

HUNDRED OF WISBECH INTERNAL DRAINAGE BOARD

At a Meeting of the Hundred of Wisbech Internal Drainage Board
held at Middle Level Offices, March on Wednesday 14th June 2023

PRESENT

M G Day Esq (Chairman)	G L Lake Esq	Cllr A Miscandlon Esq
N Buttress Esq (Vice Chairman)	Cllr D Laws	Cllr G Booth Esq
F D Leach (Deputy Vice Chairman)	J Leach Esq	Cllr Haq Nawaz Esq
N J Harrison Esq	Cllr R Gerstner Esq	Cllr C Marks
H Duncalfe Esq	Cllr D Oliver Esq	Cllr B Barber
Cllr J French	Cllr M Davies	Cllr S Imafidon Esq
Cllr S Hoy	Cllr C Boden Esq	

Mr Robert Hill (representing the Clerk to the Board), Mr Paul Burrows (MLC Chief Executive), Mrs Nicola Oldfield (MLC Chief Engineer) and Mr Graham Moore (Consulting Engineer) were also in attendance.

Apologies for Absence

Apologies for absence were received from J Bunning Esq, C Smart Esq, A Pinder, Cllr Roy and Cllr Seaton.

B.2081 Declarations of Interest

Mr Hill reminded Members of the importance of declaring an interest in any matter included in today's agenda that involved or was likely to affect any individual on the Board.

Mr Harrison declared an interest in any item in relation to the maintenance work of the Board.

Mr Harrison & Cllr Miscandlon (as members of Waldersey IDB) declared interests in any matters concerning Waldersey IDB.

The Chairman, Mr Buttress and Mr F Leach as District Officers of the Board declared interests in matters concerning the District Officers and District Officers Fees.

Cllrs Laws, French, Marks, Davies and Imafidon declared an interest in all planning matters as members of Fenland District Councils planning committee and left the room when specific applications were being discussed.

B.2082 Confirmation of Minutes

RESOLVED

That the Minutes of the Meeting of the Board held on the 17th November 2022 are recorded correctly and that they be confirmed and signed.

B.2083 Matters Arising

None

B.2084 Bank Mandate and National Savings & Investments

- i) The Clerk requested authorisation to add the Chief Executive to the Barclays bank signatories if necessary.
- ii) The Clerk reported that it is necessary to update the signatories on National Savings & Investments.

RESOLVED

- i) That Mr P Burrows be added as an authorised signatory of the Barclays Bank Account, should this be required in the future.
- ii) That Mr P Burrows, as Clerk to the Board and Mr M Day, as Chairman, be the authorised signatories of the National Savings Investment Account and that the account of Hundred of Wisbech Internal Drainage Board with National Savings and Investments be changed accordingly.

B.2085 Vacancies in Membership

Mr N Buttress proposed Mr Ben Wales to fill a vacancy as an elected member. He reported that he was a former employee of the Board, so had good knowledge of the district, was a Waldersey Internal Drainage Board member, District officer and pump attendant at the South Brink pumping station. Mr F Leach seconded the proposal.

RESOLVED

That Mr Ben Wales be invited to become a member of the Board.

B.2086 Member Training Update

The Clerk reported on the training undertaken by Members in the past year.

Members considered it important for the new council appointees to have access to the ADA training modules.

RESOLVED

That the link to the ADA training modules be sent to the new members of the board.

B.2087 Access Problems

Further to minute B.2064, Mr Harrison reported that access within the industrial area continued to be a problem and that currently approx. 80% of works had been completed. He reported that there were major issues with access on the SB Components site and that there was construction taking place within the Lamb Weston site.

The Chairman reported that there had been site meetings last year and there had been agreements reached to clear sections ahead of maintenance works, however, when the contractor arrived, the representative who made the agreements were no longer around and the process had to be started again, causing further delays to the maintenance programme.

Mr F Leach reported that he had been on a site visit last week to the Lamb Weston site, who were constructing a bund wall which encroached onto the Boards byelaw distance and after discussions had agreed to stop construction work. However, 24 hours later, works had re-commenced.

In response to Cllr Boden, Mr F Leach detailed the access issues encountered by the Boards contractor through the industrial area and that he would welcome any assistance that could be provided by the council to resolve these issues.

In response to Cllr Boden concerning the Boards powers to enforce byelaws, Mr N Buttress reported that the Middle Level solicitor had been requested to issue entry notices to allow the Boards contractor to gain access.

Paul Burrows reported that the Board does have powers to enforce and this starts with the issue of a notice to clear the encroachment, generally within 28 days. Following this period, the Board needs to have a clear plan of action to remedy the situation, following which the Board are entitled to recover their costs involved, the recovery of such costs likely to require legal action.

Cllr Boden reported that although Boards do not want development within the 9mtrs byelaw distance, generally the planning department at the council do not receive specific communications from Internal Drainage Board's giving a clear objection to development within byelaw distance.

Cllr Laws reported that although drainage authorities are not statutory consultees, responses from drainage authorities are welcomed, as without specific responses the council has no way to be able to consider these issues, it being the responsibility of the drainage authority to register objections. She confirmed that the drainage authority needs to ensure a response refers to issues concerning the 9-metre byelaw distance and then the council planning officer can take these concerns into account as part of the process.

The Chairman referred to issues with original plans from developers showing the byelaw distance being kept clear but when the development has been completed, there are encroachments within the byelaw distance.

Mr G Moore queried that as Fenland District Council have all Internal Drainage Board watercourse information on their GIS, why are they not able to take this into account as part of the validation process. Cllr Laws reported that following validation, there is a 21-day response period, which should allow time for drainage authorities to respond.

Mr G Moore reported that in the past, through Middle level, individual applications were responded to, but generally these comments did not appear to have been taken into account.

Mr G Lake informed members that he had been on the Board a long time and that in the past, he felt let down by the council concerning planning/development but he was pleased to see the current representation and the positive comments from the council representatives in trying to find ways to resolve these issues.

Cllr Marks referred to a lack of understanding from developers concerning land drainage issues.

Mr N Buttress referred to the current issues at the Lamb Weston site, which involved the site owner looking to address problems/issues from Anglian Water which needed compliance with requirements of the Environment Agency concerning potential discharges which had led to the current encroachment issues with the Board.

Cllr Hoy reported that the SB Component site had been discussed at the previous meeting of the Board, where it had been found that the site was owned by Fenland District Council, which had been referred back to the council by the Board.

Mr N Buttress confirmed that the Chairman and District Officers do get applications to comment on and that as everyone agrees that the 9-metre byelaw distance needs to be kept clear, could a member of the Board respond directly to Fenland District Council on matters concerning encroachment within the 9-metre byelaw distance. Cllr Boden informed members that Cllr Laws was the relevant portfolio holder and could be a conduit for communications.

In response to Cllr Laws, Mr P Burrows updated on the issues faced by the Middle Level in recruiting an additional planning engineer and that the post was now being re-appraised.

Cllr French reported that it was essential to liaise between the Council and Boards and referred to a recent report supplied by the Middle Level Planning Engineers which was extremely useful in formatting a response from the Council. Mr G Moore commented that these types of responses take a long time, which impacts on ability to respond to other applications.

Cllr Boden referred to responses made by Middle Level to developers and commented that if these were also forwarded to Fenland District Council, it would be possible to take these into account by the Council Planning Officer.

In response to Mrs N Oldfield, Cllr Laws reported that each site is looked into separately on its own merits and therefore Fenland District Council require a response on each application. Mrs N Oldfield queried if it would be possible to have a default standard lodged with the Council that there should not be any development within the 9m distance.

Cllr Boden stated that it was important to find a mechanism to allow responses to be made within the required timescales and there was a planned meeting next week with the Middle Level Chief Executive at which he intended to look further at the specific issues with the SB Component site and more generally a mechanism that allows timely responses in relation to the maintenance of the 9m byelaw distance.

B.2088 Hundred of Wisbech IDB and Waldersey IDB Review of Joint Pumping Arrangements/Amalgamation

Further to minute B.2065, Mr Hill informed members of the background to the joint pumping arrangement with Waldersey IDB and the agreed formula for the split of shared costs. He reported on the progress of the formal agreement being drafted and that the Middle Level Solicitor hoped to have it finalised in the near future.

In response to Cllr Boden, Mr Hill reported that both Boards had previously given consideration to an amalgamation but both were happy with the current status concerning the joint pumping arrangements, however, the possibility of a future amalgamation would continue to be considered.

B.2089 Clerk's Report

Mr Hill advised;

i) Middle Level Commissioners and Administered Boards Chairs Meeting

That a ninth Chair's Meeting was held on the 13th December 2022.

The meeting covered a wide variety of matters likely to affect IDBs. A summary of the key points and resolutions follows;

David Thomas advised on the planned staffing changes being implemented due to his impending retirements. He stated that his post was being split back into Chief Executive/Clerk and Chief Engineer and that the appointments were:

Paul Burrows – to be the new CEO/Clerk - currently in post with the EA as a national Delivery Assurance Manager, and before that as Flood & Coastal Risk Manager for the East Anglia Area, then Flood Strategy Manager – Paul spearheaded Tactical Plans for the Fens which have secured the possibility of obtaining significant grant allocation on a Board by Board basis over a 15 year period, whilst at the same time defining a pathway to better understand the challenges faced and options worth considering for our lowland catchment as climate change and growth tests our current infrastructure arrangements.

Nicola Oldfield – to be the new Chief Engineer – currently in post with the EA as a Senior Project Manager. She most recently project managed the £30M Middle Level Barrier Bank scheme and had just taken over as project manager of the Cranbrook Counter Drain Strategy. She has, in the past, been employed by an IDB and has worked in close partnership with many IDBs including North Level IDB. Jonathan Brown stated how pleased the MLC Executive had been with these two candidates and how easy the choice had been given their knowledge of the area and experience to date.

An update was given on the role out of telemetry, which was receiving positive feedback from District Officers. A request was made for the login details to be provided to Chairmen as well as District Officers and it was confirmed that this would be arranged.

David Thomas confirmed that all but two Boards had stated their wish to move to the new planning and consenting charging and reporting arrangements and that the Assistant Treasurer was finalizing figures ready for the 2023 IDB/DDC meetings. A request was made for all correspondence which developers and their agents which is copied to Chairman should include the planning application references.

The protection and control of Bylaw strips was discussed at length and it was agreed that a policy document outlining the red-lines Boards should be applying to ensure that their ratepayers do not suffer as a result of development will be prepared for the Boards to consider. It was noted at the meeting that the refusal to issue any consent is subject to a reasonableness test, hence the document cannot preclude consenting everything within the 9m strip and the policy will be for guidance purposes only. It was felt that it should help developers, planning authorities and the Boards by providing some additional clarity. It was also felt that some case history examples to be circulated to members might help them understand the issues which have to be addressed.

Climate Change was discussed and it was noted that the MLC had completed its carbon audit and would now start work on carbon reduction and mitigation initiatives. It was also noted that the M&E engineer was looking at base levels of energy consumption at pumping stations, for example to see if panel heaters are left on permanently. He will be making recommendations to Boards if he identifies scope for reducing power without risking the apparatus.

WRE were mentioned and the Chief Executive stated that he was pleased that the draft water resource plan for the East included extensive reference to agriculture and its need for water to support the growing of food to feed the nation and also of the key role played by IDBs in transferring water to the point needed by abstractors. He also commented upon the newly

proposed Cambridgeshire fens reservoir, north of Chatteris and advised that the MLC were responding on the need to get fill supply and draw-down arrangements right, but also that we need to seek to gain capital from the opportunities that the new reservoir will present in terms of bringing money into the area and potentially helping reduce flood risk and assist with water need balancing.

The Chief Executive advised that a decision had been made to move the MLC and IDB's electricity supply contracts from Anglian Farmers to the Green Energy Advice Bureau. This followed several years of extended poor service levels and lack of timely information coming from Anglian Farmers.

The future of IDBs and the value of potential amalgamations was once discussed and this gave rise to questions over small boards being able to secure a quorate for which this had been a particularly poor year. It was agreed that this item should remain on the agenda and that any Chairs who felt that the time was right for their Boards to look again and the advantages/disadvantages of amalgamation would contact the Clerk. It was also agreed that it may be useful to undertake an exercise around updating the original Geoff Beal report which had recommended that the number of Boards within the area administered by the MLC could reasonably be reduced to three or four.

The Clerk finally noted that the ADA Great Ouse branch AGM would be held on the 7th March at Prickwillow Hall and would be in the format of workshops in the morning and an AGM in the afternoon. The workshops theme this year would be; water resources, the new reservoir and climate change.

ii) Annual Flood & Water Conference 2023

Invitation to ADA Flood & Water Conference 2023

Tuesday 21 November 2023 | 11:00 – 17:00 | One Great George Street, London, SW1P 3AA

ADA is delighted to invite you to join them for the ADA Flood & Water Conference on Tuesday 21 November 2023, as the conference returns to the magnificent venue of One Great George Street, Westminster, London. ADA will bring together a leading line-up of prominent political, policy, and technical speakers from across the United Kingdom to discuss key policy topics of the moment during the main conference session.

Following feedback from members, the format of this year's Conference has been developed to:

- maximise the time available for networking between delegates and suppliers to the sector,
- invite a greater variety of guest speakers, and
- provide more convenient timing for those travelling to and from London.

The Conference will open at 11.00 for networking with delegates and an expanded Exhibition of ADA's Associate Members in the Great Hall. A buffet lunch will be served from 12.00 before the conference presentations commence at 13.20 in the Thomas Telford Theatre. The Conference will close at 17.00.

Discussion forum

A discussion forum will form part of the day where delegates will be able to pose topical questions to the speakers/panellists via the conference chair. ADA wish to receive delegates questions in advance, which can be submitted as part of the ticket booking process on Eventbrite. Their aim is to consolidating key subjects for discussion and questioning and to maximise the value of this session.

Book your place

ADA has launched bookings for this year's conference early to give everyone plenty of advance notice of the revised date of Tuesday 21 November 2023 to make travel arrangements. They invite you to secure your place now via Eventbrite, via the link below. Tickets are non-refundable but can be transferred.

[ADA Flood & Water Conference 2023 Tickets, Tue 21 Nov 2023 at 11:00 | Eventbrite](#)

iii) Meeting of the Welland and Nene Branch

The Clerk reported on the Meeting of the Welland and Nene branch of the Association held in Woodhall Spa on 23rd February 2023.

iv) Water Resources East (WRE)

Further to minute B.2039 (v), the Clerk reported that the requested contribution from this Board for 2023/2024 financial year is expected to once again be £125. Contributions from drainage boards within the East of England secure a direct stake in WRE and help to ensure their needs and opinions are taken into account.

v) Planning and Consenting Fees

Proposed changes to planning and consenting service supply charging

Two changes are proposed. The current arrangements and the proposed changes are outlined below.

1. The current arrangements for charging for Technical Services advice and support, for planning and consenting matters, is based upon a direct cost recovery arrangement. To achieve this all time spent on every item of work undertaken has to be logged and recorded in detail. This information is then pulled together and invoices prepared and checked before being passed to the Board Chairs for sign-off. This requires a considerable amount of time and effort and this time is of course included in the eventual fees paid. It is considered that a more efficient model would be to mirror the one used for charging for Clerking services which is based upon a lump sum annual fee. This has a number of advantages. It reduces internal workload which in turn releases time to carry out productive work. It also allows Boards to budget for the fees knowing at the time of rate setting what the annual fees will be.

To ensure that a fair assessment is made it is suggested that the last five years of fees are looked at and an average taken. If there is clearly one or two years where one or two planning matters have impacted heavily upon the figures then an appropriate adjustment will be made. The final fee will be converted into a fraction of the costs of overall cost of supplying planning and consenting services for all Boards including the MLC and this percentage will become fixed until such time that a review is called for.

In addition, we will still actively encourage developers and their agents to enter into Pre/Post application contracts. This will help keep the overall planning costs to a minimum. We will also be looking to move more and more to lump sum charges for developers for the same reasons outlined above, ie to reduce internal administration work and costs where possible.

It is not proposed that this change will extend to other Technical Services work, such as surveys, catchment analysis, and refurbishment/replacement/improvement scheme work or associated advice which will continue to be logged and charged on a "hours spent" basis.

2. Many members have noted that the reporting in relation to planning application comments and responses is comprehensive. Again, it often takes many hours to produce such detailed reports for which the Board is charged. This time could be spent in dealing with and taking action on planning and consenting matters. There is also the issue of the potential time lapse between any planning/byelaw issue raising its head and the meeting of the Board. It is of course normally advantageous to take action as soon as possible after any issue had become apparent. It is therefore proposed that going forward the Board nominate who they wish to be copied in on all planning correspondence, for example the Chair and Vice-Chair. They will then be able to liaise with the Planning Engineer if they wish to and will be conversant with discussions being undertaken. The Board may also wish to delegate decision making for initial actions for bylaw infringements to the Board nominee/s.

To ensure that the Board is consulted on the most important matters it is proposed that when it is wished for a matter to be raised within the Board report then a request from the Chair can be made and a detailed report would follow. This would normally be the case where significant costs might be associated with enforcement, including perhaps incurring legal fees or where an unusually large or significant development is proposed.

Should the above change be agreed to, then going forward the Engineer's report will provide a list of all planning applications of interest to the Board and consents applied for/approved but unless requested by the Chair no detail will be provided.

vi) Changes to Electricity Supply Contracts

The Clerk reported that Boards have encountered problems with the operation of the electricity contract by Anglia Farmers over the years. Following various meetings with them it appeared some of these problems were being addressed and the service appeared to be improving this, however, was short lived. Over the past 2 years there has again been a significant deterioration in both the quality of service and lack of account management received from Anglia Farmers.

During the summer the Middle Level Commissioners were approached by Green Energy Advice Bureau (GEAB), one of the UK's leading energy companies and buying group, whose portfolio includes numerous companies with over 200 million kwh tendered per annum. They have experience working with an estimated 60 Internal Drainage Boards, which include locally the Ely Group of Internal Drainage Boards and Downham Market Group of Internal Drainage Boards. We accordingly contacted Jean Heading of the Ely Group of Internal Drainage to enquire of the service provided by GEAB and she has confirmed she is far happier with the service received from them compared to that from Anglia Farmers and since has signed a 5-year fixed rate contract with GEAB from 1st April 2022.

A report was presented to the Middle Level Commissioners at their Board meeting on 3rd November 2022 and due to the ongoing poor performance of Anglia Farmers, together with the positive feedback given by Jean Heading of the Ely Group, the Commissioners' resolved to consider moving to alternative arrangements. The Executive Committee were delegated the final decision and having considered a report on the options and subsequently confirmed their agreement that a move would be appropriate in the circumstances.

The Clerk reported this was considered a positive move and recommended the Board also move to this alternative arrangement.

The Clerk reported that this Board's Chairman had subsequently agreed for the Board to serve notice to Anglia Farmers and for Green Energy Advice Bureau to handle the energy procurement process and management of the electricity contract.

The Clerk advised that the Middle Level Commissioners and its administered Boards have entered into a fixed rate energy supply with Corona Energy for an 18-month period from 1st April 2023.

vii) Insurance

Historically the number of insurance companies willing to quote for the insurance requirements of the Middle Level Commissioners and administered Boards is limited.

Our insurance portfolio is complex and includes a range of policies that includes Commercial Combined (largest component), Motor Fleet, Engineering & Construction, Terrorism, Management Liability, Marine Craft and Professional Indemnity.

The overall cost of our insurance portfolio for 2023/24 will be £192,275 (£152,373 in 2022/23) a 26% increase, although increases will differ Board by Board depending on their individual insurance needs.

Key factors and changes are highlighted below:

- For Commercial Combined insurance, 2022/23 was the last year in our previous five-year agreement with AXA which included a 7% price reduction woven into the deal. For 2023/24 Towergate, our brokers, approached several companies and all bar AXA were not willing to quote given the size and complexity of our portfolio. Independently we also approached the NFU who declined to quote for the same reason.
- There has been an increase in fleet, property and marine assets included within our cover.
- In view of rising inflation most Boards agreed to index link their insured sums from 1st April 2023. AXA have increased insured sums by 15%, which has resulted in an increase within the overall premium.
- AXA have offered a 2-year stability deal, where any premium increases, subject to claims not exceeding 50% of the written premium, will be capped for 2024/25 at 2.5%. This excludes any increases in sums insured.
- AXA will not extend the stability deal as they plan a review of their whole IDB scheme in 2025.
- Commercial combined policy excess has increased from £350 to £2,500. None of our four 2022/23 claim values were above this new excess.
- Excesses are dictated by AXA's overall scheme for all IDBs and this is apparently now standard and has been imposed due to the number of lower value claims across the whole IDB industry. As other IDB/IDB Groups come out of their previous agreement with AXA the above will apply.

For future years Boards ought to consider index linking their valuations of properties and pumping stations every 3-5 years rather than annually, to mitigate annual premium increases and balancing having suitable cover without being over-insured.

It should also be noted that personal accident and sickness cover only covers employees or members up to 80 years of age. Boards may need to consider the implications of this.

With regards to insurances, Cllr Boden referred to the final paragraph concerning personal

accident and sickness cover not being available for employees or members over 80 years of age and therefore the importance of having a policy in place to ensure the Board do not put any person over the ages of 80 in such a position that would invalidate any personal accident insurance cover.

Cllr Marks referred to recent meeting of another drainage Board at which it was reported that a member affected by this had taken out private insurance cover. Cllr Booth considered it was important to get a clear understanding on this for the Board to then develop a clear policy.

viii) Delegation of signatory on consents

The Board was asked to note that under the Board's scheme of delegation, the Chief Executive has delegated the authority to sign consent on behalf of the Board to the Chief Engineer. As well as the Chief Engineer being better placed to technically assure individual consents, this will enable them to effectively take ownership over the whole planning and consenting service. This also creates a mechanism for escalation in case of any issues or complaints.

ix) Service Delivery Frameworks

The Board were asked to resolve that the Clerk, on their behalf, be authorised to enter into user and/or access agreements for public sector delivery frameworks (For example, Environment Agency Delivery Frameworks and SCAPE). This will open up access to the fees, terms and conditions of these Frameworks so our Consulting Engineers can compare and choose the most suitable procurement route for delivery of the Boards future needs. This does not tie the Board to using any Framework they then have a user/access agreement with, and Frameworks are not the only procurement route for delivery that will be considered. Having this resolution from all the Boards we administer is key if we are to package work across Boards to exploit economies of scale and become more efficient and effective in the delivery of services.

RESOLVED

- i) WRE – That the payment for 2023 is approved
- ii) Insurance – That no person over the age of 80 be authorised to actively take part in any operations of the Board and for a policy to be further developed upon receipt of further clarification is received concerning this matter.
- iii) Delegation of signatory on Consents – that the Board noted the delegation.
- iv) Service Delivery frameworks – that the Board approved that the Clerk be authorised to enter any user/ access agreements.

B.2090 Delivery of Annual Maintenance Contract

Mr Harrison reported that there had been no significant issues concerning the maintenance works, progress had been hampered by a wet start but since this it had been possible to get on and that currently he was up to date with the programme. He referred to the photographs in the report which gave a clear indication of how quickly water levels can rise in a short period.

Mr N Buttress referred to works that were carried out by the contractor at 5.00am on Saturday morning as it was easier to get works completed at times when road traffic was light. He referred to the benefit of having a local contractor who was able to react quickly to particular requirements, viz;

Annual Maintenance Report 2023

Work over the Autumn period went relatively smoothly with no major issues, favourable weather conditions helping greatly, any slubbing areas requested were completed with some spoil having to be stored at the farm because of different issues (rubbish or not a convenient tip site) this spoil is now in the process of being removed.

Regular mowing has been started but the second cut and also any work in the industrial section has been delayed because of high rainfall, we hope to start work on these areas on week starting 22nd May.

Excessive rainfall on Tues 9th May put the industrial drainage system under huge strain as shown in attached picture and several businesses showed concern but fortunately no significant rainfall followed and levels subsided, as a result of this an extra board has been put in the weir at point 33 to deflect more water under those conditions down the first culvert under the bypass, point 29.

Many thanks go to both Neil and Fred for their support.

Nigel Harrison



Viz;

Hundred of Wisbech I.D.B.
Consulting Engineers Report – May 2023

Flood Risk and Water Level Management Schemes

Proposal for Drainage Improvements south of Point 53 at the A47 (Project Ref 346/20) and the Condition of the Existing Culverts under the A47 (Points 29, 50 & 53)

Further to the last Board Meeting Report an application was received from Carnell Support Services, a drainage contractor, on behalf of Highways England to undertake the “temporary damming of the watercourse at each end of the culvert, silt and sediment will be cleared with a suction pump and a cctv survey inspection” for the existing culverts at Points 29, 50 and 53.

The application was received in mid-February with a programmed commencement date of less than three weeks which, given the potential for adverse weather including heavy rainfall, was considered an inappropriate time of year for the works to be undertaken. In addition, the application made no allowance for water level management during the works and the potential need to provide the alternative routing of flows to prevent flooding occurring to the upstream system.

With the approval of the Board's Chair work commenced as programmed during very poor conditions. The culverts at Points 29 and 53 were cleaned and desilted but, unfortunately work on the culvert at Point 50 was abandoned due to poor weather conditions. It is understood that the temporary road signs could not be kept clean because of the intense snow fall; because of this it is not known how beneficial the works undertaken will be. The outstanding work will be completed later in the year.

At a meeting of the Cambridgeshire & Peterborough Flood and Water (CPFloW) Partnership held in mid-March the Commissioners' Planning Engineer challenged the National Highways representative who confirmed the position and provided an update on the culverts beneath the A47 advising that National Highways had no concerns about the structural integrity of the culverts but will organise a meeting with the Board once the works are finalised to discuss future plans.

Attenuation Area near Point 29 (Project Ref 346/23)

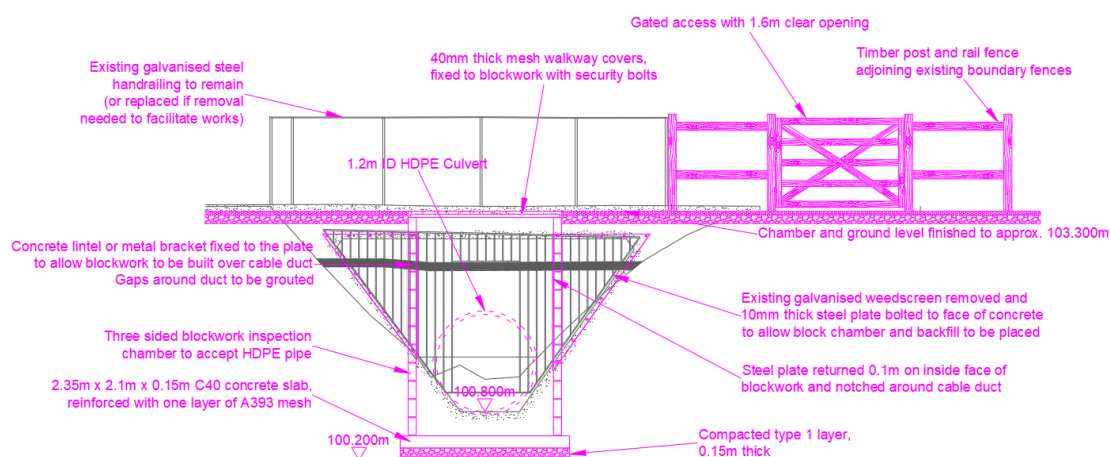
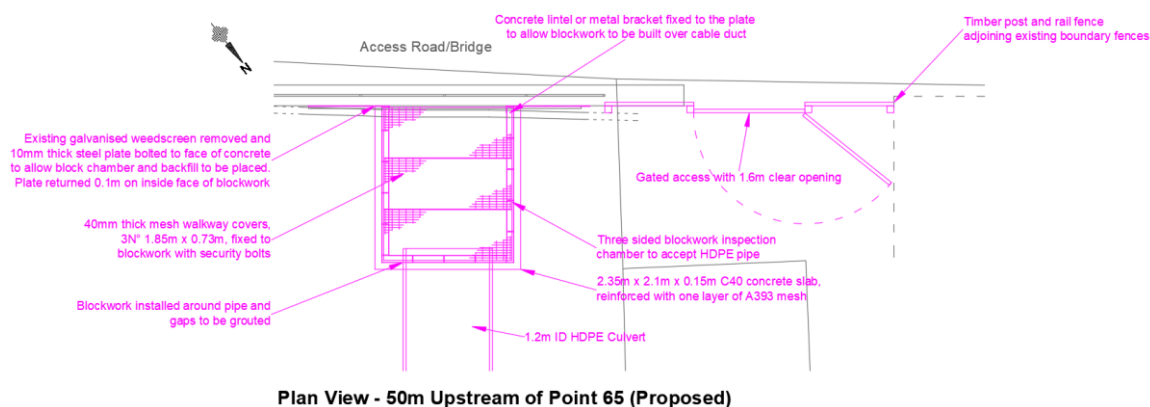
No subsequent correspondence has been received from H L Hutchinson Ltd or its agents.

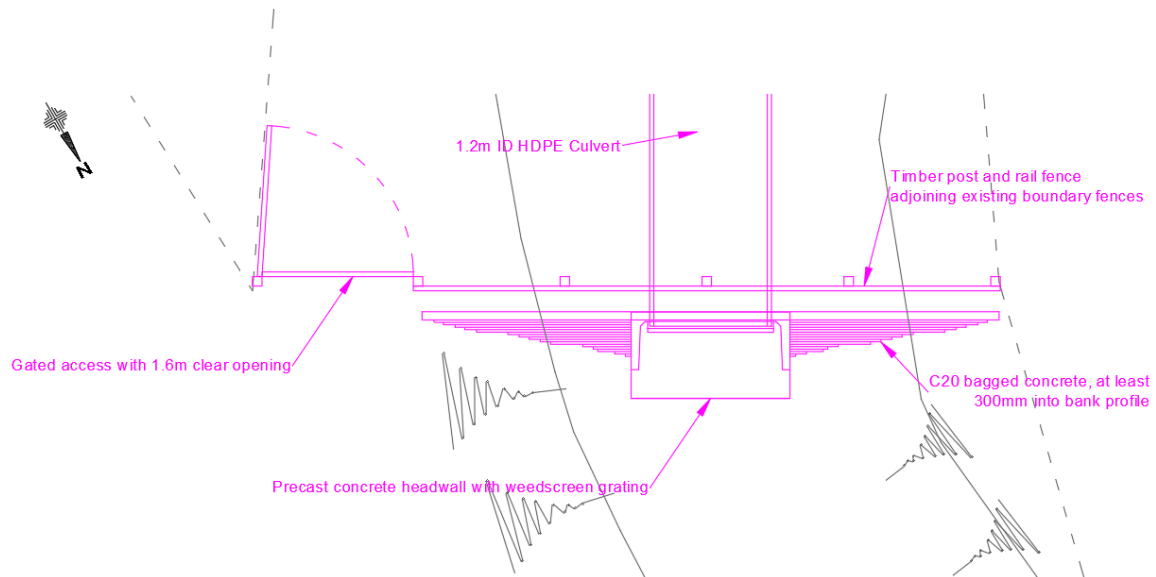
Confirmation of the status of the land transfer is awaited and once this is confirmed invitations to tender for the preparation of a hydraulic model of the sub-catchment to determine the parameters for the outfall structure can be sought.

Culverting Works near Point 66 (Project Ref 346/24)

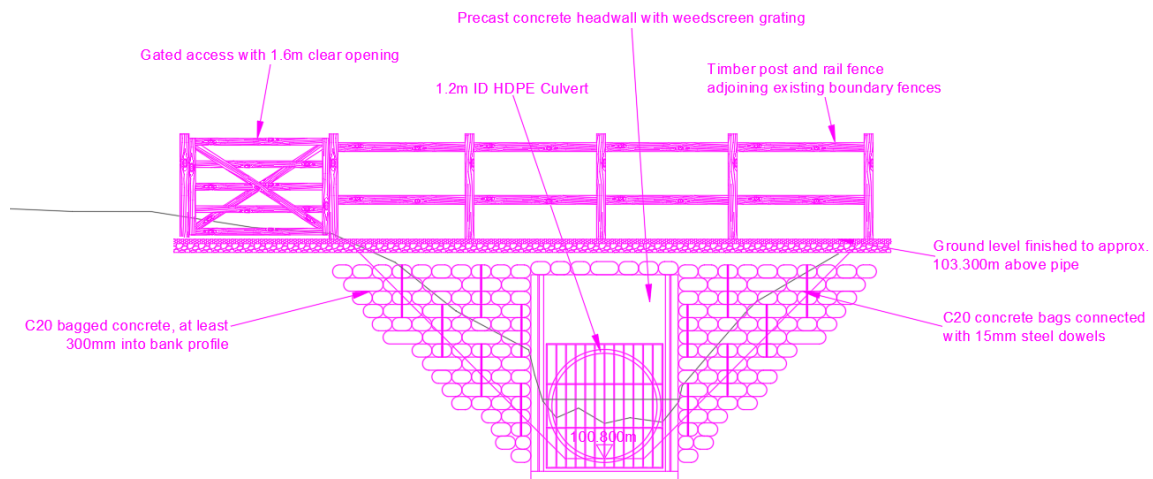
Following inspection by the Conservation Officer, there were concerns that culverting the watercourse was not the best course of action for biodiversity and that maintaining the open watercourse by other means should be explored. Further details of this were sought which delayed finishing the production of the tender documents. After further discussion with the Board regarding the advice received from the Conservation Officer, the Board decided to progress the culverting scheme as planned. The design drawing has been amended to include for a precast structure at the upstream end (as this will be the most efficient method with less sandbagging and will enable the best way of affixing a weedscreen) and a stone/gravel surface along the culvert alignment instead of a grassed top, to aid maintenance. At the time of writing, the tender documents are being finalised to go out prior to the meeting.

Extracts from Drawing No 346/205C





Plan View - 132m Upstream of Point 65 (Proposed)



Cross Section 2 - 132m Upstream of Point 65 (Proposed)

Flood Alleviation Investigation (Project Ref 346/25): Hundred of Wisbech and Waldersey Internal Drainage Board Catchment Study and Outline Business Case

This scheme has been included in the EA's programme refresh for May 2023. An invitation to tender (ITT) has been drafted for the preparation of a Catchment Study. An ITT letter has been prepared and will be issued imminently. It is recommended that the Tender returns be assessed by the Board's Works Committee and Consulting Engineer and on agreement of award the application for approval of the study (FCERM7) can be submitted to the EA.

It is considered that upon the return of the quotations a meeting should be held with the Board's Works Committee together with representatives from Waldersey IDB to discuss the next steps, funding opportunities, the submission of an application to the EA etc.

Planning Applications

In addition to matters concerning previous applications, the following new development related matters have been received and, where appropriate, dealt with during the reporting period.

MLC Ref.	Council Ref	Applicant	Type of development	Location
1670	F/YR22/1093/F	Elm Parish Council	Residence (Conversion)	Fridaybridge Road, Elm
1671	F/YR22/1124/PIP	Mrs Bullard	Residential (Up to 4 plots)	Needham Bank, Friday Bridge
1672	F/YR22/1123/PIP	Mrs Bullard	Residential (Up to 9 plots)	Needham Bank, Friday Bridge
1673	F/YR22/3130/COND	Trapoc Ltd	Storage and distribution (B8) (Change of Use)	Cromwell Road, Wisbech
1674	F/YR22/1170/F	Miss C Wing	Residence	Wales Bank, Elm
1675	F/YR22/1219/F	Mr & Mrs T Smithee	Residence (Extension)	Main Road, Elm
1676	F/YR22/1202/F	Westview Investments Peterborough Ltd	Industrial (Extension 3 units)	Sandall Road, Wisbech*
1677	F/YR22/1239/O	Mr D Hyde	Residence	Colletts Bridge Lane, Elm
1678	F/YR22/1235/F	Gemma Pearl	Residence (Extension)	Main Road, Elm
1679	F/YR22/1237/F	Ms Phoebe Porter	Residence	Fridaybridge Road, Elm
1680	F/YR22/1260/F	Lamb Weston/Meijer	Industrial (Processing Plant Storage with wastewater treatment buffer tanks)	Weasenham Lane, Wisbech*
1681	F/YR22/1351/F	Mr & Mrs Santoro	Residence (Extension)	The Stitch, Friday Bridge
1682	F/YR22/1367/F	Mr Holloway	Residence (Extension)	Back Road, Friday Bridge
1683	F/YR22/1398/PNC04	Mr & Mrs M Day	Change of Use (Agricultural to residence)	Redmoor Lane, Wisbech
1684	F/YR22/1383/F	Mr & Mrs M Gower	Residence	March Road, Friday Bridge
1685	F/YR23/0044/F	UA Asset Management 2 Ltd	Storage and/or Self Storage (2 units)	Cromwell Road, Wisbech*
1686	F/YR23/0061/F	Mrs T Ashman	Residence	Elm Low Road, Wisbech
1688	F/YR23/0058/F	Mr & Mrs G Proctor	Residence	Halfpenny Lane, Elm
1689	F/YR23/0106/O	Elm United Charities	Residential (Up to 6 plots)	Well End, Friday Bridge
1690	F/YR23/0102/F	D & S Gangel	Residence (Extension)	Elm Road, Wisbech
1691	Enquiry	Fenmarc Produce Ltd	Industrial	Gosmoor Lane, Elm
1692	F/YR23/0151/F	Mr & Mrs Brown-Ahern	Residence (Extension & workshops)	Back Road, Friday Bridge
1693	F/YR23/0142/F	Mr T Forster	Residence (Conversion)	South Brink, Wisbech
1694	Byelaw Consent Application	Cousines of Emneth	Access Culverts	New Bridge Lane, Wisbech

Planning applications ending 'PIP' and 'IP' relate to Permission in Principle

Planning applications ending 'COND' or 'DISC' relate to the discharge of relevant planning conditions

Planning applications ending 'PNC0' relate to prior notification change of use issues

Developments that are known to propose direct discharge are indicated with an asterisk. The remainder propose, where applicable and where known, disposal to soakaways, infiltration devices

and/or other Sustainable Drainage Systems (SuDS). The applicants have been notified of the Board's requirements.

Mr Gangel chose to use the Infiltration Device Self-Certification Service for surface water disposal from an extension to his residence in Elm Road, Wisbech (MLC Ref No 1689) and, in doing so, agreed that if the device was to fail in the future, the land owner would be liable for any remedial works to rectify the situation.

Grantham to Bexwell Pipeline – Anglian Water Services Ltd [AWSL] (MLC Ref Nos 1579 & 1637)

Anglian Water Services Ltd have proposed to install a new potable water supply pipeline from Grantham to Bexwell that crosses part of the Board's area. The route of the pipeline has been published and landowners contacted. The proposals have been sent to the Middle Level Commissioners for consent and are currently being assessed

Planning Updates & Consultations

Please note that this document, which was prepared for the previous reporting period, is no longer available on the website; an update is currently being prepared and will hopefully be available shortly.

All responses to consultation documents were made on behalf of both the Middle Level Commissioners and its associated Boards.

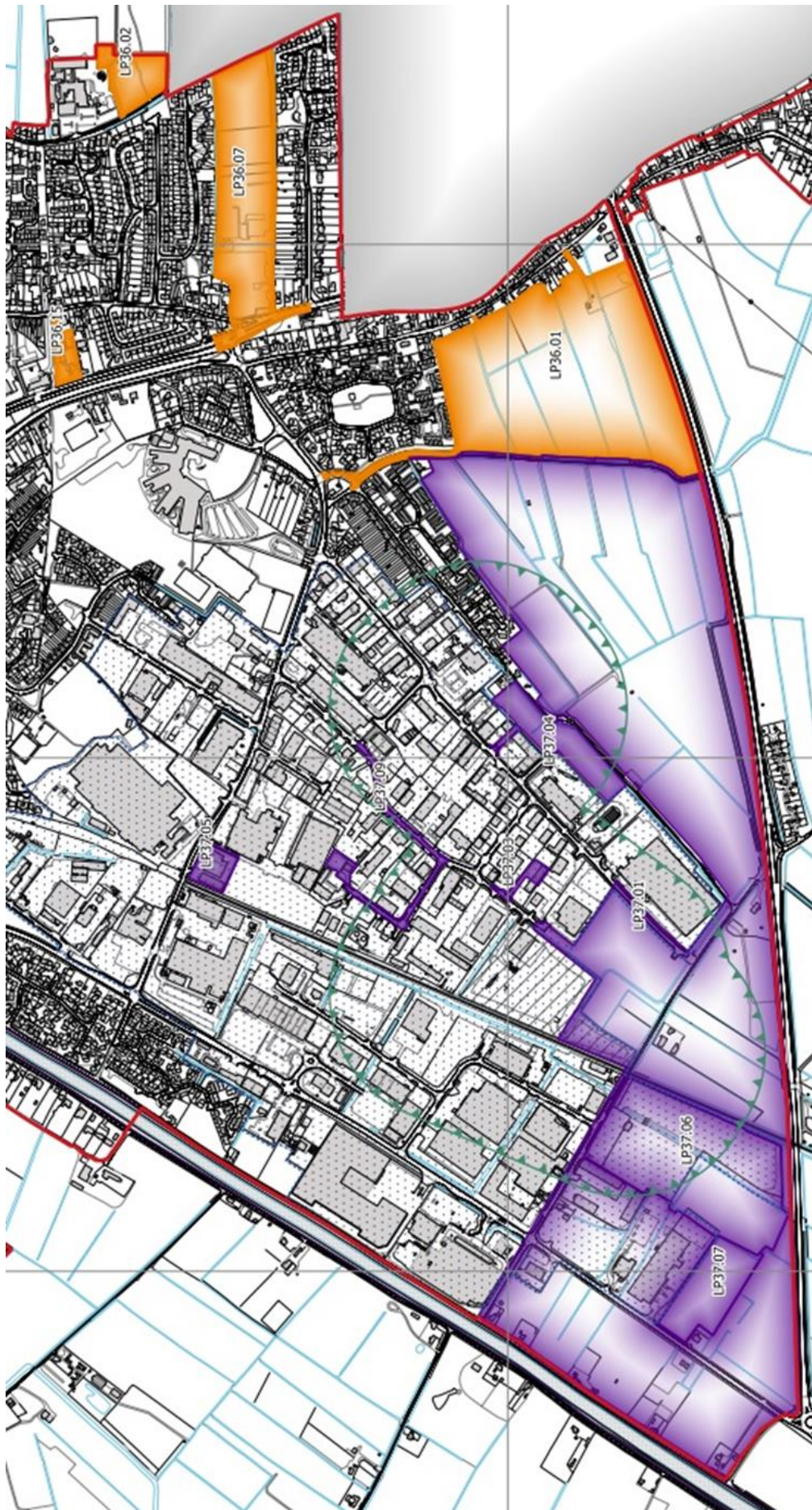
Emerging Fenland Local Plan

The draft Local Plan which sets out the emerging policies and proposals for growth and regeneration, and the "proposed sites" to deliver this growth, was the subject of a Public Participation Consultation during September and October.

Proposed sites within the Board's catchment

Wisbech

The "proposed sites", are shown on the following extract from the Draft Policies Map (August 2022) Wisbech (Inset 28).



Extract from the Draft Policies Map (August 2022) Wisbech (Inset 28) showing the proposed sites in the Board's catchment

The “proposed sites” are:

- A. Policy Reference LP36.01 (Strategic Housing and Economic Land Availability Assessment [SHELAA] Site reference 40371) – Land off Halfpenny Lane and land between New Drove and the A47, East of Halfpenny Lane, West of Elm Low Road – 316 dwellings

This is the Seagate Homes site which has been the subject of some discussion with the Board concerning the access to the site only.

- B. Policy Reference LP36.07 (SHELAA Site reference 40056) – The College of West Anglia Elm High Road – 137 dwellings

This allocation includes part of the former College of West Anglia site that is currently being re-developed. With the exception of works to the access roads the site is outside of the Board’s catchment.

- C. Policy Reference LP37.01 (SHELAA Site reference 40002) – South Wisbech Site Allocation – 60 hectares

The supporting text advises that the site provides an extensive area suitable for employment development. There is some existing employment development at the east of the site. It is estimated that approximately 60 hectares of land are available, which are expected to be developed incrementally over the course of the plan period and advises that development proposals:

- Provide a mix of employment uses, including uses within classes B and E(g);
- Could accommodate live/work units on the land to the west of Halfpenny Lane;
- Should be designed in a coherent and co-ordinated manner which does not prejudice development of the wider site;
- Support the delivery of improvements to the transport network;
- Undertake an assessment of Flood Risk, which reflects the recommendations of the SFRA Level 2 Assessment;
- Provide appropriate mitigation of contaminated land;
- Demonstrate that the proposal is compatible with Health and Safety Executive advice, due to the site’s location within a HSE Consultation Zone;
- Minimise the loss of high-quality habitats and adverse impacts on protected species, providing mitigation and biodiversity net gain in accordance with Policy LP23;

and

- Provide appropriate landscaping and planting to reduce visual impacts on the landscape, particularly at the southern boundary with the A47.

D. Policy Reference LP37.03 (SHELAA Site reference 40398) – Plot 4 land south west of 47 Algores Way – 0.23 hectares

This allocation includes part of the former College of West Anglia site that is currently being re-developed. With the exception of works to the Ramnoth Road/Churchill Road/Elm High Road junction the site is outside of the Board's catchment.

E. Policy Reference LP37.03 (SHELAA Site reference 40398) – Plot 4 land south west of 47 Algores Way – 0.23 hectares

F. Policy Reference LP37.04 (SHELAA Site reference 40402) – Land south of Foster Business Park, 79, Boleness Road – 1.74 hectares

This site has been the subject of previous discussions with the Board and currently has planning permission for 29 business units – FDC Ref Nos F/YR05/1453, F/YR17/0493/F & F/YR21/3118/COND (MLC Ref Nos 803, 1429 & 1622).

G. Policy Reference LP37.05 (SHELAA Site reference 40415) – H L Hutchinson Ltd, Weasenham Lane – 0.56 hectares

This site has been the subject of previous discussions with the Board but it is understood that this allocation relates to the formation of new office accommodation within an existing building and, therefore, is likely to have minimal impact on the Board's system – FDC Ref No F/YR13/0601/F.

H. Policy Reference LP37.06 (SHELAA Site reference 40534) – Land south east of Burrall Plas Tec Limited Cromwell Road – 7.48 hectares

This proposed site is the Co-Part UK Ltd site, which is actually to the south east of the Coveris UK site, and is the subject of previous and ongoing discussions with the Board, most recently FDC Ref Nos F/YR20/0899/F – Trapoc Ltd & F/YR22/3130/COND (MLC Ref Nos 375, 485, 498, 956, 957, 1196, 1248, 1546, 1558, 1573 & 1673).

I. Policy Reference LP37.07 (SHELAA Site reference 40536) – Land north east of 25 Cromwell Road – 1.99 hectares

This allocation relates to the "Hutchinsons site" that has been the subject of previous and ongoing discussions with the Board, most recently FDC Ref Nos F/YR20/0420/F & F/YR20/1271/VOC (MLC Ref Nos 1239, 1264, 1477 & 1556 + 346/23).

J. Policy Reference LP37.09 (SHELAA Site reference 40538) – 11 Europa Way – 0.77 hectares

This site currently has planning permission for 3 industrial units (B2 - workshops and offices) – FDC Ref Nos F/YR03/0580 & F/YR20/0105/FDL (MLC Ref Nos 612 & 1543).

Elm

The “proposed sites”, as shown on the following extract from the Draft Policies Map (August 2022)

Elm (Inset 10), are:

A. Policy Reference LP14 (Strategic Housing and Economic Land Availability Assessment [SHELAA] Site reference 40520) – Land north west of Nemphlar, Begdale Road – 6 plots

This land has planning permission for a six pitched travellers’ site involving the siting of six mobile homes, eight touring caravans and six utility buildings with associated works.

B. Policy Reference LP53.01 (SHELAA Site reference 40322/40306) – Land north of March Road – 215 dwellings

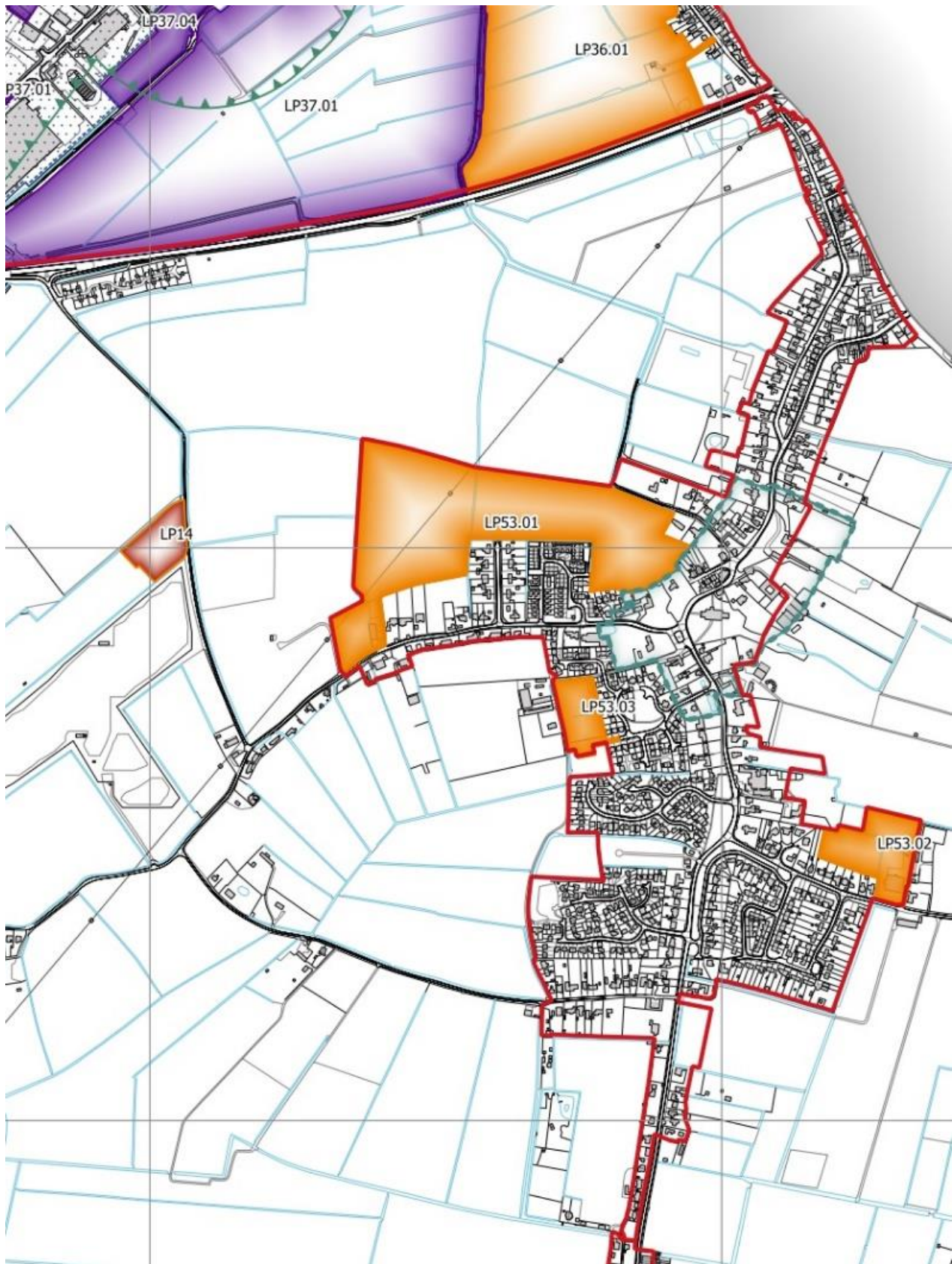
This site is adjacent to the Board’s District Drain upstream of Points 72-73 and at Point 76 (Halfpenny Field).

C. Policy Reference LP53.02 (SHELAA Site reference 40053) – 33 and land north of 17-31 Gosmoor Lane – 50 dwellings

This site has previously been and is currently the subject of discussions with the Board and involves the re-development of the former agricultural site and buildings to the east of the primary school. Planning permission has recently been granted for 63 dwellings - FDC Ref Nos F/YR15/0952/O, F/YR16/0543/F, F/YR16/0545/O and F/YR22/0226/F (MLC Ref Nos 1333, 1369, 1370, 1600 & 1636).

D. Policy Reference LP53.03 (SHELAA Site reference 40083) – Land west of Cedar Way accessed from Grove Gardens – 5 dwellings

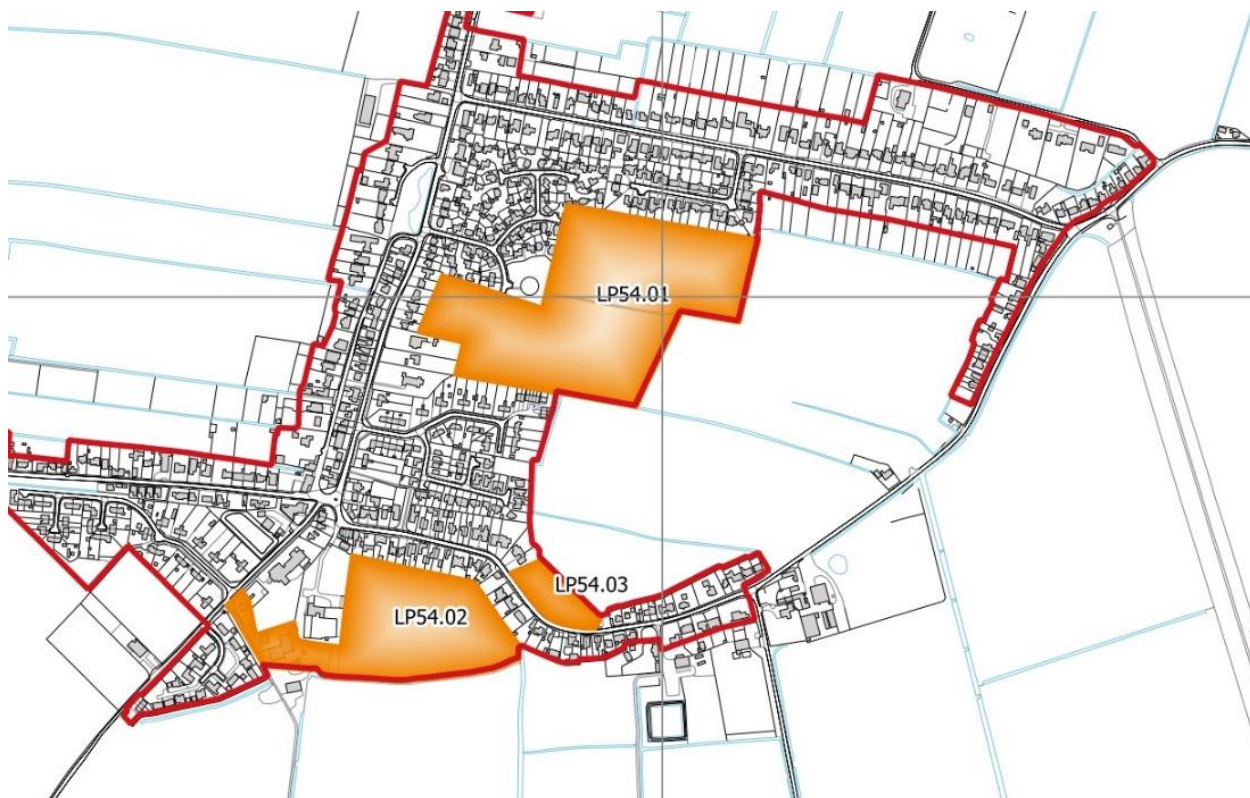
It is presumed that this relates to an area of land to the south of the balancing pond that serves Grove Gardens.



Extract from the Draft Policies Map (August 2022) Elm (Inset 10)
showing the proposed sites in the Board's catchment

Friday Bridge

The “proposed sites”, as shown on the extract below from the Draft Policies Map (August 2022) Friday Bridge (Inset 11) are:



Extract from the Draft Policies Map (August 2022) Friday Bridge (Inset 11) showing the proposed sites in the Board's catchment

- A. Policy Reference LP54.01 (Strategic Housing and Economic Land Availability Assessment [SHELAA] Site reference 40319) – Land east of Flint Way – 137 dwellings

The supporting text advises that the development proposals should provide various items including “A site layout which maximises the benefits of the substantial field drains on the eastern and southern boundaries, including through building frontages, outlook and access”. The southern part of the Board's “The Stitch” District Drain between Points 99-100-101 forms the southern and eastern boundaries of the site.

- B. Policy Reference LP54.03 (SHELAA Site reference 40127) – Well End – 6 dwellings

A planning application has recently been submitted to the Fenland District Council, FDC Ref No F/YR23/0106/O (MLC Ref No 1689). A decision is currently pending.

Response to the Consultation

A response was submitted to FDC on behalf of both the MLC and the associated Boards with catchments within the Council's area and included comments on:

The Settlement Hierarchy and the Countryside – Frontage Infill Development

Growth Strategy – Neighbourhood Areas;

Health and Well-being; Renewable Energy – Renewable and Low Carbon Energy Infrastructure

Design and Amenity – Policy LP 7: Design – Nature, Public Spaces, Homes and Buildings +
Policy LP 11: Community Safety

Housing – Policy LP 12: Meeting Housing Needs - Homes for Permanent Caravan Dwellers/Park Homes and Boat Dwellers

Town Centres – Policy LP 17: Culture, Leisure, Tourism and Community Facilities - Community Facilities

Transport and Infrastructure – Strategic Infrastructure, Transport Infrastructure, Community Infrastructure, Wisbech Rail, Wisbech Access Strategy, Whittlesey Relief Road, Local Projects, Public Rights of Way (PRoW)

Natural Environment – Policy LP 24: Natural Environment_- Designated Sites, Local Sites, Habitats and Species of Principal Importance, Biodiversity and Geodiversity in development, Mitigation of Potential Adverse Impacts of Development

Policy LP 25: Biodiversity Net Gain + Policy LP 26: Carbon Sinks and Carbon Sequestration - Trees & Hedgerows + Table 8: Landscape Character Areas + Policy LP 29: Green Infrastructure

Flood and Water Management - Policy LP 32: Flood and Water Management

Specific comments included:

Disappointment was expressed that most of the contents of Part (B) Flood Risk and Drainage of Policy LP14 – Responding to Climate Change and Managing the Risk of Flooding in Fenland within the current Local Plan have not been included in this policy contained within the draft Local Plan 2021-2040. As a result, it is considered that the new policy is much weaker which is disappointing given the special water level and flood risk management requirements within the Fens.

Concerns were raised about the piecemeal development encountered within the Council's area, for example, along Upwell Road in March or the Bridge Lane area in Wimblington, which is resulting in many small and isolated attenuation systems which will be difficult to maintain and will be a future liability for the parties concerned, the failure of which could potentially increase flood risk. The Council was advised that the Middle Level Commissioners and associated Boards would prefer more holistic solutions to be utilised such as the pond excavated by Hutchinson's in conjunction with the Hundred of Wisbech IDB which will serve several developments in the area close to the A47/Cromwell Road junction.

Policies for Sites and Settlements

When responding to similar documents it has been noted that having prepared detailed responses to specific site allocations, which has taken a significant amount of officer time and expense, the responses made are ignored.

Therefore, as a result, with a few exceptions detailed responses on individual sites were not prepared but a list of minimum requirements that need to be considered was provided when determining the suitability of a proposed site.

Specific responses

Specific responses were made on the following sites:

Policy LP 6: Renewable and Low Carbon Energy Infrastructure – Site Allocations LP06.01
SHELAA Site reference 40468 - 98.79 ha at Coldham Wind Farm, Elm + LP06.02
SHELAA Site reference 40469 174.29 ha at land adjacent to Graysmoor Drove,
Elm.

Policy LP36: Residential site allocations for Wisbech (Page 118) (Map 28 Wisbech (Inset))

Policy LP46: Residential site allocations in Chatteris (Page 137) (Map 02 Chatteris (Inset))

Next Steps

All comments received during the consultation period are being reviewed with any changes arising being made to the draft Local Plan.

A Proposed Submission version is due to be published in summer 2023 for public consultation. This version of the plan will then be submitted together with any responses to the Secretary of State who will appoint an independent Planning Inspector to carry out a public examination into the document.

It is presumed that, in a similar manner to previous developments, the Board will wish to continue to raise concerns about the adverse impacts of growth and development within and affecting its catchment.

High Rainfall Event and Flooding Incident – December 2020

When attending meetings of the Peterborough and Cambridgeshire Flood and Water (FloW) Partnership, the Middle Level Commissioners' Planning Engineer has raised concerns about the issues experienced within Cambridgeshire during or following high rainfall and/or exceptional circumstance type events and has enquired of other partners whether given the time that has elapsed any progress is being made to resolve some of the issues. To date the response has been limited.

In view of the above it is considered appropriate to advise the appropriate RMA, where relevant, on areas which experience problems, particularly within the urban environment, and requires protection, intervention and/or investment.

Initially, three areas of designation are proposed:

- A. Business as usual - Areas where there are no known problems with the local water level and flood risk management systems that cannot be solved through the Boards “day-to-day activities”.
- B. Areas of concern - An area served by a water level and flood risk management system that can approach capacity during rainfall events which has been the subject of or is at an increased risk of flooding that is unlikely to be solved through the Board’s “day-to-day activities” and may require protection, intervention and/or investment by the relevant RMA(s).
- C. Acute drainage areas – A geographical area with multiple or interlinked sources of flood risk where there is a need for a higher standard of water level and flood risk management than normal to ensure that any new development will not increase flood risk that affects people, properties and local infrastructure and may require protection, intervention and/or investment by the relevant RMA(s).

Neither items B nor C are the same as a “critical drainage area” which has a specific meaning in flood risk terms i.e., “A Critical Drainage Area (CDA) is an area that has critical drainage problems and which has been notified to the local planning authority as such by the Environment Agency in line with the National Planning Policy Framework (NPPF).”

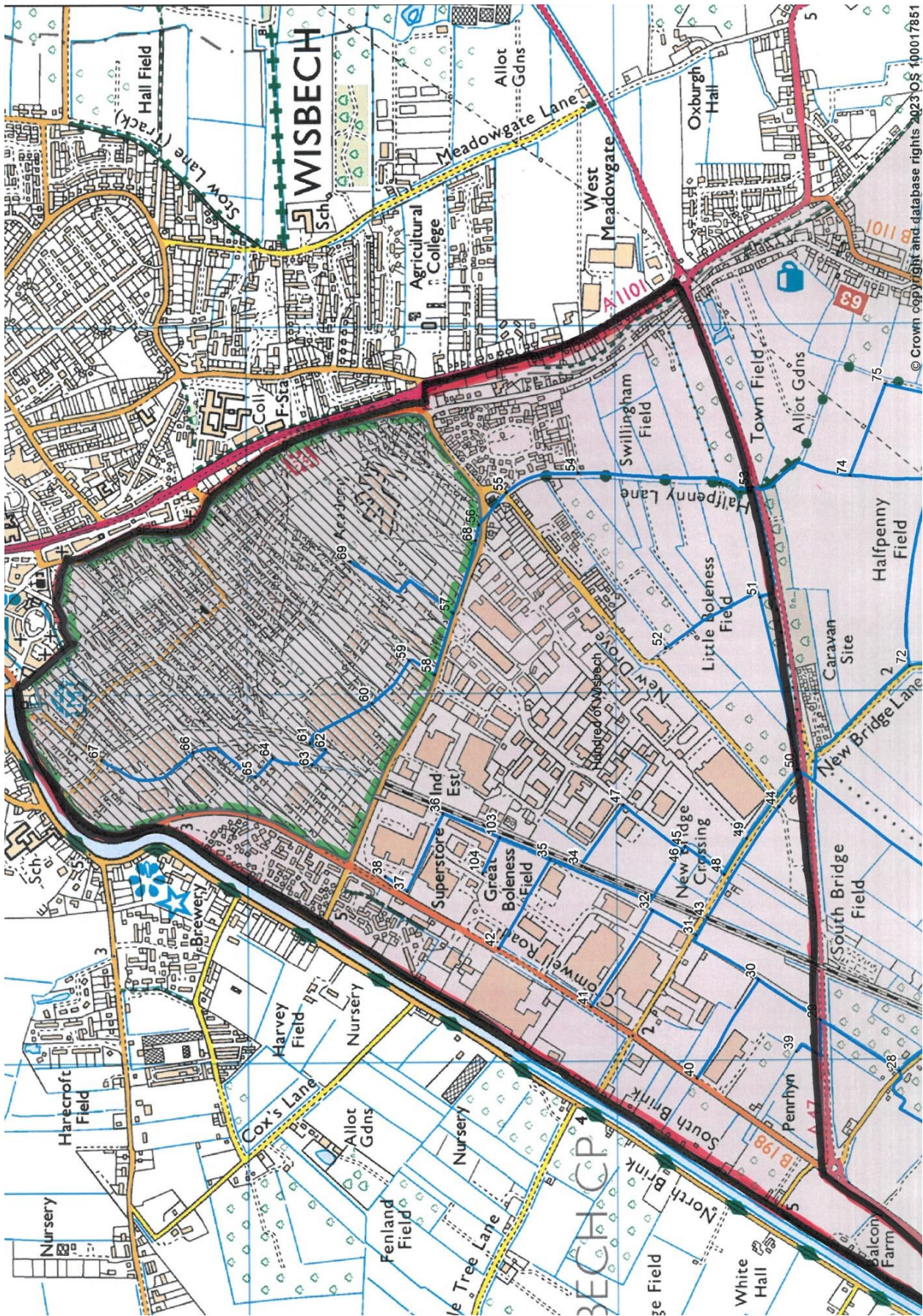
In order to maximise the local knowledge Elm Parish Council was approached to clarify the extents of flooding that occurred during December 2020 but this has not yet been received. However, the County Council in its role as the Lead Local Flood Authority (LLFA), provided the following list.

Elm Low End, Elm, PE14 0DD	Properties at imminent risk of flooding, residents reported highways and garden flooding (due to the bow wave from traffic).	Reported February 2014
Oldfield Lane, Wisbech PE13 2RJ	Flooding in Hundred of Wisbech reported by MLC. MLC checked and responded to the complaint asking for further detail, but no reply was received.	Reported June 2014
Gosmoor Lane, Elm, Wisbech, PE14 0AJ	Resident reported 4in of water flooding their garden and house as well as neighbour’s property.	Reported August 2014
Main Road, Fridaybridge, PE14 0HJ	Councillor reported reoccurring issue, IDB rodded the drain, but it did not help. Confirmed business premise flooding and number of houses in imminent risk of flooding.	Reported November 2014
Birch Grove, Elm, Wisbech, PE14 0AP	Road totally covered in water. Running down neighbour’s driveway. Happening often and getting worse as well as taking longer to clear. Water flooding front gardens and driveways. Believed to be a SW sewer.	Reported December 2014

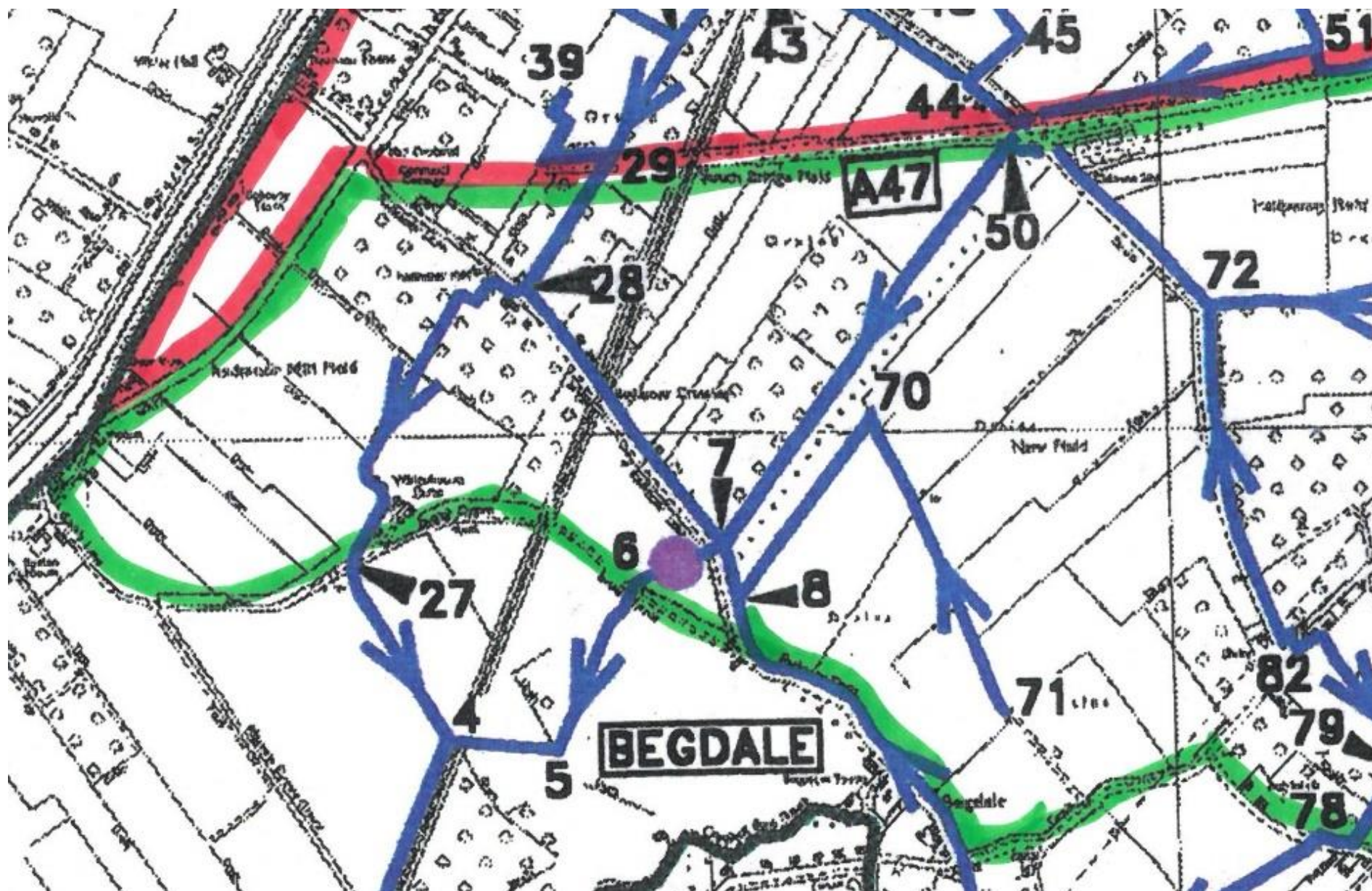
Fridaybridge Road, Elm, Wisbech, PE14 0AT	Flooding from Anglian Water Foul Water system also during an inspection of the area it was found that the site is 0.5m lower than the adjacent footpath and road meaning there is a higher risk of surface water runoff.	Reported April 2015
Birch Grove, Elm, Wisbech, PE14 0AP	Ditch was blocked along Fridaybridge Road causing surface water discharge along the back of the properties on Birch Grove.	Reported July 2017
The Stitch, Friday Bridge, Wisbech, PE14 OHX	Councillor contacted F&T team to report that there are numbers of houses regularly affected by flooding highlighting The Stitch as a problem area.	Reported March 2018
Cromwell Road, Wisbech, PE14 ORG	Report of external flooding to roads and gardens.	Reported December 2020
Fridaybridge Road, Elm, Wisbech PE14 0AT	Resident reported internal property flooding due to drains/gullies blocked and overflowing.	Reported December 2020
Fridaybridge Road, Elm, Wisbech PE14 0AT	Resident reported external flooding to garage/outbuildings and fields due to highways drains/gullies overflowing.	Reported December 2020
South Brink, Wisbech, PE14 ORS	Resident reported an external flooding to roads, gardens, outbuildings (including garages) and fields due to highways drains/gullies overflowing.	Reported April 2021
Main Road, Friday Bridge, Wisbech, PE14 OHJ	Resident was digging a hole for a surface water drain in their garden and the hole flooded, they pumped it away but it comes through the soil again.	Reported June 2022

Note the lack of reports of flooding of both property and the highways in Wisbech or at Wales Bank and the eastern end of Begdale Road, Elm.

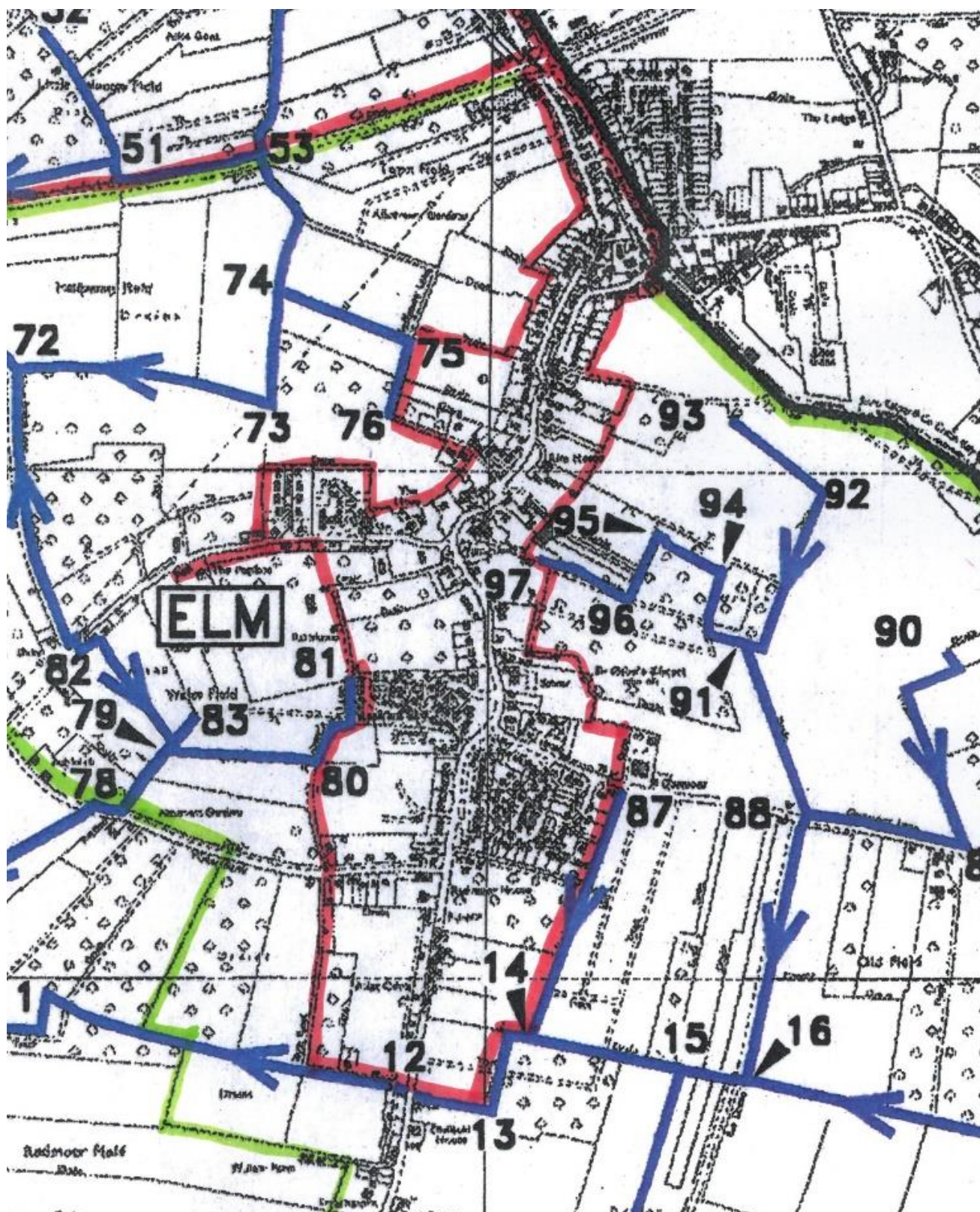
A review of the potential extents of either an “area of concern” and/or “Acute drainage areas” within the Board’s catchment has been undertaken and are shown on the following extracts.



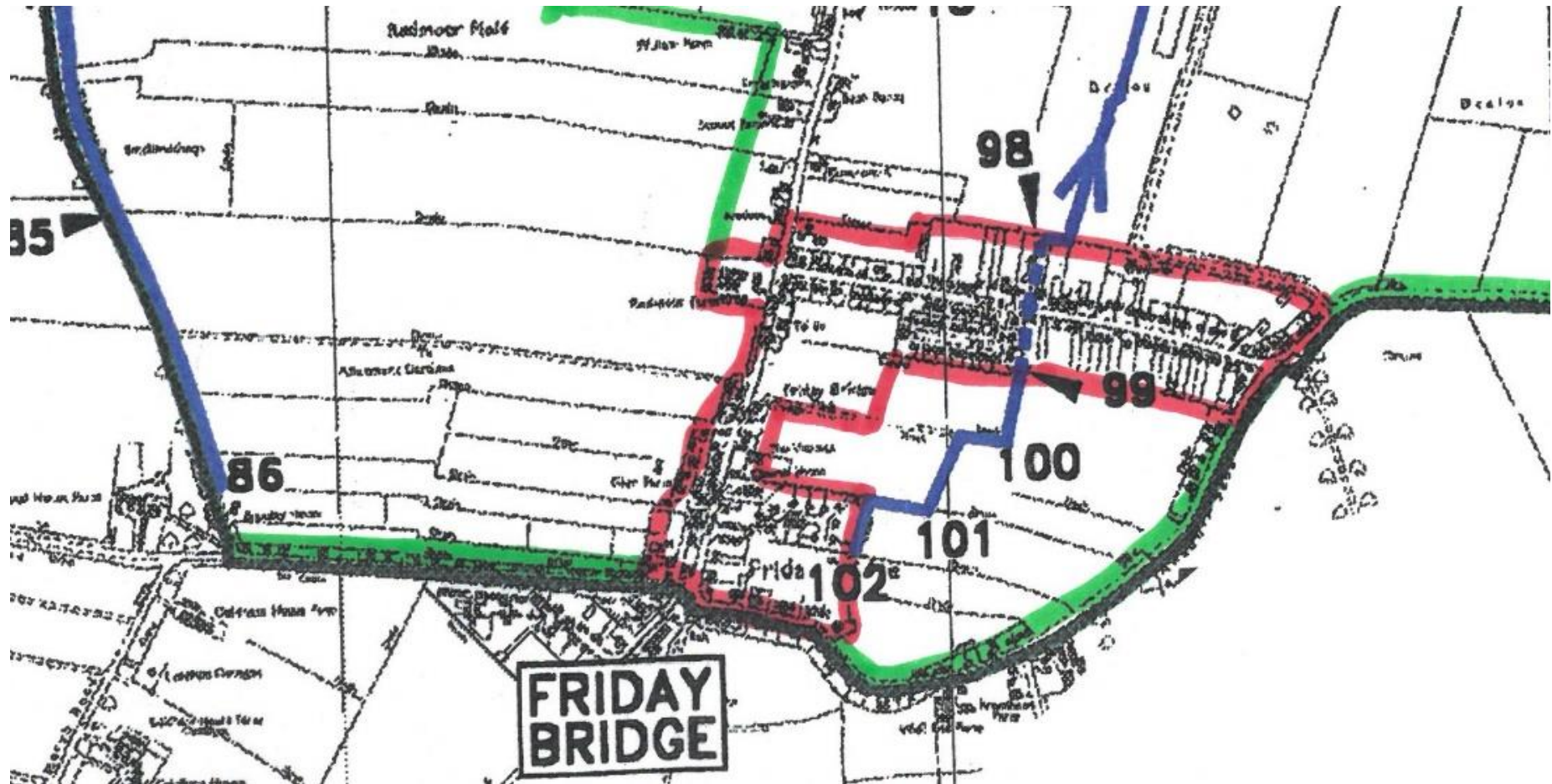
Plan of southern Wisbech showing the current acute drainage area, hatched and edged dashed green, and the revised acute drainage area, edged black



Extract of the Board's District Plan showing the acute drainage areas, edged red, and areas of concern edged green, for the Redmoor/Begdale area



Extract of the Board's District Plan showing the acute drainage areas, edged red, and areas of concern edged green, for, Elm



Extract of the Board's District Plan showing the acute drainage areas, edged red, and areas of concern edged green, for Friday Bridge.

The entire Board's catchment to the east of the B1101 (Friday Bridge/Main Road) is an area of concern due to its reliance on one culvert at Point 12.

The intention is to highlight these areas to the relevant RMA e.g., planning authorities, LLFA, Anglian Water, the Environment Agency etc., as an area which requires more involved management and will assist in protecting the local flood and water management systems including the Board's system.

As a result, apart from in the most exceptional circumstances, an initial request is that all water discharges within this area must be attenuated to current volumes and/or greenfield rates of run off, where practicable.

Following discussions, colleagues within the Middle Level Commissioners' Works Department advise that following the December 2020 event the MLC system took up to ten days and IDB systems up to five days to return to normal.

It is also considered that current surface water design practices do not allow for the weather conditions experienced prior to the December 2020 event or the complex network of water level and flood risk management systems within the Fens. Therefore, consideration is being given to requiring designs to:

- A. Incorporate a higher Standard of Protection (SoP), possibly up to 0.5% AEP (1 in 200 year) event
- B. Include a greater allowance for Climate Change, in excess of 40%, and
- C. Be able to "store" water on site for several days until the peak flows have passed.

Strategic Drainage and Wastewater consultation and issues

A. The Right to Connect

Members will recall that during the passage of the Environment Act through the House of Lords an amendment was sought which aimed to minimise the impact of new housing development on levels of local flood risk and the likelihood of storm discharges of untreated sewerage effluent into the water environment. It aimed to ensure housing developers design systems according to a hierarchy of drainage options that seek to reduce to a minimum the volume of rainwater entering combined sewerage systems removing the current "right to connect" to public sewers.

On the basis that the various RMA involved could have been asked to consider taking the opportunity to write to the government and voice their concerns over the right to connect for new developments the views of the Boards administered by the Middle Level Commissioners were sought.

The amendment was not moved and the House of Lords were not invited to take a decision on it. The Environment Act received Royal Assent in November 2021.

However, the results of the Boards who provided a positive response is as follows:

For the removal of the Right To Connect	54%
Against the removal of the Right To Connect	23%
Neither for or against the Right To Connect	18%
Not an issue for the Board	5%

The discharge from sewers can cause several challenges including increased flood risk, pollution and water quality issues, the solution to which is often at the rate payers' expense. Unsurprisingly the majority, but not all, of the Boards supporting the removal of the right either served or were detrimentally affected by areas of urban development.

Of those Boards against the removal some only served small urban areas with a limited number of sewers. Others served urban areas but only one received significant "benefit".

The Board that neither opposes nor supports the removal served a significant urban area but the remainder served a limited number of, or have no, adopted sewers within their catchments.

Other comments received expressed:

- A. Concerns about the lack of investment and the need for improvement to the existing adopted infrastructure and;
- B. Suggested that the permission to connect should be on an approval basis so that it can be controlled and any impacts managed and;
- C. Required the Clerk to promote and lobby the Board's position.

Some Boards are more rural whilst others feature a larger urban area. Similarly, a larger individual Board may be predominantly rural but include a sub-catchment(s) which is largely, and increasingly, an urban environment which has to accommodate the resultant flows.

Therefore, it is considered that it would be difficult to have a simple yes/no solution within a complex system such as The Fens.

B. Anglian Water Drainage & Wastewater Management Plan (DWMP)

Draft DWMP

A more detailed review of the DWMP will be included in the updated version of the Strategic Planning Consultation Responses document currently being prepared. However, it is considered appropriate to include specific entries for the relevant WRCs of interest in the local area.

1. Draft DWMP Consultation

The draft DWMP document has been the subject of a consultation which provided an opportunity to comment on the document and included the following specific points:

Groundwater infiltration & surface water removal

The problems associated with groundwater infiltration and surface water within the sewer system, particularly within combined systems, are known and are a problem for all RMAs involved. Particularly when the water table is high and/or during the winter months.

The removal of groundwater infiltration and surface water from the sewerage system, to reduce the number of flood events, pollutions and storm overflow spills is considered to be an appropriate option in the correct circumstances and location.

The question that will need to be resolved in these situations is where will the surface water go instead? Most other surface water systems are approaching their finite capacity and will require the installation of significant infrastructure to deal with the flows. Who will pay and be responsible for this? Care will also need to be taken to ensure that flood risk is not being increased elsewhere within the WRCs catchment for another RMA to deal with as a result.

As the approval and consent of other RMAs may also be required, prior detailed consultation with the parties involved MUST be undertaken and agreed BEFORE work commences.

(NB: In respect of this document, infiltration refers to groundwater entering the sewer system which **increases hydraulic loadings and threatens wastewater treatment efficiency.**)

Water level Management Solutions

The use of SuDS, wetlands and other green structures is considered to be an appropriate option in the correct circumstances and location.

The management of SuDS and other water level management systems is an ongoing challenge for many RMAs. Without suitable arrangements being imposed these could simply become potential liabilities for the various rate/bill payers. Therefore, adequate arrangements **MUST** be made to ensure that the long-term ownership funding, management and maintenance for the upkeep of any green infrastructure, whether on or off site, in perpetuity is achieved.

Consideration also needs to be given to any restrictions upon maintenance of the drainage “facility” due to the presence of protected habitats and species.

As the approval and consent of other RMAs may also be required, prior detailed consultation with the parties involved **MUST** be undertaken and agreed **BEFORE** work commences.

Partnership Working

The Commissioners and associated Boards are prepared to work in partnership with the local community, private and public partners to contribute to and deliver schemes for conservation, navigation, water resources, water level & flood risk management where there is a mutual benefit to the partners concerned.

However, to what extent they are prepared to contribute would be the subject of a decision for the respective authority and this may vary dependent upon their views.

2. Programme outputs

L3 water recycling catchment	2021 population	2035 population	2050 population	Passed RBCS	Resilience risk score
WEST WALTON	114071	119746	122948	Yes	2

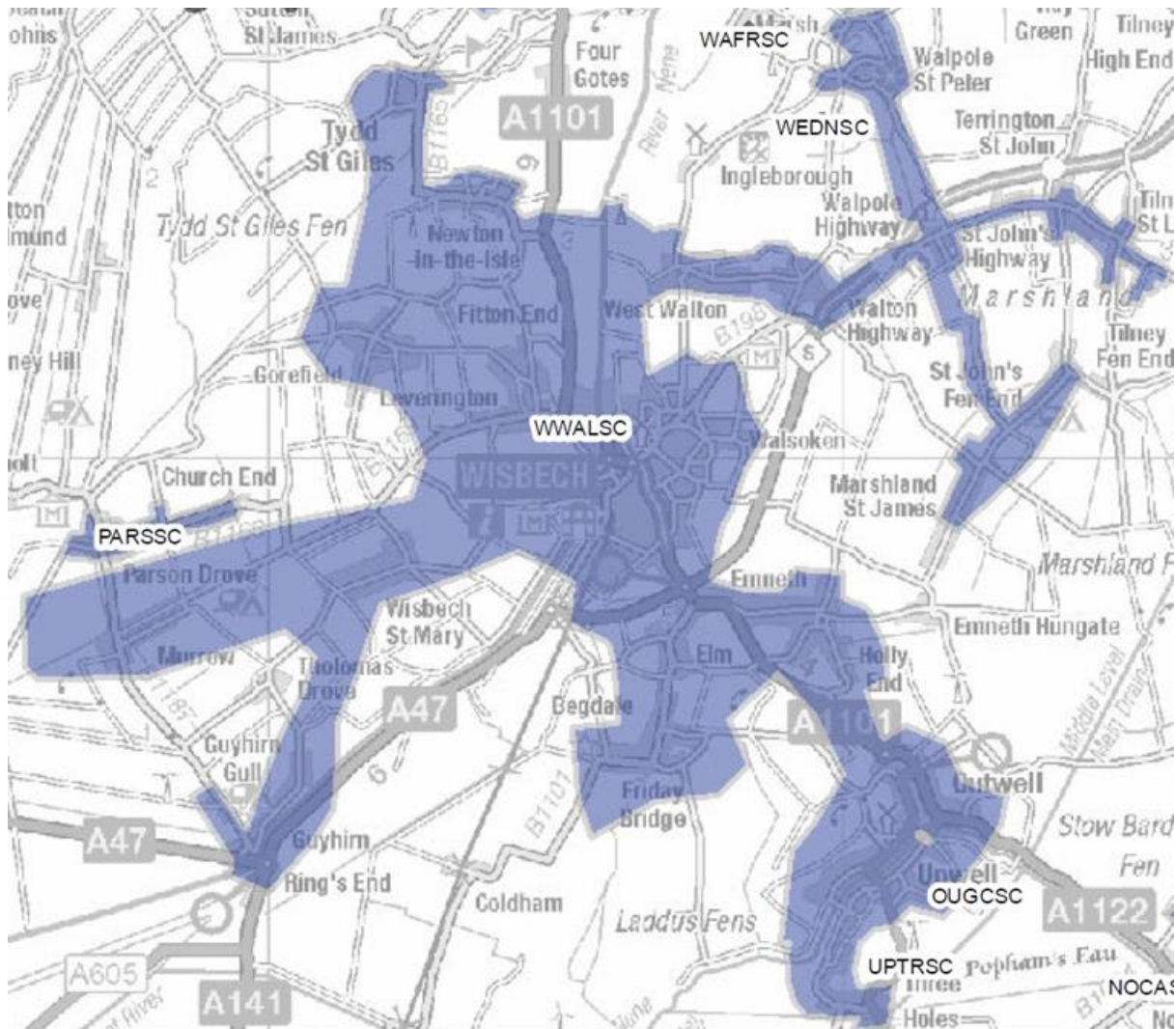
Planning objective themes reviewed	Stakeholder concerns/ comments	Medium term strategy	2050 Strategy	Partnership opportunities identified
Escape from sewers WRC compliance Environment and wellbeing	Flood risk implications.	Wait and see.	25% infiltration reduction.	-

Extracts from Anglian Water's draft Drainage and Wastewater Management Plan showing the results and proposed plans for West Walton WRC

Long term strategy only

Table 8

L3 water recycling catchment	2050 strategy
West Walton	25% infiltration reduction.

West Walton WRC

This WRC serves a large area including Wisbech, Elm, Friday Bridge and other villages including Outwell, Upwell and Three Holes. An increase in population across the whole catchment of 8877 by 2050 was used in the BRAVA/RBCS process. Despite concerns being raised no risk has been identified and a “wait and see” approach has been suggested by Anglian Water in the medium term.

The long-term strategy is to reduce infiltration, presumably by removing surface water connections, lining sewers etc.

WRC Compliance

The quality of the discharge does not appear to be a cause for concern. However, members will be aware of Natural England's concerns about nutrients affecting the aquatic environment.

The final DWMP document is currently being prepared and is due to be published this spring.

3. Storm Overflow Consultation

A consultation exercise on Storm Overflow Discharges was held during February. In view of the concerns discussed above it was considered appropriate to consult all the administered Boards even though many would not be directly affected.

The main means of providing a response was to provide answers to five specific questions and, whilst responses were provided, in view of the nature of the matter; the responses received from the Boards consulted and given that the issue is rising up the political agenda it was considered that a more detailed and focused response was required.

The following are the headlines or a brief resume of the response:

A. Existing sewer systems and problems

1. The Right to Connect – As discussed elsewhere in this Report
2. Other issues – On going pollution problems, the surcharging of or high discharges during or following high rainfall events, the lack of capacity within WRCs.

B. General

It is considered that all the current targets are too vague and will take too long to achieve any meaningful results and that the consultation was not open and transparent as the locations of the points of discharge are not readily identified within the document, therefore making it difficult to provide a meaningful comment.

Advice was given that:

Most of our systems are pumped often remaining stationary for extended periods thus dilution may not occur as expected; water is abstracted for various purposes – see High Priority Sites – Public Health below; the adverse impact on areas of interest including designated environmental sites; and that no “compensation” is provided for having to receive, transfer and dispose of the discharges from the overflows.

C. Storm Flow Technical Overview

High Priority Sites

1. Ecology

a. *Environment targets*

It is considered that these targets should apply to **all** sites not just high priority ones, with solutions implemented much sooner than identified if the Government's target of halting biodiversity decline is to be achieved and the goals of the Water Framework Directive and the 25 year environment plan are to be achieved.

b. *Sensitive Inland Water*

Reference was made to the proximity of trigger points.

2. Public Health

The document refers to Designated Shellfish Water and Designated Bathing Water as trigger points which is understood, but it is not appreciated that vast quantities of water are abstracted from Fenland water level management systems for agricultural use, whether this is washing or irrigating crops for consumption within the food chain.

It was suggested that it would be prudent for the trigger points to be reviewed to include those other items which could affect public health on a wider scale.

Potable Water

Reference was made concerning the use of excess water from both the Commissioners' and surrounding systems to fill the proposed Fens Reservoir and the potential benefits of improving water quality from the discharges into these watercourses.

3. Amenity

Emphasis is given to bathing waters but no reference is made to other wider but perhaps smaller benefits on the Commissioners' largely navigable systems and the disposal of sewage into these watercourses may have an adverse impact on wider issues, for example, tourism, angling etc or if these wider "costs" are considered when assessing the adverse impacts of overflows on the local area.

4. Assessing spill frequency

Event data Monitors

- a. From a closer review it was identified that some of the discharges of interest including Doddington, Nightlayers and Ramsey WRCs are not fitted with Event Data Monitors. Therefore, it is not known how the number of spills can be fully assessed.

Event Duration Monitors will be installed on all of Anglian Water's overflows during Asset Management Plan (AMP) period 7 (2020-2025) and this will, hopefully, reduce the level of uncertainty during AMP 8 (2025-2030) and AMP 9 (2030-2035) by producing "real" data.

- b. Rainfall target: Storm overflows will not be permitted to discharge above an average of 10 rainfall events per year by 2050 but this target should be more defined including restriction on the duration of spills and the volume discharged. This may be difficult to achieve. The Standard of Protection (SoP) provided, the use of "typical" rather than excessive rainfall events and modelling of the various systems to identify potential problem overflows rather than actual data – the number of spills, duration of the spills etc was questioned.

Growth

The growth that has occurred in the last fifty years has contributed to the increased number and length of spills and this will only become more severe as further growth continues unless adequate steps are taken now to resolve these as a matter of urgency.

Climate Change

It would be appropriate for all RMAs to prepare for the worst-case scenario and there is an aspiration to achieve this but this could be expensive, may prove unnecessary and wasteful leading to criticism. It was suggested that the most economic and environmentally acceptable standard should be achieved.

Screening

It would be beneficial to know where these initial overflows are located.

D. Storm Overflow Consultation

Performance Guide

It appears that priority is given to the number of spills rather than the length of time of the discharge, the volume of flow being discharged or the cumulative effects of the overflows due to their close proximity to each other.

Preferred Plan

It would be beneficial if the “headlines” from assessments and guidance on suggested solutions could be provided to identify and instigate any early engagement with the parties concerned, for example, land owners, developers etc.

Customer Support

Reference was made in the document to continual engagement with customers but there appears to be limited engagement with those RMA who have to receive the flows from the storm overflows.

It was suggested that such engagement commences and both the Commissioners and associated Boards look forward to continual engagement and transparency on storm overflows and networks in the future.

E. Consultation Questionnaire

The answers to the questionnaire were generally included in the response, but in reply to the question *How confident are you that this strategy aligns with our Purpose?* A very low confidence comment was provided adding that some of the systems cannot be managed without significant investment and improvement works being required on several networks.

F. Summary

Whilst it is pleasing that the issue of sewage overflows is being progressed this appears to be primarily due to political pressure rather than at the instigation of the water industry.

There are concerns that priority will be given to resolving issues associated with storm overflows rather than those existing problems associated with WRCs and associated systems.

Greater transparency, early engagement and further discussions should be undertaken to any issues related to adoptable sewer systems and storm overflows if the current problems are to be resolved.

The final DWMP document is currently being prepared and is due to be published this spring.

C. Review for implementation of Schedule 3 to The Flood and Water Management Act 2010 (F&WMA)

The Flood and Water Management Act (FWMA) details the provision of comprehensive flood management to protect people, homes, and businesses. It is written to protect water supplies to the consumer and helps safeguard community groups from unaffordable rises in surface water drainage charges. The Act introduces into law the concept of flood risk management as the preferred approach rather than reliance on flood defences (existing or proposed) for protection of sites.

1. Schedule 3

Schedule 3 of the FWMA was introduced to establish a SuDS approving body (SAB) at the county/unitary level for the regulation of new development and compliance with The Act. It was intended that this Schedule would be introduced into law around 2015/2016, following the original Act that achieved royal ascent in 2010 but this did not happen and Schedule 3 did not achieve approval due to concerns that it would restrict housing delivery and growth.

Instead, the government made amendments to the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG) to stipulate those decisions on planning applications relating to major developments (over 10 dwellings, or equivalent non-residential developments) should ensure that SuDS are put in place, unless demonstrated to be inappropriate. The Local Planning Authority (LPA) in consultation with the Lead Local Flood Authority (LLFA) currently need to approve drainage schemes and ensure they are appropriately maintained.

Currently the maintenance of a development typically falls under the responsibility of a Private Maintenance Company (PMC) which is usually paid for using service charge agreements with the owners of the new properties and often selling residential properties as leasehold rather than freehold.

2. Review

In early December industry experts sent an open letter to the Prime Minister which “strongly urged” the implementation of Schedule 3.

Following a review, DEFRA announced in January 2023, the government’s decision to implement Schedule 3 which will provide a framework for the approval and adoption of high quality SuDS and is expected to occur at a yet to be determined date in 2024. As a result, the Government is giving consideration to how this will be implemented subject to final decisions on scope, threshold and process whilst being mindful of the cumulative impact of new regulatory burdens on the development sector and water industry. Defra recently undertook a consultation survey with LPAs and LLFAs but not with IDBs and other relevant parties. However, there are several issues and challenges that require resolution before progressing further.

3. Changes to existing laws

The implementation of Schedule 3 will introduce some small changes to three existing laws.

a) Building Act 1984

Section 59 which gives local authorities the power to request that sustainable drainage systems in an unsatisfactory condition be renewed, repaired or cleansed is to be amended.

Section 84 which stipulates that local authorities withhold the right to request that impermeable surfaces around a building which do not allow for the satisfactory drainage of its surface or subsoil be remedied requires amendment to specify that surfaces need to remove water in a satisfactory manner.

b) New Roads and Street Works Act 1991

Section 63 will include a small change should Schedule 3 be enacted.

c) Water Industry Act 1991

Section 106 to remove the right to connect. Following Schedule 3’s commencement, a person may only exercise this right if their drainage system was approved by an SAB before construction and if a proposal for their

drainage system to communicate with a sewer was included in their application for approval.

The NPPF and the associated PPG will require amending to reflect any changes.

4. Implementation

Whilst there will be some changes to current procedures it is considered that there are several potential benefits including better working practices, better integration with other RMA, the removal of the automatic right to connect, potential revenue streams etc but there are several potential problems that need to be resolved including funding mechanisms; potential increased costs on the rate payer; lack of resources, skills and capabilities; the need for more timely responses possibly taking staff members from other work.

The proposal is the subject of on-going discussions and a meeting with the LLFAs and other partners has been requested to discuss the issues in order to maximise any opportunities and minimise any adverse impacts on both the Middle Level Commissioners and the Boards to whom it provides a planning consultancy service.

These discussions will include, as a minimum:

- a) The suggested change in surface water design practice, as discussed elsewhere in this report.
- b) Ensuring that adequate arrangements are made for long term ownership funding, management and maintenance arrangements for the upkeep of any water level and flood risk management system, whether on or off site, in perpetuity including details of the works to be carried out by the occupier/land owner, adopting authority, the Management Company or other responsible person/authority, together with the costs attached, are included in the "Homeowners Pack" and the Deed of Sale.
- c) The right to connect needs to be on an approval basis to ensure that it can be controlled and any adverse impacts managed.
- d) That any incurred costs on the rate payer are kept to a minimum.

Norfolk Water Management Partnership [Norfolk County Council (LLFA)]

No further correspondence has been received.

Norfolk Water Strategy Programme (NWSP)

The current position is being ascertained.

Pollution Incident in the Boleness Road/AlgoresWay area.

The pollution that appears to be discharging into the Board's system from an unknown source looks to be continuing. It has been noted as slowly spreading across the urban area of the Board's system but can disperse following a period of rain. A bad odour has also been experienced near Point 49, the Lineage Building.

As part of the submission for the silt and sediment removal associated with the culverts under the A47, as discussed earlier in this report, the following extract was received.

It is understood that Carnell Support Services undertook a Waste Acceptance Criteria (WAC) test to analyse the contaminants in the soil/water which was found to be inert and non-hazardous in waste disposal terms.

Culvert 2



Heavily polluted drain and surrounding watercourses. Very strong smell from the pollution present. Water is un-naturally blue in colour and cloudy with a white lining evident at the base of the watercourse. Unclear how long it has been like this but appears that it could've been like this for some time! Unlikely to find protected species due to the level of contaminants. Above photo is of the upstream culvert and adjoining culvert.



In view of this a copy of the extract was included in the Commissioners' response to the Storm Overflow consultation. In response the company's DWMP and Water Recycling Growth Manager responded as follows:

"Giving the colouring it doesn't look like it's AW driven, but would be good to understand if there were tests on it."

In view of the apparent lack of interest being shown it may be considered appropriate to review the position and reiterate more strongly the collective concerns to the responsible parties. If it is considered appropriate a meeting with those parties can be organised to enable the Board's views to be known and further discussion to occur, as required.

General Advice

Assistance has been given, on the Board's behalf, in respect of the following:

- (a) Following a meeting raising concerns about development in the area a grievance was received regarding the previous verbal report concerning an unconsented structure within the open watercourse to the rear of Needham Bank in Friday Bridge. On investigation it was alleged that the previous owners of the property had filled a small section of the watercourse to provide access to a paddock they owned on the opposite side. This blockage has now been removed by the present owner and flows have been restored.
- (b) Further to the last Board Meeting Report, further investigation has been undertaken concerning the alleged unconsented filling of an open watercourse to the rear of the houses in Begdale Road, Elm which may have led to the flooding in the local area. A letter has been sent to the landowner requesting the removal of the blockage and the submission of a Section 23 application that meets the Board's requirements.



Consulting Engineer

18 May 2023

Hundred of Wisbech (346)\Reports\May 2023

Culverting Works near Point 66

With regards to the culverting works near point 66, Mrs N Oldfield reported that tenders would be opened tomorrow and there would then be an assessment of each tender to make a recommendation.

Flood Alleviation Investigations

Mrs N Oldfield referred to the Flood Alleviation Investigations and reported that invitations to tender were being finalised with a view to being sent out within the next 1 to 2 weeks. In response to Mr Hill, she confirmed that the study was being progressed with the Environment Agency and had been included in the Environment Agency's programme refresh for May 2023 and should qualify for Grant-in-Aid funding.

Attenuation Area near Point 29

In response to Mr G Lake, the Chairman confirmed that the attenuation area point 29 was the Hutchinson's development and Mr F Leach considered it to be in the region of one acre. Mr Hill confirmed that the Middle Level solicitor had recently received communications and it was hoped that the transfer could be completed in the near future.

Members gave consideration to the Seagate Home development proposals and those members of Fenland District Council planning committee left the room while this was being discussed. The Chairman reported that there had been a site meeting approx. three years ago at which the developers had raised concerns over access to the site and put forward a proposal to pipe and fill a watercourse for them to use as an access route for the site. At this time the Board had recommended a box culvert to retain capacity within this section.

Cllr Hoy reported that the application has now been received and has been validated and that the developer was proposing to use Halfpenny Lane as access.

Mr F Leach confirmed that he had received the application but considered a meeting was required to discuss the issues and that the site was downstream of all the access issues previously discussed.

Cllr Laws referred to the possibility of an extension if it was not possible for the Board to formulate a response due to its complexities of the proposals, however this could not be guaranteed and Cllr Boden stressed the importance of liaising with Cllr Laws during the response period.

Supplementary report, viz;

Hundred of Wisbech IDB

Consulting Engineers' Supplementary Report - April 2023

Improving Capital Delivery

Introduction

Since being in post I have been getting to grips with a number of things in the Engineering/Technical Services Department. I've made a number of observations: officers are knowledgeable, dedicated and committed to delivering a service to the Commissioners and IDBs; working in partnership with the Environment Agency and local planning authorities/LLFAs is clearly evident; the operations team do an excellent job managing water resources in an extremely complex system; our capital delivery programme is growing as assets come to the end of design life; we have some significant changes and challenges ahead (biodiversity net gain requirements, the climate emergency and Fens Reservoir amongst others) which need careful planning and resourcing if we are to properly represent members and local communities and secure the best outcomes for the catchment.

We have an increasing capital delivery programme, with a number of ongoing projects and many identified for future delivery. I have identified areas where improvements are needed to deliver these projects better and to improve communications between the consulting engineer and the Boards.

Resources

Staff in MLC's Technical Services are currently stretched in terms of capacity and capability. There is a significant lack of suitable people across the engineering and project delivery profession generally, which impacts not only MLC's ability to recruit, but also the availability of consultant and contractor resources.

As well as our services to IDBs, and the Bank Raising Scheme over the next 4-5 years, and delivery of the pumping station refurbishment programme, there is an immediate need to provide resources to support MLC input to developing plans for Anglian Water's Fens Reservoir. This will have a significant and profound impact on water management in the catchment, and MLC officers need to ensure we secure the very best outcomes for our Board members, ratepayers, customers and the environment. We will be working very hard over the next 6 months to achieve this before the project passes its next 'gate'.

Now that MLC receives revenue through navigation licences, we have to ensure that we deliver on the requirements set out in the Navigation Byelaws 2020. This is a work in progress, but again sets additional demands on our internal resources and our ability to be proactive.

MLC were unsuccessful in recruiting a new planning engineer in 2022 and the existing team is under continued pressure to resolve ongoing and new applications, let alone adequately accommodate new demands. We are now looking at alternative resource solutions to support the wider engineering department.

IDB Projects

I am already aware of a number of projects that have been in progress for some time. There is lack of a clear programme of delivery and/project management discipline for these; there are no specific timescales and other agreed tolerances with the IDB as 'client', and this makes it difficult to plan and prioritise resources and workloads.

I am compiling a programme of all the projects being delivered by MLC and determining the resources needed to complete them. I will work with the Boards in question to progress delivery as quickly and efficiently as possible.

For new project requests, I am implementing a simple process with a 'Project Initiation Form' to capture key information and undertake an initial assessment of the project. I will prioritise work requested based on urgency and availability of resources. Unless otherwise instructed by an IDB, our default approach will be to seek to maximise FCRM Grant in Aid funding for eligible projects. I will implement a process of reporting progress regularly to the Boards/key contacts. As part of this process, I'll be asking each Board to agree how they delegate decision making, as projects can't be effectively delivered when governed through annual meetings, and how we manage better, more frequent, communications between the Boards' delegates and officers in Technical Services.

I am looking at the possibility of 'packaging' some works together for delivery by consultants, e.g. Pumping Station Refurbishment Projects rather than delivering each one individually. This has the advantage of securing a team of suitable resources who can focus on the work and deliver it as efficiently as possible (economies of scale). This will be a change of approach for individual IDBs and will need further work to determine how we manage this approach practically when each Board is its own individual entity with maybe a once per annum meeting. I hope to provide you with more detail about this, and the benefits it will give the Boards, in the coming months.

It may take some time to deliver the backlog of projects, which in turn might delay the start of new projects. However, I'm hopeful my approach will eventually lead to a more effective and efficient delivery process.

MLC Bank Raising Scheme

This is currently the largest IDB led project in the national flood investment programme and gives us the opportunity to develop capacity and capability in the organisation and share best practice across all our work. The scheme will be under the spot-light and have a focus from the Environment Agency in terms of grant assurance.

Works are progressing on a number of fronts but were lacking leadership and direction and there was no delivery programme. I have implemented some standard project management tools to control, manage and deliver the project: An 'exception report' was raised to the Project Board/MLC Executive Board outlining the existing situation and mitigation measures being put in place; A project plan and outline programme is now in place; Clear project governance has been identified; A data management plan is being drafted; Risks and issues are being identified; Project and delivery manager resources have been appointed and they will start in April.

Most of the project work was being carried out by MLC staff putting a strain on their already stretched ability to deliver other commitments, especially to the IDBs. The Technical Services team does not currently have the capacity or capability to deliver major projects.

There was a lack of clarity around environmental impact and risk assessments for activities which are considerably more than 'business as usual.'

Resources are in place/are being identified to complete environmental impact assessment required before wholesale desilting works can be undertaken, including significant input from the MLC Environment Officer.

The Independent Technical Advisor has prepared a scope for tender to secure a consultant to develop outline design and prepare Full Business Case (for MLC Project Board approval). The consultant will provide all technical input needed for developing and planning the project and ensuring consents and approvals are identified and in place. MLC staff will continue to act in a lead client capacity, providing their specific technical expertise and knowledge of the catchment as necessary. I will lead the project as Project Executive, working closely with the Project and Delivery Managers and providing regular updates to the Project Sponsor (Chief Executive) and MLC Executive Committee.

MLC's H&S advisor, Cope, visited and assessed the provisions in place and provided advice on additional requirements. Risk assessments/methods statements are being developed for physical work activities alongside a full review of the MLC H&S policies.

A Communications & Engagement team is in place and is planning engagement in parallel with Chief Executive's proposed MLC engagement and branding improvements.

A robust forecast of project costs needs developing. It is likely that the total project costs will exceed the current approval limit of £23million from the Outline Business Case. There are also some risks to the delivery programme that need to be investigated further and mitigated as necessary. All of these will be considered in more detail over the next 6 months, appraised and included in the Full Business Case, before the end of the financial year 2023/24.

Contractors are currently being identified for the various work phases: desilting; material import; bank raising works and hard defences (including detailed design).



Consulting Engineer

5 April 2023

RESOLVED

- i) That the reports are approved
- ii) That the Chairman, Vice-Chair & District Officers review the Seagate homes planning application tomorrow following the opening of tenders and they be authorised to formulate a response to Fenland District Council on behalf of the Board.

B.2092 Capital Improvement Programme

Mr Hill referred to the programme and the two main schemes proposed for this year – the watercourse piping and filling at point 66 and works to the storage area at point 29, he informed members that both figures were estimates only, with tender for the works at point 66 being opened tomorrow and the works at point 29 to be developed following the transfer of land. He reminded members that funding for both schemes had previously been allocated, viz;

Hundred of Wisbech Internal Drainage Board

Capital Improvement Programme (2023/2024)

			PREVIOUS YEARS	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	FUTURE YEARS	ALL YEARS
			Pre Yr 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Post Year 10	Total Expenditure
Structures	Gravity outfall/overspill refurbishment/replacement	B	14.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	14.6
	Control structure refurbishment/replacement		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Joint pumping station refurbishment/replacement		1.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.5
Drainage Channels	Sleeving existing pipework		0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1
	Open ditch lining - Point 66		0.7	250	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	250.7
	Culverts under the A47 - Highways improvement works		0.3	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3
	Pipeline replacement - The Stitch, phase ii	A	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Fridaybridge improvement works - 99 - 101	B	0.0	0.0	0.0	0.0	55.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	55.0
	Channel improvement works 29 - 31 (Copart to bypass)	B	0.0	0.0	6.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.0
	Channel improvement works 53 - (Halfpenny Lane)	D	0.0	0.0	0.0	160.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	160.0
	Storage area - Point 29	B	0.1	150	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	150.1
	Culvert replacement - Point 3	B	1.3	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.9
	Walkway and handrail improvements to structures	A	0.0	6.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.0
	Water control structures improvement scheme	B	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	District wide flood alleviation improvement scheme	A	0.3	25.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	25.3
	Surveys and studies	A	0.0	0.0	5.0	5.0	5.0	5.0	0.0	0.0	0.0	0.0	0.0	0.0	20.0
South Brink p/s	Improvement/refurbishment works		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Plant & Vehicles			0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
			0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
			18.9	431.6	11	165	60	5	0	0	0	0	0	0	692

District wide flood alleviation scheme.
- works no-longer required depending on outcome of study

District wide flood alleviation study:

Approval for business case to be developed and grant-in-aid application to be submitted.
Programmed works for future years to be developed following recommendations in study.

He informed members that although there were currently allocations made for future years, these were proposals previously put forward but the whole programme for future years would be revised/updated to reflect proposals generated from the Flood Alleviation study.

Mr P Burrows referred to the importance of looking across the whole district to develop a strategic approach to future schemes and briefly referred to the current policy for the allocation of Grant-in-Aid. He further referred to the mechanisms built into the Grant-in-Aid partnership funding policy and that this excludes new development after 2012 from being eligible for grant funding. He explained that the premise behind this angle of the policy is to disincentivise Local Planning Authorities from approving development in areas of flood risk and avoiding the national taxpayer picking up the future bill.

Cllr Boden queried what was meant by flood risk area and members discussed the various mappings regarding these matters. Mr P Burrows referred to the implications of our Fenland geography generally being regarded as at flood risk. Cllr Boden queried if all developers affected were making contributions to future improvement works and Cllr Laws referred to this area being highly complex with regards to these discussions. Cllr Boden queried if this was something that the drainage board should be taking account of and Mr P Burrows referred to the principals of partnership funding being multi-tiered which required a strategic approach to ensure funding could be available at all level within the terms of the funding arrangements.

Cllr Boden referred to the Seagate Homes Development being within flood zone 3, and should therefore be contributing under partnership funding arrangement and agreed that the subject would be discussed in more detail and the meeting with the Middle Level Chief Executive next week.

In response to Mr F Leach, Mrs N Oldfield confirmed that she was currently formulating a study for all internal drainage boards for current proposals for scheme works but that as the Hundred of Wisbech proposals were already established, there would be 'accelerated' when making submissions.

RESOLVED

The programme approved in principal and for the programme to be updated when more more detail becomes available following the conclusion of Flood Alleviation Study.

B.2093 Contributions from Developers

Mr Hill reported that contributions towards the cost of dealing with the increased flow or volume of surface water run-off and treated effluent volume have been received.

Cllr Boden queried if there were more contributions likely to come 'on-line' in the next reporting period and in response Mr G Moore confirmed that there were some applications being processed currently which could lead to contributions being payable but with SUDS and more attenuation development contributions are likely to reduce. He confirmed that this would be any area for discussion to properly review the implications.

B.2094 Health & Safety

Further to minute B.2070, the Board considered the report of the Health & Safety Officer, viz;
HEALTH AND SAFETY REPORT FOR HOW I.D.B.

IT HAS BEEN 4 YEARS SINCE WE STARTED A NEW JOURNEY AND HAD A VISIT FROM THE NFU RESULTING IN A LOT OF WORK NEEDED DOING TO CONFORM. IN FACT WE WERE STARTING FROM A LOW POSITION. IT WAS SUGGESTED BY THE NFU REPRESENTATIVE THAT WE PROCEED WITH PLANS AND HAVE AN NFU REVIEW IN 4 YEARS WITH MYSELF MONITORING PROGRESS. I AM PLEASED TO INFORM YOU THAT THIS REVIEW WITH NEIL WHATLING FROM THE NFU AND MYSELF WENT AHEAD ON 24/03/2023. THE REPORT CONCLUDES THAT WE HAVE MADE VAST IMPROVEMENTS AND THE MAJORITY OF THINGS ARE NOW IN PLACE.

HOWEVER A FEW PROBLEMS ARE STILL THERE NAMELY STEPS AT THE OUTFALL WEIR (POINT 26) AND THE STEPS AT THE WEIR (POINT 12) WE HAVE BEEN WAITING FOR OUR IMPROVEMENT PLAN BUT THIS IS NOT GOING TO HAPPEN OVERNIGHT SO AT A WORKS COMMITTEE MEETING IT HAS BEEN AGREED TO PUT NEW STEPS TO THE EXISTING STRUCTURES.

THIS BRINGS ME ON TO THE SHORT SECTION OF THE DRAIN AT THE SCOUT HUT I WAS VERY DISAPPOINTED THAT THIS HAS NOT BEEN PIPED THE DECISION BETWEEN US IS AS IT WAS 4 YEARS AGO IS THAT THIS IS UNSAFE WORKING PRACTICE, WE HAVE BEEN ASSURED ON NUMEROUS OCCASIONS THAT THE TENDERS ARE NEARLY READY I HOPE THAT THIS WILL HAVE HAPPENED BY THE BOARD MEETING.

HE WAS IMPRESSED BY MOST THINGS AND PARTICULARLY THE DECISION TO MOW AROUND MC DONALDS ETC WITH A RECIPROCATING MOWER. GOING FORWARD ALL WOODEN DAMBOARDS IDEALLY NEED REPLACING WITH SAFER OPERATING SYSTEMS.

DUE TO THE CONFIDENTIAL NATURE OF THIS POLICY I AM UNABLE TO PRINT IT BUT CAN QUOTE THAT WE HAVE NO (RED) URGENT REQUIREMENTS. THE FOLLOWING STATEMENT I WILL SHARE WITH YOU AS I FEEL IT IS IMPORTANT. FROM THE VISIT IT IS APPARENT THAT THE CLIENT TAKES THEIR HEALTH AND SAFETY RESPONSIBILITIES VERY SERIOUSLY AND THE PERSON I ENGAGED WITH ON THE DAY WAS EXCEPTIONALLY COMPETENT AND KNOWLEDGEABLE WITH THE ATTITUDE AND WANT TO GET THINGS RIGHT.

IN CONCLUSION THANKS FOR YOUR SUPPORT OVER THE YEARS BECAUSE THIS HAS BEEN VERY MUCH A LONG HAUL, TEAM EFFORT, WHICH HAS APART FROM THE AFORE MENTIONED ITEMS HAS RESULTED IN MAINLY MONITORING AND TWEAKING FROM MY PERSPECTIVE.

FINALLY, I MENTIONED FORMAL TRAINING TO NEIL AND HE FELT IT WOULD LOOK GOOD IF A BOARD MEMBER HAD SOME FORMAL TRAINING BUT NOT ESSENTIAL. IF YOU WISH ME TO CONTINUE IN MY ROLE, I INTEND TO TAKE A COURSE AT MY EXPENSE FOR MY OWN PEACE OF MIND. ALSO, TO HAVE HALF ANNUAL UPDATES WITH THE CHAIR AND DEPUTY VICE CHAIR TO DOCUMENT PROGRESS PRIOR TO THE BOARD'S MEETINGS, WHILST CONTINUING MY CONTACT WITH THE BOARD'S CONTRACTOR.

IF YOU HAVE ANY POINTS, PLEASE ASK ME AT THE MEETING.

KIND REGARDS NEIL

Cllr Boden considered the report and progress made was very good and was pleased that there were no major ongoing issues of concern but raised a query over why the NFU appeared to be reluctant to release the detail of the policy/inspection, as this would generally

be accepted as being required for the Board to be able to meet their obligations concerning overall responsibilities for health & safety matters. Members discussed the issues surrounding the apparent reluctance of the NFU to release the required documentation and approved for the clerk to liaise with the Health & Safety Officer and the NFU in order to resolve these issues

B.2095 District Officer Report

Mr F Leach referred to issues when de-silting in the industrial area concerning the disposal of spoil which can become very expensive, generally requiring testing. He considered the Board should look to develop a policy for the disposal of spoil and members considered this could be an area of consideration for the works committee. He further referred to ongoing issues concerning pollution and that although both the Environment Agency and Anglian Water had been involved, neither had been able to find a resolution to the issues, viz;

District Officers Report Nov 22 to May 23.

Generally, a quiet winter with rainfall fairly low.

November. We've had discussions with MVV regarding the proposed incinerator.

January. Site meeting at the Pallet Network. Mike Neil and I established the course of a long section of pipe under the Friday Bridge Road as its route was uncertain.

March. Neil and I had site meetings with CoPart about their expansion, and Melanie at No.1 Oldfield Lane, regarding the open drain section at the scout hut.

April. Mike Neil and myself toured some of the boards district with Henry and Amanda to help familiarise them with the area. Neil walked the agricultural drains to check on their condition.

May. Neil and I attended a budget meeting at Mike's, with Robert Hill, to establish a rate recommendation for the board to consider. Considerable rainfall on the 9th, nearly caused our drains to overflow. While there was flooding to some properties in Wisbech, we didn't get any reports of problems within our district.

Neil and I have had regular meetings, sometimes two or three times a week to discuss issues that we've come across, including planning applications that require consideration, and matters concerning the ongoing maintenance with Harrison Contractors. We've had a few works committee meetings, a couple of which have been held at the Middle Level Office, to include middle level engineers and other staff.

We've met the new Chief executive, Paul Burrows, Chief engineer, Nicola Oldfield, and Environmental Officer, Sofi Lloyd.

Some time has been spent taking soil samples and pictures from a large heap of dredgings that HAC have had to cart from the industrial area. This to prove that the soil wasn't contaminated with heavy metals or pollutants, in order to arrange disposal. We're working on a method policy to deal with future dredgings, as there is such a large quantity of rubbish brought out of the drains with the soil, not only in the industrial area. Also, any dredging in the industrial area has to be carted and stored for removal at a later date, which creates a number of problems.

The two areas of considerable frustration to us are the lack of progress on the Scout Hut Piping, and the surveying of the districts drains and associated grant application. We apologise to the board and ratepayers for the lack of progress.

I've printed some information showing rainfall over the last few years, and this month so far at Walsoken, for interest. I have access to a number of weather stations around Wisbech, and this one, on our farm, near to the Elm Hall roundabout, is the nearest to the industrial area of our boards area. There is another between Outwell and Wisbech, on the boundary of the boards agricultural Eastern area. Although only a couple of miles apart, the differences in rainfall can be large.

For approval.

Fred hours 17.

Neil hours 32 to include Health and Safety.

In response to Cllr Marks, Mr F Leach considered that quality test had been carried out and it was non-hazardous but coloured and very smelly and in response to Cllr Hoy reported that it appears at outfalls at Algores Way, but Anglian Water were not aware of the piped system in the area so cannot trace its source. In response to Cllr Boden, Mr G Moore gave a brief update concerning the MVV development.

B.2096 Environment Officer's report

The Clerk referred to the Environment Officers report, viz;

MIDDLE LEVEL COMMISSIONERS

Telephone: 01354 602965
07977 068864
Email: sofi.lloyd@middlelevel.gov.uk
Website: www.middlelevel.gov.uk



**MIDDLE LEVEL OFFICES
85 WHITTLESEY ROAD
MARCH
CAMBRIDGESHIRE
PE15 0AH**

Sofi Lloyd
Environment Officer

Hundred of Wisbech Internal Drainage Board

Environmental Update – May 2023

Introduction

As I took up post in mid-October, unfortunately I am not in a position to provide a full biodiversity action plan update yet, but have compiled the following update of environmental activities and key points relevant to the Board, which I hope you find useful.

As you know, I have been familiarising myself with the IDB area, its approaches and plans as well as I can, over winter, but from now onwards I would like to plan some further visits to the IDB area to develop a much better understanding of the area and your priorities, so will be in touch to do organise this. I look forward to working with you to enhance any areas that we agree would be beneficial and feasible to do so.

1. Bank Raising Project

You will have been made aware of the Bank Raising Project and the work that is planned on the MLC channels and banks within the district. The ecological considerations of the project are being dealt with separately, outside of this report, along with the project update. However, should you have any questions about the projects' ecological considerations then do contact me directly and I will be happy to help.

2. Consents

I have been asked for input in relation to a number of consenting applications in the area. As you know, the consultants for the Wisbech incinerator project proposal have asked if the IDB have any biodiversity net gain projects they could fund to mitigate the loss of open ditch habitat as part of that development. I have discussed this with you and I await your direction as to whether this is something you would like to explore with them. For context, Local Authority biodiversity credit value estimations are ranging for £20k per credit up to £70k depending upon location and habitat type. You can expect a water-related type to be on the higher side of that scale as will require intensive and frequent management. I believe that MVV are looking for at least 0.25 units.

Their consultants have in the meantime asked if they would be able to enhance the retained ditch for the benefit of water voles. This would most probably involve the widening of the ditch and installation of pre-planted coir roll as we have previously discussed. If this is something you would be willing for them to undertake and manage, in line with your specifications, for 30 years, or you would like to propose that they fund the IDB to maintain it and/or establish these things on their behalf, please let me know. However, for these measures to be worthwhile, it would be necessary for the upstream pollution issue to be resolved first.

In the meantime, for any other consent applications I am asked to review, I will continue to focus on ensuring the key objectives of the IDB are delivered, namely, the maintenance of channel conveyance and capacity whilst conserving and enhancing the environment.

3. A47 pond-side enhancement

If you would like some input on how to improve the small triangular pond next to the A47, then please let me know.

4. Pollution

The suspected point-source pollution in the catchment remains an issue I understand. I am raising the issue with colleagues at the EA to see if investigations can be progressed but this is moving slowly. In the meantime, it may be beneficial if we could discuss options to tackle the within the channel to reduce the impacts until the cause can be managed.

5. Biodiversity Action Plan Review

The Biodiversity Action Plan has traditionally been the key document which sets out the IDBs' planned contributions towards conserving and enhancing biodiversity. Although the BAP remains vital, the objectives are unlikely to be reached unless there is a process in place to ensure that the incremental steps that need to be taken to achieve the BAP objectives are incorporated into regular operations and are reviewed regularly. Otherwise, the BAP simply becomes a document that is reviewed once or twice a year. It is the review of this vital process that I will be focussing on, rather than reviewing the objectives in the BAP, because the objectives themselves still remain valid.

6. Process and Compliance Review

I am well into a thorough process and compliance review of all our environmental approaches across all boards. This will help to ensure that IDBs are operating in line with all new legislative and regulatory requirements, updated guidance and best practice, and are better prepared for any changes we expect to be introduced in the next year. This will include the impacts and opportunities brought forward by the Environment Act 2021, including biodiversity net gain and delivering biodiversity enhancement. The outcomes of this review will feed into the BAP refresh for each IDB.

I also plan to review the currently-available pre-application environmental advice for consents and standard responses with the planning office.

7. GIS System Development

To support the activities mentioned above, an improved environmental GIS system is being developed and work is well underway to digitise all available environmental data. Lots of data exists due to all the good work already undertaken by IDBs but it exists in different states in different places. There is also a great deal of information held by the Local Environmental Records Centres, for which I am pleased to say, we now have a contract in place to receive regularly. This will be a vital data source that we must consult when planning our work to help us identify any protected and priority species which may be impacted or enhanced by our work. We are merging all these data sets to develop a more complete picture of what we have, in order to define and preserve the baseline from which to progress. This, more complete picture is also necessary to enable us to identify opportunities for environmental enhancement. Developing the GIS system this way will deliver efficiencies in environmental data collection, analysis and reporting, allowing more time to undertake practical conservation work on the ground. It will also enable us to share our data more easily with the local environmental records centres, contributing to the understanding of the local and national status of

many species and help to raise the profile of the IDB and the valuable work they do to support biodiversity. You can see an example of how some of the digitised data is coming together in the attached IDB map.

8. Work Package Ecological Screening Document

We have developed the template named above for IDBs to complete when planning any ad hoc/non-routine works that will “break ground” on the any of the banks. The information is needed in order to evidence that we have correctly considered the ecological impacts of the work, and to identify opportunities for enhancement, as we are mandated to do, by law. Activities for which the form would be relevant include bank reformation, mooring construction, culverting, head walls, piling, filling in a ditch, moving an access culvert etc.

Only the first page needs completing by the IDB (not a lot of info needed) and the rest by me. I undertake the assessment as far as possible, and then return the second part of the document to the IDB, setting out what surveys etc. will be needed, if any. I may be able to undertake some of the practical surveys but in some cases, an ecological consultant with a specialist licence may be needed. In some cases, there may not be a need for any surveys and the recommendations will be that the work can proceed with some adaptations to the proposed approach, such as altered timings or establishment of “no-work” buffers around sensitive areas.

When all desk and fieldwork is complete, the form is “signed off” from an ecological perspective, and returned to the IDB with recommendations for the approaches to be taken. This means the IDB and the operatives undertaking the work have full sight of the ecological constraints, mitigations and approaches required to remain compliant. It is recommended that this form is completed and sent as early as possible to prevent delays, even up to 1 year in advance of the proposed works. The form is available by emailing sofi.lloyd@middlelevel.gov.uk and is also available from the MLC website.

9. Protected Species

a) *Water Vole*

As always, any work that plans to “break ground” on the any of the banks, so bank reformation, mooring construction, culverting, head walls, piling etc, **OR the removal of any marginal vegetation, please let me know ASAP by completing the above ecological screening document** so we can plan the appropriate surveys and mitigations in plenty of time, to avoid any delays and ensure compliance with wildlife legislation. This is particularly relevant for water voles. We know that there are some known, valuable water-vole ditches in the district, and some which could be enhanced to better support the local population, but the accepted approach is to always assume water voles are present in all ditches, and plan work around their assumed presence, in order to avoid committing an offence in terms of wildlife legislation. There is a lot of good, pragmatic and practical guidance on how to properly consider water voles during IDB works contained in the Environmental Good Governance Guide for IDBs.

b) *Badgers*

A reminder that badgers and their setts are protected by law and care must be taken not to disturb setts during routine channel management. Sett interference requires a licence under all circumstances. Please contact us should you have any queries regarding activities taking place around any known badger sett. Please also let me know asap if there are any setts which are presenting a flood risk due to any burrowing which is destabilising banks etc. More detailed information and refresher training on approaches to be taken around badger setts will be organised in the coming months. In the meantime, please refer to the relevant chapter in the Environmental Good Governance Guide (available on the ADA website) for more detailed information on badgers.

c) *Birds*

Please be reminded of the legislation around the disturbance of breeding birds, particularly when cutting vegetation or bank-side trees, between March and September and where kingfishers are

known to hunt. Please see the relevant chapter in the Environmental Good Governance Guide (available on the ADA website) to refresh your understanding of mitigation and survey requirements and get in touch should you have any questions.

i. **Barn owls**

I have met with our barn owl conservation delivery partners and we had defined a schedule of checking and refreshing barn owl boxes over winter but have unfortunately been unable to commence due to the restrictions imposed by BTO (British Trust for Ornithology) due to avian flu. We continue to monitor the guidance and act accordingly and have been able to commence some box checking by following strict biosecurity measures. Please do let us know therefore if there are any boxes that you feel need some maintenance ASAP so we can plan to visit them before the start of the breeding season. It is even more important during these times that you please help us with the following:

- Tell us if you spot a box needing repair
- Tell us if you see a box being regularly visited in nesting season
- Tell us if you'd like a barn owl box
- Establish and maintain un-cropped field margins for foraging
-

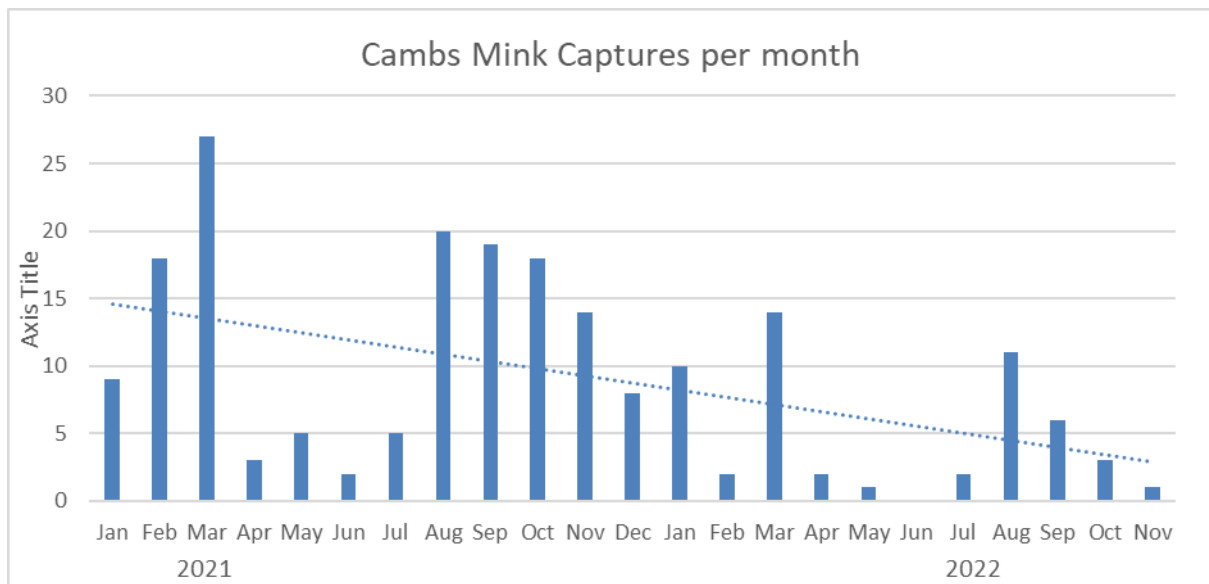
ii. **Avian Flu**

Avian Flu is now thankfully less of a risk now that temperatures are increasing and there are less avian arrivals from overseas. However, please ensure that you are familiar with, **and promote the knowledge of** the DEFRA guidelines on avian flu, in particular those for reporting suspected cases: Bird flu (avian influenza): latest situation in England - GOV.UK (www.gov.uk). If any dead birds are spotted, please do let us know and either we can come and collect and dispose of them in a safe manner to minimise the risk of the disease spreading to other wildlife, or we can arrange for the collection.

d) Mink & Water Voles

I am now part of the co-ordination team for the mink control strategy for the MLC area. The mink control project has been hugely successful so the vision of full eradication of mink is becoming much closer to being realised than was ever thought possible. A strategy refresh meeting took place on the 9th January where we reviewed the data to date to help us devise an updated trapping regime for the coming months. The key outcomes of which are that we are very much in **need of further volunteers** to respond to mink raft activation alerts in the area. Any activation would need to be attended promptly within a few hours but the need to respond is likely to be very occasional. Please let me know of any interest.

The following chart shows the number of mink caught each month, suggesting a declining population. However **there have been a number of mink caught in recent weeks in the district**, probably due to the breeding season being underway and their increased travel to find a mate, so trapping is still very valuable and reporting any sightings is key to ensure that traps are ideally placed.



The following table shows the number of Mink caught in 2022 and their locations, compared to 62 mink captures or kills in 2021.

Middle Level mink 2022_List

List of mink captures around the Middle Level in 2022

	Animal Code	Station/Location	Date	Sex
1	WRE/0761	Upwell & Outwell: Laddus Drove holt	09 Jan 2022	Male
2	WRE/0789		11 Jan 2022	Unrecorded
3	WRE/0917	Stonea Bridge	24 Jan 2022	Female
4	WRE/0786	Ramsey: PS Ramsey Hollow	24 Jan 2022	Female
5	WRE/0924	Welches Dam PS bridge SW side	10 Mar 2022	Male
6	WRE/0950	Conington Fen Bridge	13 Mar 2022	Female
7	WRE/0944	Ransonmoor: Staffurth's Bridge PS outfall, Old ...	16 Mar 2022	Male
8	WRE/0946	Ramsey Saint Mary's: Speed the Plough Bridge	17 Mar 2022	Male
9	WRE/0951	Twenty Foot, Coldham Bank	22 Mar 2022	Male
10	WRE/0957	Crooked Drain, Sutton Gault	05 Apr 2022	Female
11	WRE/0966	Crooked Drain, Sutton Gault	26 Apr 2022	Female
12	WRE/1046	Great Fen: Charterhouse Farm Bridge	16 Sep 2022	Female
13	WRE/1047	Woodwalton Fen: south	18 Sep 2022	Male
14	WRE/1081	Pingles Pit, Mepal B	21 Oct 2022	Female
15	WRE/1140	Welches Dam PS bridge SW side	27 Nov 2022	Unrecorded

This progress with mink control will positively impact on the abundance of water voles in the area. Previous water vole survey data will be reviewed over winter and added to the GIS system and further surveys will be planned to take place in spring and summer.

10. Invasive species

When any non-native species (particularly the following) are spotted, please record the location using the what3words app ([what3words /// The simplest way to talk about location](#)) if possible (if not postcode or grid ref) and inform us ASAP. Useful identification guides and information can be found online at [ID sheets » NNSS \(nonnativespecies.org\)](#)

- Floating Pennywort
- Mink
- Himalayan Balsam
- Parrot's feather
- New Zealand pigmyweed (Australian swamp stonecrop - Crassula)

a) *Floating Pennywort*

Floating Pennywort continues to be an issue in other watercourses just outside the area, so we urge you to remain vigilant, refresh your identification skills and act promptly by notifying us if you think you may have spotted any in the districts drains. Strong adherence to biosecurity procedures is vital as per the boards policy (available from the website).

There has been good progress in trialling the use of an imported weevil to control the plant so we hope that if the success continues, it may be made available nationally at some point in the future.

b) *Azolla*

Previously reported as common across the IDB area. Please record and notify us as above of any instance. There may be an opportunity to use an approved weevil to control badly affected stretches so please advise if there are any particular areas of concern as there are only limited stocks of the weevils nationally so I will have to apply early to be in with a chance of some of the stock.

c) *Chinese Mitten Crabs*

Chinese mitten crabs and their apparent rapidly increasing population continue to be a concern. There are reports of some banks in some areas being damaged by their extensive burrowing but it is always difficult to pin this on the crabs alone with there being so many other factors which affect the stability of banks.

We liaise closely with the EA and follow their lead with the management of this species and many others to ensure that nothing we do contradicts their approach, regulation or legislation. Defra has no intention currently of developing policy which would allow the crabs to be caught and removed for commercial or conservation reasons. In particular there was some concern that they were found to carry a gill fluke in other counties which had the potential of being transmitted to humans if they were to be consumed. As Defra isn't planning to change their stance, the EA's approach remains that any crabs which are caught as by-catch must be killed on-site and not removed. The fishing for the crabs specifically is not lawful. There is no recommended or authorised approach to deal with rising populations unfortunately. A commonly held view is that removing mature individuals from the population creates a vacuum that immature individuals then tussle to fill, driving greater movement within the local population and perhaps increased burrowing as a result.

We will continue to monitor the recommended approaches and will adapt ours promptly to follow when necessary.

d) *Turkish Crayfish*

We have received reliable reports of the presence of Turkish crayfish in some MLC drains. Turkish Crayfish are a schedule 9 listed species listed in the Wildlife & Countryside Act meaning that it is an offence to release them or allow them to escape into the wild. Their impact is not widely understood but it is said that they are known to reside alongside Signal Crayfish, rather than displace them or be displaced by them. Where populations of our native and protected white-clawed crayfish are still present, they are likely to outcompete them but they do not carry crayfish plague which does impact native crayfish. There is no evidence that Turkish crayfish burrow so it is unlikely that they would cause extensive damage to riverbanks but they could reduce fishery profits by competing with fish for food, stealing baits or causing declines in fish recruitment through loss of macrophyte habitat, according to the non-native species secretariat. Please be vigilant and report sightings of the species and maintain strong biosecurity procedures. They can be distinguished from other crayfish species by their long narrow claws, as shown in the pictures below.



Turkish Crayfish

Claws: claws normally same colour as body but underside lightly coloured. Fingers long, straight and narrow



White-clawed crayfish

Claws: are noticeably granular and are whitish to light pink on the underside, never red.



American Signal Crayfish

Claws white or turquoise patch at junction between fixed and moveable finger. Underside of claws are red.

If it is necessary to dispatch a Turkish crayfish, American signal crayfish, or any other non-native crayfish, because it has been removed from the channel accidentally, please ensure that you are familiar with its distinguishing features and can confidently tell it apart from particularly white clawed crayfish. This will ensure no offence against a protected species occurs. There are very few records of the native white-clawed crayfish remaining in the MLC area but care should still be taken and no assumption made. More information can be found at: <https://www.nonnativespecies.org/non-native-species/information-portal/view/381>

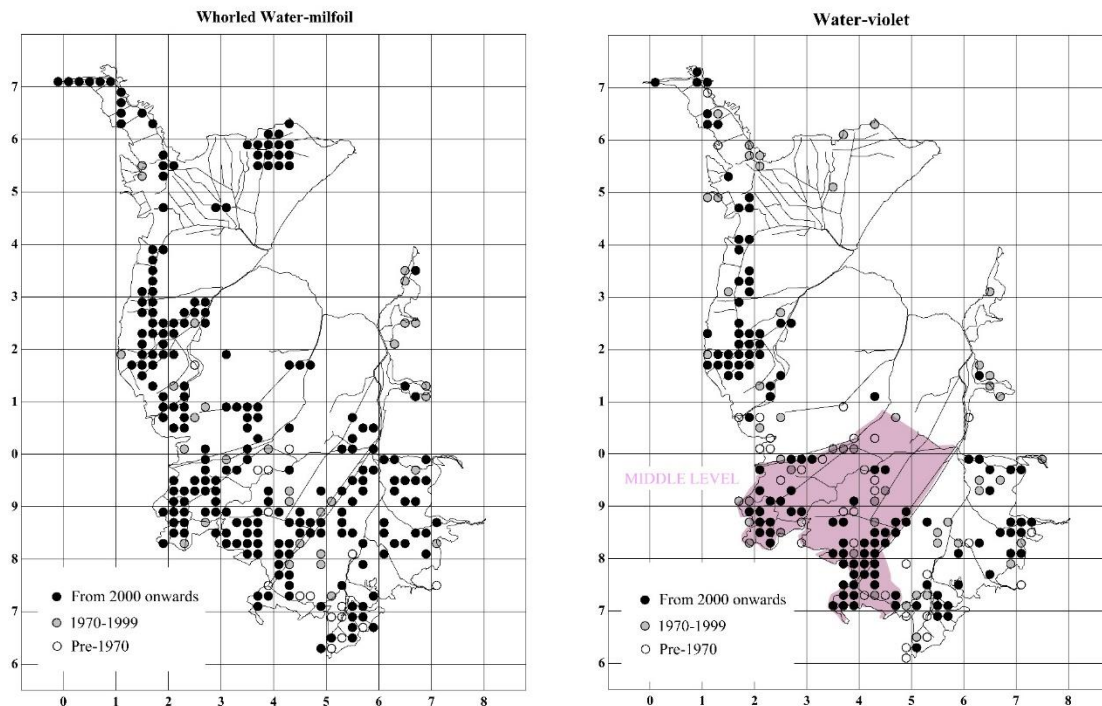
11. Fenland Flora Project

The long-running fenland flora project, headed up by botanist Jonathan Graham, to identify and record the presence of rare, threatened and notable aquatic plants in the fens, is nearing completion. The results highlight:

- There are lots of nationally significant aquatic plants in fens, many of which are only found in IDB drains and are present because of the way the drain is being managed.

- Water quality is important for many aquatic plants and a good proportion of IDB drains have good water quality.
- A summer-maintained water level is good for many plants.
- Non-IDB field drains are important too so where possible, aim to always hold some water and cut periodically.

The diagrams below show how the presence of 2 England red data plants that are frequent in local drains.



The plant location data will be added to the GIS system and made available so it can be reviewed ahead of any planned works, and will be added to BAPs. The data will also be useful in identifying any opportunities to enhance these valuable plant populations.

12. Environmental Stewardship.

You will most likely be aware that environmental stewardship schemes and farming subsidies are changing. If you would like to discuss existing stewardship provisions within the district, or you or another rate payer is thinking of applying for a stewardship agreement or establishing new stewardship measures, please do get in touch.

13. Carbon & Climate

There are increasingly a number of low-carbon, sustainable alternatives available for many of the common materials and equipment used in flood risk management, such as low-carbon concrete and steel, solar powered mechanical and electrical equipment and coir roll for bank stabilisation. Please get in touch to discuss any projects which involve these or similar materials or equipment to understand if any are suitable for you to consider.

Last year ADA published a Carbon Accounting Guide for IDBs, which is available from their website. The process of calculating carbon emissions does not have to be as complicated as some may think. If you have reviewed the guide and would like some help to progress with calculating your carbon emissions, please get in touch.

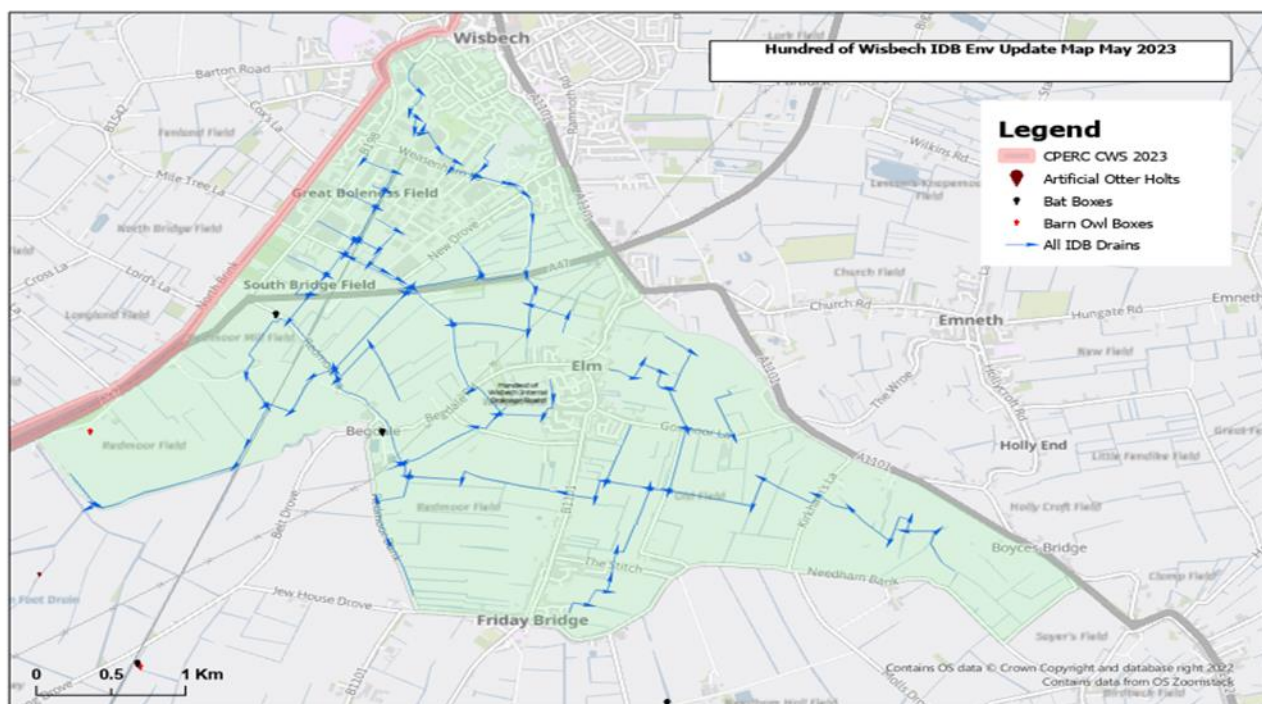
14. Paludiculture

I attended a workshop in Cambridge to discuss the progress of knowledge acquisition and trials around growing commercial crops, associated with wetlands in lowland areas, where the water level has been raised to reduce or eliminate CO2 emissions from degraded peat. This is known as paludiculture. This includes the potential for receiving an income for carbon sequestration from such

approaches. As you would expect, there is a focus on the Cambridgeshire fens as a key area for development of this approach along with Somerset, Lancashire and the Lincs fens. If you would like to know more about how this topic is progressing, would like to get involved in some trials or would like to have a go at growing a paludiculture crop such as *Typha latifolia* (Bullrush or cattail) or Sphagnum moss yourself commercially, then please do get in touch.

15. Environmental Good Governance Guide for IDBs

I have a copy of the above guide, published by ADA last September, for each Chairman and District Officer which I can hand to you when I visit if you don't have a copy already. Until then, an on-line version is available from [here](#) and you can also request copies from ADA directly admin@ada.org.uk.



RESOLVED

Members considered and approved the most recent Environment Officers report.

B.2097 Works Committee Report

The Chairman reported that all matters discussed by the works committee had been dealt with earlier during the meeting.

B.2098 State-Aided Schemes

The Board considered whether to undertake further State-aided Schemes and whether any future proposals should be included in the forward capital forecasts provided to the Environment Agency.

RESOLVED

That no proposals be formulated at the present time.

B.2099 Environment Agency – Precept

The Clerk reported that the precept for the financial year 2023/2024 has been fixed at £17,780.

The precept for 2022/2023 was £17,780.

B.2100 Appointment of Internal Auditor

The Clerk reported that following the conclusion of tendering Whitings LLP have been appointed as internal auditor for a five-year period commencing 1st April 2023 (financial years 2023/24 to 2027/28), viz;



**middle level
commissioners**

**Internal Audit Tender Proposal to
Internal Drainage Boards and District Drainage
Commissioners under the administration of the
Middle Level Commissioners**

November 2022



Index

	Page
1. Executive Summary	2
2. Your Requirements	3
3. Our Audit Approach	4
4. About Whitings LLP	9
5. Our Fees	10
6. Key Personnel and Career Summaries	11
7. Appendix A - Internal Audit Plan - Year Ending 31 March 2024	
8. Appendix B - List of Administered Boards	



Executive Summary

Whittings LLP are a regional firm of Chartered Accountants and Business Advisers, based in 11 locations throughout East Anglia.

The firm has broad range of experience in dealing with internal and external audits, serving a range of local organisations operating with the private and public sector.

On review of your invitation to tender we understand that the following requirements need to be met:

- Subject the financial statements to internal audit in accordance with statutory requirements.
- Upon conclusion of the internal audit prepare of a management letter to the board detailing any deficiencies in the internal systems, recommending improvements in addition to communicating whether in our opinion the organisation are ensuring value for money is being achieved.
- Completion of the Internal Audit Report within the Annual Governance and Accountability Return

We have had the pleasure as serving as your internal auditors for several years and have demonstrated our ability to meet the statutory deadlines set. We will strive to deliver this whilst also providing the following benefits:

- Ensuring staff continuity from year to year
- Quoting and sticking to an agreed fee for the duration of the five year appointment
- Providing a comprehensive and personable service, building on the strong working relationships that we already have with your organisation
- Pro-active in our approach to the engagement, seeking out ways to streamline the internal audit process to ensure minimal disruption to your day-to-day operations

Our fees for the first year ended 31 March 2024, excluding VAT, will be £21,250 (exc. VAT) for the Internal Drainage Boards and District Drainage Commissioners administered by the Middle Level Commissioners, a detailed breakdown of our fee structure for the five year appointment can be found on page 10 of this document.

Our clients rightly demand a service that provides high quality, specialist expertise, timeliness and cost effectiveness combined with local knowledge, an appreciation of local Fenland circumstances and district needs. Whittings LLP, having been established in the local area since 1928, have a proven track record of being able to meet these demands and continue to review and develop its business practices to ensure that this remains the case for many years to come.



Your Requirements

You have asked us to quote for providing the following services for the Internal Drainage Boards and District Drainage Commissioners administered by the Middle Level Commissioners:

- Subject the financial statements to internal audit in accordance with statutory requirements.
- Upon conclusion of the internal audit prepare of a management letter to the board detailing any deficiencies in the internal systems, recommending improvements in addition to communicating whether in our opinion the organisation are ensuring value for money is being achieved.
- Completion of the Internal Audit Report within the Annual Governance and Accountability Return

In order to obtain best value from our service, it is essential that our audit work is directed towards areas of greatest risk. You have indicated that you will maintain the accounting records, presenting our firm with accurate completed financial statements together with relevant and supporting schedules and reconciliations as required in a timely fashion.

The first accounts to be internally audited shall be for the year ended 31 March 2024. We will be able to carry out our work on these in accordance with your completion timetable which we provisionally understand to be 30 June 2024.



Our Audit Approach

Before the boards' year end, we would anticipate a pre-planning meeting between the audit team and members of the Middle Level Commissioners' finance team. At this meeting various formalities such as the timing of our procedures will be agreed, together with the identification of key audit areas. We would also at this stage confirm our understanding of the company's accounting systems and structure of internal controls.

This enables us to adopt an efficient and structured approach to risk assessment, analytical appraisal of results and the tailoring of audit testing to ensure that your accounts comply with all relevant legislation and regulations. The below internal audit strategy has been designed to be a high level statement of how our audit approach will be delivered and developed during the proposed engagement period.

Internal audit is an independent, objective assurance and pro-active consulting services designed to add value and improve the Board's operations. It provides an independent and objective opinion to the Board on the control environment that comprises risk management, control and governance.

All internal audit work will be undertaken with due regard to the requirements of Regulation 6 of the Accounts and Audit Regulations having cognition of the Practitioners Guide.

It covers aspects of all financial systems annually, rather than just on a strict 3 year cyclical basis which is a fairly common alternative for Internal Audit functions. The plan is for minimal 'systems review' days as the financial systems are undertaken on a common basis due to the administration of the boards by the Middle Level Commissioners, so using a risk based audit approach these only require to be audited on a sample basis across the IDBs on an annual basis. The normal level of both System confirmation and Transaction testing is set to ensure that some transactions of all individual boards within the Middle Level Commissioners' administered area are covered each year such as will be appropriate to the Board's level of activity and/or strength of assessed internal controls; nonetheless all Boards will be covered in all areas across a 3 year period.

Even so, where issues are identified, major internal control systems/personnel changes occur, or problems are encountered in conduct or results of the internal audit then the scheduled rota may be amended on year by year basis.

In addition, substantial work is carried each year on every Board on certain areas to ensure compliance and correctness of the Annual Return form.



The following list summarises the main work done and frequency, taking into account the objectives set out in the Annual Internal Audit Report within the Annual Governance and Accountability Return:

A -Return, Accounts & Completion (Annually)

- Ensure IDB/DDC cashbook kept up to date
- Ensure that monthly bank reconciliations are carried out
- Check that verification of bank reconciliations has been carried out
- Ensure that the annual return and accounting record opening and comparative figures agree to prior years records
- Ensure that figures stated on the annual return agree to underlying accounting records
- Checking casting and arithmetic of schedules
- Review variance report and investigate reasons excessive variances
- Ensure that the IDB/DDC publishes information on a free to access website/webpage up to date at the time of the internal audit
- Ensure that the IDB/DDC has complied with the publication requirements as set out in the Accounts and Audit Regulations 2015

B - Purchases (Cyclically)

- Ensure that the IDB/DDC has complied with its financial regulations and these are reviewed with sufficient regularity by the board
- Check proper purchase authority is recorded by the board in relation to IDB/DDC payments
- Carry out walkthrough testing in relation to IDB/DDC purchase system
- Agreement of purchase ledger balances to trial balance
- Ensuring payment of principal and interest in respect of loans is in accordance with agreed terms
- Confirm list of payments issued agrees to minutes
- Ensure that individual purchases are authorised by a relevant person



C - Minutes, Value for Money, Risk Management, Ethical Standard and Sustainability (Annually)

Minutes

- Review of minutes to check that risks relating to the boards are discussed
- Ensure that a formal risk assessment is carried out by the board
- Review the budget setting process
- Review minutes for unusual or extraordinary activities
- Check insurance review

Value for Money

- Ensure that value for money principles are being observed
- Obtain relevant tenders for capital purchases to ensure VFM principles are being considered.

Risk Management

- Ensure that the boards risk register is kept up to date and adequately covers potential areas of risk facing the board.
- Ensure that risk factors are taken into account in the board's decision making and implementation processes

Ethical Standards and Sustainability

- Ensure that decisions are made in an ethical manner by the board, bearing in mind environmental and other socioeconomic circumstances/responsibilities within the local community.
- Ensure that ethics is taken into account within the boards defined policies
- Ensure that long term sustainability is being taken into account in operational decisions.

D - Budget and Variance Analysis (Cyclically)

- Review variance analysis issued by the board
- Check that progress against budgets are regularly monitored
- Check that budgets are used for determining rates for the following year
- Review accruals for reasonableness and completeness

E - Sales (Cyclically)

- Perform walkthrough testing on the IDB/DDC rates system, including the treatment of special levies
- Review any rates write offs and ensure received board approval
- Perform walkthrough testing of other sales made by IDB/DDCs
- Review minutes to ensure all expected other income has been received and banked



F - Petty Cash (Cyclically)

- Not applicable at present, no petty cash function for any IDB/DDCs currently administered.

G - Wages (Cyclically)

- Performance of wages walkthrough
- Ensure that authorisation granted for overtime paid
- Review of P11Ds (where applicable)
- Ensure that non-pay rolled staff have been correctly taxed
- Confirm contractor expenses to invoices and that pay rates and payments are authorised within the minutes by the board

H - Assets (Cyclically)

- Vouch additions and review sales of fixed assets in the year
- Ensure assets are adequately covered by IDB/DDC insurance policies
- Ensure that asset movements in the year are reasonable and consistent with prior years
- Review fixed assets for indicators of impairment, both through physical review and by reference to the minutes

I - Bank (Annually)

- Ensure that regular reconciliations have occurred in the year and that these are reviewed by a senior individual within the finance department
- Recalculation of interim and year end bank reconciliations, ensuring clearance of any outstanding payments or lodgements following the reconciliation date
- Ensure that cashbook entries are based on transactions as made rather than in order of appearance on the bank statements
- Consideration of treasury management, including returns where significant bank balances are held by IDB/DDCs

J - Trial Balance & Nominal (Cyclically)

- Ensure Opera trial balance transferred to the accounts correctly
- Scrutinise creditors, accruals, debtors and prepayments
- Identify any transactions that are held within the audited figures that relate to prior or future periods
- Review and scrutiny of adjustment journals posting during the year and as part of the year end accounts process

All financial systems are to be documented and reviewed on an annual basis to provide the required level of assurance. Where appropriate probity audit work will be undertaken and the propriety, accuracy and recording of transactions sample tested.



In addition to the main work carried out on each board, the below areas are also considered to be valuable components in delivering a high quality and well-rounded internal audit service.

Consultancy and Advice

Internal Audit will be available to assist the Board with control or operational issues. During the year there might be emerging risks or issues that need an independent view or review. In addition, internal audit will be pro-active with suggestions and advice to management from information gained through experience, other organisations and networking groups.

Anti-fraud, Bribery and Corruption

Internal Audit will be pro-active in counter fraud work. Although it is not a function of Internal Audit to detect fraud, bribery and corruption (this is a responsibility of management and good system control) work will be undertaken to help ensure there are adequate systems and procedures to highlight potential instances.

Value for Money (VFM), Risk Management, Ethical Standards and Sustainability

As a part of the internal audit review, systems and controls established by management to secure VFM, risk management, ethical standards and sustainability will be examined and evaluated. Matters of an overall nature are also addressed within the annual work programme. Auditors may initiate, conduct or participate additionally in special reviews in these areas where need arises.

The above covers Boards administered throughout the year by MLC but where a new Board is added to the group administration facility, a special additional / fuller review will occur in the first year of involvement.

At the completion of each audit a report will be produced and released to the Middle Level Commissioners for distribution to the Boards. This report details the terms of reference and scope of the audit, findings, recommendations and a management action plan. An executive summary that includes an audit opinion on controls will also be included.

An annual internal audit report shall be produced to the Board to provide an overall opinion on controls and detail the audit work for the year.



About Whitings LLP

Whitings LLP are a regional firm of Chartered Accountants and Business Advisers. At the time of writing, the firm has 12 partners and 7 associates who are supported by approximately 165 staff. The firm operates from 11 offices within the East Anglia counties of Cambridgeshire, Norfolk and Suffolk. We are registered by the Institute of Chartered Accountants in England & Wales to undertake audit work.

Due to the size of the firm we are able to offer our clients with a comprehensive range of services whilst also providing specific insights into industry sectors which represent the key sectors that our client base operates within, these are detailed below:

Service Offerings

- Audit and Assurance
- Business Support
- Business Tax
- General Practice
- IT Services
- Payroll
- Private Client Tax
- Probate and Estate Administration
- Start Ups
- Tax Enquiry and Investigation Service
- Wealth Management

Sector Specialisms

- Agriculture and related industries
- Construction
- Contractors
- Creative Industries
- Manufacturing
- Not for Profit
- Property
- Retail
- Road Haulage
- Technology

More comprehensive information on the firm, its services, specialisms and culture can be found on the website www.whitingsllp.co.uk



Our Fees

We believe the fee scales we propose for this assignment are competitive and reflective of the work required to ensure compliance with relevant laws and regulations. We do not compromise on quality by issuing tenders for audit assignments that are clearly uneconomic.

Our fees for the year ended 31 March 2024 will be £21,250 (exc. VAT) for the Internal Drainage Boards and District Drainage Commissioners administered by the Middle Level Commissioners.

With regard to fees for future years, we would expect, on the assumption that the level of activities and quality of accounting records do not alter significantly that our fees would rise by no more than in line with our wage rate inflation, assumed to be 5% per annum. If, through efficiencies that we can introduce, we can provide the same services at a lower guide fee, then we shall pass on this discount to you.

On this premise, we quote the following four years' fees, excluding VAT, as: -

2024-25	£22,300
2025-26	£23,400
2026-27	£24,600
2027-28	£25,800

For normal ongoing continuous supply services, the initial payment request issued will not be a tax invoice for VAT purposes but will include a notional amount for VAT. On receipt of your payment a tax invoice will be issued to enable you to recover input tax where applicable. However, please note that a VAT invoice will be issued in certain rare circumstances for exceptional "non-continuous" work only.

You will be billed at appropriate intervals during the course of the year. We would expect most of the fees to be billed in a single fee note raised soon after the completion of the Internal Audit Report and issue of our management letter to the board. We would also propose to raise fee notes for any further specially agreed work on a quarterly basis. Payment of fees will be due within 30 days of the date of the payment request.



Key Personnel and Career Summaries

Our philosophy is to provide each client with a dedicated team responsible for their affairs, thus ensuring that we can provide both expertise and continuity of service.

All our audit staff are either qualified or studying for professional qualifications in either AAT, ACCA, or ACA. Our partners, associates and staff undertake a vigorous ongoing programme of continuing professional development, to maintain high technical standards.

Over many years we have experienced extremely high levels of staff retention, enabling us to staff audits with the same individual's year on year. This allows us to accumulate high levels of background understanding of your organisation and these mature relationships with clients makes two way communication both easy and friendly.

The proposed core audit team will be:

Your Audit Principle

It is intended that the audit principle responsible for this assignment will be Ben Beech, an Associate of the firm who is based at our March office. Ben began working for Whitings in 2011, qualifying as a Chartered Accountant in 2016. He is in charge of the firm's audit and assurance offering within the Fenland and surrounding areas, dealing with many of the firm's larger clients operating in a range of sectors. He is also involved in the monitoring and development of the firm's professional standards and compliance procedures.

Your Relationship Manager

Your designated relationship manager for this assignment will be Aston Hinson who is also based at our March office. Aston has worked with Ben for many years supporting him in the provision of high quality audits to some of the firm's largest clients. Aston is also part of the firm's Not for Profit team, assisting these organisations with their accounting and tax requirements.

Your Audit Team

The audit team will include a range of staff appropriate to the varying tasks involved ranging from qualified accountants to junior accounts technicians.



Appendix A - Internal Audit Plan - Year Ending 31 March 2024

The below is an indication of the number of working days required to carry out the internal audit of the 29 Internal Drainage Boards and District Drainage Commissioners under the administration of the Middle Level Commissioners. As a result, and taking into account the engagement timeframe, we are confident that we will be able to meet the deadlines set.

Audit Areas	Planned Days
Planning - discussions, clarification, summarising, AGAR requirement review	4
Systems - review and confirmation work	20
Transactions - testing and verification	20
Completion - collation of issues and recommendations, enquiries of management, reporting via the AGAR and management letter	6
TOTAL	50



Appendix B - List of Administered Boards

Benwick Internal Drainage Board
Bluntisham Internal Drainage Board
Churchfield and Plawfield Internal Drainage Board
Conington and Holme Internal Drainage Board
Curf and Wimblington Combined Internal Drainage Board
Euximoor Internal Drainage Board
Haddenham Level Drainage Commissioners
Hundred Foot Washes Internal Drainage Board
Hundred of Wisbech Internal Drainage Board
Manea and Welney District Drainage Commissioners
March West and White Fen Internal Drainage Board
March East Internal Drainage Board
March Fifth District Drainage Commissioners
March Sixth District Drainage Commissioners
March Third District Drainage Commissioners
Needham and Laddus Internal Drainage Board
Nightlayers Internal Drainage Board
Nordelph Internal Drainage Board
Over and Willingham IDB
Ramsey First (Hollow) Internal Drainage Board
Ramsey Fourth (Middlemoor) Internal Drainage Board
Ramsey Upwood and Great Raveley Internal Drainage Board
Ransonmoor District Drainage Commissioners
Sawtry Internal Drainage Board
Sutton and Mepal Internal Drainage Board
Swavesey Internal Drainage Board
Upwell Internal Drainage Board
Waldersey Internal Drainage Board
Warboys, Somersham and Pidley Internal Drainage Board



B.2101 Review of Internal Controls

The Board considered and expressed satisfaction with the current system of Internal Controls.

B.2102 Risk Management Assessment

The Board considered and approved the Board's Risk Management Policy.

In response to Cllr Boden, Mr P Burrows confirmed that as part of his review of Internal Drainage Board agendas and papers later in the year, he would be looking at improvements in how risks and risk management are presented.

B.2103 Exercise of Public Rights

The Clerk to referred to the publishing of the Notice of Public Rights and publication of unaudited Annual Return, Statement of Accounts, Annual Governance Statement and the Notice of Conclusion of the Audit and right to inspect the Annual Return.

B.2104 Annual Governance Statement – 2022/2023

The Board considered and approved the Annual Governance Statement for the year ended 31st March 2023, viz;

Section 1 – Annual Governance Statement 2022/23

We acknowledge as the members of:

HUNDRED OF WISBECH INTERNAL DRAINAGE BOARD

our responsibility for ensuring that there is a sound system of internal control, including arrangements for the preparation of the Accounting Statements. We confirm, to the best of our knowledge and belief, with respect to the Accounting Statements for the year ended 31 March 2023, that:

	Agreed		Yes* means that this authority:
	Yes	No*	
1. We have put in place arrangements for effective financial management during the year, and for the preparation of the accounting statements.	✓		prepared its accounting statements in accordance with the Accounts and Audit Regulations.
2. We maintained an adequate system of internal control including measures designed to prevent and detect fraud and corruption and reviewed its effectiveness.	✓		made proper arrangements and accepted responsibility for safeguarding the public money and resources in its charge.
3. We took all reasonable steps to assure ourselves that there are no matters of actual or potential non-compliance with laws, regulations and Proper Practices that could have a significant financial effect on the ability of this authority to conduct its business or manage its finances.	✓		has only done what it has the legal power to do and has complied with Proper Practices in doing so.
4. We provided proper opportunity during the year for the exercise of electors' rights in accordance with the requirements of the Accounts and Audit Regulations.	✓		during the year gave all persons interested the opportunity to inspect and ask questions about this authority's accounts.
5. We carried out an assessment of the risks facing this authority and took appropriate steps to manage these risks, including the introduction of internal controls and/or external insurance cover where required.	✓		considered and documented the financial and other risks it faces and dealt with them properly.
6. We maintained throughout the year an adequate and effective system of internal audit of the accounting records and control systems.	✓		arranged for a competent person, independent of the financial controls and procedures, to give an objective view on whether internal controls meet the needs of this smaller authority.
7. We took appropriate action on all matters raised in reports from internal and external audit.	✓		responded to matters brought to its attention by internal and external audit.
8. We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on this authority and, where appropriate, have included them in the accounting statements.	✓		disclosed everything it should have about its business activity during the year including events taking place after the year end if relevant.
9. (For local councils only) Trust funds including charitable. In our capacity as the sole managing trustee we discharged our accountability responsibilities for the fund(s)/assets, including financial reporting and, if required, independent examination or audit.	Yes	No	N/A
			has met all of its responsibilities where, as a body corporate, it is a sole managing trustee of a local trust or trusts.

*Please provide explanations to the external auditor on a separate sheet for each 'No' response and describe how the authority will address the weaknesses identified. These sheets must be published with the Annual Governance Statement.

This Annual Governance Statement was approved at a meeting of the authority on:

DATE

and recorded as minute reference:

MINUTE REFERENCE

Signed by the Chairman and Clerk of the meeting where approval was given:

Chairman

SIGNATURE REQUIRED

Clerk

SIGNATURE REQUIRED

ENTER FULL ADDRESS WWW.MIDDLELEVEL.GOV.UK SPACE ADDRESS

In response to Cllr Boden, Mr Hill outlined the timescales for getting approval of the annual Governance statements and annual returns together with the arrangements for submission to the external auditor.

RESOLVED

That the Chairman be authorised to sign the Annual Governance Statement on behalf of the Board, for the financial year ending 31st March 2023.

B.2105 Payments 2022/2023

The Board considered and approved payments which had been made during the financial year 2022/2023, viz;

HUNDRED OF WISBECH INTERNAL DRAINAGE BOARD

Payments 2022/2023 (1st April 2022 - 31st March 2023)

GENERAL ACCOUNT

Middle Level Commissioners - Administration charge, postages, telephone charges, stationery and Health and Safety contract	11,009.78
Middle Level Commissioners - Fees (Planning and development applications)	928.92
Harrison Agricultural Contracting Ltd - Maintenance work from October 2021 to February 2022, clearance of ditch behind Crown Packaging, removal of shed from drain, slubbing and hedge-trimming	20,465.10
I A Smith - Fees for work in connection with the culverts under the A47 Trunk Road	837.50
Needham & Laddus IDB - Contribution in lieu of drainage rates (Drainage of land through Needham Bank)	142.00
Environment Agency - Precept	8,890.00
Middle Level Commissioners - Contribution in lieu of drainage rates (Drainage of land through Needham Bank)	544.32
Water Resources East (WRE) Ltd - Contribution to operating costs	300.00
Association of Drainage Authorities - Subscription 2022	1,050.00
W Norman & Sons Ltd - District Officers fees to May 2022	840.00
Public Works Loan Board - Loan repayment	24,866.38
Susan Hilland - Ex-gratia payment for co-operation for the main outfall installation	100.00
Mr N Buttress - District Officers fees from 19th November 2021 to 16th May 2022	762.50
Harrison Agricultural Contracting Ltd - Quarterly maintenance work, piling work, slubbing, tree cutting, creating security bank on attenuation pond and diesel surcharge	17,028.67
Public Works Loan Board - Loan repayment	12,447.77
Fen Group - Release of 5% retention for works in connection with the replacement of the main outfall at Crooked Bank	18,925.01
Middle Level Commissioners - Renewal of insurances	389.32
PKF Littlejohn LLP - Audit Fee (2021-2022 accounts)	1,920.00
Harrison Agricultural Contracting Ltd - Quarterly maintenance work, diesel surcharge, slubbing and clearing of Cold Store culverts	17,940.67
Middle Level Commissioners - Internal audit fees (Whiting & Partners, 2021-2022 accounts)	1,506.00
Middle Level Commissioners - Administration charge, postages and telephone charges	9,427.31
Middle Level Commissioners - Contribution - Conservation officer	352.50
Middle Level Commissioners - Fees (Production of Board report, attendance at meetings, work in connection with Cromwell Road Drain between Points 33-36, planning & Development applications)	3,932.32
Environment Agency - Precept	8,890.00
Public Works Loan Board - Loan repayment	24,866.38
The Crown Lodge Hotel - Expenses in connection with Board meeting	409.00
Middle Level Commissioners - Fees (Production of Board report, work in connection with the attenuation pond, planning & development applications)	2,771.09
W Norman & Sons Ltd - District Officers fees to 31st October 2022	525.00
Harrison Agricultural Contracting Ltd - Quarterly maintenance work, slubbing, 5 litres of Roundup and land rent on Holly Bank for culvert dyke spoil	11,280.97
Mr N Buttress - District Officers fees to 30th November 2022	650.00
Public Works Loan Board - Loan repayment	12,447.77
Association of Drainage Authorities - Subscription 2023	1,098.00
Mr S A Pinder - Ex-gratia payment for inconvenience caused during drain maintenance operations and culvert lining works	750.00
Middle Level Commissioners - Fees (Production of Board report, attendance at meeting, work in connection with the proposal to transfer the access strip to the Board, planning & development applications)	1,593.61
Harrison Agricultural Contracting Ltd - Quarterly maintenance work, clearing ditch at Point 65-66, clearing area in Porters and land rent on Holly Bank for culvert dyke spoil	10,745.17
Information Commissioner - Data Protection Registration renewal	40.00
Anglia Farmers - Electricity supply 2022/2023 - Redmoor Depot	45.93
	<u>230,718.99</u>

(NB - Amounts shown include Value Added Tax)

- NB: Mr Harrison declared an interest in the payments made to Harrison Agricultural Contractors Ltd.
- NB: Cllr Laws & Miscandlon declared interests (as members of MLC) in payments to Middle Level Commissioners.
- NB: Mr Buttress declared an interest in the payment made to him for District Officers Fees.
- NB: Mr Leach declared an interest (as an employee of W.Norman & Sons Ltd) in the payment made to W.Norman & Sons Ltd.

In response to Cllr French, the Chairman detailed the nature of expenses paid to the Crown Lodge Hotel regarding the November Board meeting.

B.2106 Annual Accounts of the Board – 2022/2023

The Board considered and approved the Annual Accounts and bank reconciliations for the year ended on the 31st March 2023 as required in the Audit Regulations, viz;

[illegible]

HUNDRED OF WISBECH INTERNAL DRAINAGE BOARD
ACCOUNTS FOR THE YEAR ENDED 31st MARCH 2023

DEVELOPMENT CHARGES ACCOUNT

2023				2022		
Mar-31	Expenditure during the year			Apr-01	Balance brought forward	112.17
				2023		
				Mar-31		
	Middle Level charges	0.00				
	Joint Pumping Station Replacement Fund	5,398.00				
	To General Fund	137.25				
	- Sleeving pipework	139.50				
	- Storage area - point 29 (Hutchinsc	14,643.94			Contributions Holding Account:-	53,980.09
	- Gravity outfall pipe replacement	1,286.98			Receipts during the year	0.00
	- Holly Bank culvert	0.00	16,207.67		Prior year adjustment	0.00
	Balance carried forward		32,486.59		Interest	0.00
			<u>54,092.26</u>			<u>54,092.26</u>

REPLACEMENT ASSET FUND

2023				2022		
Apr-01	Transfer to General Fund			Apr-01	Balance brought forward	
	- Sleeving pipework	0.00			Asset replacement fund	132,931.83
	- Storage area - point 29 (Hutchinsc	0.00			Capital Improvement Scheme fund	495,498.42
	- Gravity outfall pipe replacement	0.00				628,430.25
	- Highway culverts - A47	274.50				
	- Culvert point 66	672.00				
			946.50	2023		
				Mar-31	By Loan Draw Down	0.00
	Balance carried forward					
	Asset replacement fund	132,657.33				
	Capital Improvement scheme fund	494,826.42	627,483.75			
			<u>628,430.25</u>			<u>628,430.25</u>

Hundred of Wisbech Internal Drainage Board

Treasurers Account 2022/2023

1st April 2022		31st March 2023	
Balance brought forward	1,314,687.66	Payments made during the year	230718.99
		Returned Direct Debit - Rates	<u>0.00</u> 230,718.99
31st March 2023			
Receipts during the year			
Clerk's collection account	240,020.35		
Interest on deposit accounts	<u>0.00</u> 240,020.35		
Write back of old outstanding cheques	119.58		
		Balance carried forward	1,324,108.60
	<u>1,554,827.59</u>		<u>1,554,827.59</u>

National Savings - Treasurers Account 2020/2021

1st April 2022		31st March 2023	
Balance brought forward	5,259.70	Payments made during the year	0.00
31st March 2023			
Interest on deposit accounts	4.90	Balance carried forward	5,264.60
	<u>5,264.60</u>		<u>5,264.60</u>

Summary of Bank Reconciliations as at 31st March 2023

Barclays Bank PLC

Clients Premium Account

Balance per Statement as at 31st March 2023	1,324,108.60
Less unrepresented cheques	0.00
Add outstanding lodgements	0.00
Balance per Trial Balance	<u>1,324,108.60</u>

Cash balances as at 31st March 2023

Barclays Bank PLC

Clients Premium Account	1,324,108.60
-------------------------	--------------

National Savings

Investment Account per passbook	5,264.60
---------------------------------	----------

<u>Total reconciled cash balances per accounts</u>	<u>1,329,373.20</u>
--	---------------------

Section 2 – Accounting Statements 2022/23 for

HUNDRED OF WISBECH INTERNAL DRAINAGE BOARD

	Year ending		Notes and guidance
	31 March 2022 £	31 March 2023 £	
1. Balances brought forward	693,524	1,264,110	Total balances and reserves at the beginning of the year as recorded in the financial records. Value must agree to Box 7 of previous year.
2. (+) Precept or Rates and Levies	201,858	215,434	Total amount of precept (or for IDBs rates and levies) received or receivable in the year. Exclude any grants received.
3. (+) Total other receipts	562,909	830	Total income or receipts as recorded in the cashbook less the precept or rates/levies received (line 2). Include any grants received.
4. (-) Staff costs	0	0	Total expenditure or payments made to and on behalf of all employees. Include gross salaries and wages, employers NI contributions, employers pension contributions, gratuities and severance payments.
5. (-) Loan interest/capital repayments	62,181	74,628	Total expenditure or payments of capital and interest made during the year on the authority's borrowings (if any).
6. (-) All other payments	132,000	141,075	Total expenditure or payments as recorded in the cash-book less staff costs (line 4) and loan interest/capital repayments (line 5).
7. (=) Balances carried forward	1,264,110	1,264,671	Total balances and reserves at the end of the year. Must equal (1+2+3) - (4+5+6).
8. Total value of cash and short term investments	1,319,947	1,329,373	The sum of all current and deposit bank accounts, cash holdings and short term investments held as at 31 March – To agree with bank reconciliation.
9. Total fixed assets plus long term investments and assets	239,500	239,500	The value of all the property the authority owns – it is made up of all its fixed assets and long term investments as at 31 March.
10. Total borrowings	1,410,762	1,361,074	The outstanding capital balance as at 31 March of all loans from third parties (including PWLB).

For Local Councils Only	Yes	No	N/A	
11a. Disclosure note re Trust funds (including charitable)				The Council, as a body corporate, acts as sole trustee and is responsible for managing Trust funds or assets.
11b. Disclosure note re Trust funds (including charitable)				The figures in the accounting statements above do not include any Trust transactions.

I certify that for the year ended 31 March 2023 the Accounting Statements in this Annual Governance and Accountability Return have been prepared on either a receipts and payments or income and expenditure basis following the guidance in Governance and Accountability for Smaller Authorities – a Practitioners' Guide to Proper Practices and present fairly the financial position of this authority.

Signed by Responsible Financial Officer before being presented to the authority for approval

SIGNATURE

Date

3rd May 2023

I confirm that these Accounting Statements were approved by this authority on this date:

DD/MM/YYYY

as recorded in minute reference:

MINUTE REFERENCE

Signed by Chairman of the meeting where the Accounting Statements were approved

SIGNATURE REQUIRED

Hundred of Wisbech IDB**Reconciliation between statement of accounts and Annual Return****Financial year ended 31st March 2023****Per Annual
Return**

Line 1	Balances brought forward		
	General Fund	286,728.05	
	Development charges account	112.17	
	Pumping station replacement fund	174,433.94	
	Asset replacement fund	628,430.25	
	Contributions holding account	121,154.02	
	Future works account	53,252.00	
		1,264,110.43	1,264,110
Line 2	Rates and Special Levies		
	Agricultural rates	10,536.40	
	Special Levies	204,823.00	
	Penalty	0.00	
	Costs	75.00	
	Write-off	0.00	
		215,434.40	215,434
Line 3	Total other receipts		
	Interest		
	General fund	3.05	
	Development charges account	0.00	
	Joint pumping account	1.85	
	Consent applications	350.00	
	Private works	0.00	
	Discharge contributions	474.59	
	Write Back of Provisions	0.00	
	Sale of Assets	0.00	
	Loan Advance	0.00	
		829.49	830
Line 4	Staff costs		
	Wages/salaries	0.00	
	National insurance contributions	0.00	
	Pension costs	0.00	
	Travelling expenses	0.00	
		0.00	0
Line 5	Loan repayments		
	PWLB - Principal	49,688.07	
	PWLB - Interest	24,940.23	
		74,628.30	74,628

Hundred of Wisbech IDB**Reconciliation between statement of accounts and Annual Return****Financial year ended 31st March 2023****Per Annual
Return**

Line 6	All other payments		
	Precept	17,780.00	
	Rates, insurances, telephones	984.92	
	Repairs and renewals	0.00	
	Fuel - Expenditure in year	62.68	
	Drainworks	49,279.33	
	Health & Safety	0.00	
	Administration	21,153.22	
	Costs for Sale of Depot	0.00	
	Fees	5,912.24	
	Development charges fees	0.00	
	Write back of sales ledger balance	0.00	
	Improvement works	18,965.82	
	Joint pumping	26,500.00	
	Under provision in previous year - Joint pumping	436.95	
		141,075.16	141,075
Line 7	Balances carried forward		
	General Fund	305,504.86	
	Development charges account	32,486.59	
	Pumping station replacement fund	178,295.14	
	Asset replacement fund	627,483.75	
	Contributions holding account	67,648.52	
	Future works	53,252.00	
		1,264,670.86	1,264,671
Reconciliation			
Line 1 + Line 2 + Line 3 - Line 4 - Line 5 - Line 6			1,264,670.86

Cllr Boden referred to the low interest received in the year and Mr Hill referred to the briefing note sent to all members and confirmed that following the closure of the Client Premium Accounts, the Board now operated two current accounts for cash flow purposes with transfer between the two, the second account being interest bearing. He further reported in response to Cllr Boden that the Board were also able to place sums on deposit and currently it was more beneficial for a short term one month deposit and that currently the Board had arranged for £1 million to be placed on a one-month deposit at 2.3%

Cllr Boden commented that Fenland District Council were able to access higher interest-bearing rates, currently between 3% - 4% and wondered if this could be something that the Board would be interested in investigating. Mr Hill & Mr Burrows confirmed they would be interested in looking at more details concerning this but would also need to investigate the legality of this type of investment.

Cllr Boden considered that overall interest received should be itemised with the end of year accounts package, and Mr Hill & Mr Burrows agreed to look at this further.

RESOLVED

That the Chairman be authorised to sign the Annual Return, on behalf of the Board, for the financial year ending 31st March 2023.

B.2107 Expenditure estimates and special levy and drainage rate requirements 2023/2024

In response to Cllr Boden, Mr Hill detailed individual elements within the budget proposal and confirmed that the net expenditure could be reduced when now taking into account likely interest on the revenue balances, viz;

HUNDRED OF WISBECH INTERNAL DRAINAGE BOARD

BUDGET 2023/2024

Page no.

	<u>Approved budget</u> <u>2022/2023</u> £	<u>Actual</u> <u>2022/2023</u> £	<u>Budget</u> <u>2023/2024</u> £	<u>Remarks</u>
1 Rates, Insurances and telephones	500	985	1,250	A - Includes: - Contractors charges 30,858 Slubbing/slip repairs 10,710 Fuel changeover/surcharge 4,059 45,627
2 Fuel (Oil and electricity)	0	63	0	B - Includes provision for: Contractors charges 31,475 Proposed slubbing programme (year 3/5) 25,000 additional work/Fuel changeover/surcharge 14,000 Spoil disposal 6,000 76,475
3 Drainworks (incl District Officer's fee & expenses and Environmental measures)	74,750	49,279 ^A	81,500 ^B	C - Provision based on new calculation D - Includes estimate for new electricity contract -
4 Joint Plant Maintenance (with Waldersey IDB)	26,000	26,937 ^C	47,500 ^{C/D}	E - Open ditch lining - point 66 (Scout hut) 200,000 Storage area - point 29 (Hutchinsons) 100,000 A47 culverts highways improvements 10,000 Telemetry - South Brink p/s 1,463 311,463
5 Administration charge, Health and Safety contract, Audit fee, printing, stationery, advertising, Association of Drainage Authorities subscriptions etc	21,250	21,153	22,075	F - Expenditure per capital programme
6 Planning Applications	9,000	5,912	9,000	G - Pipe and fill channel - point 66 (Scout hut) 250,000 Storage area - point 29 (Hutchinsons) 150,000 District wide flood alleviation study 25,000 H & S improvements to structures 6,000 Fees/balances from earlier schemes 600 engineer to update on progress of schemes 431,600
7 Environment Agency Precept	17,780	17,780	17,780	H - Funding (Improvement programme)
8 Loan Charges	74,628	74,628	74,628	I,J,K Includes - asset fund - I - provision towards new slubbing programme 10,000 J - provision towards new slubbing programme 3,189 K - provision towards new slubbing programme 10,000 K - Provision towards H & S improvements 3,000
9 Asset Replacement Fund	0	0	0	
10 Studies and Surveys	0	0	0	
11 Improvement Works - (per programme)	311,463 ^E	18,966 ^F	431,600 ^G	
	535,371	215,703	685,333	
Improvement works - Funding	310,000 ^H	18,693 ^H	425,600 ^H	
LESS Rents, Deposit Accounts interest etc	10,213 ^I	3,542 ^J	13,274 ^K	
annual value - 3,119,734	215,158	193,469	246,459	
GENERAL FUND				
Opening balance	286,728	286,728	305,505	
rates raised (2022/23 6.90p)	215,158	215,434	246,459	
net expenditure	215,158	193,469	246,459	
Balances	-10,000	-3,189	0	
Close balance	276,728	305,505	305,505	

Hundred of Wisbech Internal Drainage Board

Rate and levy requirements

Under Section 37 of the Land Drainage Act 1991, the appropriate proportions in which the net expenditure of the Commissioners must be borne for 2023/2024 is:-

- | | | |
|----|--|--------------|
| a) | Proportion to be borne by the Agricultural Sector – | 4.85% |
| b) | Proportion to be borne by Special levies issued to:- | |
| | Fenland District Council – | 94.60% |
| | Borough Council of Kings Lynn and West Norfolk – | <u>0.55%</u> |
| | | 95.15% |

The product of a rate of 1p in the £ on Agricultural land and buildings is £1,513.

In 2023/2024 a rate of 1p together with corresponding Special levy would raise £31,120.

Revenue balance in hand on 31st March 2023 - £305,505

The estimated net expenditure of £246,459 in 2023/2024 is equivalent to:-

- a) a rate in the £ on Agricultural land and buildings of 7.90p
- b) a Special levy on Fenland District Council of £233,140 and
- c) a Special levy on Borough Council of Kings Lynn & West Norfolk of £1,367

In 2022/2023 a rate of 6.90p in the £ was raised together with a Special levy of £203,629 on Fenland District Council and £1,194 on Borough Council of Kings Lynn & West Norfolk.

P BURROWS

Clerk to the Board

May 2023

Cllr Boden referred to the level of the revenue balances, which had increased over the years to substantially more than a 'year in hand' which could generally be used as a guide. He considered to address this and start to reduce the revenue balance to nearer a year in hand, it would be possible to leave the rate requirement at 6.90p.

The Chairman referred to the expenditure of the Board which they had little control over, namely the pumping costs and also the unknown costs for the likely disposal of spoil.

Mr N Buttress queried that if balances were reduced and in 2-3years time there was unusually high expenditure and a substantial increase in rates was required to address ongoing costs and to replace depleted balances, what would Fenland District Councils position be?

Cllr Boden firstly accepted that there was likely to be major capital expenditure in future years but this type of expenditure should be serviced by way of loan and secondly, if it became necessary to raise the annual rate requirement substantially, the Fenland District Council would fully support the Board with funding to whatever level was required.

Cllr Boden proposed a rate of 6.90p together with corresponding special levies and this was seconded by Cllr French. There was no amendment to the proposal put forward and the Board approved a rate of 6.90p together with corresponding special levies for 2023/2024.

The Board considered & approved estimates of expenditure and proposals for Special levy and Drainage rates in respect of the financial year 2023/2024 and were informed by Mr Hill that under the Land Drainage Act 1991, the proportions of their net expenditure to be met by Drainage rates on Agriculture hereditaments and by Special levy on Local Billing Authorities would be respectively 4.85% and 95.15%

RESOLVED

- i) That the estimates be approved.
- ii) That a total sum of £215,262 be raised by drainage rates and special levy.
- iii) That the amounts comprised in the sum referred to in ii) above to be raised by drainage rates and to be met by special levy are £10,439 and £204,823 respectively.
- iv) That a rate of 6.90p in the £ be laid and assessed on Agricultural hereditaments in the District
- v)
 - a) That a Special levy of £203,629 be made and issued to Fenland District Council for the purpose of meeting such expenditure.
 - b) That a Special levy of £1,194 be made and issued to the Borough Council of Kings Lynn and West Norfolk for the purpose of meeting such expenditure.
- vi) That the seal of the Board be affixed to the record of drainage rates and special levies and to the special levy referred to in resolution (v).
- vii) That the Clerk be authorised to recover all unpaid rates and levy by such statutory powers as may be available.

B.2108 Date of next Meetings

Mr Hill reminded members that the next Meeting of the Board will be held on Thursday 16th November 2023 at The Crown Lodge, Outwell.

The Chairman referred to the possibilities of a district inspection to show the new members the issues faced by the Board and Mr Buttress considered this would be best to be held in January, when the district systems was likely to be under the most stress.

RESOLVED

That the Chairman to give consideration to and arrange an inspection of the district.

B.2109 Any Other Business

Cllr Boden reported that Fenland District Council were fully supportive of Internal Drainage Boards and both members and staff at the Council would always be available to assist in any way they could.

Mr Buttress thanked the Council for their attendance and considered having the council working with the Board and being supportive will be a great asset moving forward.

He referred to the earlier discussions concerning Health & Safety matters and after due consideration, taking into account personal circumstances, he informed that Board that he would continue in the role until the November Board meeting, but would be standing down from the role of Health & Safety Officer at that time.

Members were sorry that this was the case and hoped that with a further period of reflection he may reconsider his position as his work as Health & Safety Officer was extremely helpful to the Board and greatly appreciated by the members.

.....
Chairman

.....
Date