elsewhere on the ground floor of the property.

Approximately 70m downstream of Jack's Bridge, the River Sheppey flows into a culvert that is approximately 150m in length adjacent to the A371 Long Street and outfalls outside the property known as Laurel Villa. This culvert was identified by those attending the site walk-over as a potential problem due to blockages.

The Croscombe Flood Committee also suggested that the gully located opposite the village store on Long Street, immediately upstream of the culvert's inlet, experienced surcharging from the River Sheppey, along with water emanating from the junction between the road surface and kerb, as shown in Figure 17. Consequentially, Long Street acted as a conduit for exceedance to flow west along Long Street with the area of flooding stretching from west of The George Inn as far as the public footpath known locally as Elderwell (illustrated in Figure 12).

*Figure 17 - Cracks in Long Street from which water was reported to be emanating.*



Townsend Farm on Long Street required a sewage clean-up by Wessex Water on the 3<sup>rd</sup> and 4<sup>th</sup> October however reactive operational actions were not required for two other internally flood properties initially reported to Wessex Water. Some flood mitigation works were carried out by Wessex Water to reduce infiltration into their sewer system to reduce the risk of internal property flooding from the sewers. Further infiltration lines have been identified and will be filled in as soon as is possible.

Figure 18 - River Sheppey inside bend deposition (A371 Long Street and Fayre Way junction)



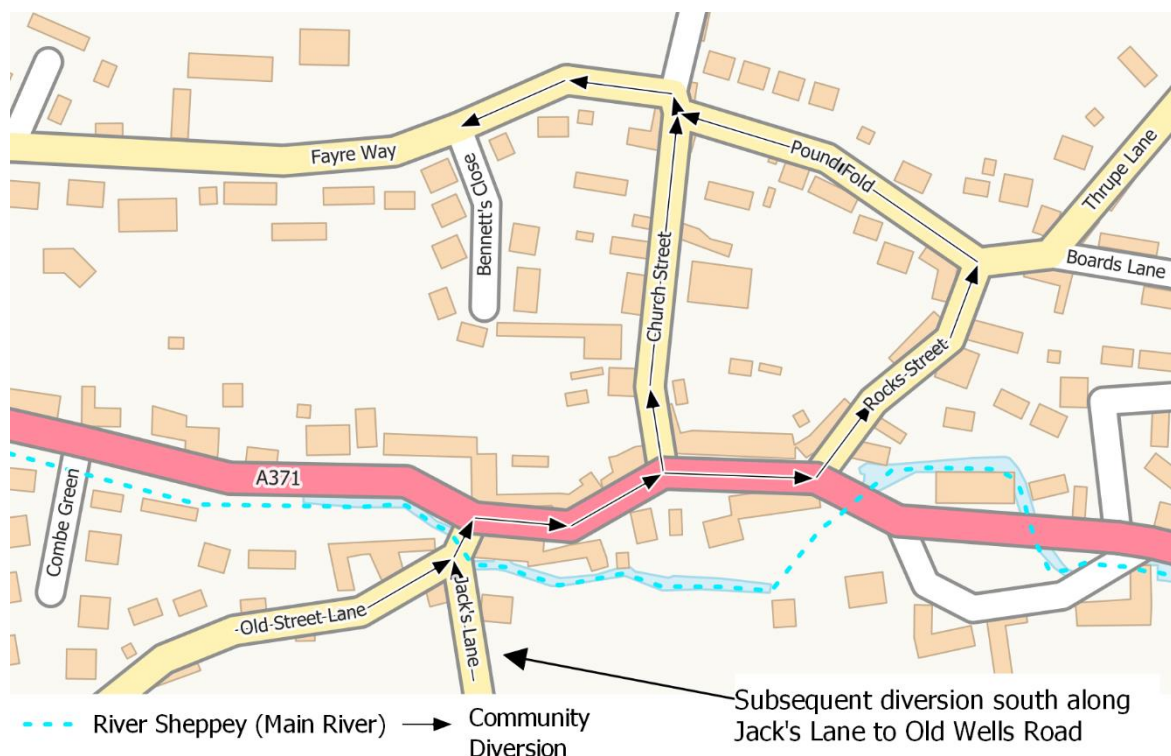
### Croscombe Highway Impacts

Jacks Lane, Old Street Lane and Jack's Bridge remained passable during Storm Alex however flooding in Long Street near the George Inn made further travel impassable in the Wells direction, as well as the flood outside the village to the west; the A371 Long Street west of Croscombe was flooded and saw one car being written off. Travel eastwards towards Shepton Mallet was unaffected.

Diversions were set up with traffic from Jack's Bridge diverted east towards Shepton Mallet, then up Church Street or Rock Street to access the west end of the village, as illustrated in figure 19. Initially, this diversion was undertaken by local residents however was revised by Devon and Somerset Fire and Rescue Service where traffic was diverted south along Jacks Lane onto Old Wells Road.



Figure 19 - Temporary diversions due to flooding of the A371 Long Street



## Croscombe drinking water service reservoir

Members of the Croscombe community raised the concern of Bristol Water's potable water covered service reservoir which is approximately 400m south of Jack's Bridge and elevated circa 50m above Long Street, Croscombe.

The reservoir is filled with treated drinking water pumped from the wider network, and has an overflow pipe that discharges (when the reservoir is being emptied) into a ditch to the north side of the reservoir and running parallel to the south of Paradise Lane; it is understood from local residents, this ditch directs water to a pond in the northern corner and when this is full, surface water exceedance continues downhill into Jack's Lane and into the River Sheppey.

It is understood from Bristol Water that works have been undertaken to the ditch along Paradise lane including the renewal of two culverted gate crossings and that when the service reservoir was last drained at the end of October, the ditch was directing flows as intended.

## Bowlsh Flooding

It is understood 10 properties flooded in Bowlsh and Darshill and the exact nature of the flooding is complex as a result of the historic watercourse infrastructure. However, it may be reasonable to assume the volume of water flowing along the River Sheppey significantly exceeded capacity. Alongside this, reports from

residents indicate sewerage discharges into the River Sheppey given the deposition of sewerage detritus e.g. toilet paper and wet wipes.

To the east of Bowlish, at Bowlish Meadows the river was described as circa 1200mm higher than normal and this resulted in flooding of circa 150mm depth to the detached garden of The Old Sluice House (No. 15 Bowlish) along with the deposition of sewerage detritus, potentially caused by discharges from the upstream sewerage network.

Residents have also reported sewer flooding in Bowlish Lane. This appears to have resulted from pressure in the sewer causing manholes to lift and sewage to spurt out. This process repeated at the manhole outside the Old Sluice House, where there is a pinch point in the sewer network. Pressure in the sewage system would have been added to by the runoff from Pike Hill and the Shaftgate estate going into the main sewer by design. This seems to be a recurring problem, and residents report this happening more than 10 times, and link it to the building of the Shaftgate Estate in the 1960's. It seems reasonable to assume that this is a combined sewer.

In the centre of Bowlish, the historic tributary along Coombe Lane has been culverted and records indicate this culvert is potentially circa 225mm (9") in diameter and therefore may be considered under-capacity. It is understood this culvert surcharged, with the pressure inside causing heaving to the road surface.

Further downstream, it is understood internal property flooding occurred at Ham Mill to a depth of circa 900mm and at Weirside, the flows in the river Sheppey were observed spilling from the weir and down into the culvert underneath the A371, this is shown in Figure 20. Flows subsequently seeped through the culvert walls causing internal flooding to the ground floor of Weirside.



*Figure 20 - River Sheppey spilling from the weir at Weirside*



Finally, downstream in Darshill, it is understood the volume of water exceeded the normal operation of the Darshill weir structure, a former mill/control structure. This is illustrated in Figure 21 below and it is understood during normal conditions, flows pass through the eastern culvert however during this storm event, all three culvert barrels were utilised.

*Figure 21 - Darshill Weir in full flow*



Immediately to the north of the weir and culverts, the watercourse bends eastwards 90° and the bank was reinforced with gabion baskets as part of a recent development however concerns have been raised by residents regarding the erosion and stability of this bank; this is shown in Figure 22.

*Figure 22 - Darshill Gabion Bank*



The system of culverts near Ham Mill, and indeed all along this stretch of the Sheppey, appear to be complex and poorly understood. Responsibility for maintenance and improvement seems to be uncertain. This situation needs to be improved.

### Shepton Mallet Flooding<sup>8</sup>

As outlined in Section 0, the River Sheppey flows in westerly direction with long lengths in culvert. Additionally, the Collett Park Stream drains the area to the south and flows northerly, carrying considerable amounts of surface water from the Tadley Acres estate (in the triangle formed by the confluence of the A37 and A371) and the Cannards Grave fields to the SW of Cannards Grave Road (A371). It is then culverted beneath the former HMP Shepton Mallet Prison and Leg Square, ultimately discharging into the River Sheppey between 4 Leg Square and The Old Surgery.

In contrast to the flooding in Croscombe, flooding in Shepton Mallet is understood to be from a combination of surface water and surcharge from manholes, as a result of high-water levels within the culverted River Sheppey and Collett Park Stream with both culverts understood to be beyond capacity. It was reported that there was a “gush of water almost resembling a waterfall” and with the culvert capacity reached, water flowed down Gaol Lane into Leg Square with water surcharging from manholes.”

<sup>8</sup> Information obtained from a Microsoft Teams Meeting with the Shepton Town Council held on the 14<sup>th</sup> December 2020, annotated maps, Flood Incident Report forms and description of flood event by Major General (ret'd) R A Pett CBE, MBE, DL received on 22<sup>nd</sup> January 2021

It is water was observed surcharging from Manhole ref 0750 along the Collett Park Stream culvert along with foul sewer manhole 0700. The locations of these are illustrated in Figure 23 with further photographs provided in Figure 24 and Figure 25.

Figure 23 - Leg Square Drainage Schematic

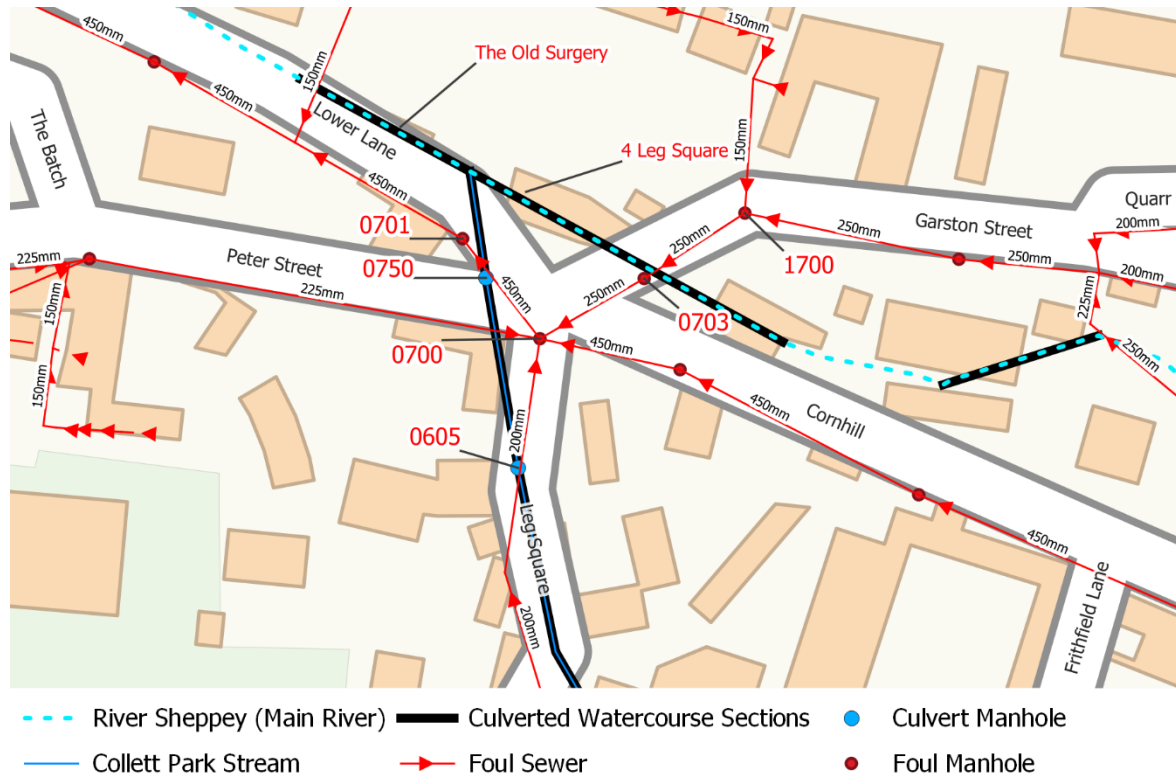




Figure 24 - Surcharging from Collett Park Stream culvert (manhole ref: 0750)



Figure 25 - Flow path from Gaol Lane into Leg Square



Flows along the Gaol Lane / Leg Square link were described as a 'waterfall'

Flows continued down into Leg Square

Consequently, the combination of the surface water flowing from Gaol Lane and the surging manholes contributed to flooding of some properties' gardens, ground floor and basements in the vicinity of Leg Square. The western end of Garston Street was also reported as "completely flooded".

Leg Square was completely flooded and impassable to traffic for several hours and was considered by community members as being dangerous to children on foot and other similarly vulnerable persons e.g. the elderly.

Additionally it was described by the community that “the road surface between The Hollies and The Old Manor House split and was forced upwards to a height of several feet, and the cobblestones across the south side of Leg Square were forced upwards and into the Square itself.”

Cannards Grave Road (A371) was flooded and blocked to traffic on 4th October, well before the engorged stream surged into Collet Park. The park was extensively flooded in the area of the duck pond and well beyond, forming a small lake. The “stream”, in full flood, then surged under Charlton Road (A361) into the grounds of Whitstone School, where it formed another large lake in the school grounds, abutting the wall to the west beside Frithfield Lane, which leads from Charlton Road to the Prison entrance. Water normally flows under Frithfield Lane at that point, into a culvert under the Prison towards Leg Square but, on this occasion, water escaped through numerous gaps in the mortar of the wall, up to a height of one metre.

The Town Council and community expressed that they believe “that the existing infrastructure cannot cope and that it will become worse when the Cannards Grave Road and Prison developments proceed, unless extensive and realistic water management arrangements are put in place first.”

### New development and surface water drainage requirements

It should be noted that national and local planning policy requires all new development to not exacerbate flood risk elsewhere and this is typically achieved through limiting the discharge of surface water runoff from a site. Additionally, developments of more than 10 dwellings are required to provide sustainable drainage systems (SuDS) to manage surface water runoff, including provision for the impacts of climate change. This national policy is further strengthened by Mendip District Council’s local planning policy.

To this end, the emerging details for the Cannards Grave Road site include a number of attenuation features to collect surface water runoff in and this is discharged from site at a controlled rate mimicking the existing greenfield discharge rate. The details for the site are not yet finalised with subsequent design and information to be undertaken and agreed through the reserved matters and discharge of conditions stages prior to any construction being undertaken.

One of the recommendations of this report is that requiring stricter standards of developers in regard to surface water runoff be investigated, and implemented if at all possible.

## Conclusion and Probable Causes

This Section 19 flood investigation has sought to gain a better understanding of the flooding which occurred in Croscombe, Bowlish and Shepton Mallet on the 3<sup>rd</sup> and 4<sup>th</sup> October 2020. The investigation into this flood event has involved a number of organisations and locally supplied information for which Somerset County Council Lead Local Flood Authority is grateful for.

Based on the investigation the following are considered contributory to the cause of the flood event on the 3<sup>rd</sup> and 4<sup>th</sup> October 2021.

- The topography of the River Sheppey catchment, with steep valley sides is such that any surface water runoff is directed downhill into the River Sheppey very quickly.
- The River Sheppey is historic in nature with many structures including culverts, mill leats, bifurcations, weirs etc. All these structures affect the capacity of the watercourse in conveying flows.
- Almost continuous rainfall occurred starting on Wednesday 30<sup>th</sup> September 2020 and culminating on Sunday 4<sup>th</sup> October. As such, the catchment may be considered to be saturated.
- The rainfall which occurred in the above five-day period was circa 1.2 to 1.4 times the October average rainfall amount. On Sunday 4<sup>th</sup> October, rainfall was circa 10 to 14 times the October daily average rainfall.
- The flow rates along the River Sheppey were such that the capacity of various structures (particularly culverts) were exceeded leading to flooding in Croscombe, Bowlish and Shepton Mallet.
- The exceeded capacity of the River Sheppey had a follow-on impact to the foul water network with the potential for ingress of flood waters utilising foul sewer capacity, along with the potential discharge from the sewer network.

## Next Steps

During the development of this Section 19 flood investigation report, funding has been sought and agreed from the Somerset Rivers Authority (SRA) for a detailed study into the River Sheppey Catchment with this study being led by Mendip District Council.

As recognised within this investigation and through previous assessments, flooding which occurs in the River Sheppey catchment is complex, occurring from multiple sources including rivers, surface water runoff and groundwater. It is understood the Sheppey Catchment Study will draw on previous assessments and may include:

- Review of all existing information and surveys carried out to date;
- Additional investigations and walkover surveys carried out in areas where data is missing, including full CCTV survey of culverted watercourses to review capacity and condition;
- Assessment of flow routes and capacity of the existing open watercourses including assessment of changes in bed levels;
- Identification of flood risk issues and a review of the options to mitigate these;
- Modelling of the catchment, flow pathways and groundwater flow to assess the sensitivity of the system to climate change and any proposed options identified to mitigate risk;
- Assessment of the need for additional measures for reducing blockages and maintenance in the future (i.e. trash screens);
- Consultation with landowners on land management practices and any potential implementation of Natural Flood Management measures (i.e. constraints to delivery of these options);
- Review of any proposed naturalisation of the existing watercourse (de-culverting) including any online wetland areas and tree planting currently identified within the Mendip District Council catchment review;
- Identify ways in which community engagement can be used to improve resilience (education, change in behaviours, accountability and action);
- Costed Action Plans for the delivery of identified mitigation options to inform future funding bids (where required);
- Outline assessment to identify potential funding sources for delivery using the Partnership Funding approach.

Alongside the Sheppey Catchment Study undertaken by Mendip District Council outlined above, there are a number of potential actions which can be undertaken following the October 2020 flood event. The Lead Local Flood Authority will monitor the delivery of these actions with the relevant risk management authorities. Mendip



District Council have an excellent set up updates on their parts of the work at: [MENDIP FLOOD RISK MANAGEMENT PROGRAMME \(arcgis.com\)](https://arcgis.com).

1. Review of Property Flood Resilience Environment Agency

A number of properties, particularly in Croscombe, with previously installed Property Flood Resilience (PFR) measures experienced internal property flooding. These should be reviewed to determine the performance of such measures and if any remedial actions are needed.

2. Highways gully cleansing and road maintenance SCC Highways

A number of issues were reported with the gullies across this investigation area including blocked gullies in the vicinity of Saddlers, Croscombe. Reactive gully cleansing is required to identify and clear these gullies and ensure a pro-active approach to maintenance is undertaken.

Increased collaboration with Croscombe Flood Committee and Shepton Mallet Town Council could be utilised to ensure that the timings of maintenance / cleaning activities are such that they are able to attend to, and clear, as many highway gullies as possible. Parked cars may be an obstacle for this action.

3. Targeted CCTV survey of drainage and watercourse structures SCC  
LLFA

As noted above, some surveying may be undertaken by Mendip District Council as part of the Sheppey Catchment Study. However, where not required by MDC, additional survey should be undertaken for the LLFA's asset records and for the consideration of improvements. This survey could focus on the following:

- Old Street Lane highway drainage discharging into the River Sheppey in the vicinity of the Manor House, downstream of Jack's Bridge.<sup>9</sup>
- River Sheppey through Bowlish, in particularly the weirs and culverts in the vicinity of the Horseshoe Inn and Ham Mill / Weirside.
- The River Sheppey and the Collett Park Stream in the vicinity of Leg Square and, if possible, under the prison, Shepton Mallet.

Further survey locations may be determined in time. Areas where damage is found should be programmed in for repair works, in partnership with landowners and other stakeholders.

Mendip District Council organised surveys which look place over February and March 2022. These included the Coombe Lane Culvert, Little Brooks Lane, Collett Park and Whitstone School. Further surveys in harder-to-access sites will take place later in 2022. Planned surveys are visible here; [River Sheppey Communities Flood Resilience Project | MENDIP FLOOD RISK MANAGEMENT PROGRAMME \(arcgis.com\)](https://arcgis.com).

The surveys identified some locations where repair works are required. This work will be progressed as soon as possible with the proper authorities.

4. Weirs and culverts in selected areas to be mapped LLFA

<sup>9</sup> The report to Croscombe Parish Council about the flood of 21/11/2016 has some valuable observations about the operation of the drainage system in this area, and proposals for upgrades.



Following on from the CCTV survey, the locations of conditions of all weirs and culverts in selected areas to be mapped, pinch points and trouble spots identified, and responsibility and opportunity for maintenance and upgrade of each stretch to be established. This to include Bowlsh (especially around Ham Mill), in Croscombe, particularly around Jacks Bridge and Millrace.

5. Review of sewer infiltration Wessex Water

During a flood event, with elevated water levels, there is the potential for groundwater to infiltrate into the sewer network, thereby utilising sewer capacity. Some works has already been undertaken by Wessex Water to locate and re-line sewers minimising the potential for ingress of water, this work should continue.

6. Review combined sewers Wessex Water

During a flood event, surface water running into sewers by design causes build up of pressure in the system and surcharging. Existing combined sewers in places where sewer flooding has been reported (such as those at Pike Hill and the Shaftsgate estate, running down Bowlsh Lane) to be reviewed to see if this surface water input can be diverted or attenuated.

7. Explore the use of a 'Critical Drainage Area' SCC LLFA & Environment Agency

A Critical Drainage Area (CDA) is an area defined by the Environment Agency and notified to the Local Planning Authority (LPA) where critical drainage problems are known to occur. Within these areas, surface water management as regards new developments is held to a higher standard to achieve flood risk management benefits.

8. Improve local flood forecasting Environment Agency

A 'flood alert' was issued at 10:21am on Saturday 3rd October and this outlines that flooding is possible however no higher 'flood warning' i.e. that flooding is expected was issued. A review should be undertaken to improve forecasting in the catchment with the aim to improve flood alerts and warnings in order to provide sufficient notice for residents.

9. Explore updates to local planning policy SCC LLFA & MDC

In order for the Local Authority to require any stricter standards to be applied (such as accounting for events at greater than 1 in 100 years return period, or requiring runoff at less than greenfield rates), this needs to be stated in local planning policy. It is recommended that further work be undertaken with a view to requiring stricter standards to be applied to surface water management by developers in affected areas around the River Sheppey.

10. Support local residents in preparing for floods SCC LLFA & community

Review the local community response to the flooding and support the development of community resilience through Shepton Mallet Town Council, Croscombe Flood Committee, Parish Councils and other interested bodies. LLFA, Somerset Rivers

Authority, Civil Contingencies Unit and the EA to work with the community to review and where necessary develop the local flood plan in the context of any lessons from this event. Residents have stated a particular interest in information on funding for community mitigation projects and education for communities.

#### 11. Maintain partnership working partners All

All partners to maintain regular contact and periodic meetings to keep one another and the public informed of the progress of the above actions, and facilitate co-operation between different authorities.

#### 12. Education on riparian rights and responsibilities SRT

There seems to be a lack of knowledge amongst the public about the rights and responsibilities of riparian owners. Work to be undertaken to educate landowners and the public on these matters.

#### 13. Residents have expressed a desire for further hydrological information about flooding in Croscombe.

The first request was for a rain gauge to be installed. This is something that could be discussed initially within the Croscombe Flooding Committee, perhaps with LLFA, EA or SRA support. They need to consider what data they want to collect, and what they want to do/ want done with it. Ideally the gauge would be situated on the land of/looked after by a local volunteer.

The second request was for an analysis of rainfall for each flood event, with a view to establishing where the community is most vulnerable. SRA to discuss this with CFC with a view to scoping, costing and prioritising this work.

## Rights & Responsibilities

It should be noted that everyone has a responsibility for flood risk management including formal Risk Management Authorities (RMAs) and informal stakeholders including community groups and local residents. The following should be noted in relation to responsibilities.

### Somerset County Council Lead Local Flood Authority

In accordance with the Flood & Water Management Act 2010 upon becoming aware of a flood event the Lead Local Flood Authority must, to the extent that it considers it necessary or appropriate, carry out an investigation and publish the results notifying any relevant risk management authorities of its findings.

In particular the LLFA have responsibility for ordinary watercourses, and surface water and ground water flooding. Under the Land Drainage Act 1991 SCC have permissive powers to require works for the removal of obstructions to maintain the flow of any ordinary watercourse.

## Environment Agency

The Environment Agency maintains overarching flood risk responsibilities, including improvement or construction work on Main Rivers. Main Rivers are defined by Defra and are shown on the Flood Map for Planning; as pertains to this study the River Sheppey is classified as Main River from just upstream of Shepton Mallet. A main river is defined as a watercourse marked as such on a main river map, and can include any structure or appliance for controlling or regulating the flow of water in, into or out of a main river.

## Riparian Owner's Responsibilities

Under common law landowners are the riparian owner of any watercourse within or adjacent to the boundary of their property. Where a watercourse is sited between properties each owner may be equally responsible.

Riparian owners' responsibilities include the maintenance of the bank and bed of their section of watercourse to prevent any obstruction to the flow in the watercourse. Common issues include allowing vegetation to become overgrown or undertaking other work that may affect the watercourse. Riparian owners also have ultimate responsibility to protect themselves and their property from flooding.

Issues with this matter should, in the first instance, be reported to the Lead Local Flood Authority.

## Highway Authority

Somerset County Council, as Highway Authority, is responsible for maintaining the highway. Highway drainage is designed to manage the rainfall upon the highway. These systems are not designed to manage excessive run-off from third-party land or from watercourses. The highway drainage is maintained in accordance with risk management principles.

## Landowners and residents

Options to further address this flood risk will be considered as detailed above, however it should be recognised that homeowners have an important responsibility in protecting their properties.

It is recommended that residents consider developing a Flood Action Plan for their property and community to mitigate the impacts and reduce the time taken to recover should further flooding occur.

In addition it is recommended that homeowners consider steps that can be taken to protect their homes and that they are offered advice on property flood resilience products, suppliers and potential sources of supplementary funding.

## Limitations

The statutory requirement for the LLFA (SCC's Flood Team) to produce a Section 19 Flood Investigation Report are to investigate the following:

Events leading up to the flooding

Numbers of properties flooded

Which RMAs have flood risk management functions in respect of the flooding (as listed above)

Whether each of those authorities has exercised or is proposing to exercise those functions in response to the flood

The inclusion of a detailed narrative of the flood event, rainfall data and probable causes as laid out above are not statutory requirements for inclusion in a s.19 Flood Investigation Report, nor are they a detailed scientific analysis. Caution should therefore be used when relying on the analysis undertaken within this assessment.

Rather, SCC LLFA endeavour to produce s.19 reports that provide as much evidence, information, and data to inform the community, and support bids for funding of future comprehensive studies that may better interpret the information and data to and for the benefit of communities and enable all RMAs to further exercise their functions.

## Appendices

### Appendix A – Acronyms and Glossary

CCU	Civil Contingencies Unit
CDA	Critical Drainage Area (see below)
EA	Environment Agency
FRM	Flood Risk Management
FWMA	Flood and Water Management Act 2010
DB	Internal Drainage Board
LDA	Land Drainage Act 1991
LFRMS	Local Flood Risk Management Strategy (see below)
LLFA	Lead Local Flood Authority (see below)
MDC	Mendip District Council
PFR	Property Flood Resilience (see below)
RMA	Risk Management Authority (see Appendix B)
SCC	Somerset County Council
WW	Wessex Water (Water and Sewerage Company)
Catchment	The area that serves a watercourse with rainwater.
Climate Change	A long term change in weather patterns, in the context of flood risk, climate change will likely produce more frequent severe rainfall
Critical Drainage Area	An area located within Flood Zone 1 and designated by the Environment Agency where critical drainage problems are known to occur
Defence	A structure that is used to reduce the probability or impact of flood water on a particular area.

Exceedance flow	The flow of water that occurs on the surface once the capacity of the underground drainage system design standard is compromised.
Flood	The temporary covering by water of land not normally covered with water
Fluvial flooding	Flooding caused by rivers
Local Flood Risk Management Strategy	Somerset's flood risk management strategy for surface water, groundwater and ordinary watercourses, published February 2014; sometimes shortened to Local Strategy
Lead Local Flood Authority	The Flood and Water Management Act 2010 identified Somerset County Council as the Lead Local Flood Authority for the county of Somerset. This gives the county council a strategic role in overseeing the management of local flood risk and with a number of duties and powers.
Main River	A watercourse defined by Defra and shown as such on the Flood Map for Planning. The Environment Agency has flood risk management responsibilities and powers for Main Rivers
Property Flood Resilience (sometimes also referred to as Property Level Protection)	These are measures which can mitigate the impact of flooding on properties either by increasing the resistance of a building to flooding or by increasing its resilience by speeding up the time taken to recover after a flood. Examples include flood barriers, flood resistant doors, non-return valves on pipes, etc. Further information can be found on the Blue Pages of the National Flood Forum: <a href="http://bluepages.org.uk/">http://bluepages.org.uk/</a> .
Ordinary watercourse	A river, stream, ditch, cut, sluice, dyke or non-public sewer that is not a designated Main River, and for which the local authority has flood risk management responsibilities and powers.
Return period	Also known as recurrence interval. An estimate of the likelihood and severity of flooding. It is based on the statistical analysis of data to provide a probability that an event of any given magnitude will occur in any given year. This may be expressed in years (eg. 1 in 100) or



	as a percentage (1%) chance of occurrence in a given year.
Riparian owner	Under common law landowners are the riparian owner of any watercourse within or adjacent to the boundary of their property. Where a watercourse is sited between properties each owner may be equally responsible. Riparian owners' (landowners whose land is crossed or bordered by a watercourse) responsibilities include the maintenance of the bank and bed of their section of watercourse to prevent any obstruction to the flow in the watercourse.
Surface water flooding (pluvial flooding)	Surface runoff flooding is caused by rainfall and is that flooding which occurs due to water ponding on, or flowing over, the surface before it reaches a drain or watercourse.
Section 19, S19	Section 19 of the Flood and Water Management Act that places a duty on LLFAs to investigate flooding as it deems necessary and appropriate. The decision whether or not to investigate a flood is at the discretion of the Lead Local Flood Authority and the extent of the investigation will be adjusted to reflect the clarity of the responsible authority, the significance of the incident and the resources available.

## Appendix B - Risk Management Authority Responsibilities

There are a number of key organisations who together manage flood and coastal erosion risks in Somerset and are defined as risk management authorities in the Flood and Water Management Act. A 'Risk Management Authority (RMA)' means:

- a) the Environment Agency (EA),
- b) a lead local flood authority (county council),
- c) a district council for an area for which there is no unitary authority,
- d) an internal drainage board,
- e) a water company, and;
- f) a highway authority.

Each RMA has its own defined areas of responsibility, including for particular sources of flooding as shown in Table 3.

*Table 3 - Risk Management Authorities and their responsibilities for managing flood risk*

Flood Source	Environment Agency	SCC LLFA	Mendip District Council	Wessex Water	SCC Highway Authority
<b>Rivers:</b>					
Main river	X				
Ordinary watercourse		X	X		
<b>Surface Runoff:</b>					
Surface water		X			
Surface water originating on the highway					X
<b>Other:</b>					
Sewer flooding				X	
The Sea	X				
Groundwater		X			
Reservoirs	X				

Full details of the roles and responsibilities of the risk management authorities in Somerset and how they work together can be found in the appendices of our Local Strategy for Flood Risk Management: <http://www.somerset.gov.uk/policies-and-plans/strategies/flood-and-water-management/>.

## Appendix C - Useful contacts and links

### Flood Risk Management – Somerset County Council

Telephone: 0300 123 2224 (8am to 6pm Monday to Friday)

Email: [Flooding@somerset.gov.uk](mailto:Flooding@somerset.gov.uk)

Website: [www.somerset.gov.uk/floodrisk](http://www.somerset.gov.uk/floodrisk)

### Environment Agency

Telephone: 03708 506 506 (Monday to Friday 8am to 6pm)

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Website: [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency).

Incident hotline: 0800 80 70 60 (24 hours)

Floodline: 0345 988 1188 (24 hours)

For details of flood warnings please visit:

<https://flood-warning-information.service.gov.uk/warnings>.

### Area Highways Office – Somerset County Council

Telephone: 0300 123 2224 (8am to 6pm Monday to Friday)

Email: [countyroads-southsom@somerset.gov.uk](mailto:countyroads-southsom@somerset.gov.uk)

Roads and Transport:

<http://www.somerset.gov.uk/roads-parking-and-transport/highway-area-offices/>

Travel Somerset: <https://www.travelsomerset.co.uk/>.

### Civil Contingencies and Community Resilience

Somerset Direct number - 0300 123 2224.

Somerset prepared: <http://www.somersetprepared.org.uk/>

### Somerset County Council

Telephone: 0300 123 2224 (8am to 6pm Monday to Friday)

Email: [generalenquiries@somerset.gov.uk](mailto:generalenquiries@somerset.gov.uk)

## Version History

Rev	Date	Details	Author	Checked by	Approved by
			Engineer	Service Manager	Strategic Manager
1	May 2021	Draft for comment	A. Lambart & C. Brammeier		
2	June 2021	Updated following meeting with RMAs	C. Brammeier		
3	July 2021	Draft public issue for comment	C. Brammeier	H. Smith	J. Doyle
4	March 2024	Reformatted to new council standard	Anna Meares		



**Somerset**  
Council

# Flood Investigation Report

*Section 19 Flood and Water  
Management Act 2010*

## Chard & Tatworth

21-22<sup>nd</sup> October 2021

<b>Organisation</b>	Somerset Council
<b>Title</b>	Chard & Tatworth Section 19 Report
<b>Owner</b>	Somerset Council LLFA
<b>Primary Legislation</b>	Flood & Water Management Act 2010

<b>Date of Incident</b>	21 <sup>st</sup> & 22 <sup>nd</sup> October 2021	<b>Date of Report</b> <b>Version – 15<sup>th</sup> Feb 2024</b> <b>Status: <i>Final</i></b>
<b>Site / Catchment Location:</b>	Chard, Tatworth	



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## Introduction

The function of a Section 19 report is to gather information on the happenings during a particular flood event. They are known as a Section 19 report because they are required under Section 19 of the Flood and Water Management Act 2010. The legislation says:

### **Section 19: Local authorities: investigations**

(1) On becoming aware of a flood in its area, a Lead Local Flood Authority must, to the extent that it considers it necessary or appropriate, investigate—

(a) which Risk Management Authorities have relevant flood risk management functions, and

(b) whether each of those Risk Management Authorities has exercised, or is proposing to exercise, those functions in response to the flood.

(2) Where an Authority carries out an investigation under subsection (1) it must—

(a) publish the results of its investigation, and

(b) notify any relevant risk management authorities. A Section 19 report will often detail any ongoing work with regards to flooding in the area, and will signpost additional work that should be considered, usually in the form of investigations to be undertaken.

In addition, a Section 19 report will often detail any ongoing work with regards to flooding in the area, and will signpost additional work that should be considered, usually in the form of investigations to be done.

It is not the function of a Section 19 to provide concrete solutions for flooding. This requires far more detailed technical work, liaison with landowners, and decision making about schemes in concert with the public and other stakeholders, although the Section 19 report can help in demonstrating the need for this work and securing future funding. Also, it is impossible to prevent absolutely *all* flooding in *all* circumstances – rainfall events vary widely in intensity, and whatever drainage systems or flood mitigation schemes are put in place, there is always the possibility, however remote, that an extreme rainfall event will overwhelm them. We can, however, plan for the vast majority of rainfall events, and in the course of doing so, make extreme events less impactful. Even a small difference in the final height or path of flood water can be the difference for some between their homes flooding and not, so even small schemes can have value in an extreme rainfall event.

The usual way to describe the severity of rainfall events is to describe in terms of ‘1 in X years’. If we take the example of a 1 in 100 year event, this is an event of a size that will be equalled or exceeded *on average* once every 100 years. This means that over a period of 1,000 years you would expect the one in 100 year event would be equalled or exceeded ten times. But the distribution of events is not even over the 100 years - several of those ten times might happen within a few years of each other, and then none for a long time afterwards. This report deals with a rainfall event of 1 in 38 year intensity, so the flooding in terms of extent and depth was not as

extensive as that resulting from a 1 in 100 year event, which is shown on Environment Agency flood maps.

Appendix 1 includes selected photographs sent in by residents showing flooding in progress, and maps showing more detail of the area. We are grateful to residents for the information they have provided which has enabled the compilation of this report.

## Area Information

Chard is a town of approximately 13,000 people in south Somerset. It sits on the eastern edge of the Blackdown Hills, and as such has steep slopes to the west and northwest. It sits on a watershed - a ridge of land which separates water flowing to different rivers - with most the drainage in the town heading towards the River Isle, though some drains connect to the River Axe.

There are a number of surrounding villages, many sitting along the route of the River Isle and nearby watercourses. The village of Tatworth was also badly affected by this weather event

This report covers the heavy rainfall incident on 21<sup>st</sup> and 22<sup>nd</sup> October 2021, and the subsequent flooding in Chard and Tatworth.

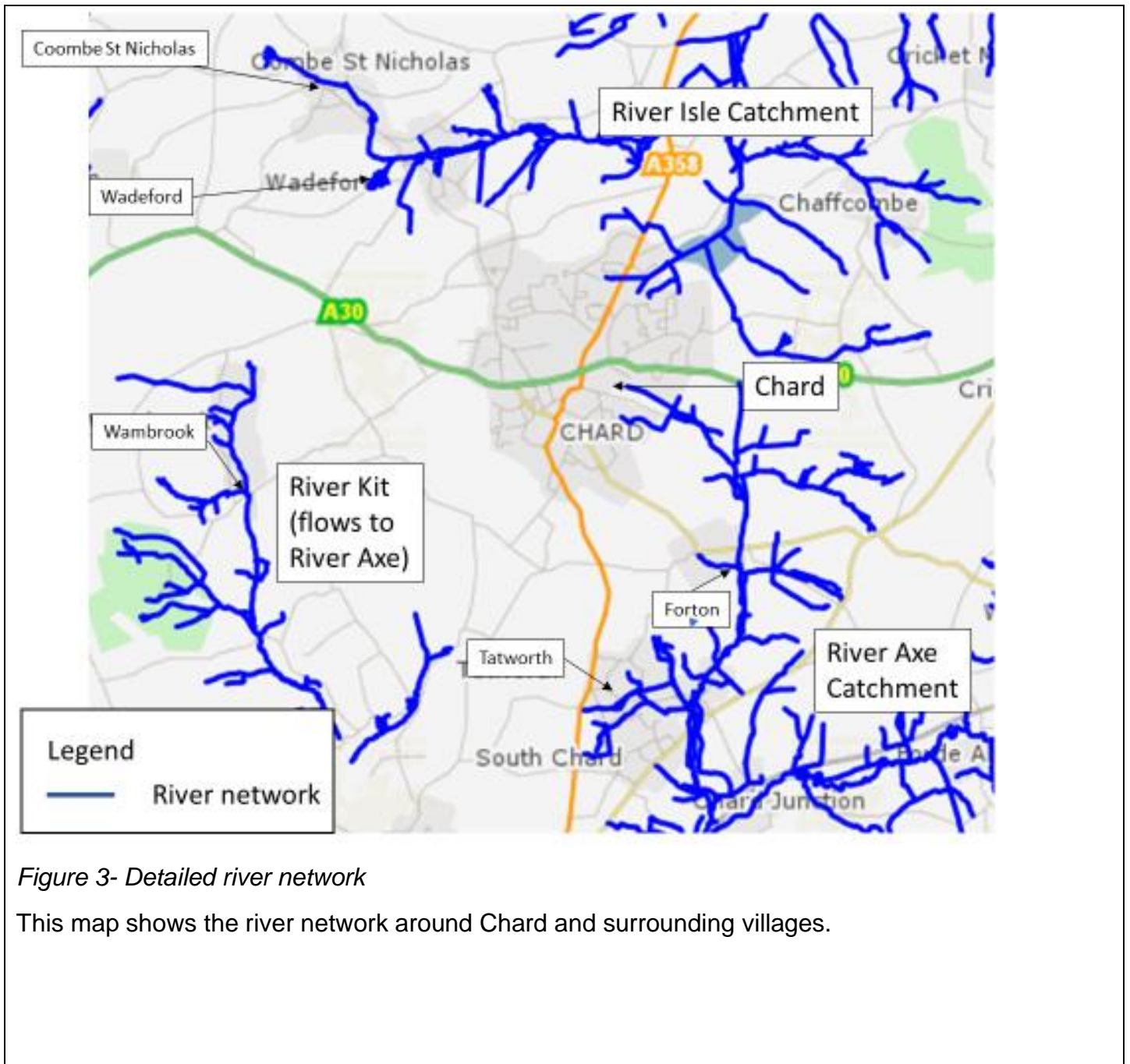


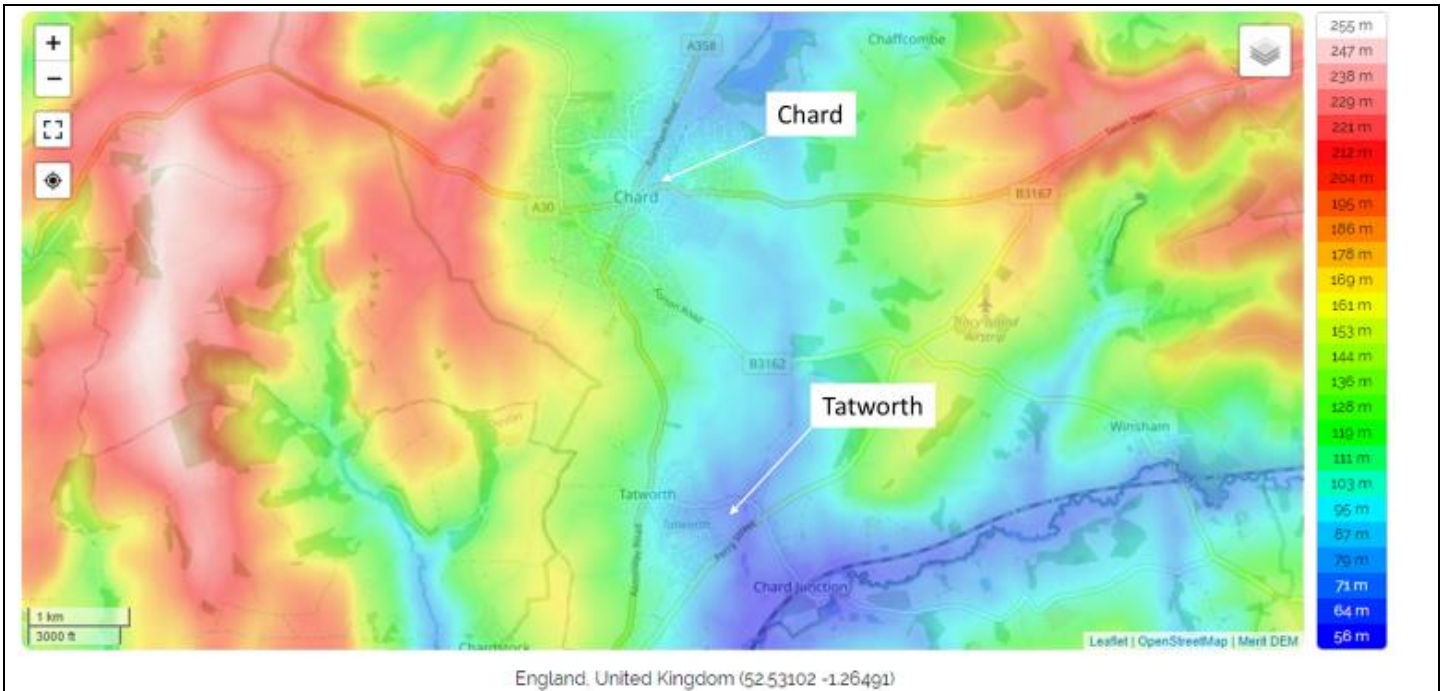
Figure 1 - Site Plan of Chard Town showing neighbourhoods.





Figure 2- Plan of Tatworth



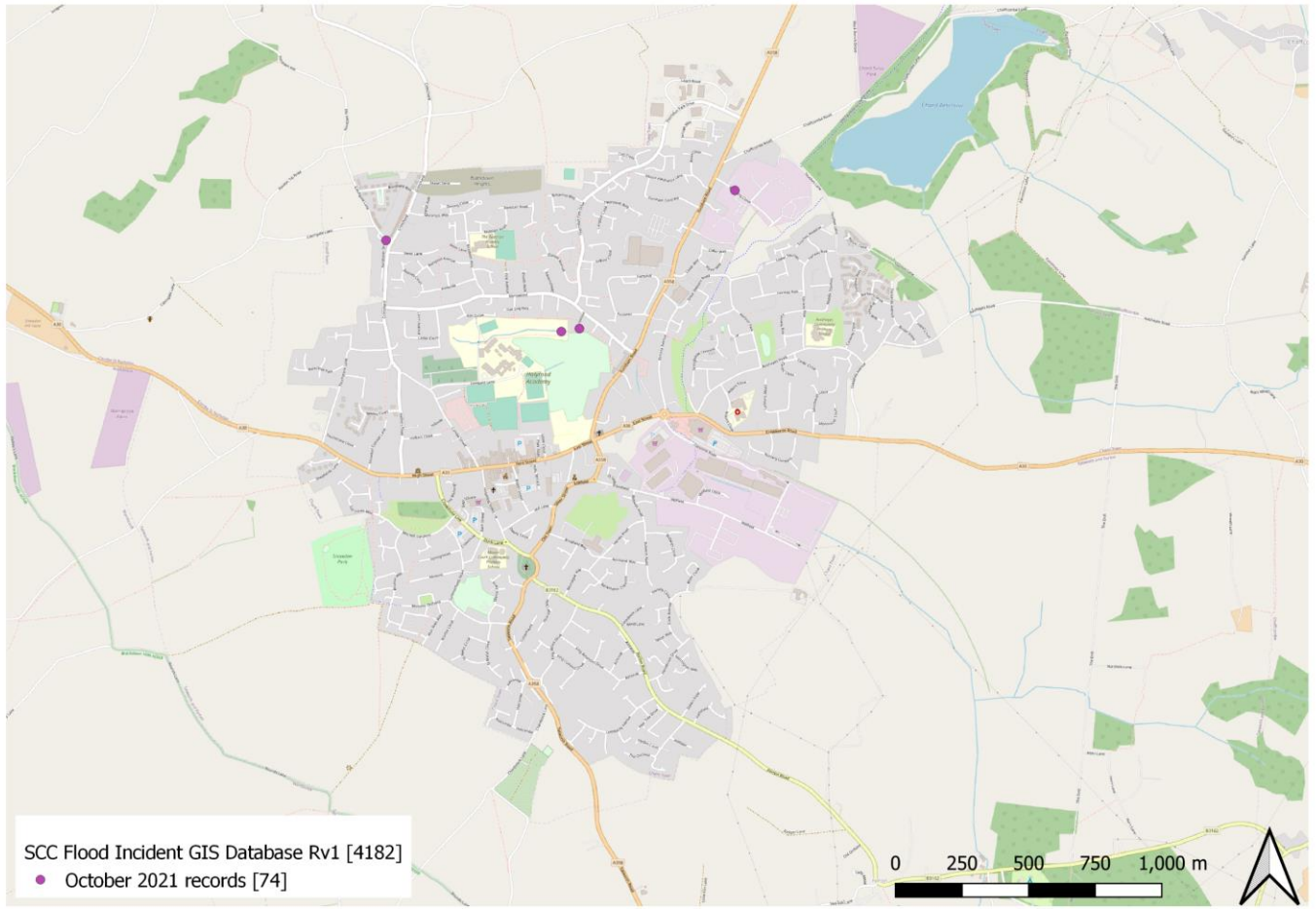


*Figure 4- Topography.*

This shows the form and, most importantly, height of the land surrounding Chard. Pink and red land is the highest, with blue at the lowest points. From this we can see that there are substantial hills to the west and east of Chard (the Blackdown Hills), and very steep slopes down into the low points around Chard reservoir and Tatworth.<sup>1</sup>

<sup>1</sup> [Chard topographic map, elevation, relief \(topographic-map.com\)](https://www.topographic-map.com/)





*Figure 5- Areas of Chard affected by flooding in October 2021*



Impact and Extent of Flooding - Summary	Flooding in Chard took place around Catchgate Lane in the northwest, in Beeching Close in the northeast, and around Glynswood. Flooding in Tatworth took place around Fore Street, Station Road, Factory Lane and Lower Coombses. There was flooding around Forton, but no reports of flooded properties have been forthcoming. This has been assumed to be outbuilding or road flooding.
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<p>Events of the Night and Risk Management Authority Activities</p>	<p>A variety of agencies were present on the night of the event, fulfilling their statutory duties. Their actions must be understood against the backdrop of widespread flooding across the southwest, and a life-threatening incident affecting at least ten households in Ilminster. The Fire Brigade were not able to attend to issues in and around Chard, as they were attending life-threatening emergencies elsewhere, and were at operational capacity in doing so. South Somerset District Council (SSDC) and The Civil Contingencies Unit deployed duty officers who opened a flood relief centre and organised the distribution of sandbags. Members of Town and Parish councils were present helping residents to protect their homes and relocate to safety. Highways held no statutory duties on the night, but teams were ready to close roads if requested. It eventuated that these services were not called upon. Road repairs following the event were minimal and promptly delivered, where required.</p> <p>During the day of 20<sup>th</sup> October the MET Office released weather warnings for rain, and some residents had made attempts to get hold of sandbags ahead of time. A significant number of residents were fearful after the previous flooding in June, but the event in October was much less extensive. There were several properties and businesses that were quite badly flooded, but the water cleared without significant impact.</p> <p>The Duty Civil Contingencies Officer received a phone call at 22:00hrs concerning flooding in Chard and Ilminster. Reports of Chard flooding said that properties were already being flooded, and that water was up to two feet (600mm) deep. It was quickly confirmed that the Guildhall was open as a Place of Safety and that sandbags were distributed from there. Fire and Rescue also confirmed that they were taking numerous calls and were prioritising those where life was at risk.</p> <p>There was concern among residents regarding the volume of rain forecast, and there were reports of residents attempting to unblock drains. Residents attempted to secure sandbags. There seemed to be problems with supplying additional help and support for the public, beyond what the Civil Contingencies Officer and Counsellors could offer; one officer reported that it was very hard to get through to anyone on the 24-hour helpline, and when they did the operator said that they would speak to someone, but no assistance or call back was forthcoming. They then managed to reach the on-call director via a personal contact, but the county officer who called back said that the team on the ground seemed to have everything in hand, and there wasn't anything extra they could do. The officer did say that good support was available after the event, with a drop-in surgery at the Guildhall and SSDC officers going door to door with leaflets designed to help those who had been flooded.</p>
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In a later post-event meeting, some of those who could have offered additional capacity reported that, as they were untrained, they had been told not to attend unless emergency services specifically asked them to. Fire & Rescue (F&R) supported to some extent– they reported that they “*need the people on the ground to know what they are doing*”. However, F&R also reported that this policy of council officers not joining rescue efforts unless called upon by F&R needs review. They have a large geographic area of responsibility, and when floods occur in one place floods are also occurring throughout the region, and they become stretched in their ability to respond to arising incidents.

On the night, it was found that information did not flow freely, due to Chain of Duty officer protocols not functioning as intended.

There is a gap in the system in that, with river flooding there is the EA and their incident response system available. During surface water flooding, SCC is responsible, and they do not have a formal emergency response role, or as sophisticated an out of hours/incident service.

Fire & Rescue were not significantly present in Chard on the night of 21<sup>st</sup> October due to other incidents occurring in the region with greater danger to life, and they were over-capacity dealing with those.

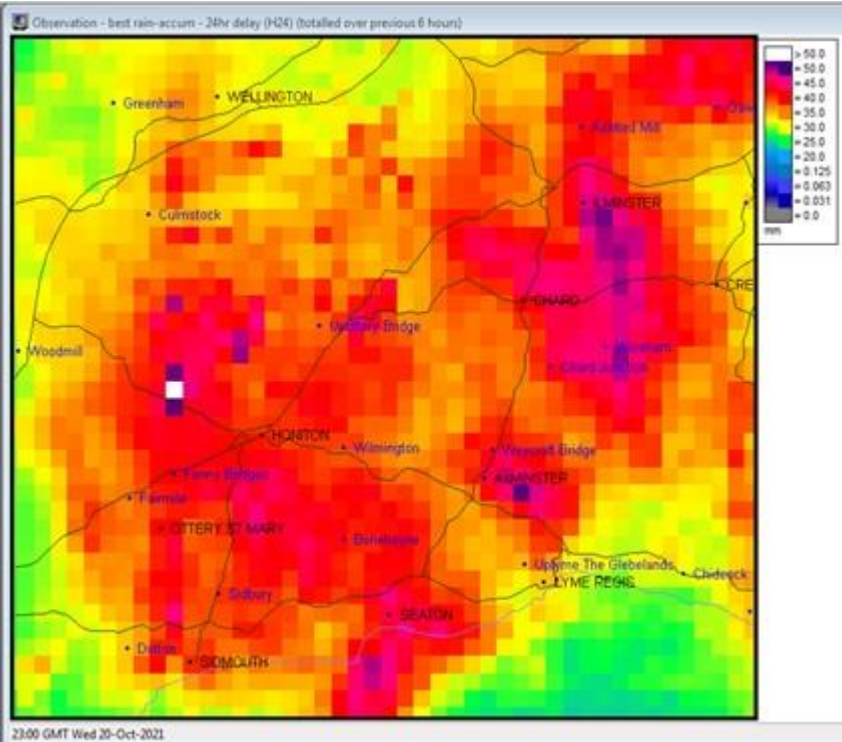
Highways were ready to close roads on the night but in the event, were not called upon. In Chard, Highways were aware of the significant rainfall and its significant impact in in Glynswood, and of surface water, flowing through Catch Gate Lane, overwhelming the flood prevention silt trap Highways had installed there. Again, there was flooding in Furnham Road Industrial Estate. Road damage was less than in June, with only a small patching response required in Northey. Catch Gate Lane in Glynswood seemed to be a crucial pinch point and Thorndon Park. There is pictorial evidence of the evening with brown surface water coming onto Thorndon Park and back onto Glynswood. Highways have since performed jetting and camera surveys of specific problem areas.

There was significant pressure on Forton and Lower Coombses. Flooding in Waterlake Road and the end of Lower Coombses was reported by Highways as being equivalent to that during the June incident. This would seem logical with Waterlake Road as a low point, and so allowing for surface water to pool first during any significant flood. However, no reports of flooded properties have been forthcoming, so for the present this has been assumed to be road and outbuilding flooding.

The primary cause of flooding was determined to be a high volume of rain, and the resultant overland flow of rainwater.

<p><b>Impact and Extent of Flooding</b></p>	<p>Four properties were reported as being internally flooded in Chard. These were dispersed throughout the town – two on the north side in differing locations, and two in Glynswood. Part of the flooding in Glynswood was due to the stream, which runs across the open ground behind the secondary school, backing up again. It is not known in what part this was due to the debris grid to the culvert becoming blocked, and how much was down to a lack of capacity in the culvert.</p> <p>In Tatworth there were reports of flooding in eight locations. Four properties were flooded from surface water running downhill across a field. Three locations may have been road flooding only – property flooding has not been confirmed. However, from the locations these also appear to be surface water running to a low point. One flooding location was at a factory adjacent to a watercourse. Debris around the watercourse indicated that the water here had been high and fast flowing. It is possible – but has not been confirmed- that the factory was flooded from the watercourse.</p> <p>There were reports of flooding in Foreton, however there have been no reports from residents of flooded properties. It is assumed that this flooding was to roads and possibly out buildings.</p>
<p><b>Catchment Area</b></p>	<p>Chard sits at the edge of the Blackdown Hills. The natural path of surface water is down from the hills to the west of Chard, into central Chard, and then down to the low point at Chard Reservoir via Furnham Road and Beeching Close. The reservoir overflows into the River Isle to the east of the town. Surface water from the areas of Coombe St Nicholas, Wadeford and Nimmer run down into the River Isle. Southeast Chard, Wambrook, Higher Wambrook, and Coombses/Tatworth/south Chard areas sit in a different catchment – that of the River Axe – and surface water from there will run into the brooks and away to the Axe.</p> <p>The only ‘main’ river is a stretch of the Isle, down through Knowle St Giles into Chard Reservoir. A main river is classed as a river which the Environment Agency maintains in terms of flood risk. A flood warning was issued for this stretch, but it has not been implicated in any property flooding. The rest of the waterbodies in this report will be ordinary watercourses. These are under the responsibility of riparian owners (those who own the land through which the river flows) unless there is a legal agreement stating otherwise.</p> <p>The area is not covered by an Internal Drainage Board (IDB). An IDB is a public body that manages water levels in an area, known as an internal drainage district, where there is a special need for drainage. IDBs undertake works to reduce flood risk to people and property and manage water levels for agricultural and environmental needs within their district.</p>



<p><b>Historical Information</b></p>	<p>District Council records are time-limited. Historic flooding episodes are listed in appendix 2. Wadeford and Coombe St Nicholas in particular have a history of flooding.</p> <p>See Appendix 2: <a href="#">Historical flooding</a></p>
<p><b>Drainage Assets</b></p>	<p>The drainage assets of concern are gulleys in the road and their connecting drainage pipes, plus any culverts and connections to the sewerage system or surface water bodies. The local authority keeps records of drainage under their care, mostly belonging to the Highways Department. Private drainage is not generally recorded. The drainage network around the affected areas is extensive, as figures 15, 16 and 17 show (Appendix 1)</p> <p>Blocked drainage assets have been highlighted as an issue in previous flood incidents, however they were not mentioned on this occasion. It is therefore assumed that on this occasion the system worked as it should.</p>
<p><b>Rainfall Information</b></p>	<p>On the night of the 20th to 21<sup>st</sup> October there was considerable rain that fell in the 24-hour period. Upwards of 70% of the monthly average fell in this 24-hour period. In the seven-hour period up to the point of flooding, the area experienced 60% of the monthly average, allowing for consideration as a significant rainfall event.</p>  <p>Observation - best rain-accum - 24hr delay (H2K) (totalled over previous 6 hours)</p> <p>23:00 GMT Wed 20-Oct-2021</p> <p>Precipitation (mm), higher events</p> <ul style="list-style-type: none"> <li>0.0</li> <li>1.0</li> <li>5.0</li> <li>10.0</li> <li>20.0</li> <li>40.0</li> <li>60.0</li> <li>80.0</li> <li>100.0</li> <li>&gt;100.0</li> </ul>

	<p><i>Figure 7- The extent of rainfall over Somerset at 11pm, 20 October 2021.</i></p> <p>Below is an excerpt from EA Monthly water situation report for Wessex:</p> <p>“October was a wet month for Wessex, with ‘above normal’ rainfall at 187% of the LTA (149 mm). There was light rain at times throughout the month but the main rainfall events occurred on 1 – 4, 19 – 20 and 28 – 31 October which combined produced around 90% of the month’s total rain... The highest accumulation was on 19 and 20 October when 33% of the month’s rain fell, distributed across most of Wessex.”</p>
<b>Surface Water</b>	<p>Most of the flooding seen around Chard and surrounding villages during the event was due to heavy rainfall gathering and moving across the land – this is usually referred to a pluvial or surface water flooding.</p> <p>The mechanism appeared to be the movement of overland flow downhill, with water entering houses at points where bottlenecks in flow are presented by the topography of arrangement of streets and houses.</p> <p><a href="#">Link: EA Surface water flood risk mapping.</a></p> <p>The EA surface water flood risk map shows the predicted flooding for a 1 in 100 year rainfall event. The flooding on this occasion was much less extensive than that shown on the EA map, being a 1 in 38 year event.</p>
<b>Fluvial</b>	<p>The study area has a network of smaller streams and drainage ditches, as opposed to main rivers. Many of these watercourses are under riparian ownership. So far, one watercourse may have been implicated in the flooding which took place on this date. Anecdotal evidence suggests that many riparian owners are unaware of their rights and obligations with regards to their watercourses.</p>
<b>Coastal</b>	<p>There is no risk of coastal flooding in this area.</p>
<b>Groundwater</b>	<p>Most of Chard is on bedrock of sandstone (the Upper Greensand Formation), apart from Furnham Road and the associated industrial estates, which are on mudstone. Borehole logs indicate a layer of clay beneath the greensand. There are also shallow deposits of mixed clay, sand, and gravel. Upper Greensand is porous and will absorb water, however mudstone will not. The shallow sands and gravels will variably absorb water depending on the percentage of clay it contains.</p> <p>A significant contribution in previous events was the springs in the hills surrounding Chard. Groundwater had been raised by previous high rainfall events in June and July, which had caused intermittent springs in the hills to start to</p>

	<p>discharge water. This added to the overland flow from the rainfall to increase the severity of flooding. However, on this occasion springs were not implicated, probably as less rain had fallen in the run-up to the flooding event.</p>
<b>Soil Moisture Deficit</b>	<p>Soil moisture deficit is the difference between the amount of water actually held in the soil, and how much water the soil can hold. A low soil moisture deficit means that the ground is almost saturated and cannot readily absorb more water. For the Chard catchment at the end of September the SMD was 70mm, but had dropped to 12mm after the rainfall event of 20<sup>th</sup> October. This supports the conjecture that rainfall had soaked into the ground and springs had not been activated.</p>
<b>Risk Management Authority Responsibilities</b>	<p>The Flood and Water Management Act places a duty on all flood risk management authorities to co-operate with each other, to ensure flood management activities are well co-ordinated, and work in partnership to reduce the severity and impact of flooding.</p> <p><a href="#">See appendix 3</a></p>
<b>Risk Management Authority Actions During And Immediately After The Event</b>	<p><a href="#">Somerset County Council</a> (in their roles as <a href="#">Lead Local Flood Authority</a> and <a href="#">Highways Authority</a>)</p> <p><b>Lead Local Flood Authority (LLFA):</b> Commissioned section 19 and began to gather information from residents and other RMAs about their activities, and when, where and how flooding occurred.</p> <p><b>Highways Authority:</b></p> <p>Had no direct responsibilities on the night. They exercised their statutory duty by having teams ready to close roads if requested. Ultimately they were not called upon. There were minimal road repairs required afterwards, which were quickly followed up.</p>
	<p><a href="#">Environment Agency</a></p> <p>Fulfilled their statutory duty by issuing flood warnings for main rivers. However, this was not relevant to Chard.</p>
<b>Risk Management</b>	<p><a href="#">Wessex Water</a></p> <p>Had teams out on site looking at sewer flooding and surface water entering the sewer system. They also responded to calls from the public who were concerned about the sluice in the Glynswood area.</p>

<b>Authority Actions During And Immediately After The Event</b>	There were reports of residents lifting sewer manhole covers to get surface water away which caused sewer surcharging elsewhere.
	<b>Somerset Rivers Authority (SRA)</b> Community engagement officers do not have statutory duties, but they assisted partners by supporting the LLFA in managing public correspondence and providing information and support to parishes around property resilience.
	<b>Devon and Somerset Fire and Rescue Service</b> Fulfilled their statutory duty by taking charge of the emergency and responding to calls for help from the public. They were largely engaged with life threatening emergencies away from Chard.
	<b>Civil Contingencies Unit:</b> (Partnership between SSDC and SCC) Officers fulfilled their statutory duty by assisting partners and the public during the incident.
	<b>South Somerset District Council (SSDC):</b> Opened the Guildhall as a place of respite for affected residents, and as a general co-ordination and recovery centre. Sandbags were distributed from here. Officers fulfilled their statutory duty by assisting partners and the public during the incident.
	<b>Avon and Somerset Police</b> Officers fulfilled their statutory duty by assisting partners and the public during the incident. Again, they were engaged with life threatening emergencies away from Chard.
	<b>Tatworth and Forton Parish Council</b> Information about their activities on the night were requested but not received.
<b>Risk Management Authority Actions During And Immediately After The Event</b>	<b>South West Water</b> Information about their activities on the night were requested but not received.



## Flooding Mechanism

Examination of flow paths of rainwater and information from residents has established several probable causes for flooding, acting together in different parts of the area.

Chard sits in a bowl in the hills (see [topographic map](#)), and rainfall runs off the surrounding farmland and into the streets of Chard. Surface water runs across the town, picking up speed, more water, and debris as it goes.

To the north of Chard, the topography acts to funnel runoff water down Furnham Road. This can also spill over into roads such as Beeching Close, where one property was flooded.

In Glynswood surface water runs down into a brook which flows through the open space near Holyrood Academy. This brook enters a culvert to run under properties at the eastern end of Glynswood and enter the drainage system. This culvert is a potential bottleneck for flows, especially if blinded.

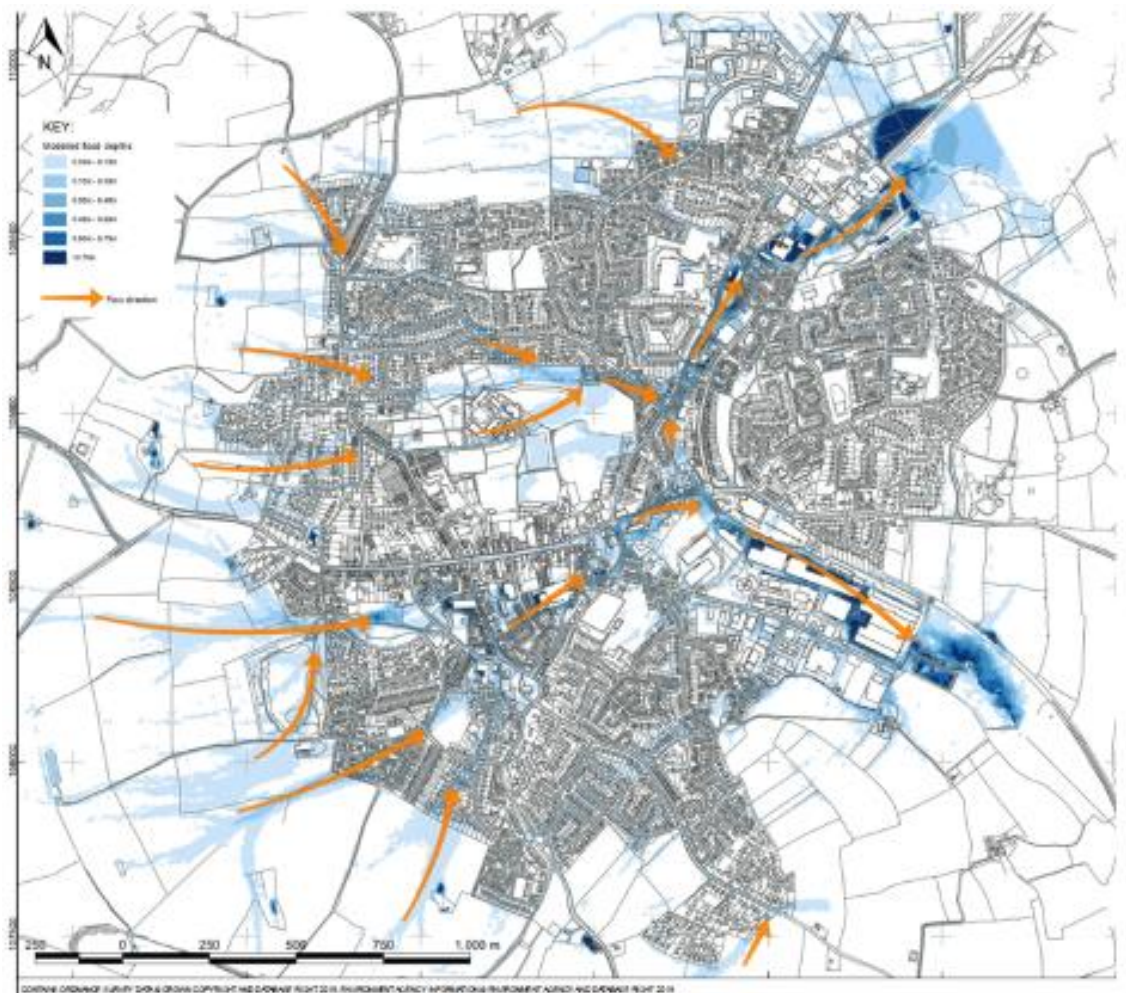


Figure 8- Model mapping of 1 in 375 year rainfall event.

	<p>This is more extensive than the 1 in 38 year event which took place, but shows the primary paths of water cross the town.</p>
<p><b>Recommendations</b></p>	<p>What this incident has demonstrated, however, is the poorly defined incident response activities of some responsible authorities, especially when organisations such as Fire and Rescue are busy elsewhere. There needs to be an in-depth review of the Somerset Council emergency flooding response system, with proper definitions of roles and plans for when multiple events are ongoing. The Environment Agency are expert at this, so their advice should be sought.</p>
<p><b>Planned Developments</b></p>	<p>The planned development at Blackdown heights has naturally raised concerns about the destination of surface water from this development. The full plan is available via South Somerset District Council's Planning Portal. The natural flow path of water from this site is towards the east.</p> <p>Full planning permission has been granted and development has begun. The full details are available under planning permission number 19/00074/FUL, but moving from outline to full planning permission being granted was conditional on a number of factors, including:</p> <p>Surface water shall not discharge onto the highway.</p> <p>Surface water details to serve the development shall be submitted and approved by the Local Planning Authority.</p> <p>The developers have proposed to meet these conditions by installing a surface water attenuation area (sustainable urban drainage basin) and ecological habitat enhancement at the east end of the site.</p> <p>According to the developers: "The Flood Risk Assessment and Drainage Strategy confirm that the site is not within an identified floodplain or an area at risk of flooding. Surface water will be controlled and [discharged to] existing local watercourses and existing drains to the east and west. A sustainable urban drainage basin proposed at the east end of the site will accommodate runoff arising from the development during periods of extreme rainfall.</p> <p>The Environment Agency (and previously the LLFA) have reviewed the Flood Risk Assessment (FRA) and are satisfied that surface water can be satisfactorily controlled to ensure that the risk of flooding downstream of the site is not increased. Whilst the evidence received from residents clearly shows that the local area has and continues to suffer from flooding, the FRA has demonstrated, with the agreement of the Environment Agency, that this development can be</p>



	<p>adequately mitigated to ensure that there is no increase in terms of flood risk to adjacent and other sites.”</p> <p>There is a further development awaiting a decision known as Land East Of Mount Hindrance Farm, near Crimchard and Cuttifords Door. This proposes the building of for 295 dwellings. Again, in order to have full planning permission granted, the developer will need to submit and receive approval for a drainage strategy for the site, which will not worsen flooding in the area.</p> <p>The Holbear development on the south extent of Chard is also causing concern amongst local residents. Modelling has shown that the surface water draining from this development will flow into the watercourse that heads towards Foreton. The following condition has been imposed on the planning permission:</p> <p>‘No development shall be commenced until details of the surface water drainage scheme, based on sustainable drainage principles, ... have been submitted to and approved in writing by the Local Planning Authority. ... The drainage scheme shall ensure that surface water runoff post development is attenuated on site and discharged at a rate and volume no greater than greenfield runoff rates and volumes.’ So far, the developers have not proposed a suitable scheme to meet this condition.</p> <p>Dialogue is ongoing between the Local Authority, Lead Local Flood Authority, the developers, and other stakeholders to ensure that the developers proposals will meet this criteria.</p> <p>In both cases, proper implementation of the planning conditions should ensure that, at the very least, the developments will not worsen existing flooding.</p>
<b>Ongoing Works</b>	<p>Flood mitigation measures are currently being developed for Chard. This includes a pilot project in partnership with Wessex Water in late 2023, which involves the distribution water butts to affected areas in Chard.</p> <p>Following this, a modelling and mitigation study on Chard will be expanded to other settlements in the area.</p>
<b>Planning Policy and Future Development</b>	<p>The pillar of planning policy on surface water is that developments must not increase flood risk elsewhere or cause risk to people and properties. As referred to in the Planned Development section above, incoming planning applications have conditions applied to them which ensure runoff from the development is attenuated on site. No more surface runoff water should leave the site than did while it was an undeveloped, grassed field (the ‘greenfield rate’). This should ensure that no development makes flooding in the area around it worse. This is in accordance with ‘The National Planning Policy Framework Section 14; Meeting the challenge of climate change, flooding and coastal change’, and also the Government standards for Sustainable Drainage Systems. It is required that</p>

	<p>runoff must not increase due to the development, and all overflow should be first restricted to the greenfield 1 in 1-year runoff rate during all events up to and including the 1 in 100-year rainfall event, with 40% added for climate change on top of previous rainfall figures. If this cannot be met from infiltration and site design, long-term storage of surface water needs to be added to allow water to be released gradually from the site. There should also be a full maintenance and operational management schedule for the development confirming the body who will maintain the system for the lifetime of the development. We would expect to see a full operational and maintenance schedule, confirmation and adoption arrangements before planning permission is fully granted.</p> <p>For the Local Authority to require any stricter standards to be applied (such as accounting for events at greater than 1 in 100 years return period, or requiring runoff at less than greenfield rates), this needs to be stated in local planning policy.</p> <p>It is recommended that further work be undertaken with a view to requiring stricter standards to be applied to surface water management by developers in affected areas in and around Chard.</p>
<p><b>Appendix 1: Photos</b></p>	<p><i>Photos from Chard:</i></p>



*Figure 9- Flooding on Glynswood*



*Figure 10- Flooding in an unknown location in Chard.*



*Figure 11- Flooding in an unknown location in Chard.*

Note the colour of the flood water, indicating that it is carrying silt and debris.



*Figure 12- Flooding in an unknown location in Chard.*



<b>Appendix 2: Historical information.</b>	Date	Location	Receptor
	July 1968	Wadeford	2 houses
	October 1994	Nimmer	2 houses
	January 1995	Wadeford	Road
		Knowle St Giles	Road
		Thorndon Park Drive, Chard	2 houses
	May 2011	Whatley	Road
	October 2011	Furnham Road, Chard	Road
	November 2011	Coombe St Nicholas	Road
	May 2012	Winsham	Road
	August 2012	Winsham	Road
	September 2012	Knowle St Giles	Road
	November 2012	Crimchard Road	Road
		Chard Junction	2 houses
	October 2013	Coombe St Nicholas	Road
		Wadeford	Road
	December 2013	Bath Street, Chard	1 commercial property
	January 2014	Crewkerne Road, Chard	Road in two places
Dening Close, Chard		Road	
Combe Street, Chard		1 house	
<b>Appendix 3: Drainage pipes in Chard</b>			

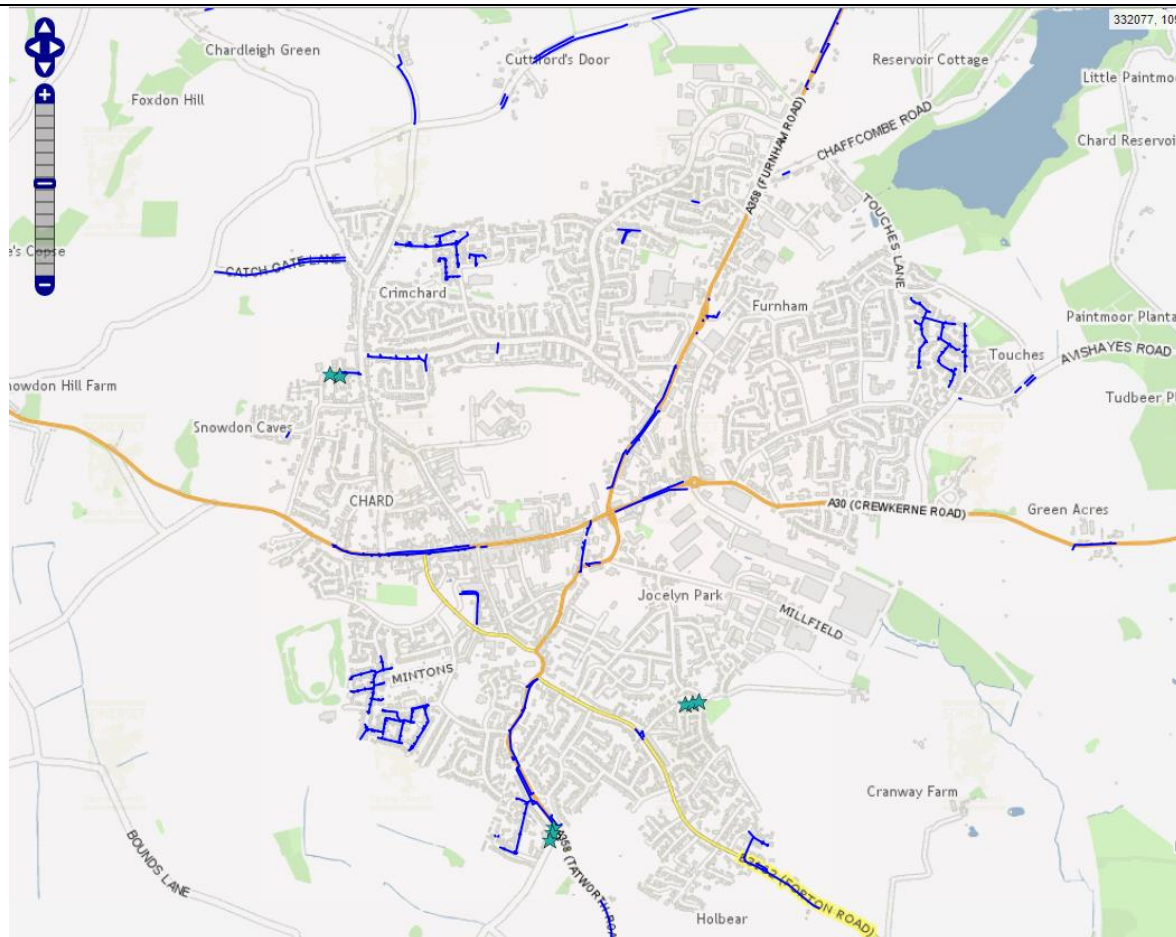


Figure 13- Surface water drainage pipes in Chard.

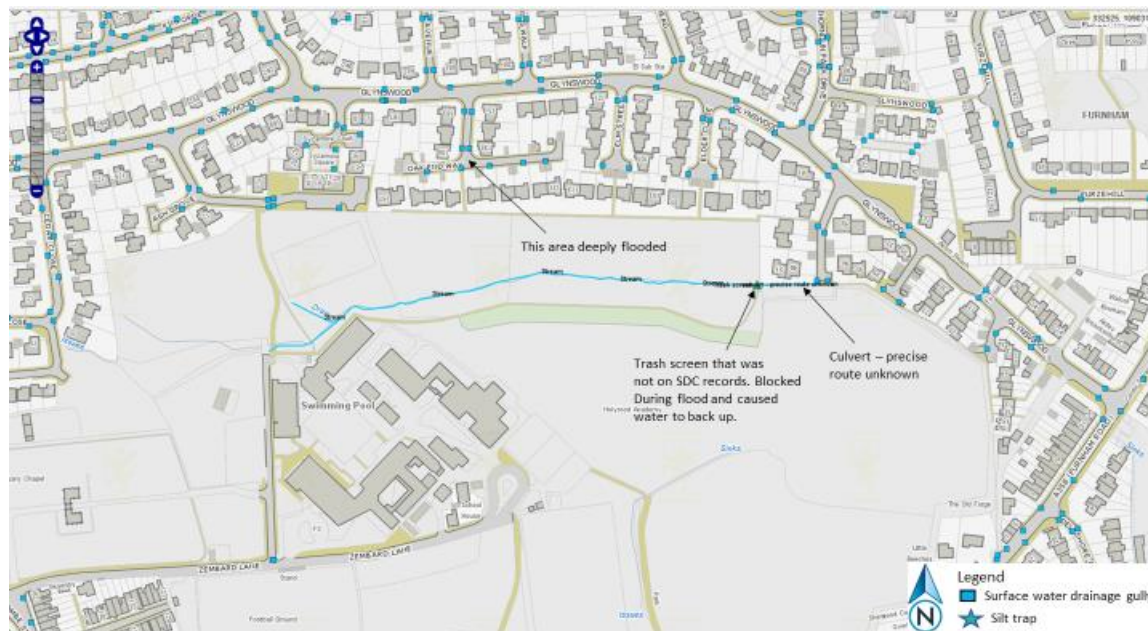


Figure 14- Gullies in Chard



Figure 15- Surface water drains in Glynswood.



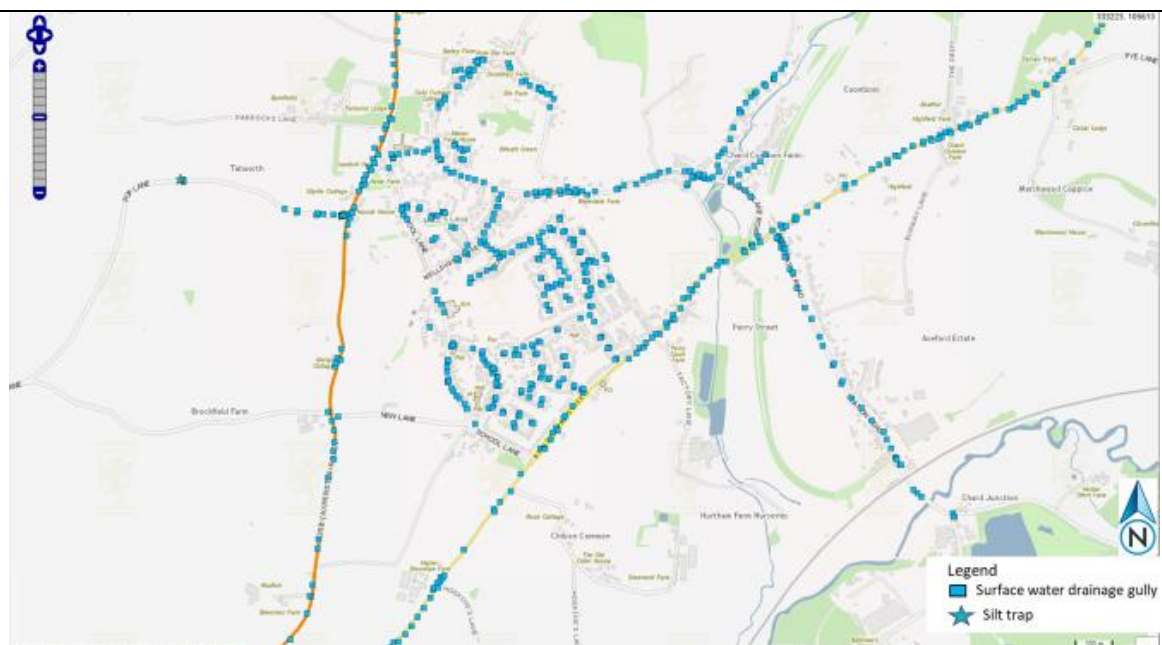


Figure 16- Surface water drainage in Coombses and Tatworth.

#### Appendix 4: Risk Management Authority Responsibilities

<p><b>Risk Management Authority Responsibilities</b></p>	<p>Somerset County Council (in their roles as LLFA and Highways Authority)</p>	<p>As the LLFA they are required to develop a strategy to tackle local flood risks, involving flooding from surface water, 'ordinary watercourses', for example ditches, dykes, and streams, groundwater, canals, lakes and small reservoirs.</p> <p>Along with all LLFAs, they are required to:</p> <ul style="list-style-type: none"> <li>investigate all significant flooding incidents;</li> <li>maintain a register of flood defence assets;</li> <li>act as a statutory consultee in the planning process on surface water for major developments; and</li> <li>build partnerships and ensure effective working between authorities that have control over flood risk.</li> </ul> <p>They also have to undertake specific tasks associated with the Flood Risk Regulations, and this includes completing a Preliminary Flood Risk Assessment and identifying flood risk areas.</p> <p>As the highways authority they have the lead responsibility for providing and managing highway drainage and roadside ditches under the Highways Act 1980. The owners of land adjoining a</p>
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		highway also have a common-law duty to maintain ditches to prevent them causing a nuisance to road users.
	Environment Agency	<p>The Environment Agency has a strategic overview of all sources of flooding and coastal erosion (as defined in the Flood and Water Management Act 2010). It is also responsible for flood and coastal erosion risk management activities on main rivers and the coast, regulating reservoir safety, and working in partnership with the Met Office to provide flood forecasts and warnings.</p> <p>The study area runs across one of their internal borders. Chard, Coombe St Nicholas, Wadeford, Nimmer, and points north of the southern edge of Chard are handled by the Wessex office. South of this, including Tatworth and Forton, are handled by the Devon office.</p>
	Wessex Water	<p>They manage the risk of flooding to water supply and sewerage facilities and flood risks from the failure of their infrastructure.</p> <p>Their southernmost border is tight around the south side of Chard, so they are responsible for water and sewerage in Chard itself, and the northern settlements such as Wadeford, Coombe St Nicholas, and Nimmer.</p>
	Somerset Rivers Authority (SRA)	<p>Somerset Rivers Authority's main aim is to give Somerset greater flood protection and resilience.</p> <p>Somerset Rivers Authority focuses heavily on providing additional maintenance and improvements to rivers and their catchments, roads prone to flooding, and structures such as culverts and drains.</p>
	Devon and Somerset Fire and Rescue Service	<p>The Fire Brigade is typically the lead responder for a flooding incident. The Fire Brigade role includes saving life and carrying out rescue of casualties or persons stranded by flooding, including by boat. They may pump out floodwater.</p>
	Avon and Somerset Police	<p>The police co-ordinate the emergency services during a major flood and help with evacuation of people from their homes where necessary. They also close roads and take other actions to ensure public safety.</p>

	South Somerset District Council	They are key partners in planning local flood risk management. They can carry out flood risk management works on minor watercourses (outside of IDB areas).
	South West Water	They manage the risk of flooding to water supply and sewerage facilities and flood risks from the failure of their infrastructure. Their northernmost border is tight to the south side of Chard, so they are responsible for water and sewage in Tatworth and Forton.
All bodies are required to work in partnership to support the local flood risk strategy, to ensure flood management activities are well co-ordinated, and work in partnership to reduce the severity and impact of flooding.		





**Somerset**  
Council

# Flood Investigation Report

*Section 19 Flood and Water  
Management Act 2010*

## Ilminster

20<sup>th</sup> October 2021

<b>Organisation</b>	Somerset Council
<b>Title</b>	Ilminster Section 19 Report
<b>Owner</b>	Somerset Council LLFA
<b>Primary Legislation</b>	Flood & Water Management Act 2010

<b>Date of Incident:</b>	20 <sup>th</sup> October 2021	<b>Date of Report: 27<sup>th</sup> January 2023</b> <b>Version: 5.0</b> <b>Status: Final</b>
<b>Site / Catchment Location:</b>	Ilminster	

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## Introduction

The function of a Section 19 report is to gather information on the happenings during a particular flood event. They are known as a Section 19 report because they are required under Section 19 of the Flood and Water Management Act 2010.

### Section 19: Local authorities: investigations

- (1) On becoming aware of a flood in its area, a Lead Local Flood Authority must, to the extent that it considers it necessary or appropriate, investigate—
- (a) which Risk Management Authorities have relevant flood risk management functions, and
  - (b) whether each of those Risk Management Authorities has exercised, or is proposing to exercise, those functions in response to the flood.
- (2) Where an Authority carries out an investigation under subsection (1) it must—
- (a) publish the results of its investigation, and
  - (b) notify any relevant risk management authorities. A Section 19 report will often detail any ongoing work with regards to flooding in the area, and will signpost additional work that should be considered, usually in the form of investigations to be undertaken.

It is not the function of a Section 19 to provide concrete solutions for flooding. This requires far more detailed technical work, liaison with landowners, and decision making about schemes in concert with the public and other stakeholders, although the Section 19 report can help in proving the need for this work and securing funding. Also, it is impossible to prevent absolutely *all* flooding – rainfall events vary widely in intensity, and whatever drainage systems or flood mitigation schemes are put in place, there is always the possibility, however remote, that an extreme rainfall event will overwhelm them. We can, however, plan for the vast majority of rainfall events, and in the course of doing so, make extreme events less bad. Even a small difference in the final height or path of flood water can be the difference for some between their homes flooding and not, so even small schemes can have value in an extreme rainfall event.

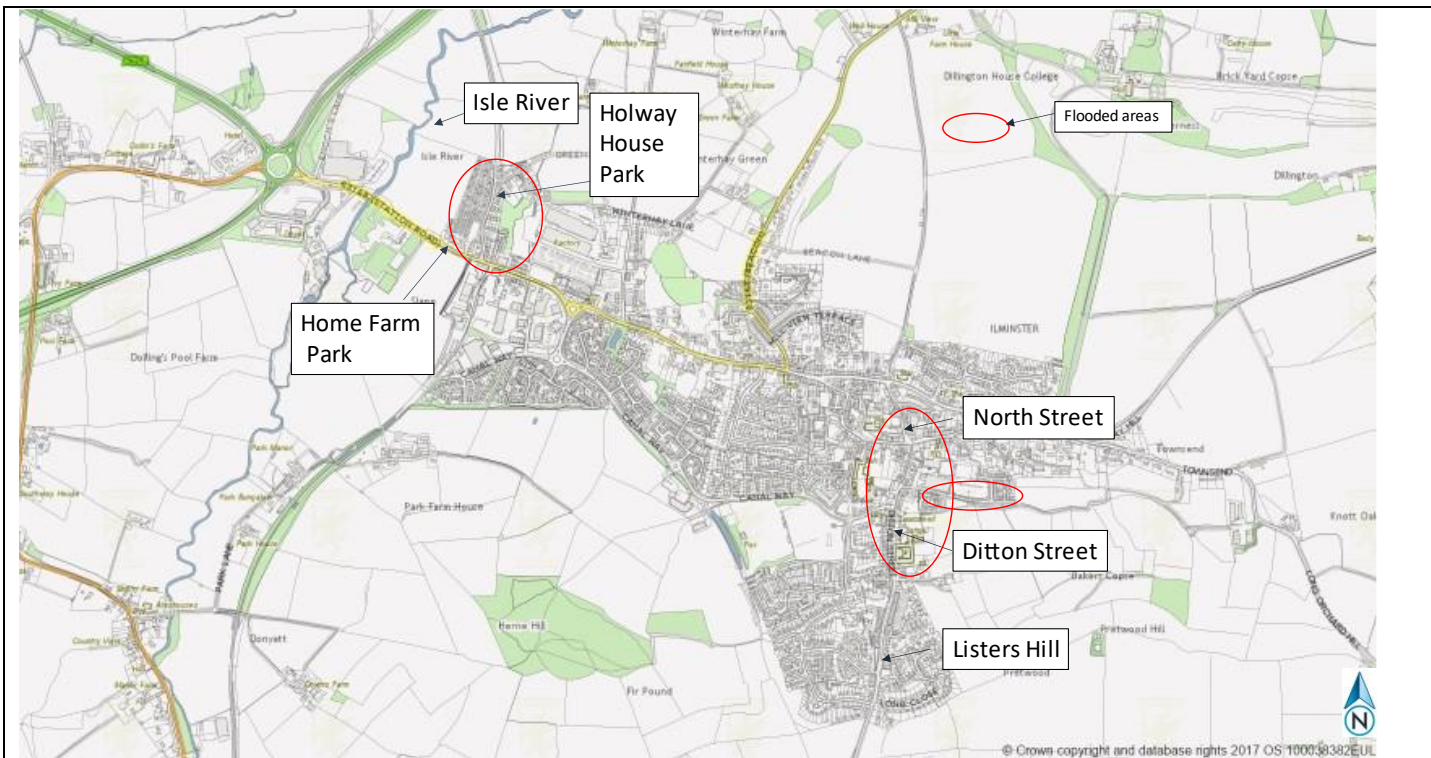
The usual way to describe the severity of rainfall events is described in terms of ‘*1 in X years*’. If we take the example of a 1 in 100 year event, this is an event of a size that will be equalled or exceeded *on average* once every 100 years. This means that over a period of 1,000 years you would expect the one in 100 year event would be equalled or exceeded ten times. But several of those ten times might happen within a few years of each other, and then none for a long time afterwards. This report deals with a rainfall event of 1 in 38 year intensity. Reports of flooding

extents from residents suggest that the flooding was not nearly as extensive as that resulting from a 1 in 100 year flooding event, which is what is shown on Environment Agency flood maps.

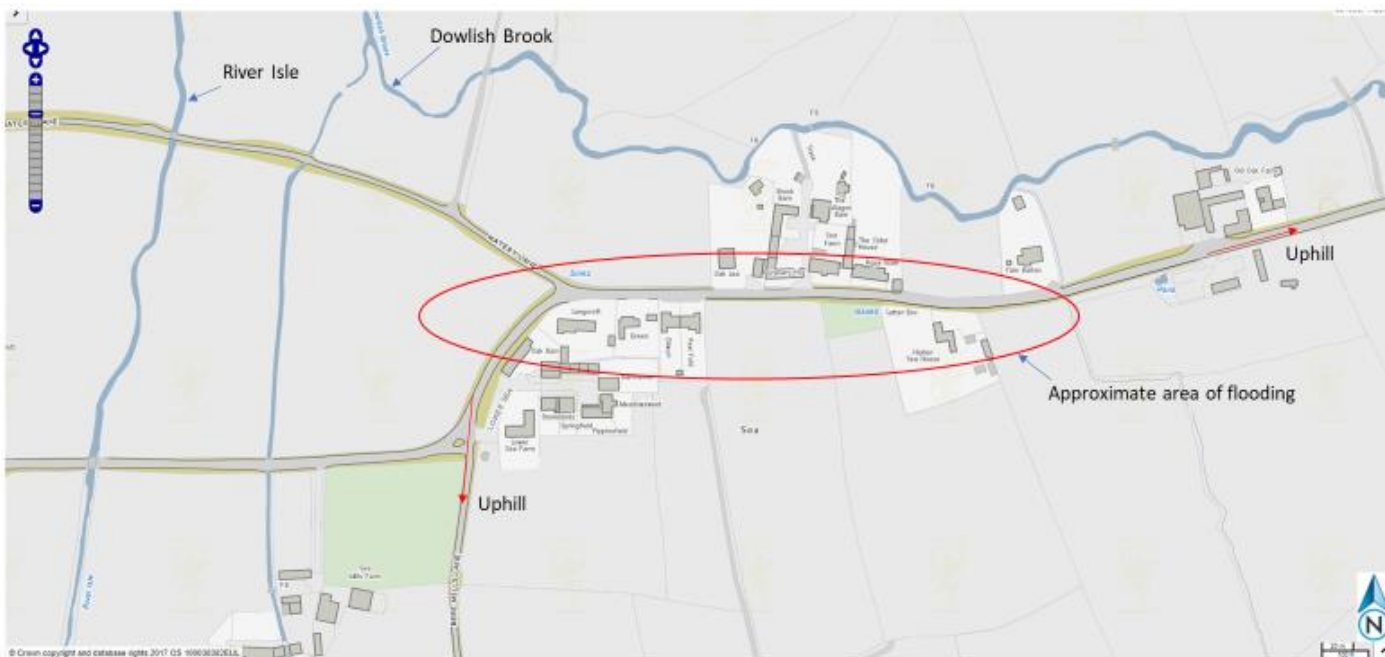
This report includes selected photographs supplied by residents showing flooding in progress, and maps showing more detail of the area. We are grateful to residents for the information they have provided which has enabled the compilation of this report.

### **Area Information**

Ilminster is a town in South Somerset located west of Yeovil and Southeast of Taunton on the intersection between the A303 and A358. It is a small market town with about 5,800 residents recorded on the 2011 census. The town is positioned within an agricultural landscape. Its form is broadly linear in the valley formed between Beacon Hill, Pretwood Hill and Herne Hill. It is referred to in the Somerset Local Plan as an historic market town of Saxon origin originally centred on the Market Place and church and extending between the Shudrick Stream and lower slopes of Beacon Hill. The town subsequently spread along the route of the watercourse and part way up the surrounding hills. More recent residential development is identified as having expanded north, south and southwest. Industrial and trading areas have been sited predominantly on the western edge of the town. This area is known historically to have been wet and marshy. The parish includes the hamlet of Sea, 1.5 miles to the south west.



**Figure 1: Catchment of this report, Iminster**



**Figure 2: Catchment of this report, Sea**



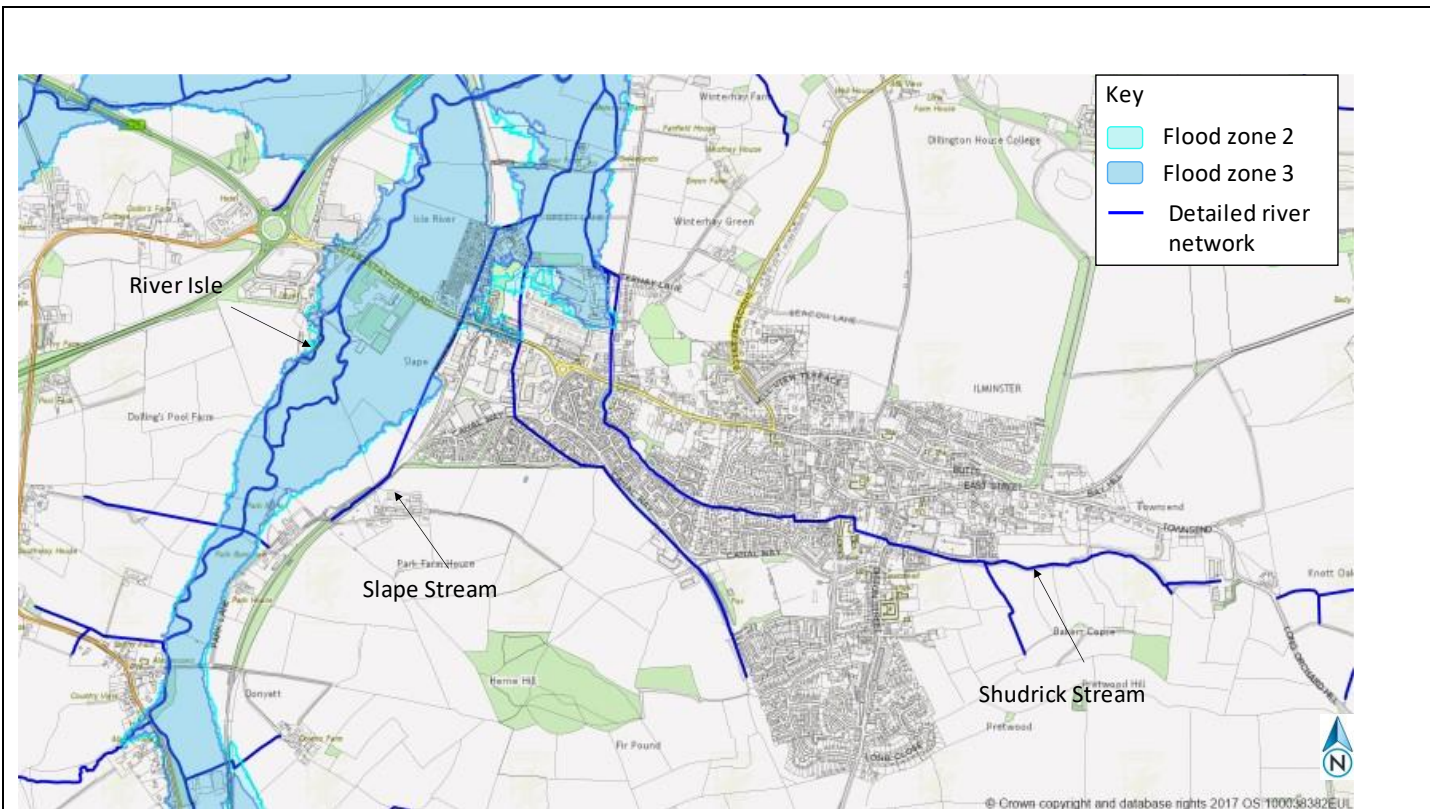
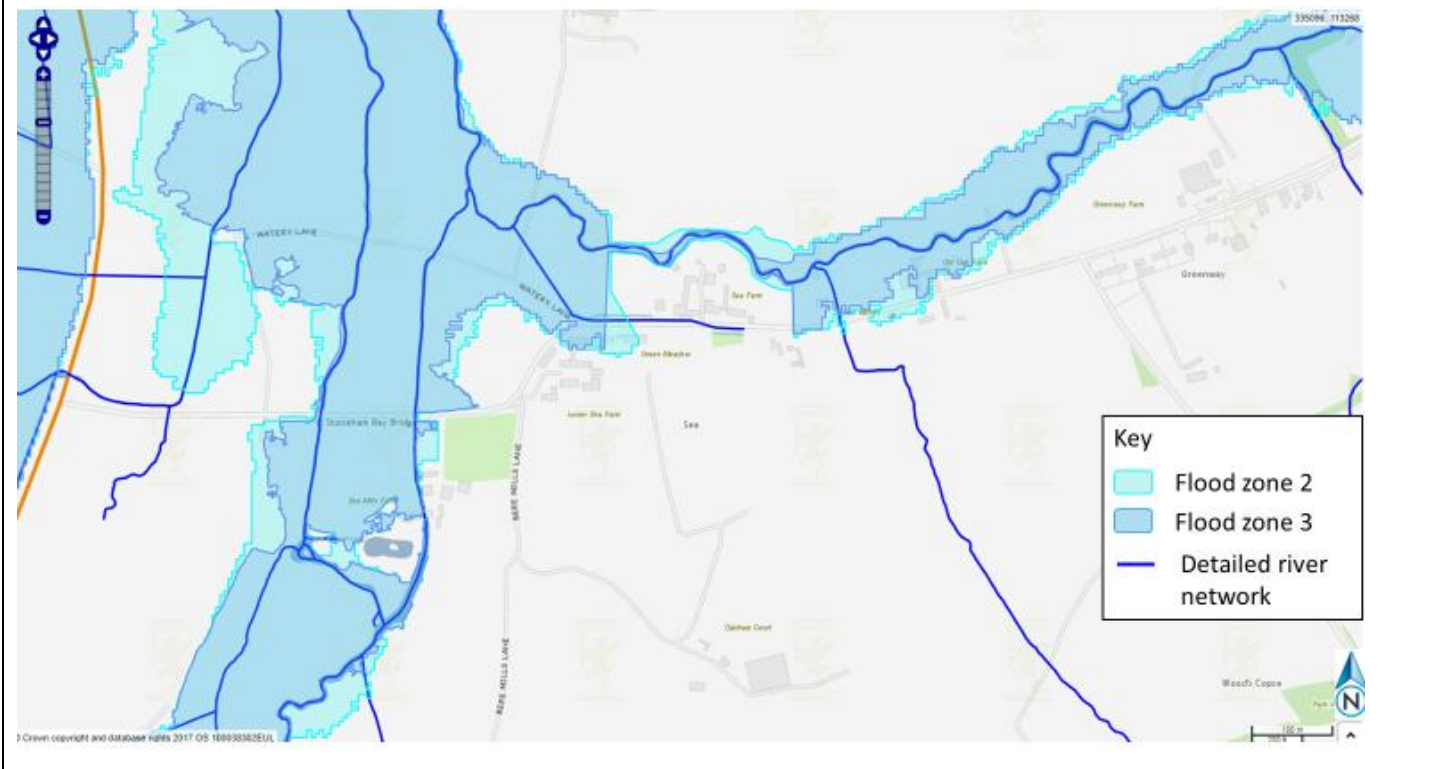


Figure 3: Flood zones and detailed river network from the Environment Agency. (Ilminster)



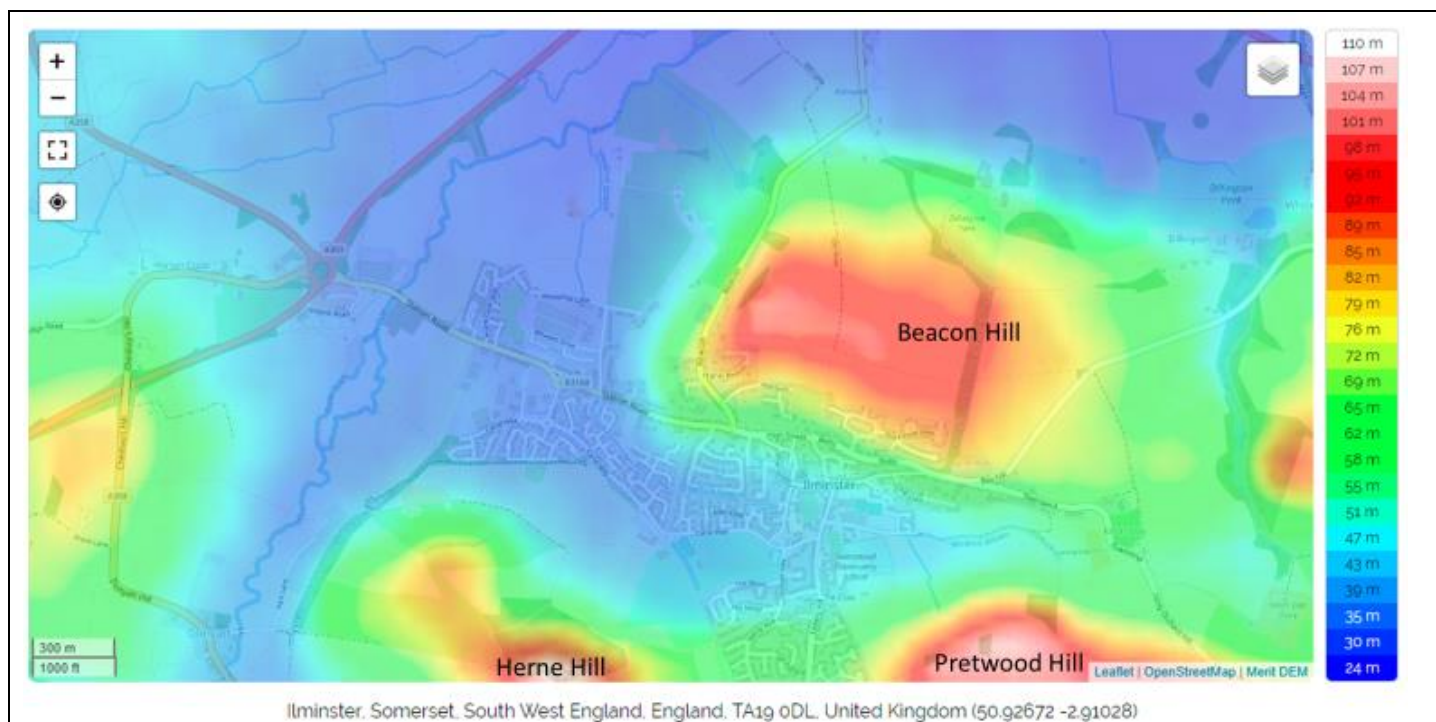
**Figure 4: Flood zones and detailed river network from the Environment Agency. (Sea)**

The above maps also show the risk of fluvial flooding – that is, from the river alone. Flood zone 2 consists of areas that have 0.1-1% chance of flooding from rivers in any year, and Flood zone 3 consists of areas that have a 1% or higher chance of flooding from rivers.

Ilminster is in the catchment of the River Isle, which discharges into the River Parrett at Middelney on the Somerset Levels. The Isle runs to the west of the town, with a tributary (the Shudrick Stream) running across the town east to west. Both the River Isle and the Shudrick Stream are main rivers.

The Shudrick Stream enters the Isle to the north of Ilminster. Ilminster is surrounded by high ground to the north, south and east, with further high ground across the river to the southwest. The low points are next to the Isle to the west, and along Old Road, North Street and Ditton Street on the East of town.

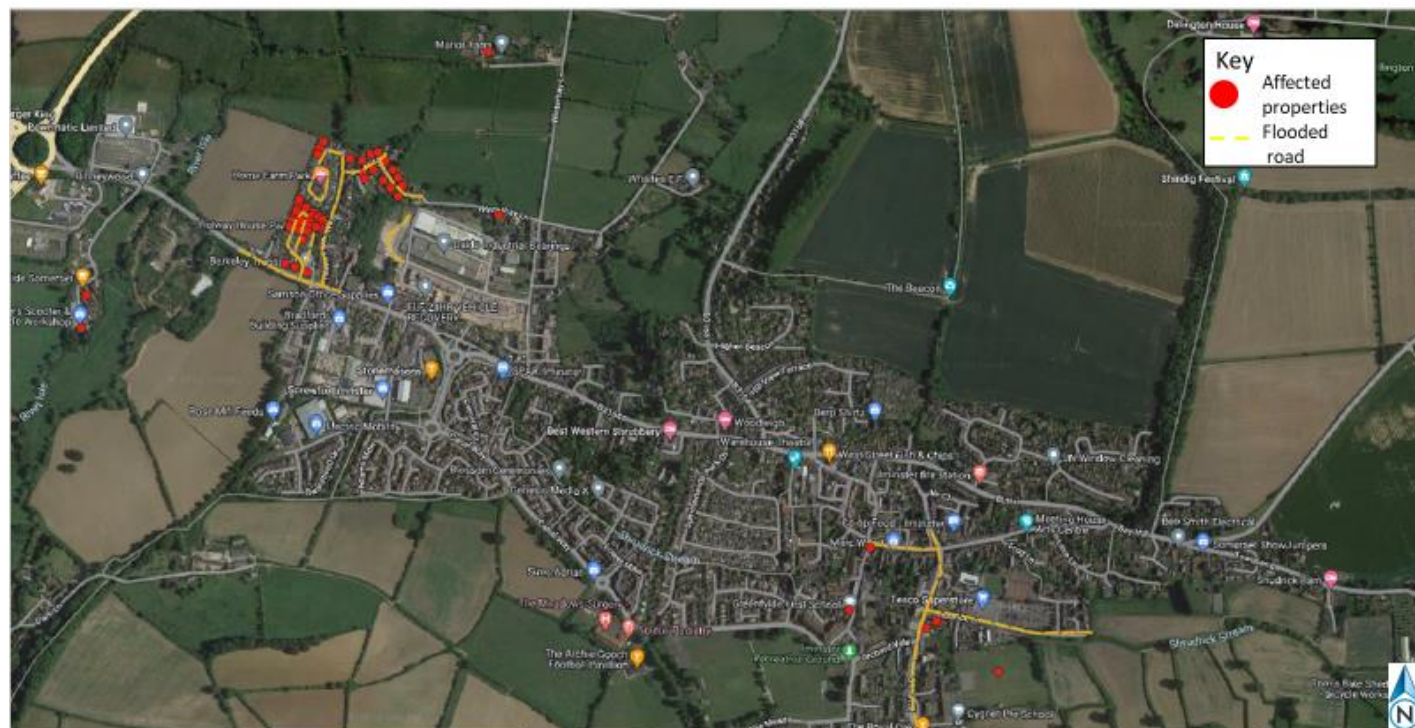
The following map shows the form and, most importantly, height of the land surrounding Ilminster. Pink and red land is the highest, with blue at the lowest points. Beacon Hill summit is around 103m Above Ordinance Datum (AOD), Pretwood Hill 107m AOD and Herne Hill 110m AOD. The land falls to about 55m AOD, at the head of the Shudrick Stream then down to around 30m AOD at the downstream confluence with the River Isle. Within the town the lower levels are generally on land between the Shudrick Stream and Canal Way at about 33m to 34m AOD. Note that the majority of the area which flooded is at the same low point as the river Isle, and the steep slopes from the Beacon down to the east end of town.



**Figure 5: Topographic map of Iminster area.**

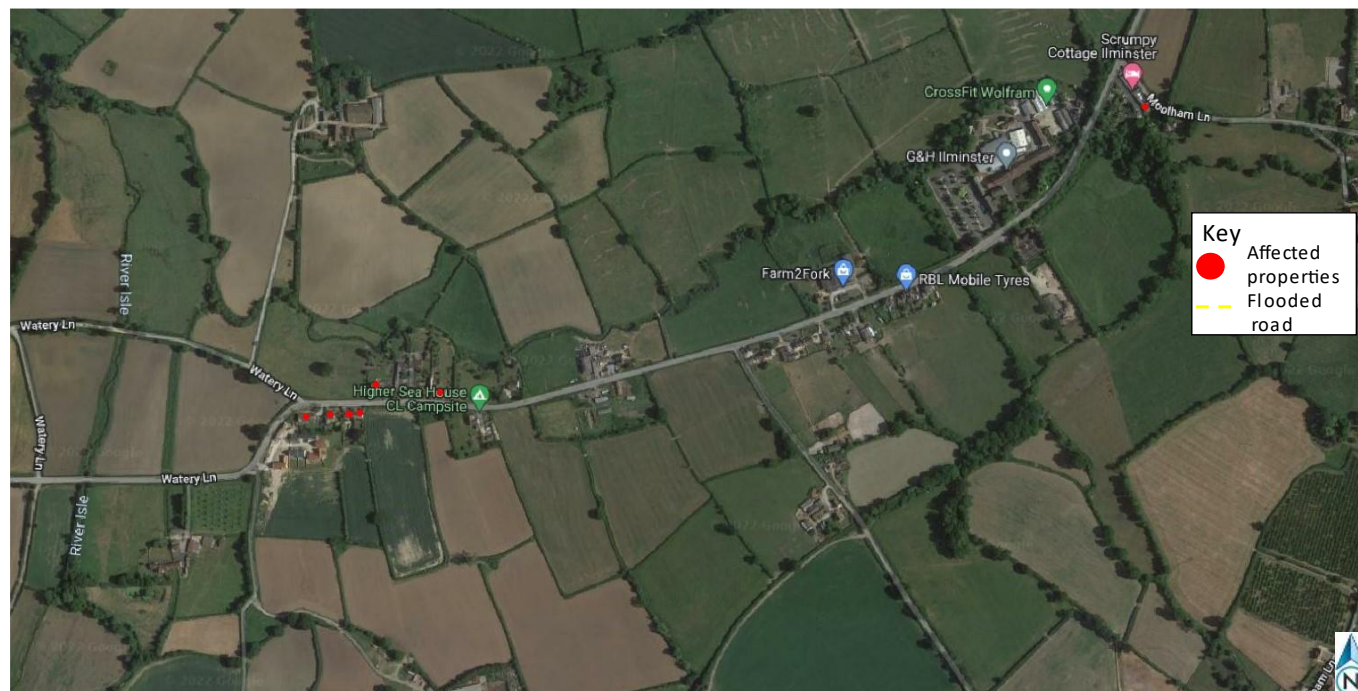
50 properties have been reported as flooding in Iminster during the event. The actual number affected may be higher, as those affected sometimes do not report having been flooded.





**Figure 6: Areas affected in Iminster**

Six Properties were reported as being affected by flooding in Sea, and one in Dowlish Ford.

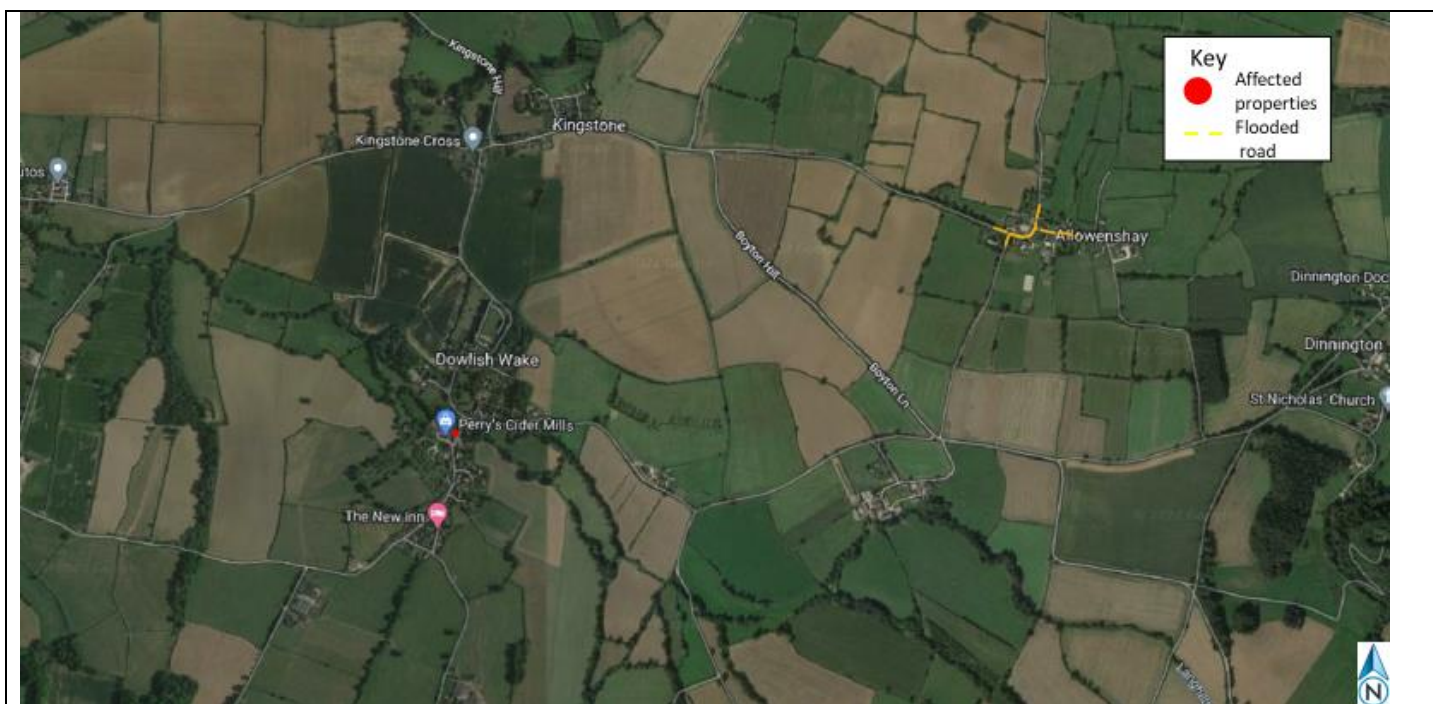


**Figure 7: Areas affected in Sea and Dowlish Ford**

One property was reported as being affected in Dowlish Wake. Roads were flooded in Allowenshay.

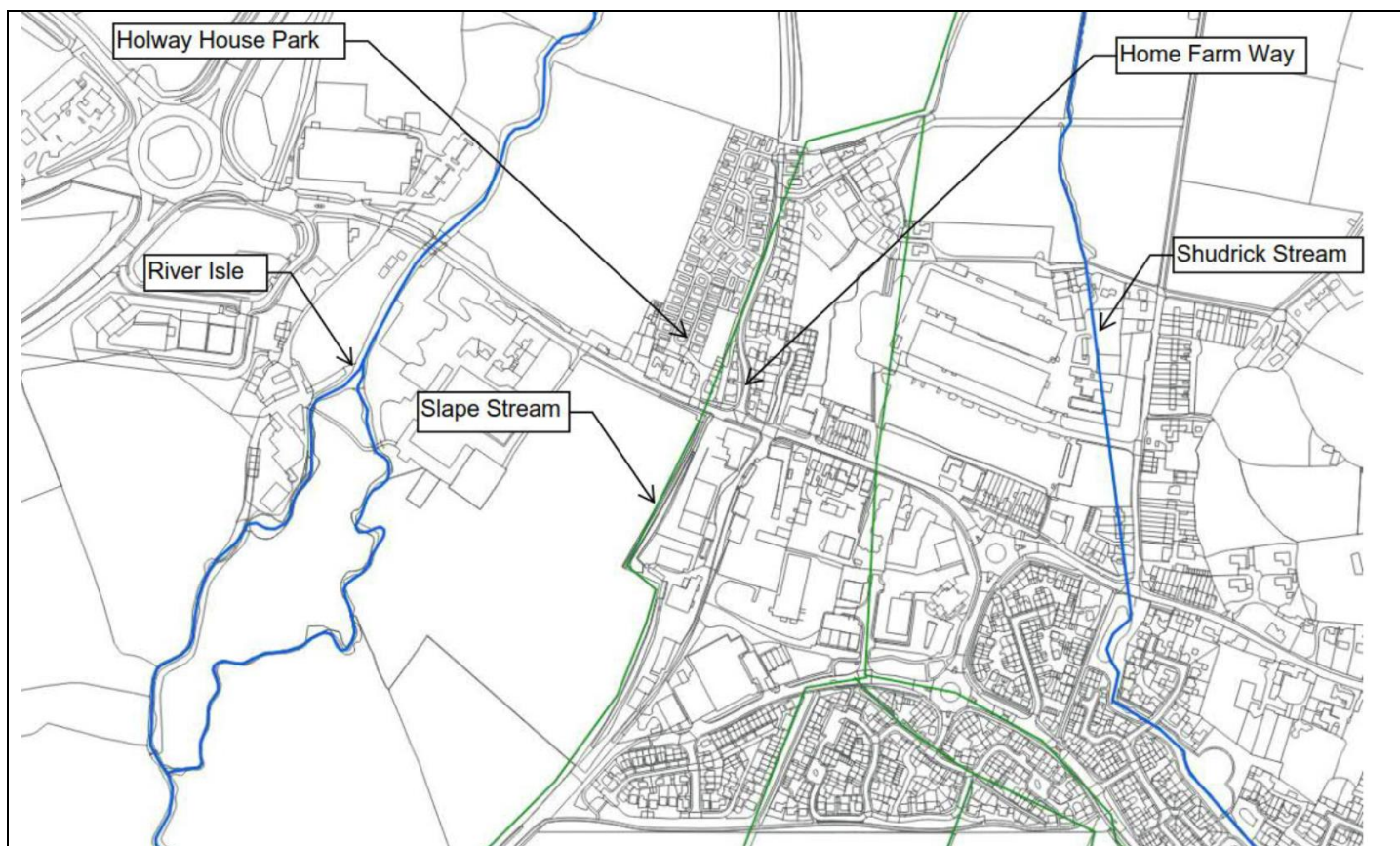
Horton Village was also reported as being badly affected, but no details have been received.





**Figure 8: Areas affected in Allowenshay and Dowlish Wake**

These are the main areas reported as being affected by flooding in October 2021. Flooded farmland or forestry is not shown.



**Figure 9: Watercourses around the Park Home sites**

Both Holway House Park and Home Farm Park park home sites were particularly impacted. Houses in Station Road, Green Way and Home Farm Way, and the industrial area around Whites Drive also experienced flooding.

Although the Slape Stream is marked on this map as running down Home Farm Way, alongside the residential parks, Station Road, where it appears as a ditch running alongside the small industrial area on the old station site. The stream has been culverted under the park homes developments.

**Impact and Extent of**

Severe flooding took place in Ilminster and Sea on the 20th of October 2021. High rainfall on the back of previous wet weather created high river flows and overland surface water flows in the area.

<b>Flooding - Summary</b>	<p>This is combined with a relatively impermeable underlying geology and soils (see section on <a href="#">Groundwater:</a>), which would have been saturated prior to the rainfall event occurring. The River Isle experienced one of the highest water levels in 30 years gauge history. The resultant flooding was in excess of what any residents of the area had seen in their lifetimes, and flows on the river Isle were the highest recorded. This created two issues – the Isle coming out of its bank and flooding areas to the west of town, and rainwater accumulating in North Street, Ditton Street and Shudrick Lane.</p> <p>This report will examine how the infrastructure and stakeholders managed with the excess of surface water, and investigate what can be done to reduce the effects of extreme rainfall events in future.</p>
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<p><b>Impact and extent of Flooding</b></p>	<p>Over the 20<sup>th</sup> and 21<sup>st</sup> October 2021, flooding was extremely severe in Ilminster and Sea. In an incident of this nature it is difficult to collate exact numbers of properties affected, and whether flooding was internal, or external. From reports, it is known that at least 50 properties were affected.</p> <p>The principal cause of flooding in Ilminster and Sea was the high volume of rain and saturated ground conditions. This caused the Isle to burst its banks, and there was a resultant overland flow of water. The bursting of the Isle caused severe flooding at the western edge of Ilminster, causing residents to be evacuated, while the accumulated rainfall running down from the Beacon caused surface water flooding at the eastern end of town. In Sea, surface water ran down the main road and entered properties mostly via the front doors. This water could have come from rainfall, or from local drains and streams, or a combination of the two.</p> <p>A variety of agencies were present on the night of the event, fulfilling their statutory duties. This flooding incident was wider than the Ilminster area, so many agencies were having to prioritise across the county. The Fire Brigade were attending life threatening emergencies, and in Ilminster they evacuated residents. The Police were out assisting with emergencies across the county. The Civil Contingencies Unit had two duty officers out who opened a flood relief centre and organised the distribution of sandbags. They were also active securing alternative emergency accommodation for evacuated residents, and trying to find transport to get them there. They worked in concert with Fire and Rescue, and other District Council, County Council and Parish Council officers. Members of Ilminster Town council were out helping residents to protect their homes and handing out sandbags. The Highways Authority had no statutory duties on the night, and were not required to be called out. Over the following days they visited various sites where debris has been washed into the road, to clear up and identify road areas which needed repair. The Environment Agency fulfilled their statutory duty on the night by issuing flood warnings on main rivers. There were no reports of sewer flooding, so Wessex Water were not involved.</p> <p><b>Timeline of events: 21<sup>st</sup> October 2021</b></p> <ul style="list-style-type: none"> <li>• 19:00 - Following heavy rainfall on Wednesday 20<sup>th</sup> October 2021, levels on the River Isle began to rise.</li> <li>• 22:00 - Civil Contingency Officer (CCO) called to action.</li> <li>• 22:36 - CCO called Fire &amp; Rescue who confirmed that they were dealing with multiple incidents.</li> <li>• 22:42 - Flood Warning for this area was issued; River Isle from Chard Reservoir to Hambridge, 112FWFISL10A. Levels continued to rise, peaking at Donyatt at approximately 23:30 and at Hort Bridge at 23:45. Over the course of the event, 61.8mm of rain fell on the nearby Snowdon Hill in 24 hours (71% monthly average). 52.4mm of</li> </ul>
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that fell during a 7 hour window, which equates to 60% of the average monthly rainfall for the area.

- 24:00 – Peak rainfall predicted for now.
- 01:00-01:30 – Flooding started in the areas of Station Road, Holway House Park, Green Lane and the Old Orchard. All reports are consistent that the onset and rate of rise was very rapid, with peak depths being reached within 20-25 mins.
- 02:00 – Fire & Rescue began rescuing people from park home development. River Isle reported to have burst its banks.
- The time when the Ditton Street end of Ilminster and Sea began to flood are unknown.

#### **Ditton Street:**

According to the reports of agencies out on the night, the flooding at Ditton Street was believed to be due to a combination of urban surface water, surface water coming off of land at the end of Shudrick Lane and the top of Listers Hill, and water spilling from the Shudrick Stream. Drains were reported by residents as being blocked. There have also been reports that ditches have not been cleared by land owners. The Shudrick stream runs along Shudrick Lane, and at one point enters a culvert, which feeds into a large drain running under the Tesco petrol station, and emerges in Abbots Close. The culvert appears to have been overwhelmed by the volume of water coming down the Shudrick Stream. If it had been blocked, we would expect to see more debris attached to the grate in front of the culvert in the photograph below. The overwhelming effect was supported by the testimony of a local resident, who said that he had never seen so much water coming down the Shudrick catchment into the culvert by Tesco, and that it appeared to overwhelm the stream and culvert, which then compounded the subsequent surface water flooding on Ditton Street. The culvert, at 600mm diameter, is comparatively undersized for a catchment from which it collects.





***Figure 11: Culvert in Shudrick Lane, taken some time after the incident.***

This stretch of the Shudrick Stream, including the culverted reach in question, is Main River and as such the EA is the flood risk management authority for this stretch. Under their permissive powers, they undertake periodic inspections of the culvert and channel. If there are significant concerns, and if they are able to, they exercise their powers to mitigate the situation. Ultimately the responsibility falls to the riparian owner. The EA's last culvert survey was undertaken in February 2017. This survey found no problems in the majority of the culvert from the inlet on down, but in the lower section (where it becomes an old masonry arch structure), there are two service pipes passing across the culvert, which pose a potential blockage risk. The pipes would be very difficult to remove, and at least one is currently in use for conveying sewage.





***Figure 12: Storage area near Station Road. (Taken after flood waters had subsided)***

Within the culvert, the Shudrick Stream then flows to the west under Ditton Street and Wharf Lane. Further downstream on the Shudrick the watercourse passes through a housing development in an open channel before flowing into a storage feature upstream of Station Road (as seen in Figure 12).



***Figure 13: East end of Shudrick Lane at Walnut Close.***

This photograph was taken close to where the road ends and the fields begin; the surface water floods down the road and into Ditton Street (which is half a metre lower than the top of the town culvert in Shudrick Lane) where it floods homes and shop premises. This roadway leads into fields where the area is in Flood Zone 2-3. On the right, on the other side of the wooden fence, is the Shudrick Stream.



**Figure 14: Looking west down Shudrick Lane.**

Tesco car park is on the right, just outside of the photograph, and there is a small car park on left. Further to the left is the Swanmead school playing field, part of which also flooded. The entrance to the small car park, where the wooden fence ends, is the start of the town culvert on the Shudrick Stream.

**North Street:**

Flow down North Street was not a problem early in the event, but flow down Listers Hill was. Drains on Listers Hill and High Street were reported by residents as having been blocked for some time.

Residents reported runoff coming straight down from the fields to the north of Ilminster, from the beacon, coming right down the Old Road past the allotments, crossing the road and going straight down into North Street. The first obstacle it comes to is the shops at the bottom of the Market Square. A Local long-term resident observed that problems on the night were due to the overwhelming volume of water.

**Station Road, Home Farm Park, and Holway House Park:**

The River Isle overflowed into the park homes developments, Rose Mill Industrial Estate, and the Station Road area. Flooding started in the areas of Station Road, Holway House Park, Home Farm Way, Green Lane, and the Old Orchard area around about 1:30am. Water levels rose rapidly. Flood water was reported as flowing towards the north east, from the field to the South of Station Road, crossing Station Road and entering Holway House Park. It flowed down the lane next to Holway House and into Home Farm Way and, according to resident reports, it was increased by flood water flowing from the Isle downstream of Hort bridge. The water then crossed the field to the West of Home Farm Park and over topped the informal bank around Home Farm Park, continuing through the park to Home Farm Way. The combined flow then carried on down Green Lane and the Old Orchard area, reaching significant depth.

Four residential properties were reported as being flooded on Station Rd, with water flowing with sufficient force to destroy a masonry garden wall. There is a ditch going past the old station which has flooded on several occasions, and another that goes through a culvert by the Stonemasons pub and comes out in the industrial area. Residents have reported that that these were not properly maintained, and they feel that this has contributed to the flooding.

**Holway House Park** was one of the worst affected areas with depths of water being described as up to 1.25 meters. Around 19 of the park homes were flooded internally, with nine being damaged beyond repair. A further 13 properties along Green Lane and three in Home Farm Way flooded with depths to around a metre. Thanks to its elevated ground level, none of the park homes in Home Farm Park were flooded internally, although there was external damage to garages and vehicles. There were an additional three commercial properties flooded in the Rose Mills Industrial Estate, which is on the left bank of the Isle upstream of Hort Bridge. From the damage witnessed in the buildings it was evident that there were water depths of up to 10 centimetres.

There are defences on the river Isle upstream of Hort Bridge which are maintained by the Environment Agency. It is believed that there was some outflanking of those defences at the very upstream end, and that this is the first time that has happened since they were built in the 1970s. On the night, park residents were lifting manholes to get water to drain away – but these are thought to have been sewage manholes so doing this would have caused and/or added to flooded sewers elsewhere.

There is a network of small drainage ditches around the park homes, Home Farm, and the old station, which overflowed on the night. Ownership and responsibility for these assets is not definitively known, but is probably riparian. Residents feel that



the flooding would have been contributed to because they have not been maintained. There is also a cattle grid which was installed to catch field runoff. Residents reported that water was overflowing from the cattle grid and contributing to flooding.



**Figure 15: Holway House Park**

**Lamplighters:**

There is a new development called Lamplighters, just off Wharf Lane to the South of the town centre. Water is reported as coming off of the development and flowing into the middle of town.

**Sea:**

In Sea, surface water ran down the main road and entered properties mostly via the front doors. Six properties were flooded internally, some to over 1/2m in depth. One property had a flood door fitted, which failed. Residents said they believed that road drains were blocked. There is also concern that a pond along Watery Lane is adding to the risk by not being properly maintained or managed, and that a ditch near the corner in the road is overgrown.



<b>Historical Information:</b>	District Council records are likely incomplete, but they show the following previous flooding episodes:
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Date	Location	Receptor
23/07/2017	Ditton St /Wharf Lane/ Silver St.	x10 properties, Highway
31/01/2014	Greenway	Highway
16/01/2014	Station Road	Highway
24/12/2013	Station Road	x3 properties
22/02/2013	Herne Rise	Highway
12/01/2013	Ditton Street	Highway
24/11/2012	Ditton Street	x5 properties
21/11/2012	Winterhay Lane	Highway
21/11/2012	Station Road	Highway x2 properties
21/11/2012	Green Lane	Highway 1x property
21/11/2012	Horton Cross	Highway
21/11/2012	Townsend	Highway
29/04/2012	Listers Hill	Highway
16/01/2012	Shudrick Lane	Highway
13/12/2011	Station Road	Layby
11/01/2011	Greenway	Highway
01/10/2010	B3168 Beacon	Highway
13/12/2008	Ditton Street	x6 properties
29/05/2008	Shudrick Lane	Highway
16/04/1998	High Street	Highway
1947	Ditton Street	Highway

**Drainage Assets:**

The drainage assets in question are the gulleys in the road and their connecting drainage pipes, plus any culverts and connections to the sewerage system or surface water bodies. The local authority keeps records of drainage under their care, mostly belonging to the Highways Department. Private drainage is not generally recorded. The drainage network around the affected areas is extensive, as Figures 15 to 18 show. However, significant problems with draining the accumulated rainfall during the incident have been noted by many parties.

For the most part, this is due to the severity and intensity of the rainfall – during a flooding incident, it is very difficult to tell if a gully is blocked, or if it just being overwhelmed by the sheer volume of water. Some gullies reported as blocked by residents could be due to this overwhelming effect. Further investigation of the drainage system would be required to ascertain the exact problem in each location, and clean as required.

Current design standards for highways drainage require drains to cope with a 1 in 5 year event plus 20% allowance for climate change, and that a 1 in 100 year event not exceed the bounds of the highway. This event was a 1 in 38 year rainfall event. Drainage meeting the current design standard would not have coped with the intensity of rainfall during the flood event, and would have overflowed onto the highway or failed to drain all the water away even without any obstruction.

When a new housing estate is built, planning policy states that the outflow from any surface water collection system should not be greater than the volumes of water which flowed from that site as a green field.

However, these standards only apply to modern sites. Previously, housing and highways drainage were built on principles of coping with average rainfall, and were designed for the rainfall levels and groundwater levels of the time. With the effect of climate change over the years, many of these installations are no longer adequate for even average rainfall, let alone the 1 in 38 year event that occurred on 20<sup>th</sup> October.

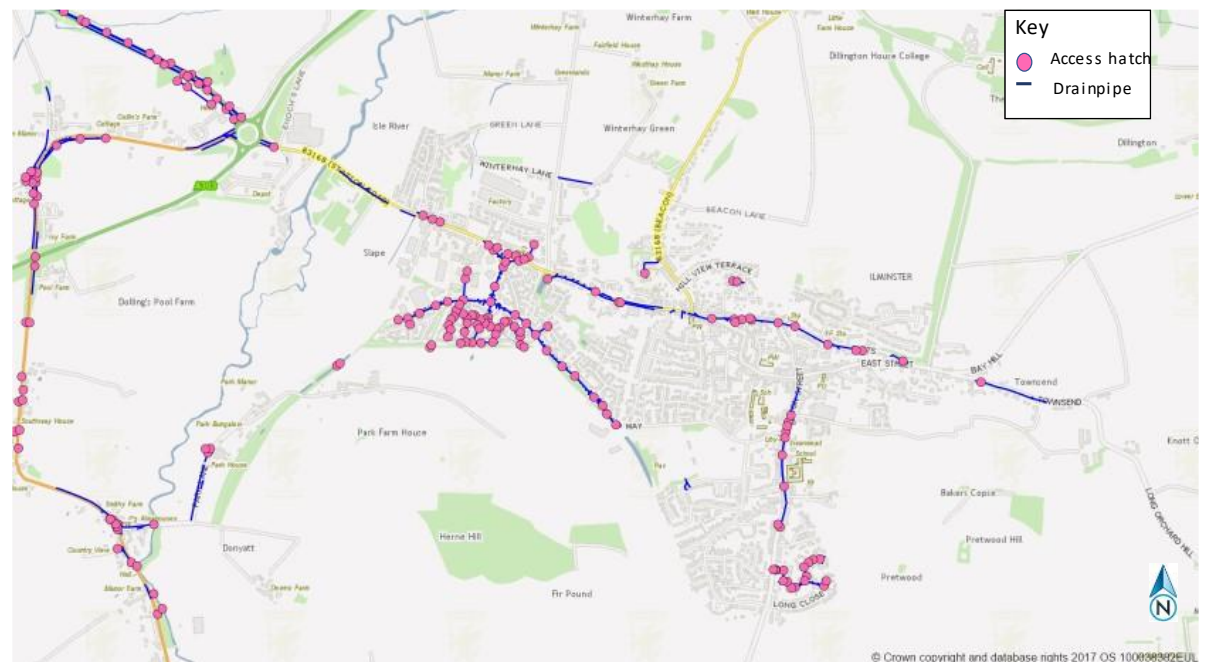
Many of the sewers in Ilminster are combined foul and surface water systems. The modelling undertaken for the Integrated Catchment Report indicates that they often do not have sufficient hydraulic capacity to contain flows during a 1 in 5 year (20% annual probability) event. The model indicates flooding to the highway from sewers during the 1 in 5 year event and by the 1 in 20 year event, the model shows that combined flows contribute to property flooding.

Lister Hill, North Street, and the High Street saw large amounts of surface water emanating from the fields uphill of the eastern end of town. This water is likely to have carried large amounts of soil and debris, and could well have caused gullies

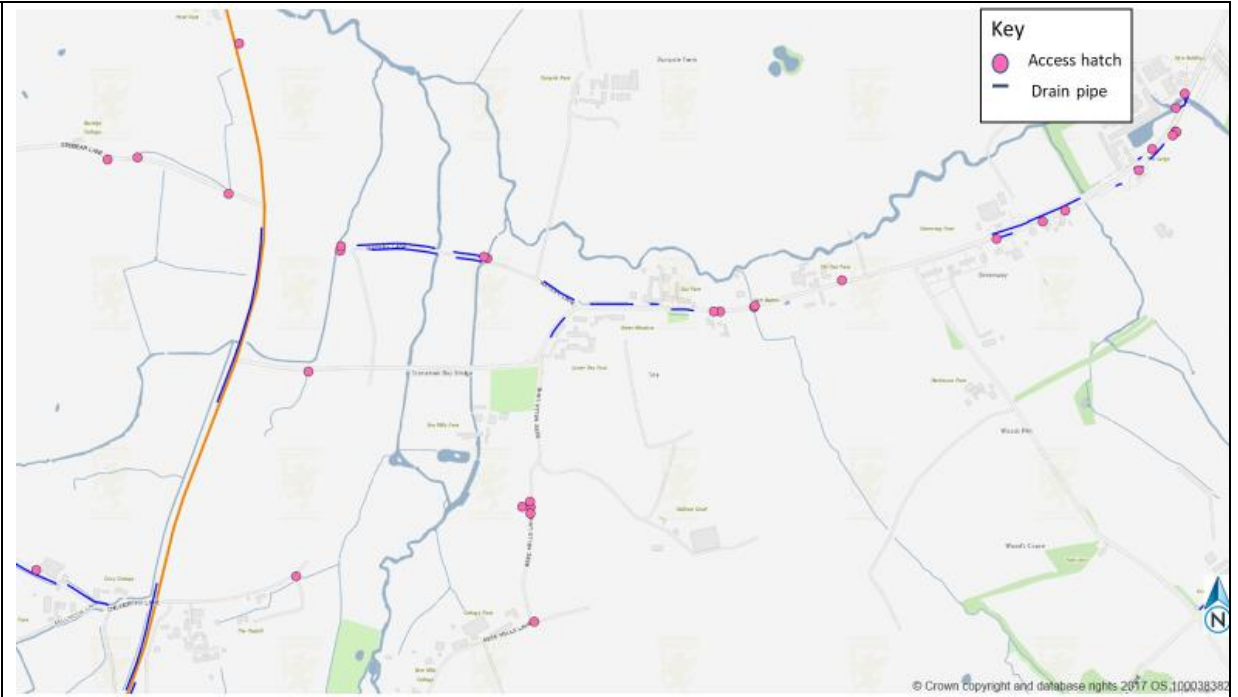
and drains to become impaired on the night. Residents felt that gullies and drains were blocked in any case before the event.

The Shudrick Stream was the eventual recipient of large amounts of this runoff water, which caused it to also flood. The Shudrick Stream runs through a culvert underneath the Tesco filling station, and there are reports that this became partially blinded with debris during the night, adding to the flooding issues, although this is not supported by photographs. There are varying reports of the size and extent of this drain, ranging all the way up to 'big enough to stand up in', although EA records show it is only 600mm in diameter. Ownership is also uncertain, but the EA would have flood-related responsibility as this is a main river.

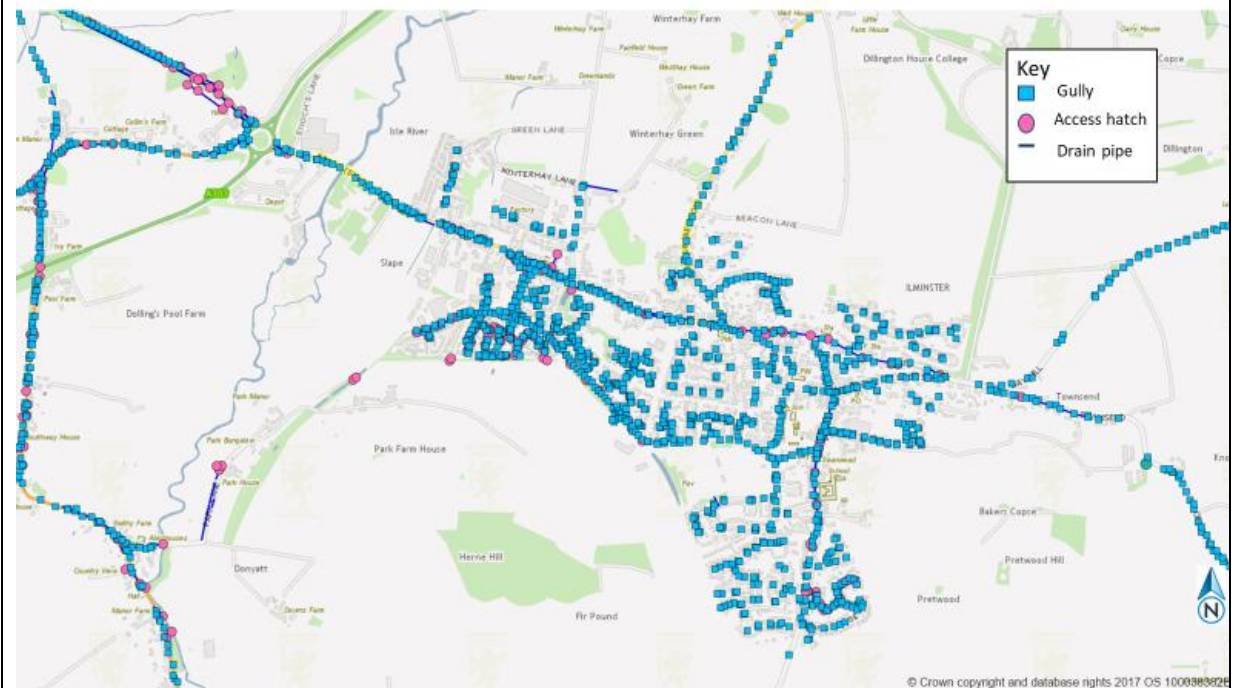
In Sea, there were reports that highways drains in Green Meadows were blocked.



**Figure 16: Highways surface water drainage pipes in town**

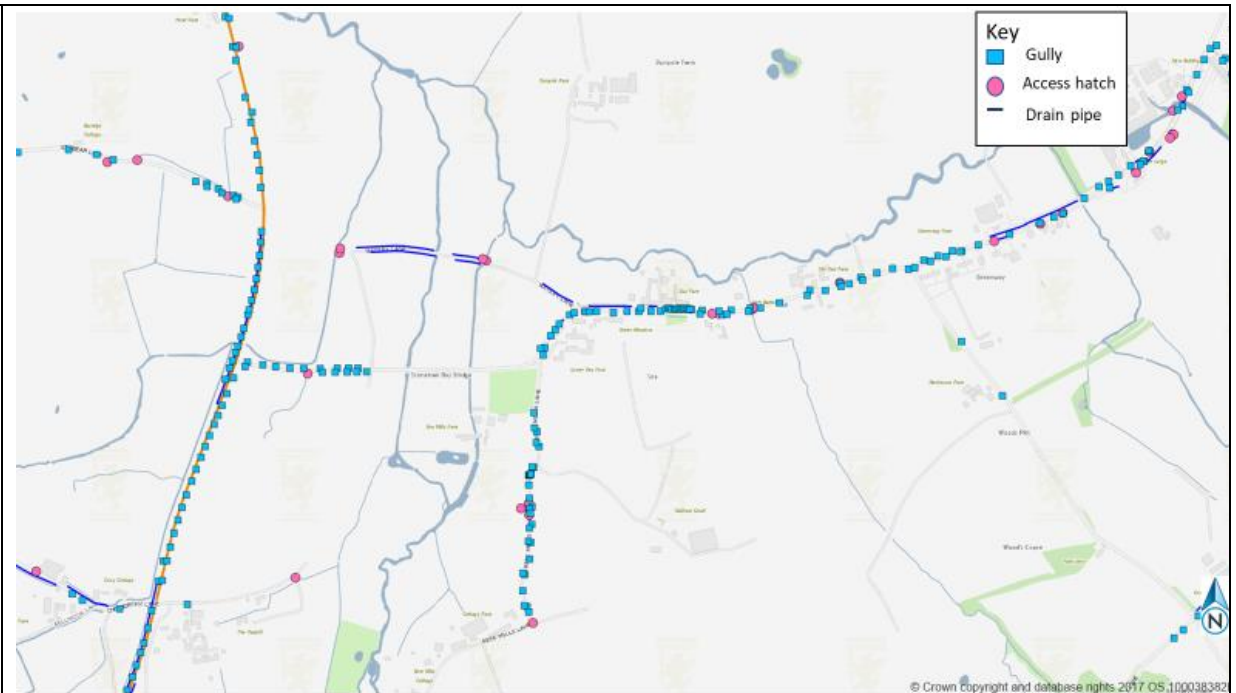


**Figure 17: Highways surface water drainage pipes in Sea**



**Figure 18: Highways gullies in Ilminster**





**Figure 19: Highways gullies in Sea**

The drainage network around the affected areas is extensive, as the figures show. However, residents and others have noted some significant problems with draining the accumulated rainfall during the incident.

In part, this could just be due to the severity of the rainfall – during a flooding incident, it is very difficult to tell if a gully is blocked, or if it just being overwhelmed by the sheer volume of water. Many gullies reported as blocked by residents could be due to this overwhelming effect.

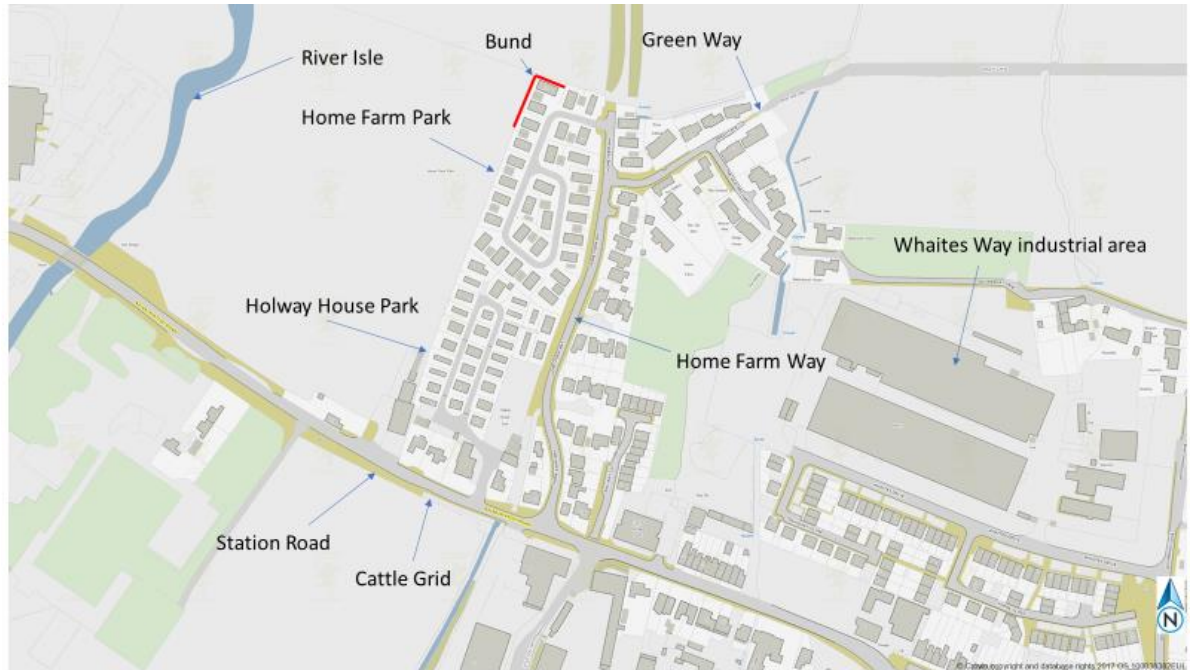
Current design standards for highways drainage require drains to cope with a 1 in 5 year event plus 20% allowance for climate change, and that a 1 in 100 year event not exceed the bounds of the highway. Drainage meeting the current standard would not have coped with the intensity of rainfall during the flood event, and would have overflowed onto the highway or failed to drain all the water away even without any obstruction.

When a new housing estate is built, planning policy states that the outflow from any surface water collection system should not be greater than the volumes of water which flowed from that site as a green field.

However, these standards only apply to modern sites. Previously housing and highways drainage were built on principles of coping with average rainfall, and were designed for the rainfall levels and groundwater levels of the time. With the action of climate change over the years, many of these installations are no longer adequate

for even average rainfall, let alone the more intense events we have seen in recent years.

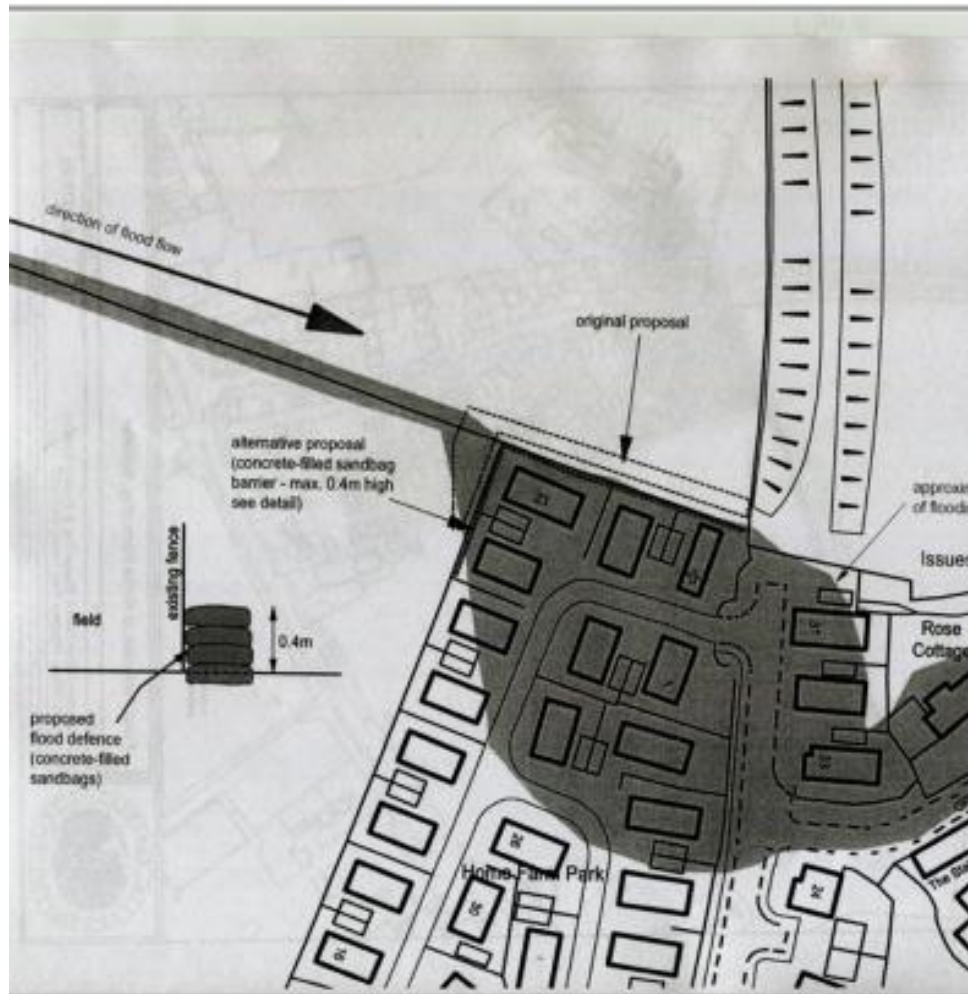
Within the residents' testimony of the flooding to Home Farm Park and Holway Park there were many references to 'the bund behind Home Farm Park'. Investigation has revealed some of the history and detail of this bund, and a cattle grid installed around the same time on Station Road.



**FIGURE 20: BUND LOCATION.**

A copy form has been found, dated 26<sup>th</sup> June 2013, which details the application by Ilminster Town Council and the West Ilminster Flood Mitigation Group (made up mostly of residents of Holway House Park and Station Road). This form details the proposal to construct a bund, at the back of the north most corner of Home Farm Park, and a cattle grid and ditch along Station Road, as shown in the following maps:

**Bunds  
Around  
Station  
Road and  
Home  
Parks**



**Figure 21: Proposed bunds at the back of Home Farm Park.**

The deep grey area shows the area flooded in 2008.

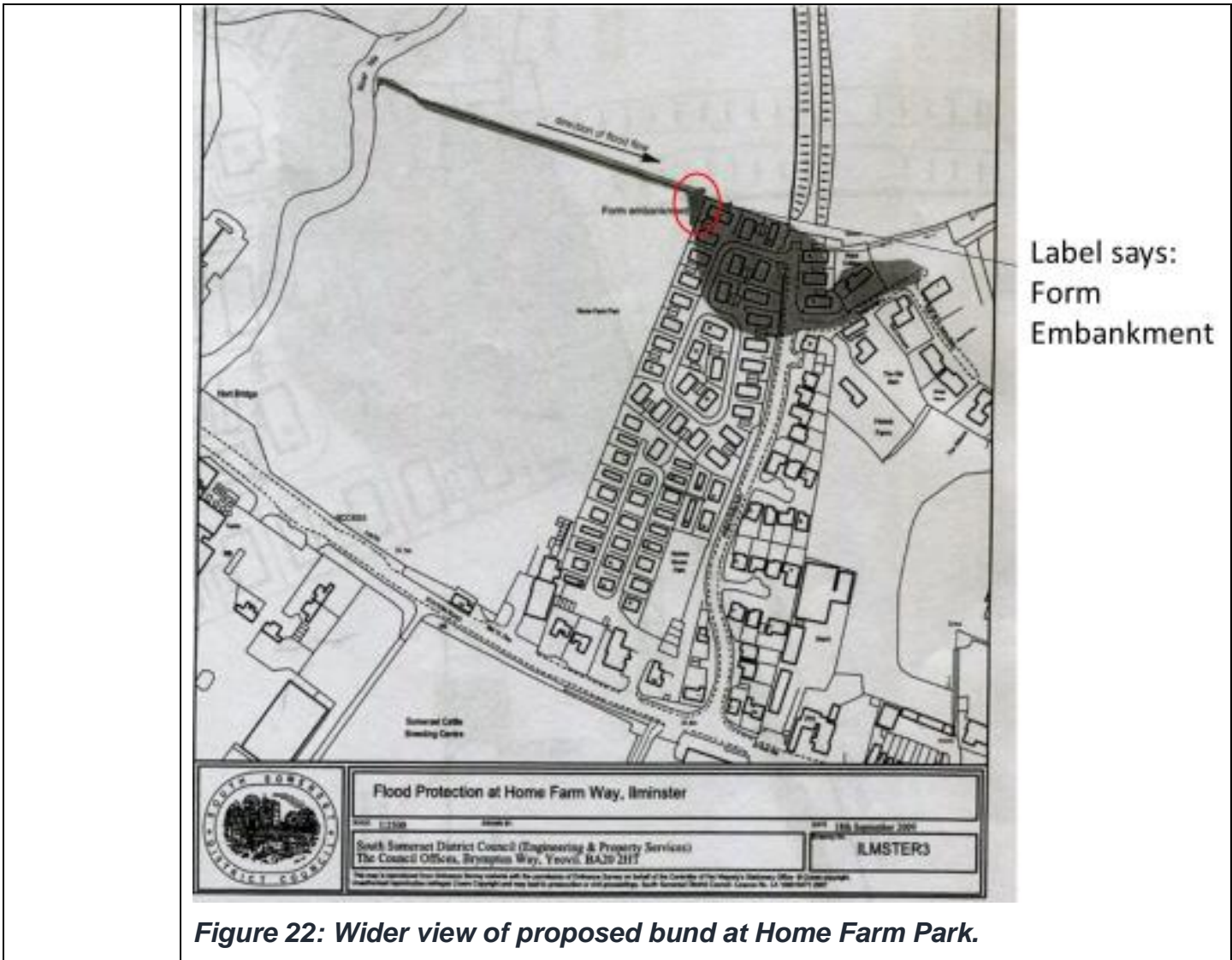


Figure 22: Wider view of proposed bund at Home Farm Park.





**Figure 23: Proposed cattle grid and ditch on Station Road.**

Further works were proposed to install a cattle grid structure next to the drainage ditch on Station Road, designed to divert water coming across the field away from the main Station Road surface, and down the ditch that runs alongside the old station area.

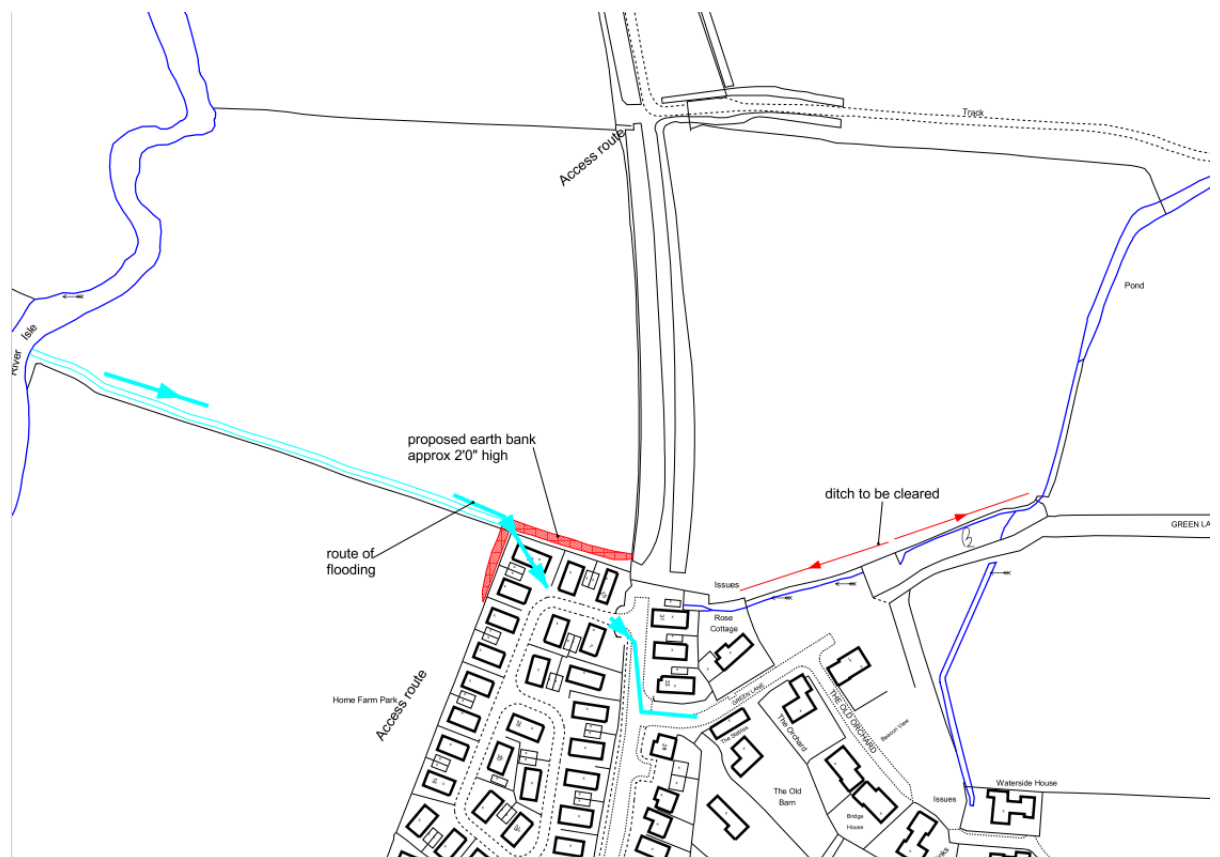
SCC records show that the funds were granted to Ilminster Town Council as requested. However, there are other records which suggest (but don't state explicitly) that this funding was used only to build the cattle grid and drainage system on the south of Station Road. In the event, the bund was built by South Somerset District Council on 23<sup>rd</sup> September 2014. The bund, ditch and cattle grid are all visible on site. Furthermore, the bund is visible on Lidar data<sup>1</sup>, and the cattle grid has been referred to during residents' testimony of the October 2021 event. Details of the construction of the cattle grid were included with the application, but

<sup>1</sup> [LIDAR terrain map of \(archiuk.com\)](http://archiuk.com)



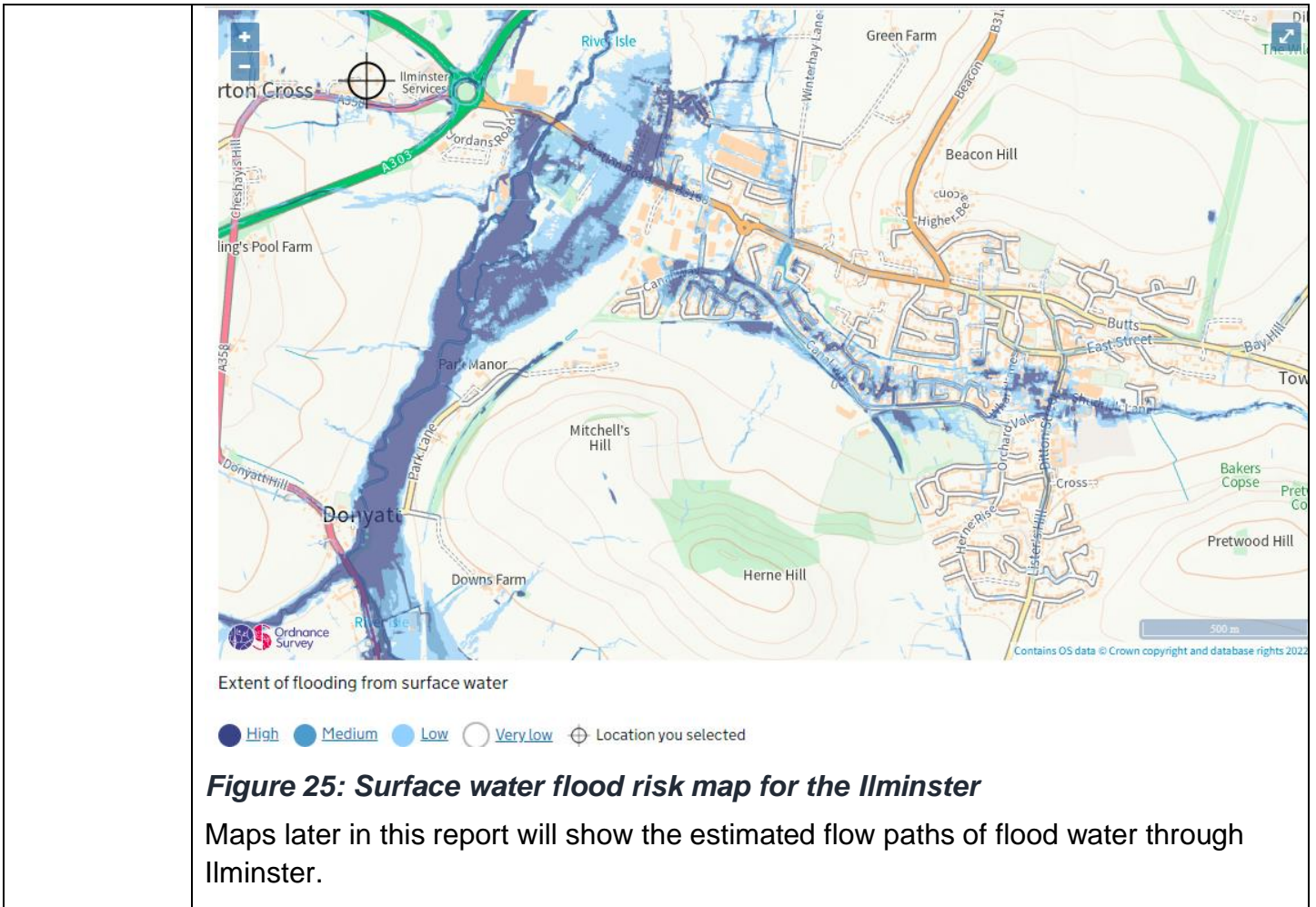
unfortunately full details of the proposed bund were not included. As originally applied for to Somerset County Council, it had a central core of sacks of concrete, with an earthen bund of unspecified original height over the top. However, it is not known whether this was how it was actually built, nor what the design parameters of the bund were; it appears to have been constructed in response to floods in the area in 2008, but it is not known whether it was designed to withstand, for instance, a 1 in 100 year rainfall event, or another parameter.

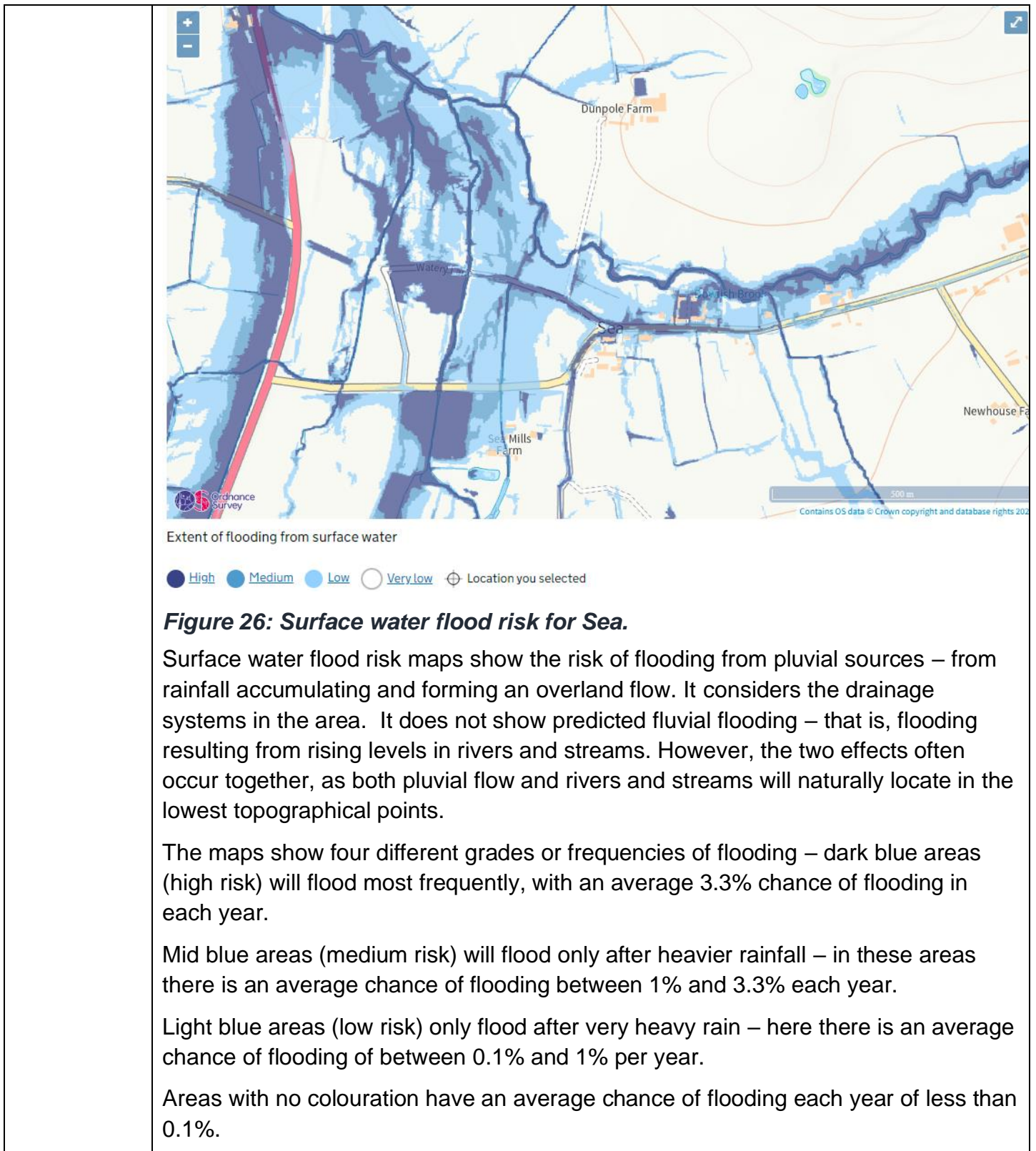
The land that the bund is on belongs to Dairygold, however it appears that their land agents were unaware of the bunds existence. Residents around the Home Parks, Green Lane and Old Orchard have produced various records around the construction of the bund. They state that the bund was constructed by SSDC on 23<sup>rd</sup> September 2014, over the course of a single working day, using bulldozers. They state that the scheme was designed and supervised by an SSDC engineer, now retired. Another officer who worked alongside this engineer, and still works for SSDC, has managed to track down some paperwork relating to the original installation.



**Figure 24: Design records for Bund around Home Farm Park, SSDC.**

	<p>Reports from residents as to the current state of the bund and the reason for it vary. Some maintain that the bund has degraded and been flattened, others that it is intact. Some maintain that an increase in size of the gardens of some of the Park Homes has intruded into the bund, some that annual ploughing of the Dairygold field has caused problems. A survey of the bund needs to be undertaken as part of re-instatement and/or improvement works. It may be better, rather than try and restore the bund to an original condition of unknown resilience, to ascertain what design parameter we wish to use and rebuild to that standard.</p>
<p><b>Rainfall Information:</b></p>	<p>There was very heavy rain on the 20<sup>th</sup> and 21<sup>st</sup> of October, on the back of previous heavy rain saturating the catchment.</p> <p>The amount of rain, which the Environment Agency estimate at around 62 millimetres in 24 hours, was 71% of the monthly average, just in that 24-hour period.</p> <p>The nearest river gauge is at Donyatt, which is just upstream of Ilminster. This gauge is used by the Environment Agency to predict flooding and issue flood warnings for the main river Isle. On the 20<sup>th</sup> of October, this gauge returned the record highest level for the river Isle, over the gauges 30-year history.</p> <p>Below is an excerpt from EA Monthly water situation report for Wessex:</p> <p>“October was a wet month for Wessex, with ‘above normal’ rainfall at 187% of the LTA (149 mm). There was light rain at times throughout the month, but the main rainfall events occurred on 1 – 4, 19 – 20 and 28 – 31 October which combined produced around 90% of the month’s total rain. The highest accumulation was on 19 and 20 October when 33% of the month’s rain fell, distributed across most of Wessex.”</p>
<p><b>Surface Water:</b></p>	<p>Most of the flooding witnessed around eastern Ilminster during the event was apparently due to heavy rainfall accumulating and moving across the land – this is usually referred to a pluvial or surface water flooding.</p> <p>The basic mechanism appeared to be the movement of overland flow downhill, and as the east of Ilminster is in a valley, heavy flooding was experienced in these topographical low areas around Ditton Street and the Shudrick Stream.</p> <p>Flows in transit also caused significant flooding and damage to roads and property, and carried the debris from this along, blocking drains in the process.</p>





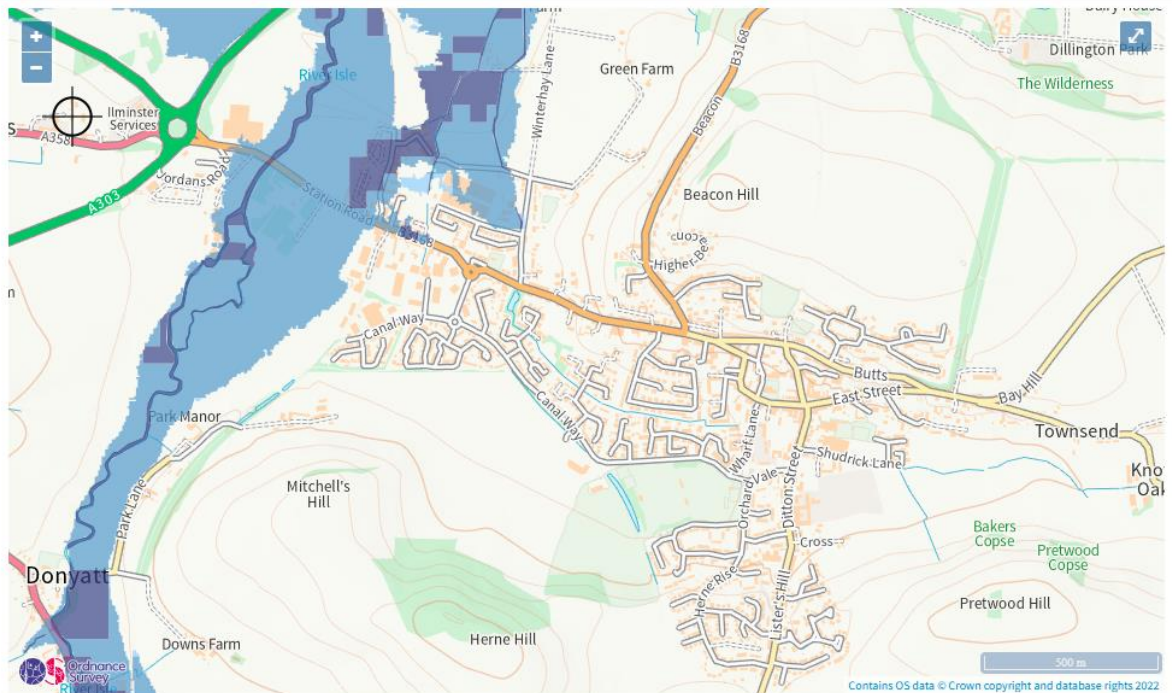


In context, the rainfall event that fell on Ilminster and Sea in October 2021 has a 2.6% chance of occurring every year.

The western side of Ilminster was particularly badly affected by fluvial flooding from the River Isle. The river appears to have bypassed the Environment Agency flood defences upstream of the Hort bridge and spread out over the old Dairygold site and fields next to the river. It then entered the two park homes sites and surrounding roads, both from the east and from the south, as water ran across Station Road, as shown in figure 27. It also affected the Rose Mill Industrial estate on the Horton Cross side of the river.

The nearest fluvial gauge is at Donyatt. The highest level recorded at this gauge during the incident was 2.649m on the 20<sup>th</sup> of October. This had dropped slightly to a high of 2.608m the following day. This is not the highest this gauge has ever recorded: 3.91m was recorded on 16<sup>th</sup> March 2013 and 4.11m on 17<sup>th</sup> March 2014. This is from riverlevels.co.uk, where the records only go back as far as January 2013.

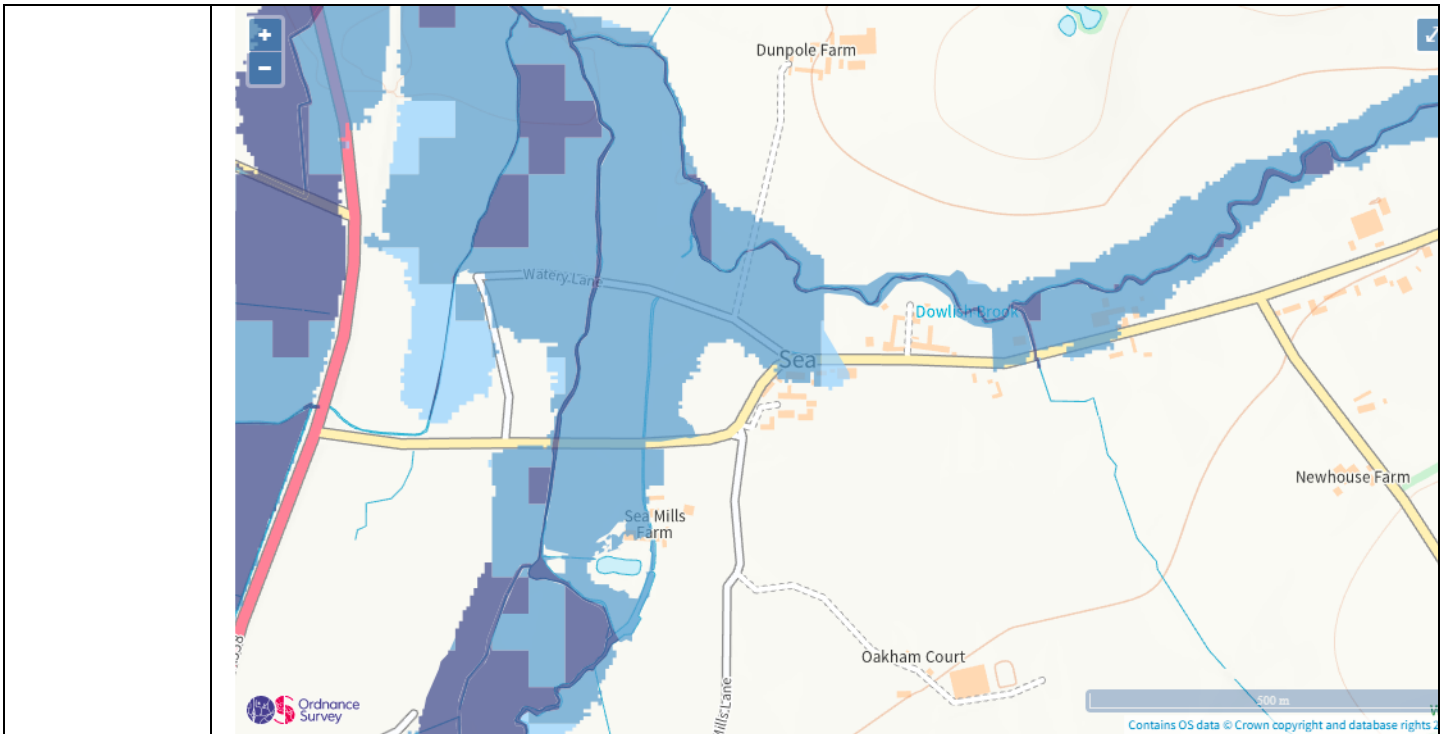
Fluvial:



Extent of flooding from rivers or the sea  
 ● High ● Medium ● Low ● Very low ● Location you selected

**Figure 27: Fluvial flood risk Ilminster**





Extent of flooding from rivers or the sea

● High 
 ● Medium 
 ● Low 
 ● Very low 
 ⊕ Location you selected

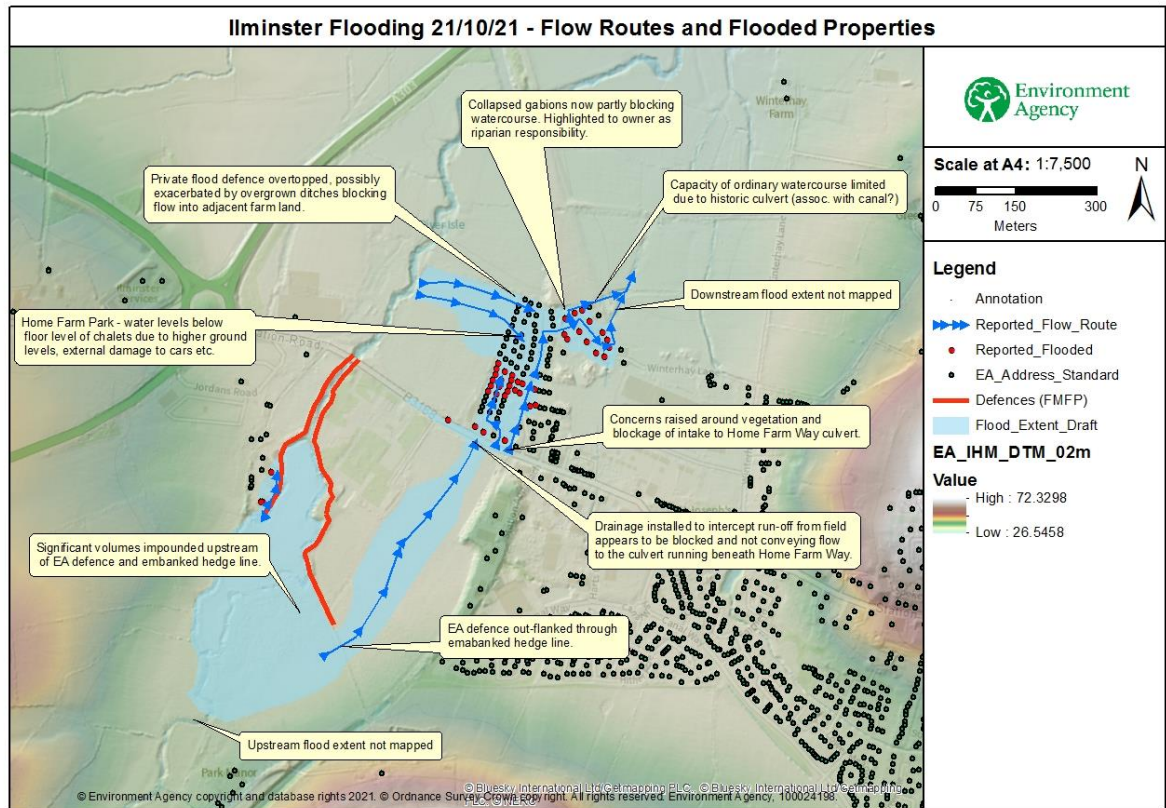
**Figure 28: Fluvial flood risk Sea**

The EA defences in Ilminster undergo routine maintenance inspections three times a year. During these inspections, the embankments are subject to hand paring to maintain conveyance and debris is removed from the weir at Hort Bridge. As part of recovery works of the 2013/14 flood, the raised embankment on the right bank upstream of Hort Bridge was extended to tie into high ground. During the latest inspection of these assets, they were all deemed to be up to the standard to which they had been designed in the 1970’s. One of the reasons the EA is bidding for funds for a flood alleviation study, is to bring flood protection in this area up to a more modern standard.

The study area, particularly around the residential home parks, has a network of smaller streams and drainage ditches, aside from main rivers. The ownership of many of these watercourses is unclear but is assumed to be riparian. In several areas these watercourses were directly implicated by residents in contributing to the flooding, either because they felt they had not been kept clear, or they were simply overwhelmed by the volume of water.

<b>Coastal:</b>	There is no risk of coastal flooding in this area.
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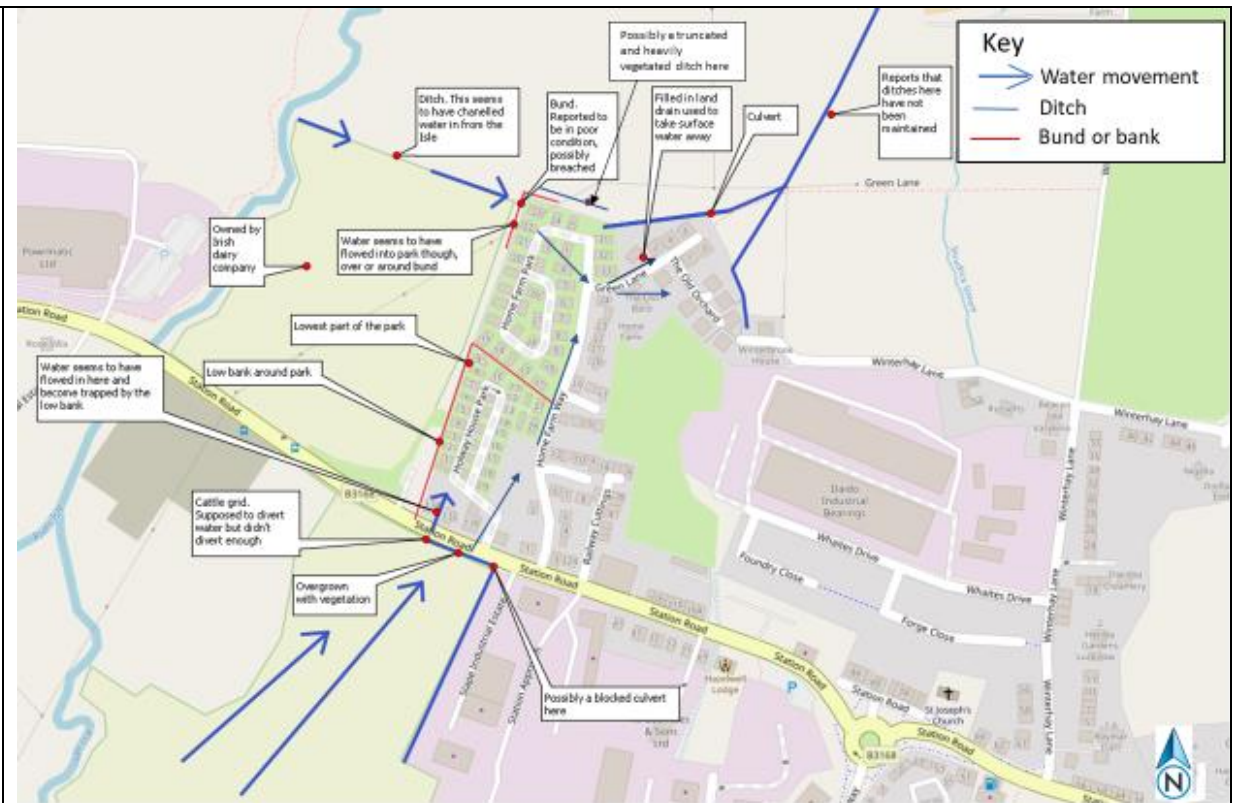
<p><b>Groundwater:</b></p>	<p>Most of Ilminster is underlain by loam and clay soils with impeded drainage. This is seen in the centre of the town and through Herne Hill to the south. To the north, the slopes of Beacon Hill, are generally freely draining loamy soils, while Pretwood Hill is overlain with shallow soils over chalk/ limestone.</p> <p>The available mapping indicates that the ground around Ilminster has poor infiltration, which indicates that runoff from rural areas is likely to be high. Historically the land on which Ilminster has been developed was low lying land known to be water meadows and marsh land.</p> <p>The eastern parts of Ilminster, and the catchment to the east, are underlain by a Principal Aquifer (able to yield significant quantities of groundwater). Central Ilminster and western Ilminster are underlain by Secondary A and Secondary undifferentiated aquifers (small amounts of groundwater stored in cracks and fissures in the rock). The EA also identifies the catchment as being in an area of Ground Water Vulnerability.</p> <p>In summary; the geology underneath Ilminster makes it more likely to flood. Once rain falls it takes a long time to drain away.</p>
<p><b>Soil Moisture Deficit:</b></p>	<p>The Soil Moisture Deficit generally decreased throughout October, interspersed with a slight increase due to a relatively drier spell towards the middle of the month. The heavy rainfall on the 19<sup>th</sup> and 20<sup>th</sup> October decreased deficit to 12 mm by the end of October which is 40% less than the LTA (40 mm) but similar to this time last year (15 mm).</p> <p>When the rain fell during the storm event, the ground was already saturated. This increased the severity of flooding as water could not be absorbed into the soil, and instead ran over the top to form surface water flooding.</p>
<p><b>Probable Causes</b></p>	<p><b>West end of Ilminster:</b></p> <p>The Environment Agency compiled the following map of flow paths at the west end of Ilminster during the event:</p>



**Figure 29: Flow paths at the west end of Iminster. Source: Environment Agency, November 2021.**

The information in this map represents an outline estimate of the flood mechanisms and flooded properties during the flood of 20/21 October 2021 on the west side of Iminster. It is based on information gathered in the aftermath of the flood and may not be a complete and accurate summary, but is based on the best data and resource available at the time.

Data collected from residents of the area during the drop-in session at The Shrubbery, Iminster, on 17<sup>th</sup> November 2021, suggest the following additional mechanisms:



**Figure 30: Further detail of west Ilminster**

Most of the volume of water has come from the river Isle. The river spilled over its banks both to the north of the Hort bridge, and around the flood defences to the south of the bridge. Water from the northern spill flowed up over the field, to the west of Home Farm Park. From here it flowed through, around and/or over the bund into Home Farm Park, and across into Green Lane. Water coming up from the south combined with pluvial flow across the fields, flowed into and over the cattle grid, and across Station Road into Holway House Park and the houses next to it. This water was trapped in situ by the low bank around the park. Another portion of the water that came up from the south flowed across Station Road and across into Home Farm Way. This flowed down Home Farm Way to join up with the water from the north in Green Lane and the Old Orchard.

A resident has reported that, during development of Green Lane in 2018/19, changes were made to the culverting system and ground levels, which has negatively affected the passage of water away from the area. This should be considered within future modelling and flood mitigation planning. The ditches downstream of Green Lane are also reported as being overgrown, and the owner (assumed to be riparian) should be encouraged to clear the excess.

A lot of work has been done previously to try and protect this area from flooding. Not all elements of the scheme seem to be functioning as intended, and they may not have been correctly specified for an event of this size. The EA defences were built in the 1970's. The EA is bidding for money to undertake a flood risk management study for Ilminster over the next couple of years, subject to gaining central government funding. If successful, this will review the current and future flood risks, including the current defences, as well as considering potential future partnership options to better mitigate flood risk, taking account of any developments in the area.

**East end of Ilminster:**

Pluvial flow from the hills to the north and south of Ilminster flowed down into the centre of town and gathered in the low spot at the junction of Ditton Street and Shudrick lane. Flow from the north came from Beacon hill, down the track past the allotments, along Old Road and into North Street. Water heading into town from the south flowed down Listers Hill and into Ditton Street. Rainwater also flowed in from the fields to the east of Ilminster and down Shudrick Lane, where it again collected at the low point. This was added to by water from the Shudrick Stream itself, which came out of bank, possibly due to the culvert that leads under Ditton Street becoming blinded with debris or overwhelmed by the large quantity of water.

EA, local residents and Councillors observed these flow paths, and also that the pluvial flow comes off fields, carrying soil, stones, and debris with it. This will tend to collect in and possibly block drains during an event. Long term local residents also observed the high volumes of water coming from these sources, and said that they felt even free running drains would not have coped with all of it.





**Figure 31: Pluvial flows around east Ilminster**

Residents have raised the issue of the crops being grown around the periphery of Ilminster and the surrounding villages. Maize has recently started to be grown, and this particular crop is associated with high levels of runoff. This could be exacerbating the surface water and pluvial flow element of the flooding experienced.

**Sea:**

Residents reported that water entered their properties from the highway, via the front and back doors. One resident further reported that highways drains outside their property were and are blocked. Sea is at a low point in the landscape, and it's entirely possible that the surface water running down Watery Lane originated on Herne Hill or Pretwood Hill as rainfall. There is also a stream just to the north of the main road through Sea, which also crosses the road near the dairy farm. There are

	no records of flow in this stream at the time, but it is possible that the water running through the centre of Sea originated, in whole or in part, from this watercourse. More detailed data and/or modelling will be required to determine the origin of this water.	
<b>Risk Management Authority Responsibilities</b>	See Appendix ( <a href="#">link</a> )	
<b>Risk Management Authority Actions During and Immediately After the Event</b>	Somerset County Council (in their roles as LLFA and Highways Authority)	Highways Authority: Were not called out on the night. Began clear up work the following day.  LLFA: No emergency role. After the event commissioned the Section 19 report and began to gather information from residents and RMAs about their activities, and when and how flooding happened.
	Environment Agency	Issued flood warnings. Flood warning was issued at about 10:20pm for the river Isle from Chard Reservoir to Hambridge. Levels continued to rise, peaking around about 11:30pm.
	Wessex Water	No emergency role.
	Devon and Somerset Fire and Rescue Service	Fielded 33 calls from Home Park Farm, Holway House Park, and Station Road. Some were to rescue people from vehicles in water. Undertook specialist rescue by boat from the caravan park for 10 people.
	South Somerset District Council	The duty Civil contingency officer (CCO) was called at 10pm. They called Fire and Rescue at 22:36 who confirmed that they were dealing with multiple incidents and were only attending where life was at risk. Peak rainfall was predicted for midnight, at around 60mm/hour. The CCO was called again by Police at 2am, and informed that Fire and Rescue were deploying boats to rescue people from the park homes development. It appeared that the river had burst its banks and mixed in with sewage from a septic tank. At

		<p>2:30am the CCO identified a rest centre nearby in case it was needed. At 2:45am Fire and Rescue confirmed that 8 people were being rescued, and the CCO purchased rooms at a nearby hotel for them. The CCO was also trying to sort out taxis who could get there without going through flood water, when Fire and Rescue reported they had found a volunteer with a Land Rover to shuttle people to the hotel. The first evacuees arrived at the hotel at 4am.</p> <p>Lines of communication became confused early in the event because some information was going directly between SSDC and others, rather than via the central control system.</p> <p>There also seems to be an emergency duty team that was available but not used. This could have helped to make things run more smoothly. There were also some issues on the night with CCOs not being able to get through to the police control centre because all lines were busy, and with confusion over payment for the hotel rooms.</p> <p>SSDC Councillor Sherman took calls from the public about Ditton Street flooding as he lives near there. He communicated on to other (town) councillors, SSDC, SCC and emergency services. Town councillors were out delivering sandbags around Ditton Street area, but the water was already in some houses. No-one contacted their office about the problems at Station Road end, even by a couple of days later.</p> <p>After the event they have been talking to other agencies and community members about community resilience arrangements, supporting Parish Councils with the development of community resilience plans, and developing grant applications for resilience equipment.</p>
	Avon and Somerset Police	No recorded actions in Ilminster on the night.
	Parish Council	No report from Sea Parish Council.
<b>Recommendations</b>	<ol style="list-style-type: none"> <li>1. Ilminster Town Council are keen to develop a resilience plan and a local resilience group – this should be progressed in concert with the SRA, and possibly the EA.</li> </ol>	

2. Stakeholders should liaise with FWAG and local landowners to discuss the issue of maize growing in the area, ascertain if it is a problem, and see if more benign crops or growing methods can be found.
3. The Shudrick Valley and the area around the River Isle have the potential for Natural Flood Management (NFM) schemes. These should be investigated as part of further work to model flood flows in the area and evaluate mitigation schemes.
4. Anecdotal evidence suggests that many residents and landowners have an incomplete understanding of riparian responsibilities. Communities should be educated on riparian rights and responsibilities. SRA may be best placed to do this.
5. There was some confusion during the incident as to communication between parties and the use of the Emergency Duty Team. In particular, this should include the Town Council and the SSDC Homelessness Team, who were unaware of the problems at Station Road and the residential parks until late the following day. Emergency plans should be reviewed to ensure that all parties involved with flooding incidents to have a method statement setting out line of communication, contact details, and full information about who can be called upon to do what during an emergency.
6. Audit gully cleaning contractors to ensure the job is being done correctly, and see if improvements can be made – e.g. informing residents in advance of gully clearing so cars can be moved to facilitate access. The frequency of gully cleaning has already been increased from around every 4 years to an annual round.
7. It took a long while to get the electricity back on at the residential parks, and this delayed people getting back into their homes and being able to start getting dried out. In future Western Power Distribution need to prioritise getting vulnerable people reconnected so they can get back into their homes.
8. Information needs to be distributed more widely about how to prepare yourself and your property for flooding.
9. Information needs to be distributed more widely about who to contact with different concerns e.g. to whom should people report a blocked culvert, or an overgrown ditch?
10. There should be a review of post incident support to residents, to ensure that it is adequate and correctly targeted. Those most at risk are mainly elderly and often uninsured. They can find it hard to access help and services, due to mobility problems or lack of internet access. People often need help 4 or 5 days after an incident when they can no longer stay with relatives or in a hotel. This package also needs to include mental health care, as many are completely shocked and bewildered by what has happened.
11. The modelling that has been done for the integrated catchment study to be extended to include fluvial and surface water movement around Ilminster. The EA are hoping to start a flood alleviation study next year (23/24), subject to a funding bid (previously mentioned), which they hope to link to the previous integrated catchment study.
12. As a separate piece of work on their modelling programme, they are updating the catchment fluvial model for the River Isle and adding in the Shudrick Stream for the first time. This model will be at a catchment scale (going from head of main river down to Isle Brewers near the Somerset Levels), so it will cover a much larger area than just

	<p>Iminster. A greater local focus in Iminster will come from the flood alleviation study. The catchment fluvial model will likely not complete until 2025 at the earliest.</p> <p>13. Changes in local planning policy should be considered. Currently the standard requirement for drainage in a housing development is to cope with a 1 in 5 year event for highways drains, and to cope with greenfield runoff rates for surface water drainage. Consideration should be given to adopting a higher standard, and/or specifying a policy of betterment.</p> <p>14. The path of the old canal in Iminster should be investigated, and it should be ascertained which other waterbody it joins into and where. Any changes required should be communicated to the Environment Agency and Ordnance Survey as appropriate.</p> <p>15. Further work needs to be done to understand the parties responsible for ownership and improvement of the bund around the Park Homes. The condition of the bund needs to be examined and improved or repaired as required.</p> <p>16. The culverting of Green Lane should be looked at to see if changes have been made without the proper permissions, and the arrangement should be taken into account in flood modelling and mitigation strategies.</p>
<p><b>Stakeholders and Funding Opportunities</b></p>	<p>The EA have overall responsibility for the management of flood risk on main rivers in England and Wales. This means they have powers to oversee, undertake and regulate flood risk management works on Main Rivers. Other risk management authorities and individuals, such as riparian owners, can be authorised by the EA to undertake works on Main Rivers in accordance with the environmental permitting regulations. Flood risk management works, such as projects and maintenance, depend upon the availability of central government funding. The availability of funding from central government (DEFRA) depends on a comprehensive assessment of options, including cost/benefit analysis, and on the environmental impacts. Central government funding might be available to cover part of the cost of the works; in such cases the rest has to be found from other local sources, such as Local Levy, local authorities, other government departments, or the private sector. Where the EA or another risk management authority are not funded for maintenance or development works, responsibility falls to the riparian owner. The EA can provide advice in such cases.</p>
<p><b>Development Planning</b></p>	<p>The most recent local plan for Iminster (adopted 2015) mentions fluvial flooding as a constraint to development in Iminster, but surface water flooding is not considered.</p> <p>Previous local plans have identified an area in the Shudrick Valley as being allocated for housing. This area was rejected by the Planning Inspector prior to adoption of the latest Local Plan.</p>



	<p>The Plan also brings forward allocations of employment land with an enabling development of housing for sites around the River Isle, in the vicinity of Hort Bridge, and between the isle and the static home parks. Flooding is considered as a significant issue for the sites around the River Isle, and the improvement of flood defences or other suitable mitigation solutions along the river should be a core consideration by any developer. The issues of surface water flooding need to be taken into account here too, and again any developer should be required to provide betterment on this issue.</p>
<p><b>Ongoing Works</b></p>	<p>The modelling that has been done for the integrated catchment study is to be extended to include fluvial and surface water movement around Ilminster. The EA is hoping to start a flood alleviation study next year (2023/24), subject to a funding bid, which they hope to link to the aforementioned integrated catchment study, previously completed by SCC and Wessex Water. This will require the input and collaboration of all other authorities, communities, and stakeholders.</p>
<p><b>Planning Policy and Future Development</b></p>	<p>In order for a planning application to be granted, they must have conditions applied to them or a design detailed within them which ensure that surface water runoff from the development is attenuated on site and leaves the development at no more than greenfield runoff rates. This should ensure that no development makes flooding in the area around it worse. This is in accordance with National planning policy and the Government standards for SUDS, published on the .gov.uk website. These documents deal with rainfall intensity of a 1 in 1 year and 1 in 100 year event – much more common than the event covered in this report.</p> <p>In order for the Local Authority to require any stricter standards to be applied (such as accounting for events at greater than 1 in 100 years return period, or requiring runoff at less than greenfield rates, or if development is proposed within Flood Zone 3, it should also seek to provide flood mitigation to existing properties, as well as those proposed in the new development), this needs to be stated in local planning policy.</p> <p>It is recommended that further work be undertaken with a view to requiring stricter standards to be applied to surface water management by developers in affected areas in and around Ilminster.</p>

## Appendix: Risk Management Authority Responsibilities

<p><b>Risk Management Authority Responsibilities</b></p>	<p>Somerset County Council (in their roles as LLFA and Highways Authority)</p>	<p>As the LLFA they are required to develop a strategy to tackle local flood risks, involving flooding from surface water, 'ordinary watercourses', for example ditches, dykes, and streams, groundwater, canals, lakes and small reservoirs. Along with all LLFAs, they are required to:</p> <ul style="list-style-type: none"> <li>• investigate all significant flooding incidents;</li> <li>• maintain a register of flood defence assets;</li> <li>• act as a statutory consultee in the planning process on surface water for major developments; and</li> <li>• build partnerships and ensure effective working between authorities that have control over flood risk.</li> </ul> <p>They also have to undertake specific tasks associated with the Flood Risk Regulations, and this includes completing a Preliminary Flood Risk Assessment and identifying flood risk areas.</p> <p>As the highways authority they have the lead responsibility for providing and managing highway drainage and roadside ditches under the Highways Act 1980. The owners of land adjoining a highway also have a common-law duty to maintain ditches to prevent them causing a nuisance to road users.</p>
	<p>Environment Agency</p>	<p>The Environment Agency has a strategic overview of all sources of flooding and coastal erosion (as defined in the Flood and Water Management Act 2010). It is also responsible for flood and coastal erosion risk management activities on main rivers and the coast, regulating reservoir safety, and working in partnership with the Met Office to provide flood forecasts and warnings.</p>
	<p>Wessex Water</p>	<p>They manage the risk of flooding to water supply and sewerage facilities and flood risks from the failure of their infrastructure.</p>
	<p>Somerset Rivers Authority (SRA)</p>	<p>Somerset Rivers Authority's main aim is to give Somerset greater flood protection and resilience.</p> <p>Somerset Rivers Authority focuses heavily on providing additional maintenance and improvements to rivers and their catchments, roads prone to flooding, and structures such as culverts and drains.</p>

	Devon and Somerset Fire and Rescue Service	The Fire Brigade is typically the lead responder for a flooding incident. The Fire Brigade role includes saving life and carrying out rescue of casualties or persons stranded by flooding, including by boat. They may pump out floodwater.
	Avon and Somerset Police	The police co-ordinate the emergency services during a major flood and help with evacuation of people from their homes where necessary. They also close roads and take other actions to ensure public safety.
	South Somerset District Council	They are key partners in planning local flood risk management. They can carry out flood risk management works on minor watercourses (outside of IDB areas).
	All bodies are required to work in partnership to support the local flood risk strategy, to ensure flood management activities are well co-ordinated, and work in partnership to reduce the severity and impact of flooding.	



# **Preliminary Report: Section 19 Investigations 2023**

## Executive Summary

Following a number of major flooding events in Somerset throughout 2023 and early 2024, the Council has a statutory duty to undertake investigations (under Section 19 of the 2010 Flood and Water Management Act). The reports provide an evaluation of the possible causes, emergency response and consequences of flooding events.

There is currently a backlog of investigations under way for each of these events, although Somerset Council now has officer resource available to undertake these reports. This preliminary report discusses the flooding that occurred in May and September 2023, outlines Somerset Council's path forward for reporting on each event and defines a policy for investigating future flooding events.

## Background

During May, September, December 2023, and January 2024, multiple communities throughout Somerset experienced major flooding events. The affected areas were spread widely across the region, with differing causes and circumstances in each instance. For all events, the flooding was widespread enough that individual flood investigations (Section 19 reports) will need to be written for each locality (or loosely grouped localities) affected. This will result in six investigations for the May event, three for September, one for December and one for January.

To date, there has been a backlog of Section 19 Reports for historical flooding events, with investigations typically being published around 12-18 months after the event. With a dedicated resource now committed to investigating flooding events, this process will become more timely. This preliminary report outlines for process for how the 2023 Section 19 reports will be written, as well as detailing a method for how investigations will be undertaken moving forward.

## Legislation

### 2010 Flood and Water Management Act

Flood investigation and reporting are often known as 'Section 19 reports' as under Section 19 of the Flood and Water Management Act. Lead Local Flood Authorities have a responsibility, to the extent it deems necessary, to investigate flood incidents under this item of legislation. The function of a Section 19 report is to gather information on the happenings during a particular flood event. The legislation states:

(1) On becoming aware of a flooding in its area, a Lead Local Flood Authority must, to the extent that it considers necessary or appropriate, investigate:

(a) Which risk management authorities have relevant flood risk management functions, and



(b) Whether each of those risk management authorities has exercised, or is proposing to exercise, those functions in response to the flood.

(2) Where an authority carries out an investigation under subsection (1) it must:

(a) Publish the results of its investigation, and

(b) Notify any relevant risk management authorities.

In addition, a Section 19 report will often detail any ongoing work with regards to flooding in the area, and will signpost additional work that should be considered, usually in the form of recommendations.

It is not the function of a Section 19 to provide firm solutions to flooding, this requiring far more detailed technical analysis, liaison with landowners, and decision making about schemes in concert with the public and other stakeholders. A Section 19 report can help in demonstrating the need for this work and act as evidence in any future funding bids.

### Rainfall Events & Intensities

It is impossible to prevent absolutely all flooding in all circumstances. Rainfall events vary widely in intensity, and whatever drainage systems or flood mitigation schemes are put in place, there is always the possibility, however remote, that an extreme rainfall event will overwhelm them. We can, however, plan for the vast majority of rainfall events, and in the course of doing so, attempt to make extreme events less impactful.

The usual way to describe the severity of rainfall events is to talk in terms of a percentage chance of an event occurring. If we take the example of a 1% chance event, this is an event of a size that will be equalled or exceeded on average once every 100 years. This means that over a period of 1,000 years you would expect the one in 100-year event would be equalled or exceeded ten times. But the distribution of events is not even over the 100 years - several of those ten times might happen within a few years of each other, and then none for a long time afterwards.

### Somerset Council Flood Investigation Policy

Legislated within the Flood & Water Management Act 2010, the Lead Local Flood Authority (in this locality, Somerset Council) is required to investigate flood events within their jurisdiction. This function and responsibility was inherited from Somerset County Council under whom this policy was first adopted.

Somerset Council has set a threshold of ten internally flooded properties within a locality, this threshold having been exceeded in several instances throughout the county in 2023.

There no prescribed time frame within legislation in which a Section 19 report must be published following a major flood event. However, this report details the intended timeframe for Somerset Council to produce any future investigations. Accounting for the backlog of reports due to be written for the 2023 period, this preliminary report outlines the intended practice for the outstanding reports, and the anticipated timeframe for future events. More detail can be found in the later section, 'Process for Existing Reports'.

## Internal flooding

A Section 19 investigation will be triggered when at least ten properties (including residential or business) are internally flooded as a result of the severe weather event. This may include:

- flood water entering the habitable areas of the residence; or
- flood water did not enter into habitable areas, but the local authority regards that the residence was otherwise considered unliveable for a period of time

It is important to note that there are frequent instances of flooding in Somerset where the threshold of ten properties is not reached, although some residents may still experience internal property or equally disruptive flooding. In these cases, while a Section 19 investigation may not take place, the Flooding and Coastal Team and Civil Contingencies Unit will nevertheless be working with residents and agencies to improve resilience and make recommendations to avoid repeat events.

## Recent flood events

This section broadly describes three major flood events that occurred in 2023 and one in early 2024, requiring multiple Section 19 investigations. Due to resource constraints in 2023, there has been a delay in commencement of this work.

### May 2023

On 9<sup>th</sup> & 10<sup>th</sup> May 2023, multiple communities in Somerset were affected by flooding following intense localised thunder and hailstorms. Much of the flooding was caused by surface water runoff from fields and roads, with smaller watercourses in the affected area reacting rapidly. The heaviest rain fell in the catchment of the River Cam, and consequently some of the biggest impacts were seen in this area. In addition, there was also an acute flood event in Milverton (West Somerset) which shall be investigated under its own Section 19 process.

Analysis of the rainfall that occurred that afternoon suggested that as much as 130mm of rain fell in one and a half hours over the area around North Cadbury, Galhampton, Yarlinton and Woolston. The following image demonstrates the amount of rainfall experienced by the South Somerset region during this event, utilising point data provided by the MET Office.

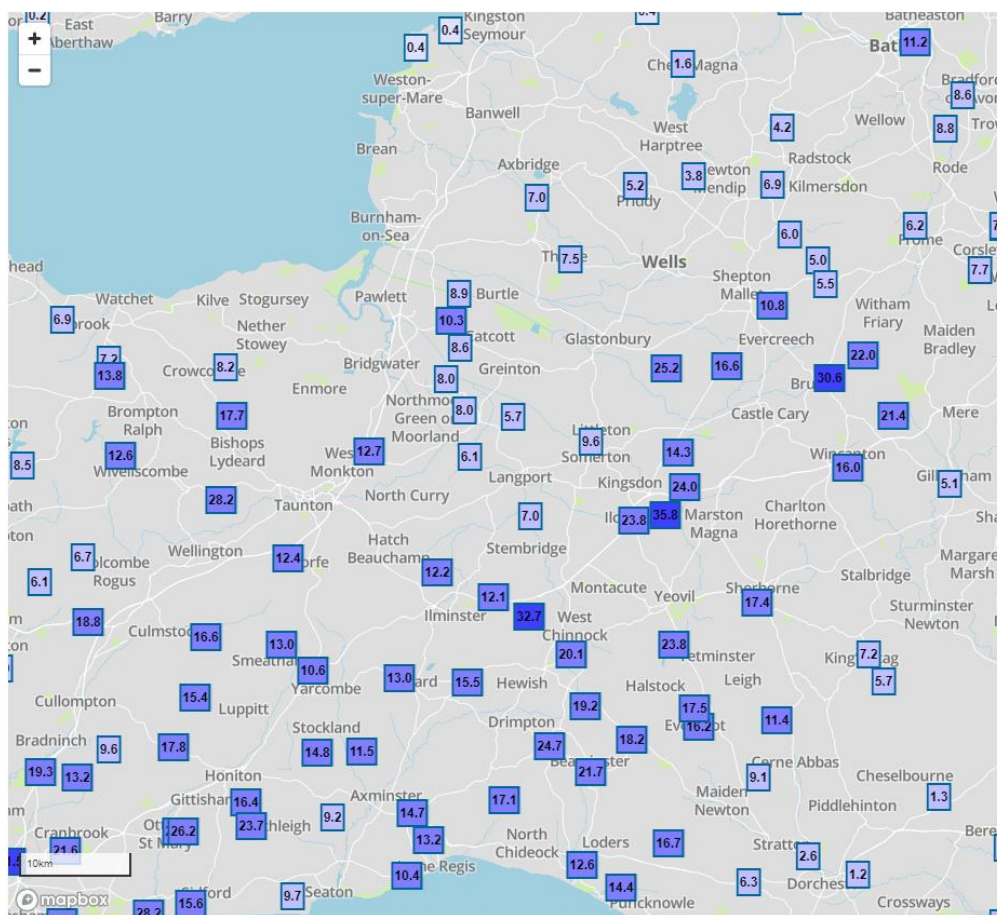


Figure 1: Daily Rainfall Totals in millimetres from 00:00 to 23:59 for 9 May 2023

Overall, 177 properties were subjected to internal flooding as a result of this event. Section 19 investigations will be undertaken for six locations on this date. The affected communities are listed in the location breakdown below.

<b>9-10<sup>th</sup> May 2023 – internal flooding breakdown</b>		
<b>Section 19 grouping</b>	<b>Communities affected</b>	<b>Internally flooded properties</b>
Milverton	Milverton	33
East Cam Valley	Galhampton, North Cadbury, South Cadbury and Yarlinton	34
West Camel & Urgashay	Podimore, Yeovilton	57
Central Cam Valley	Queen Camel, Sparkford, Weston Bampfylde	24
West Cam Valley	Urgashay, West Camel	29
Pitt Valley	Shepton Montague, Hadspen & Pitcombe	16

On 17<sup>th</sup> September 2023 a significant storm front moved through the Southwest of England, impacting upon Somerset. In particular, surface water pooling and run off caused property and public infrastructure damage in the communities of Minehead, Carhampton and Withycombe, and Wellington. In particular, acute rainfall in the catchment south of Withycombe caused unprecedented scouring and flooding, rendering significant section of the highway unusable.

It was reported that due to the significant amount of rainfall, water came from the Blackdown Hills into the rivers & Ordinary Watercourses, causing many to breach their banks. Communities impacted included residential properties owned by the Local Authority with vulnerable inhabitants. The following image demonstrates the amount of rainfall experienced by the region during this event.

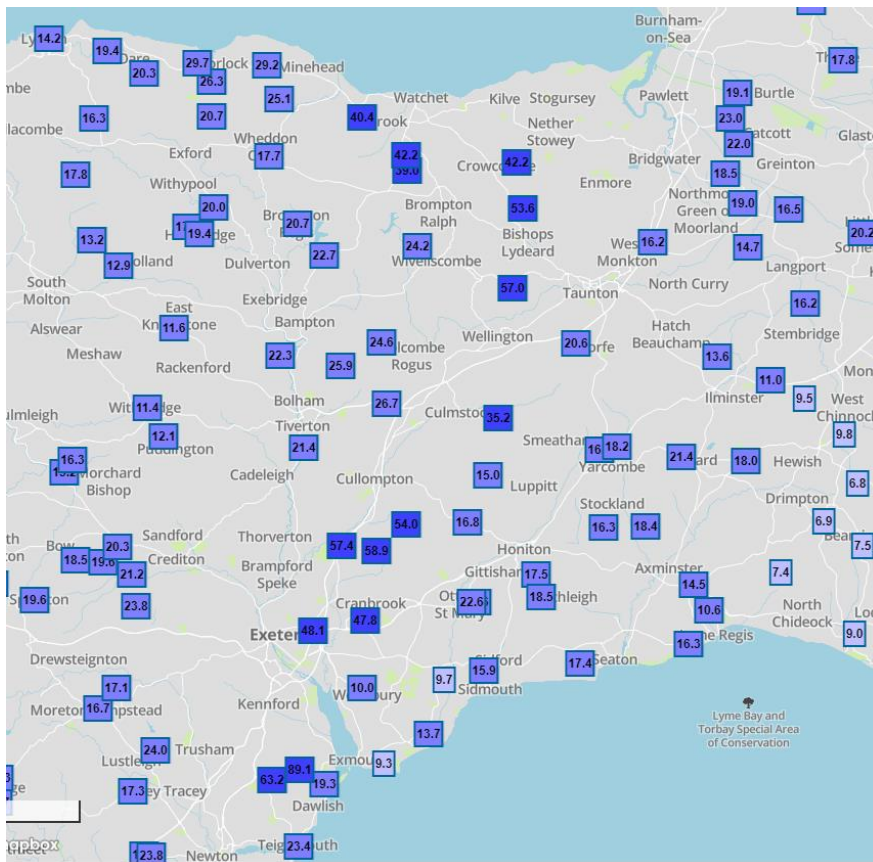


Figure 2 Daily Rainfall Totals in millimetres from 00:00 to 23:59 for 17 September 2023

Overall, 67 properties were subjected to internal flooding, as well as a number of businesses in Minehead. Section 19 investigations will be undertaken for three locations on this date. The affected communities are listed in the location breakdown below.

<b>17<sup>th</sup> September 2023 – internal flooding breakdown</b>	
<b>Section 19 location / affected community</b>	<b>Internally flooded properties</b>
Wellington	34
Minehead	22
Carhampton & Withycombe	14

### December 2023

On 4<sup>th</sup> December 2023, significant flooding impacted Martock. There was significant surface water runoff resulted in reports of approximately 14 properties internally flooded in Martock. At the time of writing, the data set is not complete, but it is likely that a Section 19 investigation will be undertaken.

### January 2024

On 4<sup>th</sup> January 2024, storm Henk affected multiple regions across the UK, bringing high levels of rainfall to areas in Somerset. There were significant surface water and river flooding impacts due to heavy localised rainfall on already saturated catchments. The flooding also included surface water and agricultural run-off. Current data suggests at least 50 properties were internally flooded throughout Croscombe, Shepton Mallet, Knole, Nunney and Bruton.

The Flooding and Coastal team are still receiving data, and final figures for internally flooded properties are still pending for the December and January events. It can be expected that any Section 19 report due to be written will also likely be subjected to a delay due to the existing backlog of investigations.



## Identified Stakeholders

The following describes relevant flood risk management authorities, sources of data and affected parties, whose feedback is essential in creating the full picture of a flooding event, feeding into the Section 19 report.

### Residents

Many households flooded internally during the extreme rainfall events of 2023 and early 2024, with varying levels of recovery. At the time of writing, some households will still not have returned to their homes due to the destruction caused by the flooding.

The communities impacted by this flooding have participated in local community drop-in events, which have helped local response authorities to understand what support is required and have also been a source of data collection for the Section 19 Reports.

### Parish councils

Parish Councils play an important role in managing flood risk at the community level, through the preparation of community flood plans and Flood Warden schemes. Many Parish Councils have been invaluable in gathering information on the flooding and reporting flood incidents in their area.

### Somerset Council

Somerset Council is the Lead Local Flood Authority (LLFA) responsible for managing flood risk from surface runoff, groundwater and ordinary watercourses, development of a Local Flood Risk Strategy, Asset Plans and investigations under the Flood and Water Management Act 2010. Somerset Council also has responsibility for some coastal erosion risk management. The LLFA is not a response team but has several statutory roles including the following responsibilities in helping to manage a flood event.

As Highways Authority, the council is responsible for helping to manage flooding through planning, investigation and supporting community recovery by maintaining and effectively draining the public highway.

Within the council, the Civil Contingencies Unit (CCU) is responsible for providing the front-line local authority response to an emergency in Somerset. This includes developing emergency plans, processes, and training to ensure that the local authority can respond promptly and effectively to emergencies in order to support residents and communities.

### Environment Agency

The Environment Agency are responsible for managing the flood risk from main rivers, the sea and reservoirs including coastal erosion risk management, permissive powers to maintain main rivers, strategic overview over all forms of flooding and development of a national Flood Risk Strategy.

### Wessex Water

Wessex Water are the local Water Authority, providing many of the water services across the southwest of England. They also provide funding for projects which safeguard homes and businesses from flooding. Sewer flooding from public sewers is managed by Wessex Water.

## Internal drainage boards

Each internal drainage board (IDB) is a public body that manages water levels in an area, known as an internal drainage district, where there is a special need for drainage. IDBs undertake works to reduce flood risk to people and property and manage water levels for agricultural and environmental needs within their district. IDB are an enforcing and consenting authority with permissive powers to carry out maintenance.

## Emergency response

During major flooding events with risk to life, the police may coordinate the emergency services and help with evacuation of people from their homes where necessary.

Devon and Somerset Fire and Rescue are primarily responsible for saving life, though may also pump out floodwater from properties.

## Riparian landowners

Riparian landowners are those who own land adjoining a watercourse and have certain responsibilities, including the following:

- They must maintain the bed and banks of an open watercourse, and the trees and shrubs growing on the banks.
- They must clear any debris, even if it did not originate from their land. This debris may be natural or man-made.
- They must keep any structures that they own clear of debris. These structures include culverts, trash screens, weirs and mill gates.

If they do not carry out their responsibilities, they could face legal action under the Land Drainage Act 1991. Details of a riparian landowners' responsibilities can be found on the Environmental Agency website: [www.gov.uk/guidance/owning-a-watercourse](http://www.gov.uk/guidance/owning-a-watercourse)

## Data collection

Though much information has already been received from residents and stakeholders, giving a rough picture of the events that occurred and some indication as to potential causes, this data must be scrutinised, filtered and analysed in order to support conclusions in each report.

In addition, there will also be a further data collection process for each report, such as MET Office rainfall data, Mapping

1. Existing data e.g. emails from residents shortly after the flooding event (data trawling)
2. Data to be gathered from organisations (MET office, EA)
3. Hydraulic & Topographical Analysis of catchments and desktop studies of surface water sensitivities
4. Filling any

## Community Engagement Officers

The LLFA employs Community Engagement Officers, whose main responsibilities include managing correspondence with communities following a flooding event and providing knowledge and expertise to improve communities' resilience to flooding. This includes attending community drop-in events following a flooding event to obtain information about affected individuals and provide advice on immediate recovery activity. The community Engagement Officers also maintain correspondence with the community through the Flooding inbox ([flooding@somerset.gov.uk](mailto:flooding@somerset.gov.uk)).

## Flooding inbox

Members of the Flooding and Coastal Team manage this council-owned email inbox, which receives many enquiries from residents, parishes, and internal communications regarding flooding events, as well as testimonials and evidence of flooding from residents. The inbox often receives images and videos of an event (both during and after), which helps to influence the content of a Section 19 report.

## Flood Online Reporting Tool (FORT)

This system allows property owners, flood risk authorities and volunteers to share details of flood reports and observations to assist with flood risk planning. Participants can record current flooding for information or record recent flooding in the last five years. The system is hosted by Dorset Council and is strictly for information, rather than triggering an immediate response from agencies.

FORT reports are the simplest and most suitable way for residents to inform Section 19 investigations. This is how the council will recognise the minimum threshold of internally flooded properties, triggering a Section 19 investigation. The data is recorded automatically and will therefore systematically feed into any report that may be written.

## LLFA data

As the LLFA receives reports of flooding via the abovementioned channels, each piece of correspondence is categorised, logged and captured on a shared council-owned drive.

## Civil Contingencies Unit Reports

The Civil Contingencies Unit (CCU) is responsible for providing the front-line local authority response to an emergency in Somerset. This includes developing emergency plans, processes, and training to

ensure that the local authority can respond promptly and effectively to emergencies to support residents and communities. CCU reports after a flooding event will feed into a Section 19 investigation to help agencies learn how to better respond to future events.

### Met Office reports

The Met Office can provide rainfall data, imagery, and an analysis of the meteorological insight into the event.

### Environment Agency

The Environment Agency can provide topographical data and river catchments, information about local flood zones and a detailed river network for each area.

### Flood Estimation Handbook

The Flood Estimation Handbook (FEH) Web Service delivers catchment descriptors and rainfall data to support the methods outlined in the Flood Estimation Handbook, and implemented in the FEH software, for estimating floods and site runoff rates across the UK.

### Resilience Direct

Provides a geographical overview an affected area, including natural data such as river data, topographical information, and river catchments, as well as structural data on potholes, drains, culverts and other mechanical flood defences.

### Missing data

Due to the time delay between the flooding events and writing these reports, there is a risk that some data could be missing in the final Section 19 investigations. This is due to a number of factors, including the development of systems team for logging flooding reports, data archiving, and a lack of reporting from the community.

There may be more numbers of flooded properties than are reported for a Section 19 investigation. This can be due to the perceived impact on insurance or saleability, as well as a lack of awareness of how to report flooding, or even the necessary of reporting to trigger an investigation.

It must therefore be stressed that a Section 19 investigation may not give a complete picture of all the properties flooded in a major event. Despite this challenge, the report should still provide thorough recommendations based on the available information.

## Process for existing reports

Although there is no prescribed timeframe within which a Section 19 report must be published following a flooding event, the following proposed timeline details how the six reports for May and three reports for September will be written.

Date	Activity	Detail
November 2023	Section 19 Officer in place	Begin project planning for backlog reports, preliminary report and 2023 reports
Dec 2023 - Jan 2024	Preliminary report written	Outline approach for investigating backlog and future flooding events
Jan 2024	Additional data collection	Met Office, Environment Agency, etc.
Jan 2024	Review of existing backlog Section 19 reports	Final edits ready for publishing
Mar 2024	Scrutiny Committee for 2020-2022 backlog reports and 2023 preliminary report	Backlog reports and pre-report should be published on Somerset Council website shortly thereafter
<i>May 2023 Section 19s</i>		
May 2023	May Flooding event occurs	Main involvement from RMAs, Fire & Rescue, Emergency Response
May 2023 onwards	Collation of data from residents	Images, personal reports of flooding to properties, FORT reports
June 2023	Community drop-ins (May flooding)	Community Engagement Officers gather information from residents about what happened, what the response was, extent of damage
Nov 2023 – Mar 2024	Preliminary report written	Outline methodology
April 2024	Analysis of existing data for May events written into report	Initial analysis of all relevant collated data
June 2024	Engineering analysis	Internal workshop to review maps, assess assets, analyse the issues
July 2024	Internal review	Draft S19s internally reviewed by Flooding and Coastal team members
Aug 2024	Consultation on May reports	Draft sent to parishes and community groups for comment, which form an appendix to the report. Not for public view at this stage.
Oct 2024	Draft report finalised	Edited, proof-reading, final formatting
Nov / Dec 2024	Final report presented to Community Scrutiny Committee	Opportunity for members to have sight of the report
Dec 2024	Final Report published	Published on Somerset Council website
<i>September 2024 Section 19s</i>		
Sep 2023	September flooding event occurs	Main involvement from RMAs, Fire & Rescue, Emergency Response



Sep 2023 onwards	Collation of data from residents	Images, personal reports of flooding to properties, FORT reports
Oct 2023	Community drop-ins (Sept flooding)	Community Engagement Officers gather information from residents about what happened, what the response was, extent of damage
May 2024	Analysis of existing data for Sep events written into report	Initial analysis of all relevant collated data
Aug 2024	Engineering analysis	Internal workshop to review maps, assess assets, analyse the issues
Sep 2024	Internal review	Draft S19s internally reviewed by Flooding and Coastal team members
Sep 2024	Consultation on Sep reports	Draft sent to parishes and community groups for comment, which form an appendix to the report. Not for public view at this stage.
Oct 2024	Draft report finalised	Edited, proof-reading, final formatting
Nov / Dec 2024	Final report presented to Community Scrutiny Committee	Opportunity for members to have sight of the report
Dec 2024	Final Report published	Published on Somerset Council website
<i>December 2023 &amp; January 2024 Section 19s</i>		
Dec 2023	December flooding event occurs	Main involvement from RMAs, Fire & Rescue, Emergency Response
Jan 2024	January flooding event occurs	Main involvement from RMAs, Fire & Rescue, Emergency Response
Feb 2024	Community drop-in	Community Engagement Officers gather information from residents about what happened, what the response was, extent of damage
Jan 2024 – Jan 2025	Collation of data from residents	Images, personal reports of flooding to properties. FORT reports.
Jan 2025	Collation of data from organisations	Rainfall data, topography, GIS mapping
Feb 2025	Data is written into report, conclusions made	Analysis of all relevant collated data
Mar 2025	Engineering analysis	Internal workshop to review maps, assess assets, analyse the issues
Mar 2025	Internal review	Draft S19s internally reviewed by Flooding and Coastal team members
Apr 2025	Draft report consultation	Draft sent to parishes and community groups for comment, which form an appendix to the report. Not for public view at this stage. Cannot pre-empt the conclusion of the report.
May 2025	Draft report finalised	Edited, proof-reading, final formatting
June 2025	Final report presented to Community Scrutiny Committee	Opportunity for members to have sight of the report
June 2025	Final Report published	Published on Somerset Council website
Key:		

<i>General</i>
<i>May 2023 Section 19s</i>
<i>September 2023 Section 19s</i>
<i>December 2023 &amp; January 2024 Section 19s</i>

## Policy for future events

This is a timeline for Section 19 investigations based upon an assumption of committed resourcing

Timeline	Activity	Detail
Day 0	Flooding event occurs	Main involvement from RMAs, Fire & Rescue, Emergency Response. S19 officer may be included in online tactical meetings to record emergency response
4-8 weeks	Community drop-in	Community Engagement Officers gather information from residents about what happened, what the response was, extent of damage
1-8 weeks	Collation of data from residents	Images, personal reports of flooding to properties. FORT reports.
1-4 weeks	Collation of data from organisations	Rainfall data, topography, GIS mapping
8-12 weeks	Data is written into report, conclusions made	Analysis of all relevant collated data
10-14 weeks	Engineering analysis	Internal workshop to review maps, assess assets, analyse the issues
10-14 weeks	Internal review	Draft S19s internally reviewed by Flooding and Coastal team members
14-16 weeks	Draft report consultation	Draft sent to parishes and community groups for comment, which form an appendix to the report. Not for public view at this stage. Cannot pre-empt the conclusion of the report.
16-18 weeks	Draft report finalised	Edited, proof-reading, final formatting
18-24 weeks	Final report presented to Community Scrutiny Committee	Opportunity for members to have sight of the report
24-26 weeks	Final Report published	Published on Somerset Council website

## References and resources

<https://www.gov.uk/help-during-flood>

[Flood recovery framework: guidance for local authorities in England - GOV.UK \(www.gov.uk\)](#)

<https://www.somerset.gov.uk/roads-travel-and-parking/flooding/>

<https://www.somerset.gov.uk/council-and-democracy/somerset-local-authority-civil-contingencies-partnership/>

<https://www.local.gov.uk/topics/severe-weather/flooding/emergency-planning/responses>

<https://www.local.gov.uk/topics/severe-weather/flooding/local-flood-risk-management/managing-flood-risk-roles-and>

<https://nationalfloodforum.org.uk/>

<https://www.wessexwater.co.uk/your-wastewater/flooding>

[Evidence review of factors contributing to surface water flooding final report.pdf \(publishing.service.gov.uk\)](#)

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Somerset Council  
Scrutiny Committee  
20<sup>th</sup> March 2024



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2023-24 Budget Monitoring Report – Month 10

Lead Officer: Jason Vaughan, Executive Director Resources and Corporate (S151)

Author: Christian Evans, Head of Business Partnering

Contact Details: [Christian.evans@somerset.gov.uk](mailto:Christian.evans@somerset.gov.uk)

Executive Lead Member:

Division / Local Member:

## 1. Summary

**1.1.** Month 10 budget monitoring in full has been reviewed in Corporate and Resources Scrutiny on the 7<sup>th</sup> March 2024. This report provides details of the Climate and Place (including Accountable Bodies) extract of the full budget monitoring report.

## 2. Issues for consideration / Recommendations

**2.1.** Scrutiny is asked to consider: -

- a. If there are any general comments or observations that they would wish to make to the Executive on the reports.
- b. If actions set out in the report are appropriate, and if any further actions should be included in the report.

## 3. Budget monitoring Report

### **Climate & Place, (including Accountable Bodies)**

#### **Climate & Place**

Lead Members:

- Environment & Climate Change: Cllr Dixie Darch
- Transport & Digital: Cllr Richard Wilkins
- Economic Development, Planning & Assets: Cllr Ros Wyke

Executive Director: Mickey Green

Service Directors:



- Climate, Environment & Sustainability: Kirsty Larkins
- Infrastructure & Transport: Mike O’Dowd-Jones
- Economy, Employment & Planning: Paul Hickson

### **Accountable Bodies**

#### Lead Members:

- Transport & Digital: Cllr Richard Wilkins
- Economic Development, Planning & Assets: Cllr Ros Wyke
- Environment & Climate Change: Cllr Dixie Darch

Executive Director: Mickey Green

#### Service Directors:

- Somerset Rivers Authority: Kirsty Larkins
- Local Enterprise Partnership and Connecting Devon & Somerset: Paul Hickson

Table 1: 2023/24 Climate & Place (including Accountable Bodies) as at the end of January 2024 (Month 10)

- Climate and Place (including Accountable Bodies) 2023/24 net budget £90.9m, projected favourable variance £7.3m, favourable movement £0.3m from month nine.

(Scrutiny Committee Climate and Place – 20<sup>th</sup> March 2024)

Service Area	Current	Current	Current Net	Full Year	Month	A/(F)	RAG	Movement
	Expenditure	Income						
	£m	£m	£m	£m	£m	Variance	Month 9	£m
<b>Climate, Environment &amp; Sustainability</b>								
Climate & Place Management	0.8	(0.1)	0.7	0.7	0.0	-	Green	0.0
Business Support	0.8	0.0	0.8	0.8	0.0	-	Green	0.1
Somerset Waste	55.5	(6.6)	48.9	48.9	0.0	-	Green	(0.2)
Drainage Board Levy	2.3	0.0	2.3	2.3	0.0	-	Green	0.0
Climate Change Costs	0.7	0.0	0.7	0.6	(0.1)	(F)	Green	(0.1)
Emergency Planning	0.4	0.0	0.4	0.4	0.0	-	Green	0.0
Flood & Water	0.8	0.0	0.8	0.9	0.1	A	Red	0.1
Countryside	1.1	(0.7)	0.4	0.4	0.0	-	Green	0.0
Mendips AONB	0.2	(0.2)	0.0	0.0	0.0	-	Green	0.0
Quantock AONB	1.1	(1.0)	0.1	0.1	0.0	-	Green	0.0
Ecology	0.2	0.0	0.2	0.2	0.0	-	Green	0.0
<b>sub total</b>	<b>63.9</b>	<b>(8.6)</b>	<b>55.3</b>	<b>55.3</b>	<b>0.0</b>	<b>-</b>	<b>Green</b>	<b>(0.1)</b>
<b>Infrastructure &amp; Transport</b>								
Highways & Transport Commissioning	2.2	(0.6)	1.6	1.6	0.0	-	Green	0.0
Infrastructure Programmes Group	1.2	(0.8)	0.4	0.4	0.0	-	Green	0.0
Highways	17.0	(0.6)	16.4	17.2	0.8	A	Red	0.0
Traffic Management	4.9	(4.6)	0.3	(0.1)	(0.4)	(F)	Green	(0.3)
Transporting Somerset	15.4	(6.0)	9.4	9.3	(0.1)	(F)	Green	0.0
Car Parks	5.8	(12.3)	(6.5)	(6.5)	0.0	-	Green	0.0
Fleet Management	1.0	(0.3)	0.7	0.7	0.0	-	Green	0.0
Community Infrastructure	0.0	0.0	0.0	0.0	0.0	-	Green	0.0
<b>sub total</b>	<b>47.5</b>	<b>(25.2)</b>	<b>22.3</b>	<b>22.6</b>	<b>0.3</b>	<b>A</b>	<b>Red</b>	<b>(0.3)</b>
<b>Economy, Employment &amp; Planning</b>								
Economy & Planning	0.0	0.0	0.0	0.0	0.0	-	Green	0.0
Commissioning Development	0.0	0.0	0.0	0.0	0.0	-	Green	0.0
Development Control	6.4	(5.0)	1.4	2.2	0.8	A	Red	0.1
Planning Policy	3.6	0.0	3.6	2.8	(0.8)	(F)	Green	0.0
Economic Development	6.2	(1.8)	4.4	3.8	(0.6)	(F)	Green	0.0
Building Control	2.0	(1.5)	0.5	0.5	0.0	-	Green	0.0
<b>sub total</b>	<b>18.2</b>	<b>(8.3)</b>	<b>9.9</b>	<b>9.3</b>	<b>(0.6)</b>	<b>(F)</b>	<b>Green</b>	<b>0.1</b>
<b>Accountable Bodies</b>								
Somerset Rivers Authority	3.0	0.0	3.0	3.0	0.0	-	Green	0.0
Local Enterprise Partnership	2.0	(2.3)	(0.3)	(0.3)	0.0	-	Green	0.0
Connecting Devon & Somerset (CDS)	1.2	(0.5)	0.7	(6.3)	(7.0)	(F)	Green	0.0
<b>sub total</b>	<b>6.2</b>	<b>(2.8)</b>	<b>3.4</b>	<b>(3.6)</b>	<b>(7.0)</b>	<b>(F)</b>	<b>Green</b>	<b>0.0</b>
<b>Climate &amp; Place Total</b>	<b>135.8</b>	<b>(44.9)</b>	<b>90.9</b>	<b>83.6</b>	<b>(7.3)</b>	<b>(F)</b>	<b>Green</b>	<b>(0.3)</b>

### Climate & Place - key explanations, actions, & mitigating controls

Climate and Place is currently forecasting a favourable variance of £7.3m at outturn, a favourable movement of £0.3m since month nine. The variances across Climate and Place are due to the following:

#### Climate, Environment and Sustainability

**Waste Services** is forecasting to be within budget at outturn, a favourable variance of £0.2m reported between month nine and month ten. The favourable movement can be explained by the following:

- Total waste volumes to the end of month nine showed an increase of 2.7% compared to last year. However, the variance in waste tonnages is an improving position, moving from 4.1% at the end of month seven to 2.7% at the end of Month 9. The rise in tonnages is ascribed to unusually high tonnages of garden waste (+17%) and residual waste above expected levels at +2% to the end of

month nine. This trend has been forecast to continue for the remainder of the year for budget monitoring. The impact of increased waste volumes has been partially offset by a lower than budgeted inflationary increase to contractor rates.

- Income from Garden Waste subscriptions continues to be higher than anticipated.
- The performance of Recycling centres has been reviewed and forecasts have been updated.

**Flood and Water** is forecasting to an overspend of £0.1m at outturn, an adverse movement of £0.1m between month nine and month ten. The overspend relates to updated salary forecasts and increased costs for Perfect Circle. Although Flood and Water is forecasting this overspend it is important to note that underspends in Climate Change salary costs have been identified to mitigate this pressure for Climate, Environment and Sustainability.

#### Infrastructure and Transport

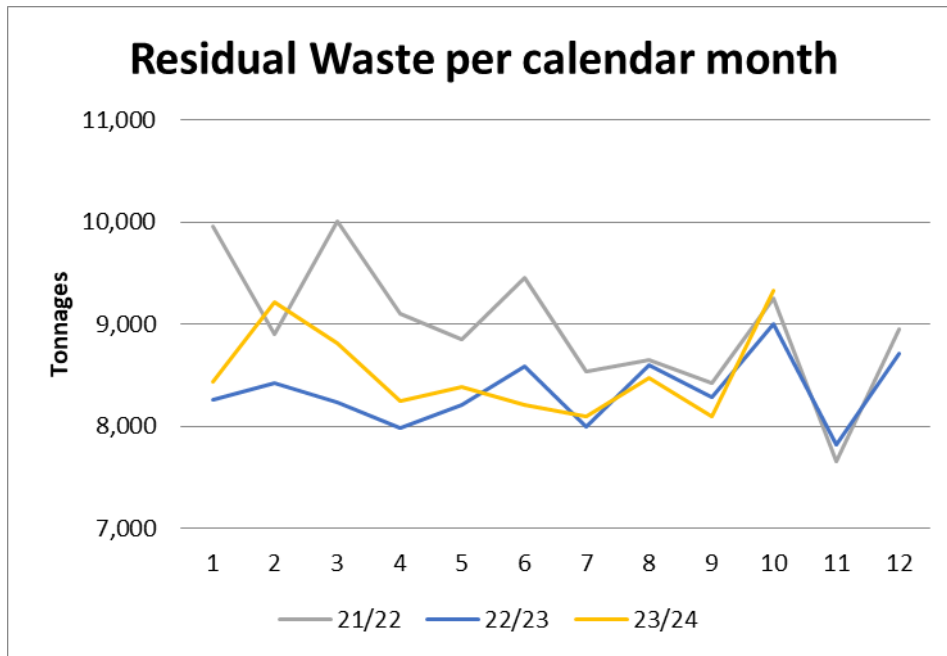
**Highways** is forecasting an adverse variance of £0.8m at outturn due primarily to an increase in Safety defects across the road network causing significant pressures on the service due to more extreme weather events. The service continues to work hard to successfully complete the investigation and repair works whilst trying to manage and control the overspend.

**Traffic Management** is forecasting a favourable variance of £0.4m at outturn, this is a favourable movement of £0.3m since month nine. This is due to receiving higher than anticipated income within the service relating to Temporary Traffic Regulation Orders (TTRO).

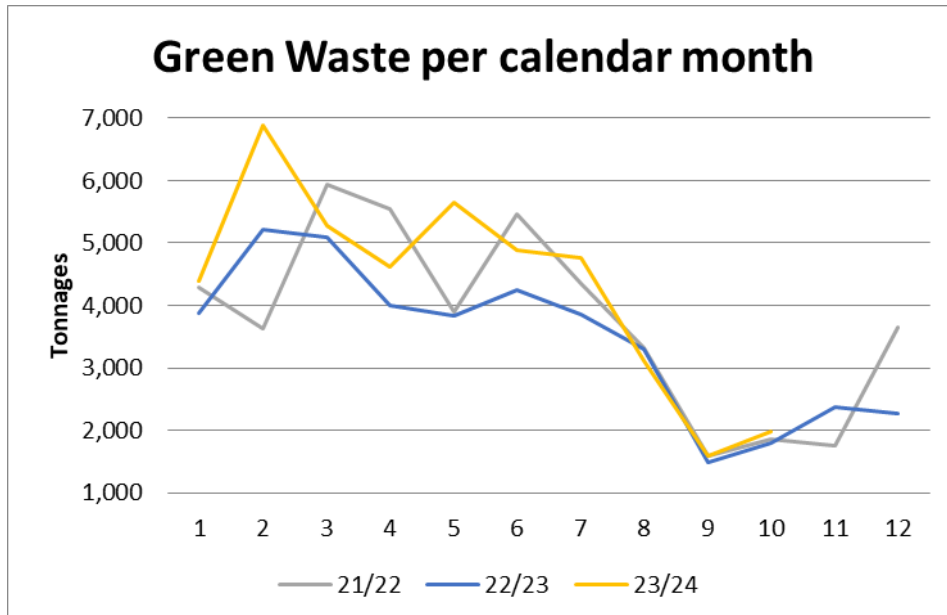
#### Economy, Employment and Planning

**Development Control** is forecasting an adverse variance of £0.8m at outturn, an adverse movement of £0.1m since month nine. There are several considerations here including ongoing reconciliation of income, income estimates for 2023/24 from legacy councils overestimating realistic annual income likely to be achieved and the current economic climate. It is likely that economic factors in recent quarters in line with the national picture has resulted in lower levels of planning applications and that, in the short term, the national increase in planning fees on the 06 December 2023 may be having an impact on the anticipated budgeted income for the last quarter. This will be monitored, and the service will look at mitigating factors to offset the pressure in this area.

#### **Climate & Place - key performance cost drivers**



The above graph shows the residual waste (per tonnage) per month. The residual waste includes Kerbside collected waste and waste deposited at the recycling centre. The graph currently shows the reduction of waste in 2022/23 compared to 2021/22, however this highlights the unexpected increase in tonnages in the early months for 2023/24. Residual Waste from July to December have reduced and are more aligned to 2022 levels.



The above graph shows the green waste (per tonnage) per month. It is expected to see a downwards trend between month 6-12 (September to April) due to the seasonality of garden waste. The graph currently highlights a higher tonnage of green waste compared to 2021/22 and 2022/23 for the early months of 2023/24, this has been driven by the unusually mild, damp, weather this year propagating plant growth and increasing the moisture content of the material.

## Climate & Place - key risks, future issues & opportunities

Due to the current economic climate, there are several key risks and future issues that need to be taken into consideration:

- **Contract inflation** is applied at various times throughout the year, as the increase in contract could be led by RPI or CPI it is currently difficult to predict accurately what the impact for each contract might be. In addition, there are a number of contractual disputes which are being worked through. It is anticipated that these can be resolved in a timely matter, but in resolution may see increased costs agreed.
- **Impact of cost-of-living crisis.** As costs continue to rise, spending habits may change therefore it is possible that services across Economic and Community Infrastructure will see a decrease in income budgets.
- **Staff vacancy levels.** Difficulties in recruiting permanent staff across Climate and Place continue to impact on the ability to deliver services, where possible agencies have been used to fill critical roles. However, this has a financial impact as generally the cost of these staff is higher than budgeted for. This reflects the national picture and is the same across a number of sectors.
- **Systems and Reporting.** Finance is continuing to work with service to bring together and understand five legacy authority budgets. There is a great deal of work to do to understand, relocate and align the legacy information to make one budget for Climate and Place. This work runs alongside the implementation of the new MS Dynamics finance system and Solver budget monitoring interface. It is there important to note that this may result in unknown under or overspends for the service.

Risks can be identified due to the change in climate. It is exceedingly difficult to be able to identify financially what the impact of climate change will be year on year, but risks with a potential financial impact include:

- Icy conditions will see a high demand on the Highways service to grit primary and secondary routes.
- Increased rainfall which has raised the risk of flooding across the County. This will require input from the Emergency Planning department, Highways and Traffic Management to help ensure residents can safely navigate around the affected areas.
- The extreme changes in weather will impact the road surfaces which continues to increase the safety defects reported and increases the costs of investigation and corrective action for potholes.



## **Accountable Bodies**

### Somerset Rivers Authority (SRA)

Somerset Rivers Authority is currently reporting to be within budget and are not anticipating any draws from or to reserves.

### Local Enterprise Partnership (LEP)

LEP is currently reporting to be within budget in this financial year, this includes contributing a further £0.4m to the reserve.

### Connecting Devon & Somerset (CDS)

The Connecting Devon and Somerset (CDS) programme included a phase one contract with British Telecommunications plc. To meet state aid requirements that contract included provisions which allowed for "clawback" of public subsidy where take up of services exceeded the levels which the supplier had modelled. Delivery has completed and the contractual monitoring period to calculate amounts of clawback is now operational. The supplier is contracted to provide its calculation of the final clawback amount as of 31 March 2024, after which date relevant clawback funds are to be returned to CDS. The CDS collaboration will process any clawback so that collaborating public sector funders receive a proportionate return based on their original investment. At this initial stage it is estimated that the sum accruing to Somerset council is likely to be in the region of £7 million although this is subject to potential change.

## **Accountable Bodies - key risks, future issues & opportunities**

Somerset Council acts as the accountable body for the Heart of the Southwest LEP, providing a service across the core functions of the LEP and its programmes. This is in the context of an assurance framework for this programme funding meeting Government principles and expectations. In performing these functions, Somerset Council works closely with the LEP core team, and the services Somerset Council provides are specified and resourced via a service level agreement between the LEP and Somerset Council.

LEP performance is subject to periodic assessment and an annual formal review by Government – the most recent of these for 2022/23 looked positively on Somerset Council's accountable body services to the LEP.

Somerset Council, working with Plymouth Torbay and Devon County Councils, has submitted an integration plan to Government outlining proposals for how LEP functions are transferred and conducted by the authorities post the Government ceasing to fund LEPs post March 2024 and how revenue funding balances and legacy capital funds held by the LEP are managed post this date. Government sign-off of the proposals in the plan are awaited and dialogue with the LEP Board advised by the Council's Section 151

(Scrutiny Committee Climate and Place – 20<sup>th</sup> March 2024)

Officers are ongoing and will determine the position regarding the division of these funds in due course.

Please ask for: Paul Hickson

Email: [Paul.hickson@somerset.gov.uk](mailto:Paul.hickson@somerset.gov.uk)

Direct Dial: 07977 400838

Date: 12<sup>th</sup> January 2024

Dear Councillor Martin

## **Response to queries raised at the 22<sup>nd</sup> November 2023 meeting of Scrutiny Committee – Climate and Place**

I am writing to follow up on actions from the 22<sup>nd</sup> November 2023 meeting of Scrutiny Committee – Climate and Place, for the Economy, Employment and Planning Service to provide you with further information in relation to:

- The investment from Government funding programmes for regeneration schemes in rural areas of Somerset; and
- The impact, to date, of UK Shared Prosperity Funding in Somerset.

In relation to the spatial distribution of regeneration investment, recent Government funding streams for regeneration schemes have included Government selection of proposals based on strict eligibility and assessment criteria, including in relation to place. These Government funding arrangements severely limit local flexibility and have resulted in regeneration investment being particularly focussed on our three principal towns of Taunton, Bridgwater and Yeovil, although monies have also been secured for regeneration schemes in Glastonbury and Wellington. Specifically, Government funding for regeneration schemes in Somerset has been secured through:

- The Towns Fund under which Government defined a list of places which were eligible to develop proposals for a Town Deal. In Somerset, only Bridgwater and Glastonbury were eligible for, and have secured, a Town Deal;
- The Future High Street Fund under which proposals were required to cover high streets or town centres which exhibited high levels of social and economic activity. In Somerset, former District Councils were eligible to apply for funding and secured investment for Taunton and Yeovil; and

- The Levelling Up Fund under which Government defined priority Local Authority areas and limited the number of proposals a Local Authority could submit. In Somerset, former District Councils were eligible to apply for funding for regeneration and investment has been secured for schemes in Bridgwater and Wellington. Other Levelling Up Fund proposals, including for rural areas, were developed by former District Councils but did not receive MP support / Government approval.

Somerset Council policy positioning on future Government funding for regeneration will include seeking greater Government recognition of the specific challenges and needs of rural areas and greater local flexibility to access and direct funding in line with local evidence bases and priorities.

Turning to the impact to date of UK Shared Prosperity Funding (UKSPF), all contracts, grant funding agreements and service level agreements for funded UKSPF project activity set out performance requirements, including expected outputs and outcomes. Progress against these requirements is monitored and managed, with provision in arrangements to reduce or cease UKSPF funding should requirements not be met. In addition, all UKSPF-funded projects must submit a final evaluation report to Somerset Council assessing wider performance and impact. Currently available summary impact data are set out below, with the listed project activity continuing to be delivered and impacts continuing to flow.

Activity	Summary Impact Data
<a href="#">Building Better Somerset</a> supporting individuals 18+ who are currently out of work to move into, or closer to, the labour market	Between 1 <sup>st</sup> April and 30 <sup>th</sup> September 2023: <ul style="list-style-type: none"> <li>• 15 people supported to engage in life skills;</li> <li>• 11 individuals supported to participate in education;</li> <li>• 3 volunteering opportunities supported;</li> <li>• 7 people supported to engage in job searching;</li> <li>• 1 individual receiving support to gain employment;</li> <li>• 1 individual in employment following support; and</li> <li>• 1 individual receiving support to sustain employment.</li> </ul>
<a href="#">#Progress Somerset</a> providing one-to-one support to young people in Somerset aged 15-18 who are, or are at risk of becoming, not in education, employment or training (NEET)	Between 1 <sup>st</sup> April and 30 <sup>th</sup> September 2023: <ul style="list-style-type: none"> <li>• 18 socially-excluded individuals accessing support;</li> <li>• 10 individuals supported to engage in life-skills;</li> <li>• 3 individuals supported to participate in education;</li> <li>• 7 individuals supported to engage in job-searching;</li> <li>• 2 individuals in employment following support; and</li> <li>• 1 individual in education / training following support;</li> </ul>

Activity	Summary Impact Data
<a href="#">Go Green Scheme</a> providing support to small and medium sized enterprises in Somerset to understand and identify measures to reduce their energy consumption	Between 1 <sup>st</sup> October and 31 <sup>st</sup> December 2023, 20 audits and action plans have been completed for Small and Medium-sized enterprises in Somerset identifying recommended energy savings of 671,036 kwh or 42% and recommended carbon savings (c02e) of 140 tonnes.

Impact data across wider activities will become available as UKSPF implementation progresses.

I hope that the above provides the further detail you were seeking.

Yours sincerely

**Paul Hickson**  
 Service Director – Economy and Planning



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