Agenda No 7

AGENDA MANAGEMENT SHEET

Report Title:	Motion from Council
Name of Committee:	Scrutiny Committee
Date of Meeting:	8 March 2021
Contact Officer:	Aftab Razzaq, Legal Democratic & Electoral Services Manager/Monitoring Officer, 01788 533521, Aftab.Razzaq@rugby.gov.uk
Summary:	On 23 February 2021, Council referred a motion to Scrutiny Committee in accordance with Council Standing Order 11.
Financial Implications:	There are no immediate financial implications.
Risk Management Implications:	There are no risk management implications arising from this report.
Environmental Implications:	There are no immediate environmental implications arising from this report.
Legal Implications:	There are no immediate legal implications arising from this report.
Equality and Diversity:	There are no Equality and Diversity implications arising from this report. It may be necessary later in the scrutiny process to carry out Equality Impact Assessments of the implications of any recommendations.

Agenda No 7

Scrutiny Committee

8 March 2021

Motion from Council

Summary

On 23 February 2021, Council referred a motion to Scrutiny Committee in accordance with Council Standing Order 11.

1. MOTION FROM COUNCIL

On, 23 February 2021 Council considered a motion submitted on notice by Councillor Ms Robbins and seconded by Councillor Poole.

"This council recognises the increase in flooding in the Borough and the probability that this will continue to increase in severity as global warming and rainfall become more prevalent. It is essential that new build homes and local facilities are protected from future flooding and that flood plains are developed to cope with the increase. This is demonstrated by the facilities at the Elliotts Field shopping centre and the good use of the car park to accommodate flooding from the River Avon and the River Swift.

We ask that this issue is reviewed by the Scrutiny Committee, looking at the way in which flooding in the Borough is managed and how this can be improved. A report then be brought to Cabinet and Council for consideration."

In accordance with Council Standing Order 11, the motion stood referred to Scrutiny Committee.

2. OPTIONS

The Constitution requires the Committee to decide how to deal with this motion. The following options are available to the Committee:

- a) Deal with the motion without further scrutiny and report to Cabinet, or Council, accordingly. In deciding to consider the motion itself in more detail, any scrutiny would need to be supported by evidence that might not yet have been assembled.
- b) Create a task group to consider the matter.

c) Refer the matter to Planning Services Working Party.

3. PREVIOUS SCRUTINY REVIEW

In 2009 a review of drainage was carried out and the final review report was submitted to Cabinet on 21 October 2009 with all the recommendations being approved. A copy of the report is attached at Appendix 1.

4. NEXT STEPS

The recommended route is to refer the matter to Planning Services Working Party with a request that it report back to the Committee.

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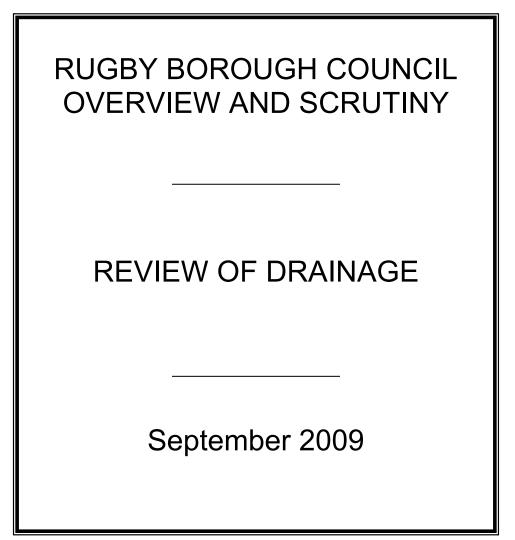
Subject Matter: Motion from Council

Originating Department: Environment and Public Realm

DO ANY BACKGROUND PAPERS APPLY

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink





REVIEW MEMBERSHIP

Councillor Ish Mistry (Chairman) Councillor Robin Hazelton Councillor Miss Kathryn Lawrence Councillor Tom Mahoney Councillor Mrs Maggie O'Rourke Councillor Ron Ravenhall Councillor Howard Roberts Councillor Ms Carolyn Robbins Councillor Brian Whistance

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ACKNOWLEDGEMENTS

This review has benefited from the involvement of a great number of people. Members would like to place on record their thanks to all members of the public who submitted their comments and to all of the Borough, Parish and County Councillors who completed the drainage survey questionnaire. Members are also grateful to the officers of the County Council and Severn Trent who gave their time and help in gathering the evidence considered by the review group.

In particular, the review group would like to thank the following individuals for their contribution to this review:

Paul Cowley, County Highways Area Manager WCC Sean Lawson, Head of Environmental Services, RBC Paul Mernagh, Street Scene Team Leader, RBC Rob Back, Forward Planning & Economic Development Manager Paul Gregory, Manager of South Flooding Team for Sewerage Operations, Severn Trent Geoff Timms, Severn Trent Flooding Team.

Bill Walton, Severn Trent Sewerage Asset Protection Manager East

CHAIRMAN'S FOREWORD

This has been an extremely wide-ranging and challenging review. It is a topic that concerns many people, members of the public and councillors alike.

We approached the review in stages, covering the following points:

- Warwickshire County Council's management of highways drainage, including maintenance of gullies
- Severn Trent's responsibilities to prevent sewer surcharging
- Issues around the mains supply and repeated burst water mains in areas such as Hillmorton
- Infrastructure issues are the drainage and water supply systems sufficient to meet future demand?
- Flood prevention and management of flooding emergencies.

Many of these are issues for which the Borough Council has little direct responsibility and we have relied heavily on the knowledge of people from other agencies such as the County Council and Severn Trent during the review. We have all learnt a great deal about how these agencies work and some of the challenges they face in addressing public concerns.

We received a lot of valuable feedback and information from members of the public, particularly from parish councils, which helped to emphasise just how many people are affected by these issues.

I would like to thank everyone involved in the review for their hard work and enthusiasm and hope that the review has produced some positive and practical recommendations which will go some way towards helping local people find effective solutions when faced with drainage problems.

Councillor Ish Mistry Chairman

1. RECOMMENDATIONS

1.1 The Panel proposes the following recommendations:

IMPROVEMENTS THAT COULD BE MADE QUICKLY AND AT LOW COST

1	The Borough Council website be improved to provide a more user friendly guide to members of the public who have flooding problems. To include a flow chart diagram, produced by the review group, showing who is responsible for particular drainage issues.
2	This flow chart be provided to Contact Centre staff at the Borough and County Councils for use in fielding calls regarding drainage and be published widely, with copies sent to parish councils suggesting that they publish it in their parish magazines.
3	Greater publicity be given to the policy of carrying out street cleansing on an on- demand basis, so as to encourage better reporting of problems
4	Residents be urged to report problems using the local environment quality report form.
5	Rugby Borough Council endorse and promote the Severn Trent campaign to explain which materials should not be disposed of down drains.
6	A page containing flooding emergency contact numbers be included in the Council diary
7	An emergency plan briefing session for members be arranged in accordance with the provisions of the Warwickshire County Council emergency planning Service Level Agreement
8	Officers investigate the possibility of using the new SMS message system for Rugby Borough councillors to send severe weather warnings, as currently provided to Parish Councils.

MODIFICATIONS OF EXISTING POLICIES AND PROCEDURES

9	A local district forum be set up where officers of all agencies involved in drainage and flooding meet on a quarterly basis to discuss forthcoming work programmes and liaise regarding work schedules
	The local district forum be asked to consider the summary of problems
10	highlighted from the questionnaire and ensure that the relevant agencies
	inform the complainants of any progress
	The County Council be asked to reconsider the policy of emptying all
11	highway gullies on an annual basis to allow for more flexibility in dealing with problem areas.
	Consideration be given to imposing a local planning condition which, when
12	necessary and appropriate, would require commercial food premises to
	install fat traps when applying for a change of use or initial planning
	permission
	A pack of information on preparing for and responding to emergency
13	
	publicise in their parish magazines.

1.2.1 Alignment with the Corporate Strategy and the Local Area Agreement (LAA)

1.2.2 Corporate Strategy

The review relates to the following corporate priority:

3. Enable our residents, visitors and enterprises to enjoy, achieve and prosper

1.2.3 Local Area Agreement

There are no specific Local Area Indicators which are aligned to this topic.

2. OBJECTIVES

The Panel determined that the objectives of this exercise would be to review the subject of drainage. This covers a wide range of topics, and crosses areas of responsibility for Severn Trent, the Environment Agency and the County and Borough Councils as well as individual agricultural landowners and households.

It was considered that the review should be undertaken in stages, covering the following points:

- Warwickshire County Council's management of highways drainage, including maintenance of gullies.
- Severn Trent's responsibilities to prevent sewer surcharging.
- Issues around the mains supply and repeated burst water mains in areas such as Hillmorton.
- Infrastructure issues are the drainage and water supply systems sufficient to meet future demand?
- Flood prevention and management of flooding emergencies.

2.1 Highways Drainage

The review of highways drainage focused on the following key lines of enquiry:

- What is the current policy and practice for the emptying of gullies and repair work?
- Where are the problem areas of highway flooding within the Borough?
- What are the key challenges involved in overcoming these problems?
- How can we advise the members of the public on what they can expect to happen when they advise us of a problem?

Having addressed these key lines of enquiry, the review group focused on the following key questions:

- How are the County Council addressing key problem areas?
- Are current policies making the best use of resources?
- Are members of the public being advised of what they can expect to happen when they report problems?

2.2 Sewer Surcharging

The review of sewer surcharging focused on the following key lines of enquiry:

- What is sewer surcharging and how does it happen?
- Whose responsibility is it?
- How many people are affected by it?
- What do people do if it happens to them?
- What information does the Borough Council issue relating to sewer surcharging?

Having addressed these key lines of enquiry, the review group focused on the following key questions:

- Is there any data on sewer problems in the Rugby area?
- Are sewers in Rugby running at capacity?
- What are the main causes of sewer problems?
- What are the response times when problems occur?
- What infrastructure improvements are planned in Rugby?
- Does infrastructure planning take proposed developments into account?

2.3 Mains Water Supply and Repeated Burst Water Mains Around Hillmorton

The review of mains water supply focused on the following key lines of enquiry:

- Whose responsibility is it to maintain the water supply, water mains and water pressure?
- Who is responsible for leaks?
- What happens when there are unplanned Interruptions to Service?

Having addressed these key lines of enquiry, the review group focused on the following key questions:

• How well does Severn Trent perform in comparison to industry standards?

2.4 Infrastructure Issues

The review of infrastructure issues focused on the following key lines of enquiry:

- Who has statutory responsibility for the water supply?
- How does Severn Trent plan for the long term future and how are risks and uncertainties built into that?
- Who has statutory responsibility for the drainage system?

• How do planning regulations affect these services and how can Rugby Borough Council plan to ensure that there is a sufficient infrastructure to meet future demands?

Having addressed these key lines of enquiry, the review group focused on the following key questions:

- How does Rugby Borough Council ensure that other agencies are consulted on planning applications?
- How does Severn Trent determine what effect different developments will have on the requirements for its service?

2.5 Flooding and Flood Prevention

The key lines of enquiry for flooding and flood prevention were:-

- What type of flooding is most likely to occur and where?
- What are current flood prevention policies?
- What is the flooding emergency plan?
- What information is available to the public on risks of flooding?
- What information is available to the public regarding what help they can expect if they are a victim of flooding?
- Any current legislation likely to affect planning in either the long or short term i.e. the recommendations of the Pitt Review

Having addressed the key lines of enquiry the review group focussed on the following key questions;-

How does Rugby Borough Council encourage flood prevention and preparedness?

What are the emergency plan provisions in the event of flooding? How can members be more informed about their role in an emergency? What can we learn from other flooding reviews that have taken place in the County?

3. METHODOLOGY

3.1 Highways Drainage

In order to develop the evidence base for the review, the Panel considered a wide range of data and information, including:

- number of blocked gullies in the Borough.
- causes of blockages.
- identification of key areas which encountered continuous problems of blocked gullies.
- benchmarking data with similar rural county council areas.
- numbers of complaints relating to highway drainage in the Rugby Borough area
- local rainfall statistics.

- responses from members of the Public to a press release asking for examples of flooding problems.
- 3.1.1 The Panel took oral evidence from the following individuals:

Paul Cowley, County Highways Area Manager WCC Sean Lawson, Head of Environmental Services, RBC Paul Mernagh, Street Scene Team Leader, RBC

In addition, the Panel issued a press release asking members of the public for their comments and responses were received from 11 members of the public who had experienced problems with drainage or flooding of some kind.

- 3.1.2 The Panel commissioned a postal survey of approximately 120 people. The survey was sent to Parish Councils, Borough and Rugby County Councillors, and residents associations. It was also placed on the Council's website. In total 39 responses were received, giving a summary of 95 problem areas. This survey covered all aspects of drainage, not just those parts relating to highways drainage.
- 3.1.3 The survey results were then sent to all of the responsible agencies, who were asked to provide information on the action taken in all of these cases. A copy of the completed questionnaire summary is attached as **Appendix 1**.
- 3.1.4 All of the parish councils that had originally responded to the questionnaire were sent a copy of this summary.

3.2 Sewer Surcharging

The Group took written and oral evidence from Mr Paul Gregory, Manager of South Flooding Team for Sewerage Operations for Severn Trent. The Group also considered evidence of information provided by Severn Trent and the Council.

3.3 Infrastructure Issues

The Group took oral evidence from the Council's Forward Planning & Economic Development Manager and written evidence from Mr Bill Walton, Sewerage Asset Protection Manager East, Severn Trent.

3.4 Flooding and Flood Management

The Group received evidence on the Pitt Review, the draft Flood and Water Management Bill, the Warwickshire County Council and Rugby Borough Council emergency plans and from Joint flooding reviews conducted by the County Council and Warwick District and Nuneaton Borough Council.

3.5 Cross Cutting Issues

The review overall has considered research evidence from a wide range of sources, including:-

- Parish Councils
- Severn Trent
- Environment Agency
- OFWAT
- Warwickshire County Council
- Borough Council Officers.

A summary of the issues raised by the questionnaire issued to Parish Councils and elected members, alongside the current position, is attached as Appendix 1.

The reports and minutes relating to this review can be found online at <u>www.rugby.gov.uk</u>, following the links to the Committee Papers system and then clicking on 'Drainage Review Task Group'. Alternatively, papers can be provided by the Rugby Borough Council Scrutiny Unit by emailing <u>scrutiny@rugby.gov.uk</u> or telephoning 01788 533593.

4. FINDINGS

4.1 Highways Drainage – current policy and practice for the emptying of gullies and repair work.

- The County Council currently has a policy of emptying gullies in Rugby once a year.
- There are approximately 95,000 gullies across the County, and approximately 10-12% of these are blocked.
- If a blocked gully is not freed by emptying, it is then jetted and, if that is not successful, excavation works may need to be carried out to effect investigation of the problem and repairs.
- An electronic tracking system flags those gullies that are obstructed or jammed.
- Currently there are 187 outstanding days of excavation jobs "ordered" in Rugby borough.
- Priority of works is given to those areas that present a property flooding risk or are on a "fast" road.
- Warwickshire County Council, as the responsible authority, uses the Rugby Area Committee members to help them prioritise the resources available and welcomes reports of problem areas from Rugby Councillors and members of the public.
- There was a perception that the quality and timing of street cleansing may also have an impact on the efficiency of highways gullies. Members were informed that street cleansing in villages was no longer conducted according to a schedule, but was targeted where it was needed or specifically requested. It was felt that this new approach needed to be better advertised.

4.1.1 Where are the problem areas of highway flooding within the Borough?

There are several key problem areas in the borough. Areas identified by councillors and members of the public include:

- Hillmorton, High Street and Lower Street.
- High Street, Ryton on Dunsmore.
- A426 Dunchurch Road near junction of Sainsbury's and Bawnmore Road.
- A428 Coventry Road, Church Lawford underneath Railway Bridge, and area by Livingstone Avenue.
- A426 Southam Road in vicinity of Toft Hill and Toft House.
- Halfway Lane Broadwell.
- The Kent Hillmorton under Railway Bridge.
- Crowthorns junction Brownsover.
- Various Locations Dunchurch Road, Southam Road Dunchurch.
- Hillmorton Road.
- Clifton Road/St Peters Road.
- Slade Road/Cromwell Road.

The County are aware of problems in these areas and the County Council has identified some additional funding for some of the larger scale drainage works. These works will include the A426 Southam Road at Toft Hill Dunchurch, A428 Coventry Road at Church Lawford Railway Bridge, A426 Dunchurch Road near Sainsbury's Island, The Kent Hillmorton under the Railway Bridge and Hayway Lane Broadwell.

4.1.2 What are the key challenges involved in overcoming these problems?

Repair work that involves excavation investigation is a complex process, which includes identifying and restoring surrounding utilities

There has also been a higher than usual level of rainfall over the last couple of years, bringing increased pressures on the maintenance programme and a resulting backlog in routine work.

Responsibility for drainage is complex, and requires a range of partners to coordinate their responses, including:-

- Warwickshire County Council responsible for draining the highway, including maintenance of gulleys and drains.
- Rugby Borough Council the local land drainage authority, with powers to deal with obstructions in ordinary watercourses
- Severn Trent responsible for mains water supply, and sewage
- Environment Agency responsible for brook courses and rivers.

4.1.3 How can we improve the experience of members of the public when they report a problem?

The Group considered the current processes that the customer experiences once they report a drainage problem or make a complaint. This covered liaison between Borough and County Council if the pubic reported a problem to the Borough Council.

The Group drafted a flow chart showing who was responsible for particular drainage issues, which could be made available to members of the public and used by contact centre staff at the Borough and County Councils. It may also be possible to consider providing some questions for call centre staff to ask so that they may make a judgement as to the severity of the problem and act accordingly.

Members were also informed of the launch of local environment quality report forms which could be used to report a variety of environmental concerns. During the course of the review the Warwickshire County Council highways team were relocated to a central office in north Warwickshire, with local officers no longer based at the Town Hall. Members expressed some dissatisfaction with their experiences of trying to contact the team directly following their relocation, and felt that this situation needed to be monitored.

4.2 Sewer Surcharging – Current Practices

Is there any data on the level of sewer problems in the Rugby area?

Sewer surcharging is where the waste becomes blocked along the main sewer channels and as a result the pressure builds up causing the waste to return back through toilets and plug holes.

Records of any public sewer problems reported by customers are kept and Severn Trent also maintains a register of properties at risk of flooding from overloaded sewers. Severn Trent supplied a copy of the register which shows which areas have properties registered, although due to data protection it is not possible to identify individual properties.

Properties on the register are given a higher priority by Severn Trent for remedial works, although there are other factors that are taken into account, such as how many properties are affected and the costs per property.

Where are the current problems within the Rugby Borough Council area?

The questionnaire commissioned by the group identified the following problems within the Rugby Borough Council area. The representatives from Severn Trent supplied information as to what action had been taken on all of the problems.

- **Ansty:** Slight problems had been experienced with the pumping station and mitigation had been fitted. Nothing had been reported since. Also, a property had been put on the 'at risk of sewerage flooding' register.
- **Teetong Road, Long Lawford:** There were issues at the private pumping station which had not yet been adopted by Severn Trent. The adoption was being considered but had been delayed as there were still some problems on the site which needed to be rectified by the developer.
- Little London, Newton: There had been some main sewer problems, particularly with a build up of fat and grease. Efforts were being made to stop the discharge of fat into sewers.
- Holbrook Road with Elizabeth Way, Long Lawford: The situation here was similar to that in Little London, Newton.
- **Recreation Park, King George's Field, Long Lawford:** Severn Trent had found three collapses in the sewers in the area and pipes had been found to be blocked with tree roots. This problem seemed

to have been rectified. A property in Townsend Lane had been placed on the 'at risk of sewerage flooding' register.

- **Broadwell:** Surveys had been carried out and some collapses had been found these had now been rectified. Valves had been fitted to the properties on the Green.
- Leamington Road, Princethorpe: Fat and grease had been found in the sewer. It had been cleansed and put on a yearly cleansing programme. No problems had been reported since the cleansing had been carried out.
- **Church Lawford Stables:** Severn Trent were unaware of any problems.
- **Bagshaw Close, Ryton:** Severn Trent were unaware of any problems here.
- Withybrook discharges into brook and Garden flooding in parts of Dunchurch: Both projects for Withybrook and Dunchurch had been deferred to the next business plan period because of high unit costs.

What are the main causes of blockages? Collapses or physical blocks?

Blockages are mainly caused by mis-use of sewers e.g. fat and grease deposits and other inappropriate materials becoming lodged in pipe work. Concern was expressed at the number of problems occurring following the discharge of fats, oils and greases into the sewers, from both business and residential properties. Business cannot be required to fit grease traps but can be prosecuted if found discharging into sewers. The sewer age and condition will also contribute to this but collapses account for only a single figure percentage of all blockages.

Old pre-war sewers often have interceptor/siphon traps (U shaped bends) on the connection before the main sewer and these often trap material causing blockages. These siphons no longer serve any useful purpose as they were originally intended to prevent smells coming back up from main sewers so Severn Trent remove them where they are causing problems. Now that all houses have U bends internally fitted on waste pipes, they are not needed. The variety of new materials disposed of into sewers (e.g. disposable nappies) has become more of a problem.

4.2.1 Sewer Infrastructure Issues

Are the sewers of Rugby running at half / full capacity? How is the capacity taken into account when new developments are proposed?

Severn Trent undertakes Drainage Area Studies of sewer catchment areas and has computer models of sewers in many catchments. This highlights the performance of the main sewers and allows them to understand the capacity of the system in that catchment. These models are used when assessing the effect of development on the public sewerage system and in designing new or replacement sewers. Again, this information is not made generally available but it is shared with other authorities when looking at holistic flooding projects.

The following infrastructure improvements are currently planned by Severn Trent:

Title	Design	Completion
GEC Alstom Leicester Road Rugby S185	May 2009	September
Sewer Diversion		2009
Long Lawford Townsend Lane Flood	Sep 2009	March 2010
Alleviation		
Rugby Walford Place Flood Alleviation	August 2009	February 2010
Manor Farm PS Frankton		lan 2010
	April 2009	Jan 2010
Draycote Village SPS and Gravity	In progress	July 2009
Sewerage		

The details and scope are not known until design is complete. At that stage a cost benefit exercise will be carried out to determine whether the projects proceed to construction.

How are infrastructure improvements prioritised?

Severn Trent are regulated by OFWAT and have to submit a five-year business plan to them. The current plan will end in 2010. At the time of reporting to the review group, Severn Trent were awaiting notification from OFWAT as to the permitted level of capital funding to be made available for infrastructure improvements. Severn Trent have advised OFWAT that they consider that priority should be given to properties which are prone to internal flooding on a regular basis, rather than those prone to external flooding occasionally. At the moment, prioritisation is influenced by unit cost and Severn Trent consider that this should not be the determining factor.

4.2.2 Severn Trent Customer Care Issues

How quickly can the customer expect a response when they report a problem?

Incidences of sewer surcharging inside properties are dealt with urgently as a matter of priority.

Severn Trent customer response times are 2 hours for reports of internal property flooding, 6 hours for reports of flooding to gardens and highways, and 24 hours for general blockages. In times of severe weather these times would be subject to conditions and job volumes.

Is there a typical customer complaint procedure?

The customer must first contact Severn Trent by email (via web site) or letter or by ringing 0800 783 4444. Severn Trent has a customer complaints procedure set out, a copy of which was provided to the group and is also available on their website. If customers are not happy with the response then they can contact OFWAT or Consumer Council for Water who will take up the matter on their behalf.

4.2.3 What information has the Review Group's survey provided?

The questionnaire which was sent to parish councils and other representatives covered all of the aspects of drainage which the review group decided to scrutinise.

Of the 95 problems reported as part of the questionnaire, 10 were related to sewers. These were not necessarily issues regarding sewerage surcharging into domestic properties, and four do not give any details. Only 3 specifically mention sewer surcharging and two of these were dealt with within 10 hours, another in 1-3 days. Some of the other sewerage problems relate to discharge into rivers or streams.

All of the responsible agencies were asked to provide an update on the progress in tackling the problems identified by the survey and this was sent to the original respondents.

4.2.4 How can liaison between agencies be improved?

The Street Scene Team Leader holds meetings with Severn Trent roughly twice a year.

Severn Trent meets regularly with the Environment Agency regarding flood protection.

Regular meetings and cross agency liaison is very important and should be encouraged. The group learnt that in Gloucestershire, each local authority has set up a local district forum where all agencies involved in drainage and flooding meet on a quarterly basis to discuss forthcoming work programmes and liaise regarding work schedules. This has been in operation for about 18 months and is proving to be very useful.

4.2.5 What can be done to ensure that there is sufficient infrastructure capacity to service new developments?

Severn Trent is only a statutory consultee on large scale developments.

Concern was expressed at the impact that a cumulative number of smaller developments might have especially if there is a lot of infill in a short space of time. This could quickly overload the system without Severn Trent becoming aware of any problems. Severn Trent had measures in place in the event of pumping stations being overwhelmed. The method used would vary according to the consequences of the flooding. Only short term remedial work would be carried out unless there were major environmental issues as a result.

4.2.6 What about the future?

It is intended that the transfer of private sewers and lateral drains to water and sewerage companies will take place from April 2011. Severn Trent considered that the date of April 2011 might be somewhat optimistic and that the transfer would have a massive impact on all water authorities. As well as removing liability and uncertainty for customers, the change will help promote the integrated management of the sewerage network and support the development of surface water management plans.

4.3 Mains Water Supply and repeated burst water mains around Hillmorton.

The group received a report on mains supply and repeated burst water mains around Hillmorton.

The review group had originally highlighted the area of High Street to Ashlawn Road in Hillmorton as an area where repeated burst water mains had resulted in loss of water pressure and traffic restrictions.

However, Severn Trent recently announced that they were preparing a scheme to replace a section of the pipe and work was expected to start in the summer. No date had yet been fixed.

4.3.1 Severn Trent's Performance regarding the maintenance of the mains water supply

The members noted that the general performance of Severn Trent in maintenance of supply and leakage was very poor according to the OFWAT tables for 2007-08.

Severn Trent confirmed that they had a number of action plans to follow on the issue of mains supply and repeated burst water mains, and that they were making improvements year on year.

4.4 Infrastructure Issues.

Of particular concern to the Task Group was how the cumulative impact of smaller developments could be taken into consideration, and how interested parties were involved in consultation regarding development.

4.4.1 How do Severn Trent assess the impact of potential developments on the sewerage/water infrastructure in any road/area?

Severn Trent has an extensive range of hydraulic models covering its operating area. With regards to sewers, these models give an indication on each sewer length as to the frequency of predicted surcharge and flooding and identify areas where improvements may be required. These models are used in conjunction with other information to help assess the likely impact of new development. Severn Trent also produce "Drainage Area Plans", which give a comprehensive view of the sewerage system in each Drainage Area.

Clean water is handled in a similar way.

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4.4.2 Is there any method of assessing the cumulative impacts of smaller scale developments?

Severn Trent recognises this as a potential problem area and are taking steps to capture as much data as possible. Data is already gathered from the majority of developments, even the small ones. The main problem relates to the single infill-type developments. A methodology for resolving this issue has recently been introduced. All this data, once captured, is fed into the Strategies team which build the additional flows back into the DAP's and models as discussed above.

4.4.1 Planning for future demand.

A study, by the Environment Agency on behalf of the West Midlands Regional Planning Authority, into the impact of housing growth on public water supplies concluded that the Severn Trent Water Resource Zone, in which Rugby is located, is at high risk of not having enough water to supply levels of growth. As a result, development of new water resources, treatment and distribution infrastructure would be required in future.

RBC is working in partnership with all Warwickshire Local Authorities and commissioning a Joint Warwickshire Water Cycle Study. The study will be a key piece of evidence to ensure that development does not have a detrimental impact on the water environment.

The study has not been undertaken before and will be structured as follows:

- Phase 1: Review existing water cycle processes and infrastructure capacity and establish a comprehensive and up to date baseline;
- Phase 2: Undertake detailed assessments of strategic water and waste water treatment options in order to accommodate planned housing and employment growth;
- Phase 3: Make recommendations for future strategic water and waste water treatment provision.

The strategy would be used to inform the Rugby Borough Local Development Framework.

It was agreed that it was not realistic for the group to determine in any detail the long-term effect of climate change on infrastructure needs. However, there was recognition that, in terms of water supply, the current use of water is too high, and the group were advised that design standards were being developed to encourage lower water usage and greater recycling of water. In terms of drainage, Sustainable Urban Drainage Systems were now a requirement in new developments, covering a range of sustainable approaches to surface water drainage management

4.5 Flooding and Flood Prevention

The Group considered the various potential causes of flooding that were likely within the area. There are properties situated along the River Avon which are identified as being included in the Environment Agency flood risk areas.

The Group felt that a key area was flood prevention. It was essential to better inform householders how to protect themselves and their properties in the event of flooding, rather than waiting until a flood occurs and then requesting assistance. Evidence shows that some 70% of those who can sign up to Floodline Warnings Direct have not done so.

A lot of work has been undertaken with respect to flooding since the floods of the summer of 2007.

4.5.1 Lessons from National and Local Reviews

Sir Michael Pitt was commissioned by the Government to undertake an independent review of the lessons to be learnt from the floods of the summer of 2007. The final review and recommendations were submitted in June 2008 and, as a result, on 21 April 2009 the Government published the draft Flood and Water Management Bill for consultation. This Bill will implement the recommendations of the Pitt report.

There have also been two recent joint reviews by the County Council and Warwick District Council and Nuneaton Borough Council. These have resulted in a number of recommendations highlighting the importance of strong emergency procedures and communication with the public, reinforcing many of the findings of this review.

4.5.2 Awareness of Flooding Emergency Procedures

One of the questions in the Warwickshire Place Survey relates to how well informed people feel about what to do in the event of a large-scale emergency. The Place Survey, which took place in 2008, is designed to supply the data by which a number of national indicators will be measured. In Rugby only 13.5% of the people questioned felt that they knew what to do in an emergency This was second lowest out of the six districts, with Stratford District coming top with 20.3%. Overall Warwickshire was ranked 17th out of 26 county areas. It was felt that more publicity and public information regarding flooding emergencies and prevention was vital and could be promoted through parish councils.

The Major Emergency Plan has been updated recently and has just been placed on the Council's website.

There is a wealth of information available on the internet regarding preparing for and responding to flooding emergencies. However, although general areas can be identified as at risk of flooding, it is not possible to identify individual properties at risk and information is not targeted to them. The Group decided that most parish councils would be aware of properties that are at risk and that an information pack on preparing and responding to emergency flooding situations should be compiled, which could be sent electronically to parish councils for publication in their parish magazines.

Some parishes have also registered with the county council and received notification of severe weather warnings by email, although this service only operates during office hours. Members considered that it would be useful if similar notification could be sent to borough councillors through the new SMS .messaging system in place.

4.5.3 Involvement of Members in Emergencies

There is provision under the Service Level Agreement with the County for an annual briefing for members on the emergency plan, but this has not been arranged. Members felt that this would be a useful exercise to promote awareness of their role in an emergency.

The county council had produced some guidance for its elected members in case of a major emergency in the form of a credit card size pullout, a copy of which was circulated to members of the group. Members felt that this was useful and suggested that the information could be reproduced for Rugby Borough councillors in the Council diary

4.6 Cross Cutting Issues

Some findings were common across several of the drainage issues. These were chiefly centred around:

- Customer Care Issues How people were kept informed of the progress made with their complaints.
- Communication How people know which organisation is responsible for which type of problem. The Group have devised a "decision tree" which is attached as **Appendix 2**, which is designed to be used in a variety of publications to make this clearer.

- Cross Agency Liaison Whether organisations effectively share information about what problems have been reported and what work is proposed.
- Evidence from the survey carried out by the group indicates that the outstanding problems identified are often complex in nature and of a cross cutting nature, with more than one agency responsible. It is also sometimes very difficult to be able to correctly isolate the source of a problem which leads to difficulties for the public in deciding who to approach.

There are a number of different agencies involved in the maintenance of drainage systems. It is important to realise that each of these agencies work to their own priorities, which may not always be able to meet public expectations.

5. CONCLUSIONS

The Group has drawn the following conclusions from its review:

5.1 Highways Drainage

- Warwickshire County Council has a good understanding of the problems that are occurring in the area which relate to highways drainage and have a detailed programme of work to tackle outstanding problems.
- There is a significant backlog of highways drainage work in the borough, exacerbated by higher than usual rainfall. This is recognised by the County Council and the Area Committee has prioritised additional funding to address these problems.
- There is an agreed policy and process for maintaining and repairing highway drainage gullies on an annual basis. Resourcing is clearly an issue and it may help to reprioritise gully cleansing by targeting efforts at areas with recurrent problems.
- There is a reasonable policy in place for defining priorities in the event of flooding, and better information should be provided to members of the public about how work is prioritised, given the scale of the problems across the borough.

5.2 Sewer Surcharging

- Severn Trent have a recognised system for establishing whether a property is at risk from sewer surcharging (the register).
- Many of the sewer problems are caused by people putting inappropriate substances, such as disposable nappies and fats into

the drains. Businesses cannot be required to fit grease traps but can be prosecuted if found discharging into sewers.

- The customer care experience of people reporting problems can be frustrating, especially when there is cross agency involvement.
- Regular liaison between the different agencies at district council level would prove beneficial, in order to make sure that all of the relevant agencies are aware of problems and any proposed action to rectify them. It would be useful if Severn Trent's data on current issues and complaints could be circulated to councillors in advance of these meetings to allow them to highlight any additional issues that they may be aware of.
- Although agencies are consulted about proposed new major developments there needs to be a recognised method of taking the impact of smaller cumulative developments into account.

5.3 Mains Supply and Repeated Burst Water Mains around Hillmorton.

- The review group highlighted the area of High Street to Ashlawn Road in Hillmorton as an area where repeated burst water mains had resulted in loss of water pressure and traffic restrictions.
- Severn Trent recently announced that they are preparing a scheme to replace a section of the pipe and work was expected to start in the summer.
- The general performance of Severn Trent in maintenance of supply and leakage was very poor according to the OFWAT tables for 2007-08. There are action plans in place to make improvements year on year.

5.4 Infrastructure

- Consideration needs to be given to the cumulative impact of small developments, and agencies such as Severn Trent need to be better involved in consultation regarding development.
- A study into the impact of housing growth on public water supplies concluded that there was a high risk of not having enough water to supply projected levels of growth. RBC is working in partnership with all Warwickshire Local Authorities and commissioning a Joint Warwickshire Water Cycle Study. As a result, development of new water resources, treatment and distribution infrastructure would be required in future.

5.5 Flooding and Flooding Preparedness

- There have been many investigations into flooding, both at national and regional level, since the major flooding of the summer of 2007 The Pitt Review in particular has made many recommendations which will be implemented by the Flood and Water Management Bill. This Bill is currently in draft for consultation and is aimed at clarifying who is responsible for managing flood risk protecting essential water supplies and encouraging more sustainable forms of drainage.
 - Members of the public need to be better informed of the measures that they can take to prepare for and prevent flooding if their home is at risk. There is a lot of information available, but it is not sent directly to those properties at risk. Parish Councils could be a useful conduit for targeting information more effectively.
 - There are specific emergency plans in place in the event of a major flooding emergency, although evidence shows that there is not a high level of awareness of civil protection arrangements in the local area.

5.6 Cross Cutting Issues

- The experience of people reporting drainage problems often seems to be frustrating. Improvements need to be made to customer care arrangements to ensure that better information is made available to the public and those who report problems are dealt with consistently and kept informed about how the matter is being addressed.
- Better information sharing between responsible agencies would be beneficial in order to ensure all agencies involved in drainage and flooding are aware of forthcoming work programmes and liaise regarding problem areas.
- Information on how to access services, particularly in emergencies, should be easily available and publicity given to emergency contact numbers.
- More information should be made available to councillors so that they are better able to liaise with residents on problems.

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
1	A45 Woolscott Bridge	Highway	WCC	Numerous Seasonal	Yes after 2 weeks	
2	Notman's farm roadway (?) Grandborough Fields	Highway	WCC		Yes-by landowner- after a year	
3	The Green Broadwell	Highway	WCC		Yes by WCC after a year	Have been works done on pumping station after problems around the green
4	Hayway Lane Broadwell	Highway				Work scheduled by CC in 2009/10
5	Willoughby Bridge Sawbridge	River	Possibly land owners /RBC		Brook surcharges when extremely heavy rain.	
6	Willoughby Main Street Junction with Moor Lane	Highway	WCC			Not aware of highway drainage issues separate from the river
7	Birchwood Road /Rugby Rd Junction Binley Woods	Highway	WCC	Frequently after heavy rain	No	Jetting works are scheduled by WCC. There are ST sewers problems there WCC aware and working in consultation.
8	Burton Lane crossing of River Anker	Highway Agricultural Run off River Flooding	RBC/EA	Approx 6-10 times		Please provide more info on location and confirm the watercourse.

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
9	Kirby Court Main Street Newbold	Highways	WCC	Several Times		Drain has been cleared
10	Main Street Newbold Outside Crown Pub	Highways	WCC	Several Times		Jetting has been done early 2009
11	Pailton Village Centre	Highways	WCC	Flooded twice in 10 years	Unable to take action.	
12	Monks Kirby	Highways	WCC	Regularly	Have done some jetting work in the area	
13	Street Ashton	Highways	WCC	Regularly	"	
14	Stretton under Fosse	Highways	WCC	Regularly	"	
15	Ansty	Sewage	ST	Regularly		
16	A428 South View Road Long Lawford	Highways	WCC			WCC to investigate.
17	A428 Church Lawford Bridge	Highways Agricultural run off	WCC ?			Area Committee funding for 2009/10 financial year
18	Bridge to Kings Newnham past Church Lawford Garden Centre	Highways River	RBC/EA			EA unaware of any property flooding from main river in this area. Please provide more info.
19	A428 Limestone Hall Lane	Highways	WCC			There has been work done, but this has not proved a complete solution. WCC aware and investigating
20	Coronation Road Railway Bridge Long Lawford	Highways	WCC			WCC to investigate.
21	Ling lane (Drainage from	Highways	WCC			WCC to investigate

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
	landfill to bad corner creating silt and water on road)					
22	Teetong Road Long Lawford	Sewage	ST		No- private sewers which have not been adopted, as not up to standard. Developers have left site.	
23	Bourton and Draycote	Brook flooding Highways Agricultural run off	RBC/EA/ ST		Non main river. Rugby Borough Council. Contact is Paul Mernagh	There are various works scheduled by WCC for Bourton and Draycote and Leamington Hastings
24	Corner Little Church Street/Hillmorton Road Opposite Temple Speech Room	Highways	WCC	Reoccurring when heavy rain	No	Has been jetted, no permanent solution found. Would have to be considered as a major scheme in future years.
25	High Street Hillmorton/Slip Road	Burst Water Mains	ST		Still problems with the impact of heavy rain.	Yes- start summer 09
26	Lower Street/Watts Lane Hillmorton	Highways Sewers	WCC/ST	Every time there is heavy rain		
27	Brindley Road Railway Bridge	Highways	WCC	Every time there is heavy rain		WCC to investigate would probably have to be considered as a major scheme in future years.

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
28	The Kent, Railway Bridge	Highways	WCC	Every time there is heavy rain		Area Committee funding for 2009 /10 financial year
29	Park Road	Highways/ Cellar flooding	WCC		Yes- but member of public concerned it should be monitored	Probably not related to drainage from the road
30	River Avon	River flooding- Newton,	RBC/EA		No main river in the village of Newton, River Avon is nearby, however EA are unaware of any properties flooding from the Avon in this area. Please provide more details.	
31	Little London Newton	River, Sewage overflow into storm drains	ST		Resolved after 6 months. Have had problems with build up of fats which have been cleared.	
32	Newton Lane/Main Street Newton					
33	Burst Mains-3 in 2008		ST			
34	Market Harborough Road between Clifton and Newton	Agricultural run off	?			

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
35	Main street Willoughby outside Rose Inn and Old Post Office	Highways	WCC	Twice in 2 years	Some improvements made	Brook flooding same as number 6.
36	Main Street/Lower Street Junction Willoughby	Highways	WCC			"
37	Flooding Moor Lane Nr Old Pastures Willoughby	Highways	WCC			ű
38	Flooding of Pond in Lower Street/Shar Lane Willoughby	Pond/Brook	RBC/EA			Non Main River. Not in EA remit.
39	Lower End Bulkington Road Shilton	Highways	WCC	Regularly		WCC to investigate
40	Grandborough, access roads by village hall	Highway River Flooding Agricultural run off	RBC/EA	Approx 5 times annually	Water recedes after a couple of days	Just above head of main river. EA unaware of any properties affected from River Leam in this area. Pleas provide more details.
41	Crowthorns/ Hollowell Way- Grass kept long as to wet to mow	Surface water run off	RBC/EA	Constant	May not have been formally reported	Surface water flooding is not within EA remit.
42	Hollowell Way to Glaramara Close-in front of Community Information Centre	Run off combined with water form damaged guttering on shops opposite Surface water	?	3or 4 times a year		
43	Boughton Leigh Junior School exit, parallel to Stonehills- Did cause flooding to gate and	Surface water run off	?	3 or 4 times a year	Resolved for the resident of 14 Healy Close	

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
	garden of 14 Healy Close					
44	Drainage Ditch into 61 Meadow Road Wolston	Flooding of highways and surface water run off from agricultural fields.	RBC/EA	Twice minor 2007 Serious July 2008	MARCH 2009	Wolston Brook is main river. Any other land drains or surface water drains which flow into this brook are under the responsibility of other organizations. Please provide more details of flooding from main river.
45	Poor Design of surface water clearance from Meadow Road Wolston	Culvert feeds into the drainage ditch	RBC/EA			As above.
46	Sainsbury's Island from Dunchurch Road			Frequently		Area Committee funding for 2009/10 financial year
47	Holbrook Road with Elizabeth Way Long Lawford.	Sewerage Surcharging	ST	Once	Yes- within 10 hours	
48	Recreation Park, King Georges Field Long Lawford	Sewerage Surcharging	ST	Twice	Yes- within 10 hours .ST have a property on risk of flooding register due to sewer collapse	
49	Blocked drains within Fosse Division			Frequently	To a limited extent	Have been working on a programme of drainage clearance within the division

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
50	Flooding at Withybrook			Frequently	To a limited extent	
51	River Leam- Kites Hardwick	River Flooding	RBC/EA	2 serious in 9 years		E.A unaware of any property flooding in this area from main river (Leam) . Please provide more details and locations.
52	Broadwell	Sewerage Surcharging Surface water run off Blocked pipes	ST ?	Various minor incidences		
53	Junction of Colehurst Lane and Smeaton Lane by fields.	Highways flooding Agricultural fields surface water run off	WCC ?	Frequently at time of heavy rainfall		WCC to investigate
54	Junction C206 and Monks Kirby Lane Monks Kirby	Blocked culvert	WCC	After Heavy Rainfall		Should now be resolved-WCC have jetted and dug out culvert
55	Road Flooding at Monks Kirby entrance to village from Street Ashton	Highway flooding Surface water run off	WCC ?	After Heavy Rainfall	Run Off Ditch Dug	
56	Various drainage issues- Monks Kirby P C		WCC/ST			WCC are aware of the issues listed. Also ST responsibility
57	Leamington Rd Princethorpe	Highways	WCC	4/5 times in	Yes-each time	RBC has dug brook

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
	Brook and adjacent properties	River Sewer surcharging	ST	Last 10 years	in 1-3 days	course on Princethorpe College land in the past 2 years. ST have area on a regular cleansing schedule
58	Flooding off hill School Street on to the Spinneys and Churchover House land	Highways	WCC	Many	Repeated Clearance but keeps returning	WCC to investigate
59	Flooding outside Churchover stables	Sewers	ST	many	Repeated Clearance but keeps returning	
60	Blocked Road Gullies and drainage channels. Easenhall – Golden Lion	Highways flooding Surface water run off from fields/properties	WCC ?	After every Heavy storm		Jetting work has taken place in past
61	Southam Road Dunchurch- outside Braemar House	Highway drainage	WCC			WCC aware
62	Bus Shelter on the green Dunchurch	Highway/Pavem ent Flooding Sewer	WCC ST			WCC has done jetting work. There is also a sewer problem on the square
63	Cawston Lane junction Rugby Road Dunchurch	Highway	WCC			No aware that this is a serious issue
64	Main Road (A423) Marton	Residential flooding Highway River	RBC/EA	Twice in last 10 years	Eventually by natural drainage	Problems caused by river-WCC not able to take action
		Surface water run off	?			R. Itchen and R.Leam are main

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
						river. Any surface water or land drainage flooding issues area not within the remit of EA. Please provide more information of any flooding from main river.o take action
65	Fern Cottage Easenhall Road Brinklow	Surface water run off- agricultural fields	?	4/5	Yes- after some months	
66	Road and Footpath adjacent to 19/21 Broad Street Brinklow	Highways	WCC	Many		WCC not aware of flooding affecting dwellings
67	Road at Junction of Colledge Close and Heath Lane Brinklow	Highways	WCC	Many		"
68	Green Lane/Heath Lane Triangle Brinklow	Highways Surface water run off	WCC ?	Many		"
69	Ell Lane Junction with the Crescent Brinklow	Possible Spring Surface water run off	?	Annually for at least 26 years		
70	New Street Play Area Ryton	Surface water run off Highways	RBC/ Parish			Probably not WCC
71	High Street Ryton-several spots and junction with Fetherston Crescent	"	WCC			There was a ST sewer collapse approx 18 months ago .WCC did associated works

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
						which improved water collection
72	Far End Church Road Ryton	"	?			WCC to investigate
73	Leamington Road Island Ryton	"	?			WCC currently investigating
74	Oxford Road and Leam Road Island Ryton	"	?			"- Same location as 74
75	Oxford Road Gullies/Peugeot Old Site	ű	?			WCC not aware- There is a traffic island being planned and drainage works would be examined as part of that. This development is delayed.
76	Bagshaw Close Ryton	Sewer Surcharging	ST			
77	Back Lane Harborough Magna by Liapari	Surface water run off	?	Always when heavy rain	Was improved but is now deteriorating	WCC to investigate
78	Corner Main Street/ Rugby Road Harborough Magna	Surface water run off	?	Always when heavy rain	Was improved but is now deteriorating	WCC aware of 1 problem, but has to access a public property to resolve this.
79	Rugby Road Pailton- Regular silted over gullies- Grips required on section of road including Cord Lane entrance	Highways drainage	WCC	Significant surface water on road even after minimal rain		WCC aware of issues

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
80	Lutterworth Road Pailton Waters accumulate at bottom of hill because of insufficient grips	Surface water run off	?		Ditch dug by home owner	"
81	Coventry Road Pailton, close to chican.Footway flooded adjacent to entrance to Pailton Club	Highway drainage- blocked gullies	WCC			"
82	Village Centre Pailton	Surface water run off	?		Ditches have been dug which has helped the problem-	Parish Council suggest reprofiling level of road same as number 11
83	Blocked road drain Wibtoft	Highway flooding	WCC	Every time heavy rain	New drain installed- after a year.	
84	Hillmorton Lane, Clifton adjacent to Meranti Lodge	Highways drainage - Blocked roadside drains in part piped ditches	WCC	Very frequently		WCC aware- not a major priority
85	Lilbourne Road Clifton from Buckwell Lane to A5	No access for road surface water to road side ditches	WCC	Very frequently		WCC has dug out grips.
86	Newton Road Clifton-stables	Surface water above stables- underground main water pipe to Newton	ST	Very frequently		WCC aware, not a major priority.

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
		believed to have perished.				
87	Disused railway on Newton Road (West Side)	Pooling	WCC	Very frequently		WCC aware, not a major priority
88	Old Hall Lilbourne Road- opposite Buckwell Lane Clifton	Highways drainage – Pooling	WCC	Very frequently		ST Storm sewer which discharges
90	Buckwell Lane Clifton, outside Greenacres-	Highways drainage - Pooling	WCC	Very frequently		
91	Plott Lane, Stretton on Dunsmore	Highways drainage Surface Water	WCC ?	Too many	Problem Unresolved	Has been jetted regularly. Will be maintained as much as possible. No permanent solution.
92	Brook Overflowing, Stretton on Dunsmore- made worse by Plott Lane Drains blocked	Highways drainage Surface Water	WCC ?	3 or 4 times annually	Problem unresolved	Not connected with Plott Lane drain problem. WCC not aware that it is a major problem.
93	Withybrook-uncontrolled raw sewerage discharges into brook	Sewer surcharges	ST		Consultants have assessed drainage system on behalf on Severn Trent although results have not yet been made available.	Severn Trent to fit larger pumps and surge tank to cope with high volumes of liquid. This will not be until AMP5 commencing in 2010.There has been no liaison with Parish Council as to how the problem will be

	Site of Flooding	Туре	Which Agency	Frequency	Has it been resolved?	Is action proposed?
						managed until then.
94	Withybrook –flooding of brook	River Flooding	WCC/ Landown ers	Problem for more than 50 years	Responsibility for maintenance of brook not resolved between WCC and adjoining land owners	RBC has dug brook course on a "without prejudice basis". ST has put flood defences round pub.
95	Withybrook- Several blocked surface water drains in Village	Highways	WCC			WCC has done work, not aware that there is a specific problem

