

MIDDLE LEVEL COMMISSIONERS

Report of the Middle Level Board on the financial year 2024/25 for submission to the General Meeting of the Commissioners to be held on 6 November 2025

MEMBERS OF THE MIDDLE LEVEL BOARD – 2024/25

(year in which first elected in brackets)

JONATHAN BROWN (Chairman)	(2006)
PATRICK ALLPRESS	(2011)
DUNCAN BOUGHTON	(1985)
ROBERT BROWN	(2013)
THE LORD DE RAMSEY	(1980) resigned 2024
JOHN HEADING	(1991) resigned 2024
MARC HEADING	(2004)
Dr DEREK LANGSLOW	(2023)
MATHEW LATTA	(2012)
ANDREW LENSEN	(2021)
ALISON MORRIS	(2024)
SAM RABY	(1991) resigned 2024
PAUL WEST	(2012)
HUGH WHITTOME (Vice Chairman)	(2002)
STEPHEN WHITTOME	(1989)

CHRIS CROFTS

(representing the Borough Council of King's Lynn and West Norfolk under the provisions of the Land Drainage Act 1991)

Mrs DEE LAWS

(representing Fenland District Council under the provisions of the Land Drainage Act 1991)

ALEX MISCANDLON

(representing Fenland District Council under the provisions of the Land Drainage Act 1991)

Ms SALLY HOWELL

(representing Huntingdonshire District Council under the provisions of the Land Drainage Act 1991)

OFFICERS:

Clerk and Chief Executive – P Burrows FCIWEM C.WEM CEnv

Chief Engineer – Mrs N Oldfield IENG MICE ACIWEM

ACCOUNTS IN RESPECT OF THE FINANCIAL YEAR 2024/25

The Commissioners' revenue balance on 31st March 2024 was £3,906,016.89 and during the year has decreased by £962,965.52 to £2,943,051.37.

The sum of £779,626.05 was received from the Environment Agency (EA), being the standard annual calculated contribution in respect of highland water contributions for maintenance works.

The precept paid to the EA amounted to £2,106.42 compared with £2,045.07 in 2023/2024.

The Commissioners borrowed £11 million from the Public Works Loan Board for the St Germans Pumping Station replacement scheme and the balance outstanding at 23rd March 2025 was £6,699,062.93.

Development contributions were received in respect of all development which would give rise to an increase in the rate or volume of surface water discharge to maintained watercourses within the catchment.

There are no unusual features in the Navigation (Middle Level Act 2018) and Adventurers' Accounts. Within the (2018) Navigation Accounts the sum of £202,890.42 was received during the year for Navigation Registration/Licence Fees and the retained balance at 31st March 2025 for the installation of facilities on the Link Route was £166,977.53.

MEMBERS ATTENDANCE

The attendances of most of the Members of the Board have been excellent as usual.

ETHNIC MONITORING

The Commissioners' workforce is ethnically classed as white European.

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THIS REPORT IS PROVIDED AS IT WAS PRESENTED TO THE BOARD
AT THE APRIL 2025 MEETING

(with the removal of employee matters and appendices)

2024/2025 Annual Report

Chief Executive's Summary

Whilst thankfully the weather has been kinder to us in 2024/25 than it was in 2023/24, the knock-on and recovery implications of the exceptionally wet year have meant that this year has been a huge challenge for our teams right across the range of our core functions. We've shown agility and adaptability in spades.

We have then taken the opportunity that came, went and then came back very late in the year, in terms of the one-off government IDB Fund and have made as much of the financial opportunity as we could with the limited time and resources available. I am truly proud as to how we have shown agility and adaptability and have gone over and above. We have used these funds to deliver important refurbishment works for MLC and IDBs but have also invested in opportunities we may not have ordinarily secured core funding to deliver. The solar installation for example will have long-lasting financial and operational benefits and has helped us conceive a new 'electricity net zero' organisational strategy that we are seeking the Board to endorse.

We pulled out all the stops and re-prioritised our diaries making successful bids under Tranche 1 for the Commissioners of £747,266 and for 25 IDBs totalling £905,968. For Tranche 2a, we secured and have delivered works on behalf of the Middle Level Commissioners:

- A suite of works at St Germans Pumping Station – including replacement generator radiator, new PLCs and rooftop solar installation (£338k)
- A suite of works at Bevill's Leam Pumping Station – including weed screen improvements, repairs and replacements of engine and electrical components (£255k)
- Purchase of a suite of mobile pumps – a range of pump types and sizes to provide emergency pumping solutions for MLC and IDBs (£540k)
- MLC depot solar power installation (£145k)

In addition, we have secured funding and delivered two packages of IDB works. A pumps and channels package covering the needs identified within 19 IDBs – totalling £636k and a weed screen package – totalling £250k.

We also bid for four projects under Tranche 2b of the £19m fund for delivery in 2025/26 and have been successful with two.

St Germans Pumping Station Resilience Phase 2 – MLC: To support a long-term goal to become 'Electricity Net Zero', this approximate £1m project includes installation of a solar array on land we own at St Germans. The premise being the savings that result from our renewables are reinvested into further phases until we become 'Electricity Net Zero'. The project also includes for research into decarbonising the generators using hydrogen fuel with potential onsite generation, as well as improved weed management infrastructure and biodiversity net gain.

Bevill's Pond Resilience – MLC & Sawtry IDB - This is a package of relatively small-scale investments totalling c£300k that will improve our understanding and management of the highland water that flows into our vulnerable Bevill's Pond. This includes new gauging/monitoring stations (to be delivered in collaboration with other partners in the catchment); telemetry improvements to Sawtry Pumping Station; design works to critical conveyance structures on Pig Water and improved security measures at Bevill's Leam PS.

Within their spring Statement the Government has increased the fund by an additional £16m and in early April 2025 we received confirmation that our Mobile Pumps Phase 2 project has also been identified to receive up to £1,215k

of funding. We have reviewed and resubmitted our plans for this project and are in the process of finalising the grant agreement with the Environment Agency.

Over the year we have also said goodbye to colleagues with deep knowledge and experience and said hello to new starters with new ideas and a fresh pair of eyes. I feel we are moving forward positively, even if it can feel like three steps forward, one step back on occasions.

There has been a sizeable impact of maximising the IDB Fund opportunity alongside staff changes and gaps, in that consequently we are behind in terms of routine M&E, environmental risk management and operations activity, and our intent to develop and introduce Key Health Indicators has been delayed. We will need to mitigate for this within the resourcing approach for T2b in 2025/26 to avoid further degradation of our business-as-usual activity into 2026/27.

Many thanks to the Board Members and IDB Chairs/Vice Chairs that joined us at St Germans in early September for an informal inspection and discussion on where we are with the Middle Level River Management Scheme. In a milestone month for pumping at the site (90 years since the opening of the original station) it maybe should not have been a surprise to have broken a record for the volume pumped in any September we have records for, with 6,276 Megalitres pumped.

Within our discussion on the Middle Level River Management Scheme, I appreciate there were and continue to be some difficult messages to digest along with some significant uncertainties ahead. Understanding and facing the true costs involved in sustaining the Commissioners' and the IDBs' complex infrastructure and having an investment and works delivery strategy that is commensurate with the benefits we provide to society is critical. Our approach needs to change and emerging information regarding climate change risk in the Fens (see Fens 2100+ section) magnifies this need.

Paul Burrows, Chief Executive & Clerk

Efficiencies and Income Generation

Seeking financial efficiency is woven into every decision made within the organisation and from 2025/26 each department is expected to keep a log of tactical measures and outcomes that have driven efficiency.

However, there are six 'Big Win' areas of organisational focus that will result in short, medium and/or long-term significant financial benefit to rate and levy payers. The majority of these require an upfront 'invest to save' approach to secure financial benefit via:

- increased efficiency
- reduced financial risk to MLC
- increased investment & income generation and/or
- increase effectiveness/productivity

In terms of realising these efficiencies, the level of investment in foundation resources has been an issue for many years. Whilst the staff have done their very best, this has resulted in significant missed opportunities for income generation, cost recovery and grant leverage; inefficient delivery (particularly capital works); compliance concerns and reputational impacts reducing collaborative/partnership working opportunities.

At the same time the delivery challenge has increased as assets degrade; delivery complexity increases; the IDB governance model within the Middle Level has weakened; climate change bites; statutory duties expand, and public/government scrutiny and expectations heighten. Affordability of core drainage rate, special levy and highland water income is increasingly a challenge and uncertain.

Over the last two years steps have been taken to start to address our foundations and wisely invest in additional capacity, leadership and capability which is starting to improve MLC reputation and credibility. This is also starting to lever some of the income generation and efficiency opportunities outlined below. Continued wise upward trend (but not step-change) investment is required, including a reinvestment of income and efficiency savings. The investment is largely within people (employees) and their skills, knowledge, energy and loyalty.

To realise many of these 'Big Win' efficiencies/income generation opportunities, we will need to enter into an increasing number of legal agreements and complex contractual arrangements with partners, developers, suppliers and Anglian Water in terms of the Fens Reservoir. MLC financial health and decision-making will come under greater scrutiny as others undertake their due diligence on us. We therefore need a maturing and modernisation of the way we present our financial information and the Commissioners need to appreciate the need to address underlying financial health to avoid collapse of potential opportunities; enable a strong negotiating position; and meet the terms and conditions of any agreements negotiated.

There is an increasing risk of legal challenge should we not be able to meet our end of any agreements, e.g. providing a service and using the income for the intended purposes. Strengthened governance of this income will be essential to mitigate this risk.

Efficiencies - The BIG WIN Six		
1	MLC Navigation See below	P10
2	Fens Reservoir Once in 400-year opportunity to re-engineer the Middle Level system – bringing efficiency, shared costs, resilience and a lever for wider investment.	P33
3	Optimising St Germans Pumping Station St Germans Pumping Station represents between 9-27% of MLC overall annual expenditure. MLC overall budget performance is largely determined by the volume and cost of pumping at St Germans. The cost of pumping is influenced by electricity:diesel costs, the weather and the tide. Whilst intelligent, the station is reactive in its automated mode and may not operate in the most power and cost-effective manner. The cost of interim refurbishments is increasing as the station ages and the first major refurbishment is due in the next 5-10 years. We have insufficient depth of knowledge to scope this. There is also considerable investment needed ahead of this refurbishment. The station will be critical in operating with the Fens Reservoir and we lack data and knowledge to optimise this future operational inter-relationship. Sea level and bed level rise in the Tidal River will increase the power needed and therefore the cost of pumping.	P38
4	Development & Consent Charging Our charging model has not changed for many years and is now out of sync with neighbouring IDBs and MLC and IDBs have been missing out on significant income over the years.	P47
5	Use of MLC, property, land & watercourses We own four properties and operational/historic land-holdings that could be used for increased income generation, including hosting renewables to drive our ambition to become 'electricity net zero' and hosting developer biodiversity net gain.	P15
6	Levering grant and partnership funding to deliver capital works Our delivery model and MLC base staff capacity and capability has not maximised on the first two six-year FCERM grant programmes (£2.6bn and £5.2bn) and has not levered as much funding from the various one-off government grant schemes as we would have liked.	N/A

There are critical resolutions outlined within this report that are key within the pathway to enabling 3, 4 and 5 within the above. The intent will be to have a specific focus on at least one of these areas at each Middle Level Board meeting.

Focus on 1. MLC navigation

This is the most mature 'Big Win' area and the problem, solution and ongoing management risks are summarised below:

Problem:

From 1848 onwards commercial navigation income funded a large proportion of operational running costs. However commercial navigation declined from the 1920s (as running costs magnified with the need to pump from the system) and eventually died off in the 1950s. Legislation meant MLC had statutory duties associated with navigation but did not enable MLC to license leisure boating. Our system was the only navigation in the country that was 'free' for the user, with infrastructure and operations funded by the MLC via drainage rates and special levy.

Solution:

- The MLC invested approximately £300k-£400k in legal services and staff time to secure the Middle Level Act (2018). The Act provides the ability to charge for leisure boating alongside strengthened powers of regulation and enforcement.
- As part of securing the legislation there was a commitment to ring-fence 25% of license fee income to invest in improving link route facilities to meet IWA standards.
- There was also approximately £40k initial investment in rural moorings and in the set-up of our enhanced navigation service.
- There is now a £75k-£100k per annum additional cost to running our navigation service.

Financial Benefits:

- Navigation License income is £200k-£230k per annum.
- There is estimated growth potential of an additional 15-30% on this through continued enforcement of unlicensed boats and hosting additional boats with existing facilities.
- Tidying up the system and becoming a more professional navigation authority open-ups other avenues of partnership working and funding (e.g. Paddle UK partnership and Canoe Foundation grant).
- The initial MLC investment has effectively now been paid back from income received and the annual costs to the MLC rate and levy payer is approximately £100k less than it was pre the 2018 Act.

Risks & Issues:

- Customer expectations have increased massively now users are paying a fee.
- To sustain and increase the income and lever improvements is a 'high maintenance' activity from a staffing perspective, without the capacity to drive the improvements that are needed with any pace.
- The income could easily erode and costs increase if fees are too high, facilities are not improved and connectivity with neighbouring systems is not maintained.
- The new Act has increased the statutory responsibilities on MLC regardless of licence income levels.
- MLC land holding limits our control over facilities provision and there are significant capital works required over the next 10 years (approximately £1m).

The IDB Governance Future within the Middle Level of the Fens

As previously reported, there is a consensus that we need to act locally to ensure the IDB governance landscape and model is fit for the future. At the November 2024 meeting the Middle Level Board supported the allocation of funds to develop an outline design.

The Board also discounted the options that amalgamating IDBs into the Middle Level Commissioners or becoming one very large two tier IDB is not taken forward into scoping or outline design of a future IDB model for the following reasons:

The Middle Level Commissioners, whilst having the responsibilities and functions of an Internal Drainage Board under the Land Drainage Act 1991 and Flood & Water Management Act 2010, have functions and responsibilities beyond a 'normal' IDB that are specified and catered for within a suite of primary legislation, predominantly the Middle Level Acts.

Amalgamating 24 IDBs into the Middle Level Commissioners would likely need new primary legislation and similarly becoming one large two tier Middle Level IDB (solely acting under the Land Drainage Act) would mean repealing a suite of primary legislation. Both approaches would be significantly more complex, costly, time-consuming and controversial than recent experience with the Middle Level Act (2018) that introduced navigation licensing.

Repealing the Middle Level Acts and becoming a Middle Level IDB would mean new legislation and a new body would be needed to take over the MLC navigation authority role (or the Environment Agency subsumes this) and potentially our water transfer role. This would add unwelcomed additional complexity to water level management within the Middle Level given how the system and infrastructure serves and balances a variety of interests and is likely to be largely unsupported by many of the beneficiaries of our system.

The outline design for IDBs within the Middle Level was commissioned and undertaken by Gradeas Consulting Limited and has been shared with IDBs, individual Board Members, Defra, Local Authorities, the Environment Agency and Association of Drainage Authorities. Feedback has been requested by 4 July 2025, along with nominal funding from IDBs to contribute towards any detailed design phase.

Organisational Foundations

At its April 2023 meeting the Board recognised the Chief Executive's assessment of the range of organisational foundation building blocks that are needed; a programme of improvements has been delivered throughout 2024/25 and will continue into 2025/26.

IT Report

An IT pathway has been developed to address critical risks and vulnerabilities, ahead of enabling more efficient and effective working. Since the last report:

- Continued roll out of laptops, replacing aging desktops to enable staff to work more securely and flexibly, reducing risk to business continuity.
- Roll out of tablets to the workforce and continued development of apps and forms (e.g. for Health & Safety reporting) to improve efficiency and log evidence. The next stage is to roll these out to the M&E team.
- Consideration of options to stabilise and future proof our internet connections; this includes a leased line for the office given the lack of cable provision.

Tablets

We are introducing a new app which is widely used within the agricultural sector and provides many of the functions we need in addition to those we have already created. We continue to develop the reporting processes using the information captured to improve our operational and asset management efficiency.

Work on developing an asset and document management framework solution for asset management has not progressed as far as I would have liked. See Chief Engineer's Summary.

Rating System

As previously reported the Water Management Alliance's (WMA) support for their rating software (DRS2005), which we use to manage and issue circa 4,000 drainage rate demands on behalf of the Commissioners and administered IDBs, will be discontinued on 31 March 2025. ADA subsequently decided not to lead on the redevelopment of DRS.

The WMA has re-written DRS for its member IDBs in Access 365, which will be made available for other IDBs to use under licence. This software is known as DRS365 and runs on the WMA Terminal Server, which will be securely operated, maintained and supported remotely.

Upgrading to DRS365 (the software licence, training and transitioning work) will cost around £10k per site (i.e. covering MLC and our administered IDBs) and the annual support charge will be around £5k per site. This covers costs and provides a more robust, sustainable and better supported system than we currently have, reducing risk to MLC and our administered IDBs. These costs will be reviewed next on 1 April 2025 and annually thereafter. The existing DRS2005 maintenance fee is £1k per annum.

The Middle Level Board agreed to adopt the Water Management Alliance's DRS365 software and we have now entered into an associated license agreement with adoption of the software planned.

HR

External HR support and advice continues to be provided by Jo Gray of Phoenix People. Incremental improvements are planned alongside line manager training and support for employee related issues where external advice is prudent.

The following topics are planned for review and/or roll-out:

- Maternity, paternity and adoption leave provision.
- Sexual harassment awareness, given recent strengthened responsibilities for employers.
- Pension salary sacrifice opt-in option for our NEST workplace pension scheme.

One specific issue that is being addressed is that the current longstanding Company Sick Pay (CSP) arrangement is open to interpretation and lacks clarity as to how an employee re-accrues their entitlement. There are some practical steps that need to be developed before the Board will be asked to ratify the clarification.

Health & Safety

External H&S support and advice continues to be provided by COPE Safety Management. A step-change in our management of H&S commenced with the appointment in Q3 2024/25 of an Operations Manager (H&S). Our H&S Policy has been reviewed and will be re-published in Q1 2025/26.

The following topics have been reviewed, improved or are undergoing improvement:

- Key leaders and employees have completed the Institution of Occupational Safety & Health (IOSH) Managing Safely training and associated certification.
- Working Time policy has been reviewed and an opt-out approach to the 48-hour maximum working week (average over 17 weeks) will be implemented in Q1 2025/26.

- Consolidation and standardisation of operational Risk Assessments, including new assessments to address gaps.
- Safe Systems of Work and COSHH assessments and other key policy information consolidated and made more accessible for the workforce via tablets.
- Incident reporting arrangements improved.
- A focus on H&S information for Bevill's Leam and St Germans Pumping Stations is in development.
- Improved rhythm of Toolbox Talks with workforce introduced.
- 4x4 off road training refresher undertaken with safety mitigations reviewed.
- H&S assessment of MLC structures and liabilities has started.
- Legionella assessment planned for Q1 2025/26.
- Inspection of depot undertaken with a focus on LOLER and PUWER.
- Training and PPE records reviewed and consolidated with improved management system introduced.

In addition, we are reviewing our approach into managing lone working. We have reviewed the suitability of our current lone working app (OK Alone) which has never been used effectively, is costly and receives poor feedback from our users. We are introducing a new app (Smart Farmer) on the tablets which incorporates a lone working module, and this will be live from April 2025.

We are also investigating personal alarm systems using learning from the tractor incident last year. Personal alarms can be worn on a belt clip or a lanyard, are waterproof and can be triggered simply at the touch of a button, with text options and GPS locators, and with the two-way call being connected either to a line manager (working hours only), on call staff or directly to a 24/7 monitoring centre/emergency services. The subscriptions vary for different levels of service.

The Board is asked to delegate the decision on the most appropriate solution for personal alarms to the Chief Officers.

Accidents and near misses

These are reviewed at the monthly Works Committee Meetings and actions identified to reduce the risks in future. Good practice is also shared between IDBs as appropriate.

There have been two incidents reported during the period:

- One minor injury. This has identified the need for refresher training for all staff.
- One incident with the potential to cause harm when an internal glass pane at St Germans Pumping Station shattered and fell from its frame. On-site improvements implemented to reduce the impact of future occurrences.

Authorisations

For 2025/26 we have undertaken a review of how we enact our powers of entry and introduced new identification badges for all employees alongside training in conflict resolution and creation of a violence and aggression at work policy. Contractors working on our behalf are issued with a letter of authorisation.

The Middle Level Board also reaffirmed the stance that all employees and contractors of the MLC are considered as duly authorised officers and therefore able to use the Commissioners' powers and IDB Byelaws for their operational and regulatory roles on behalf of the Commissioners and IDBs we provide services for.

Policy Reviews

We have an ongoing review and update of policies. In 2024/25 we also improved our management of Freedom of Information requests. The update to the Privacy Policy has identified some areas of Data Protection that require further attention. It is timely to schedule a Data Audit, which will help to identify any further areas that require

updating. Additional staff and Board/IDB training will likely be a result, along with some other strengthening of procedures across the business.

In terms of governance policies, during 2024/25 the following policies were reviewed and updated:

- Complaints Procedure
- Privacy Policy
- Anti-bribery policy (including gifts & hospitality)

Insurance & Utilities

Insurance

Our insurance has been arranged using Towergate insurance brokers for the year to 31 March 2025. AXA offered a 2-year extension of the tripartite agreement we had previously signed and this was accepted as they offered to keep our business combined policy premium at the same rate for 2025-2026, subject to there not being any changes to the existing cover, i.e. increase in valuations.

Covering MLC and our administered IDBs, the business combined policy premium has increased this year by £16,875, due to the significant increase in pumping station valuations following the meetings last year. The fleet policy premium has also increased considerably due to both the number and size of claims during the year, together with there being additional vehicles and plant. We have been warned that AXA capped the increase in the fleet premium, but if this had gone out to tender it would probably have been in the region of £110,000 plus 12% Insurance Premium Tax. This equates to an increase of £68,000.

More concerningly, AXA will no longer be offering a specific policy for IDBs going forward so this is likely to have a significant impact on the premium for 2026-2027 as there are only a few insurance companies that will quote for our business. NFU has declined to quote.

Electricity Service

In terms of standing charge policy, our appearance on BBC Countryfile has contributed to Ofgem consulting on a revised approach. They have no definite timescales yet, unfortunately, but have reiterated that IDBs remain an important case study for them and one they will continue to raise with decision-makers within government.

A group made up of nominated IDB Chairs along with the MLC Chair and Vice Chair reviewed the electricity contract. Having reviewed options, it was agreed by all to enter a 12 month fully fixed, 100% renewable power electricity contract with EDF Energy, together with a service level agreement with Green Energy Advice Bureau (GEAB), who will manage the contract and validate invoices. Our contract ends in September 2025, and we propose to adopt the same method for reviewing options and deciding upon our next contract.

New Unit Rates are within the range of 21-29p. Following the last Targeted Charging Review (TCR) in 2023/2024 the annual standing charges amounted to £155,662.32, these now stand at £130,467.61 before adding St Germans, which at present equates to £49,122.50, a total of £179,590.11, an annual increase of £23,927.79 across the portfolio. The St Germans quote does not include the TCR charges, which is not down to GEAB nor EDF, but a supplier-wide decision due to the EH1V type of meter, which means suppliers will charge the TCR as they are charged from the Distribution Network Operator (DNO).

We have been advised that the standing charges will continue to increase due to the TCR charges as these are going up year on year. The DUoS (Distribution) and TNUoS (Transmission) charges are set each year, this is the distribution and transportation costs and will be affected by such things as oil prices and demand for dealing with LNG (liquefied natural gas) shipments.

Electricity Net Zero

The highest value of efficiency to be gained that is largely within our control is our adoption of renewables to reduce our vulnerability to peaks in energy costs. The one-off government IDB Fund has enabled us to invest without cost to the local ratepayer to maximise our rooftop solar and, in 2025/26, install a ground-based solar array at St Germans.

A key condition of the business case for the solar array was setting our ambition to become 'Electricity Net Zero' over the medium term. This means overall producing as much electricity as we use, but with continued reliance on the grid as the timing of production would not align with the timing of use. This will be achieved by ring-fencing and re-investing savings into resourcing and delivering further renewables until we meet this ambition or exhaust all realistic opportunities, which include:

- Wise use of our existing property and land holdings, as well as targeted land acquisition.
- Maximise use of our existing 3.6MW grid connection at St Germans. Consider this connection as an asset.
- Consideration of solar, wind, hydrogen and associated battery storage.
- Electricity use will increase as we transition to Electric Vehicles (EVs).
- Site security measures will need to be enhanced as part of any works.

The high-level plan to meet this ambition is to:

- Cover MLC baseload requirements (all usage that is not active pumping) – short term.
- Cover for all MLC usage (Total Use) and enable a cost-effective transition to EVs – medium term.
- Develop and implement a plan for alternative to diesel generated electricity at St Germans – medium/long term.

The existing office roof-top solar, new depot and St Germans roof-top solar are estimated to cover 45% of our current baseload and 10% of our total use. By adding the solar array it is estimated that we can cover 100% of current baseload and 40% of total use. These estimates will be affirmed once solar power is being generated. These percentages are also based on a wetter than average year, however it means that 'electricity net zero' for most years is within reasonable reach with the right investment.

The Board is asked to adopt the ambition to become 'Electricity Net Zero' by ringfencing and reinvesting savings from renewables into resourcing and delivering further renewables until net zero or exhaust all realistic opportunities.

Land & Property

Improved management and registration of land is a critical foundation activity that enables our drive for strategic efficiencies and increased income generation. The formal registration of MLC owned land is now being progressed by the Land Registry who have a team dedicated to our programme of work. The actual registration of our land has begun, and this will likely take 18-months to complete. The position (as of March 2025) is that the properties at Salter's Lode, and 31 and 33 Sluice Road are now registered with Land Registry, with the property at Stanground and the Reeds Cut due to be completed imminently. Next on the list for registration are the Middle Level Main Drain and Sixteen Foot Drain. MLC land excluded from the original package is being registered on an ad-hoc basis, this includes land at Marmont Priory Lock.

In terms of the Cardea land transfer, there has been a positive move forward with Persimmon and a way forward agreed that needs finalising with respective external solicitors, however progress on this is frustratingly slow.

The Catchwater land transfer is with solicitors following valuation of the land by DVS, and negotiation is ongoing with Rochester Bridges Trust.

Notices to Terminate the tenancy agreements on all remaining leased Middle Level Main Drain bank lots have been issued and most lots will be in hand by late 2025, following the necessary notice periods. Grazing lots are already back in hand.

31 Sluice Road has now been refurbished and is ready to let, with professional tenancy management options being explored for this property and 33 Sluice Road.

In terms of MLC banks and channels where we license fishing rights, we have completed a thorough review and update of our license agreements ready for 2025/26 renewals, with a suitable increase in fees.

Office, Depot & Sites

During 2024/25 we have undertaken some individual office moves, furniture improvements and rationalisation and general de-cluttering within the Main Office to improve the working environment and security. New door security arrangements are required as the current 'card swipe' system is no longer supported, and we cannot create any new cards.

The Depot is also undergoing a significant de-cluttering exercise and improvements have been made in terms of employee health and safety by linking the depot with the mess area via a new internal door. The IDB Fund Tranche 2 depot resilience and mobile pumps packages have meant there has been significant works at the depot during 2024/25, including enclosing the storage area, installation of rooftop solar and charging points. There will be residual decluttering activity and budget required in 2025/26 to maximise the benefits associated with these works.

The 184kWp rooftop solar was installed during winter. This installation is forecast to produce 130,000 kWh of electricity annually, of this it is forecast that 10% will be used on site currently, with this level increasing considerably as we work towards reducing our carbon footprint from transport and heating. This installation includes 23kWh battery storage to cover night-time use and any peaks during day.

We are considering whether the mezzanine area could be converted into office space for the M&E team to maximise capacity and improve security, efficiency and effectiveness.

The review and improvement of the office electric car charging point, alongside a mechanism for staff/visitors to pay a contribution has yet to be actioned due to IDB Fund delivery pressures.

We are reviewing the need and options for the temporary building going forward.

Debt Management

Having had limited success with previous bailiffs, during 2024/25 we trialled a new approach to debt management. We have issued a suite of legacy drainage rate and developer charges debts held by the Commissioners and some IDBs to Glenwood Construction Debt Recovery. The MLC legacy debt within this is £9.7k. A package of navigation debt has been issued to Redwood Collections. The trial had mixed success and we will review our approach for 2025/26.

Highland Water

A formal appeal to the Minister under Section 57 (4) of the Land Drainage Act 1991 was thankfully narrowly avoided in 2024/25 given that the Anglian (Great Ouse) Regional Flood & Coastal Committee (RFCC) agreed a one-off approach to covering the shortfall in the Environment Agency's budget to ensure highland water claims (HWC) to local IDBs were met.

In addition, the Environment Agency's HWC budget for 2025/26 was increased from that which was indicatively allocated. Had the indicative allocation stood, the forecast budget shortfall would have essentially resulted in the Environment Agency imposing an active withdrawal of management of a number of districts and the Middle Level catchment without any underpinning consultation with those affected, impact assessment, any clear policy position or procedure.

However, without a programme of reform and mitigations, we will potentially be in an appeal situation at some not too distant point in the future. The time that would have been spent drafting and lodging an appeal has been used more constructively to develop 'The Highland Water Conundrum' document. This has been submitted to the Minister, Defra, the Environment Agency and our Local Authorities.

There are a range of measures that are outside of the control or influence of us and IDBs that would make a positive difference. I have identified these as recommendations within the document. Many of these recommendations are for the Environment Agency to consider and implement as appropriate.

We feel that it is unfair that HWC payments are under threat without mitigations being available that provide us and IDBs with a greater degree of control, influence and/or choice. We and IDBs have no choice but to receive and manage water that flows into our/their districts from highland areas. We/they are providing a public service to beneficiaries within (and of) highland areas and we/they have no choice but to provide this service.

The 'Highland Water Conundrum' document is available to Middle Level Board Members and Commissioners upon request.

The funding agreement for the IDB Fund Tranche 2B includes the following:

“To prevent the duplication of funding, if an asset is funded in full or in part by this IDB Storm Recovery and Asset Improvement Fund grant (Tranche 2B) the asset should be excluded from Highland Water Contribution claims for the period of 2025/26”

Therefore, whilst the T2B funding is considered capital and Highland Water claims cover certain revenue activities, meaning there should not be a duplication in funding, we need to plan and budget that we will have to discount assets from our 2025/26 Highland Water claims.

Communications & Engagement

In terms of general public engagement, during 2024/25 we have continued to use social media to promote our activities, to seek feedback and to respond to others' posts where necessary.

On social media our LinkedIn followers have increased from 390 to 632 over the last year. Followers of our Facebook page have increased from 1,113 to 1,371. Twitter/X followers are down from 932 to 929 as a result of the degradation of this platform and our reduced active use of it.

We are also committed to engaging with local people about the work that we do. Two examples:

- In July 2024, our Chief Engineer, Nicola Oldfield, attended the Ramsey Rural Museum as guest speaker, providing an insight into the history and operations of the Middle Level Commissioners.
- In March 2025, Paul Burrows, our Chief Executive, was invited to talk to the Fenland & West Norfolk Friends of the Earth group regarding the Middle Level system and the Fens Reservoir.

On 28 September 2024 we marked the 90th anniversary of the opening of the original St Germans Pumping Station. This was a key milestone in the evolution of the Fens, acknowledging that gravity discharge from the Middle Level was becoming impossible. We hosted a work experience student who helped pull together a [YouTube animation](#) to tell the story.



In March 2025 we featured on BBC Politics East with an associated [online](#) article and BBC Radio Cambridgeshire slots focussed on the Fens Reservoir, Middle Level system and regional water scarcity. Also in March 2025, Paul Burrows was invited to speak and contribute on the topic of IDB financing in Westminster to the All Party Parliamentary Group (APPG) focussed on sustainable flood and drought management.

We have been working with North Cambridgeshire Training Centre (NCTC) based in Chatteris: Nicola Oldfield has been invited to present at a Women in Engineering event in partnership with the Cambridgeshire Chamber of Commerce; we are exploring training opportunities provided by NCTC; we hope to work together to develop future opportunities for apprenticeships.

Environment

Review of key work 2024/25

Much of the routine work progressed by the Ecology & Environmental Services Department has been scaled back or put on hold over the past 2 years in order to support the progression of the Middle Level System River Management Scheme. Priority services that have been maintained are essential ecological screening and mitigations to allow works to take place compliantly, as well as providing timely assessment and response to consent applications.

As the Middle Level System River Management Scheme matured towards the end of 2024, it allowed time for the Department to refocus on routine work and process improvements including the redevelopment and launch of its service package for IDBs. A key part of the redefined IDB service package is to develop and maintain a biodiversity action plan (BAP) for each IDB, as is required by law. A meeting with each IDB was arranged between January-March 2025 to update each IDB BAP.

At the time the BAP meetings were planned last year, we were unaware that further Defra IDB Fund monies would be made available for IDB improvements and that many of our applications for funding were going to be successful. This has once again meant that the Department has had to shift attention away from regular services over Q3 and

Q4 of 2024/25. Whilst honouring the pre-planned BAP meetings we have had to prioritise the support and progression of Defra funded projects so that the 31 March 2025 deadline can be met. Many of the projects required significant survey effort and specialised licenced ecological mitigations including water vole displacements.

We will hopefully be able to resume usual business by the end of April 2025. It is for these reasons that the MLC Environment Committee meeting and finalisation of the new Operations Manual have been postponed but will be prioritised for Q2 2025.

We are in the process of drafting a refreshed MLC Biodiversity Action Plan (BAP). All MLC-serviced IDBs have reached their 5-year BAP refreshment point, as is required by the Environment Act 2021. The majority of BAP meetings have now taken place and new BAPs are being drafted for approval. All BAPs including MLC's will consider and support the priorities of the developing LNRS, also required by the Environment Act 2021, so it is a benefit that we have been key in the development of the sections of the LNRS that are most relevant to IDBs. It is the intention to submit a draft of the proposed BAP to the Environment Committee for review and for a final version to be available for review and approval by the Board at the autumn meeting.

Taking a risk-based approach to considering the environment

The Ecology and Environmental Services department often, and sometimes even personally, encounter frustration from IDB members, landowners, consent applicants, developers and the public at the need for surveys and mitigations prior to progressing any invasive work in channels and on banks. It is important that we all, as IDB employees, officers and members, are able to understand and clearly communicate that the requirements are law, not policies of the IDB, and that the laws are applicable to every person and organisation in the UK. This includes farmers, private landowners, the Environment Agency, Natural England and Local Authorities.

Most of these laws have been in place for many years. The main two pieces of wildlife legislation that govern many of the approaches IDBs take to works are the Wildlife and Countryside Act 1981 and the Badger Act 1992. Note that badgers are not protected because they are rare, they are protected in an attempt to reduce the widespread persecution and cruelty inflicted upon them.

It may well be that previously some legal requirements may not have been given sufficient weight due in part to a lack of appreciation as to consequence and a false confidence in continuing with previous custom and practise. Some may have mistakenly believed that due to the important nature of their work, such as flood risk management, they must or should be exempt from the law. Some incorrectly rely on a clause in the law that says if an offence is committed as "*an incidental result of otherwise lawful operation*", then they are protected from prosecution. This is not the case. In court, an organisation and/or an individual would still have to prove that they had taken all reasonable steps to avoid committing the offence if they were to rely on the clause.

There are instances where developers, the public, landowners and IDBs are being investigated and prosecuted due to their work unlawfully impacting on a protected species or habitat. These cases are increasing significantly, particularly against Authorities who are publicly funded and more closely scrutinised. The consequences of these cases can be devastating. Individuals can face many years of crippling uncertainty and worry while criminal cases are drawn together before being taken to court. If prosecuted, a criminal record is applied, which can be a significant barrier to securing future employment, funding and much more. Organisations suffer irreparable reputational loss, funding opportunity or contract loss and/or large fines which can and have put some commercial businesses, such as housing developers, out of business.

It may be the case that progressing works compliantly, including displacing water voles and closing badger setts, can significantly increase the cost of our works, but doing this work compliantly is much cheaper than the legal, reputational, financial and mental consequences of facing criminal proceedings.

There is legal provision for public health and safety to take precedence over wildlife welfare and this is through Natural England wildlife licencing. Where robust evidence can be provided to show there is a likely threat to public health and safety through not progressing the works, a licence to interfere with a protected species can be granted ahead of works taking place to protect the applicant from prosecution. "Urgent works" has a different legal meaning

to “emergency works”. Urgent works are those that require prompt action to resolve an expected but not imminent threat to public health and safety. Urgent works would still require a licence. An emergency would be where an unexpected event requires immediate works to prevent or alleviate a significant threat to public health and safety, such as the sudden collapse of a bank and flooding threatening surrounding residential or developed areas. In this instance it may be necessary to fix the problem first but be confident that we can provide and document evidence of threat to public health and safety to the Regulator as soon as possible after the works, as is legally required. It is not likely that repairing a bank slip after harvest to avoid damaging crops, that had originally occurred months previously, will be seen legally as either emergency or urgent works, as sufficient time would have passed to allow for the works to be planned compliantly within usual approaches.

We take a risk-based approach to environmental compliance. Routine operations are adapted to reduce the risk of committing a wildlife offence as much as possible. This includes training and educating the workforce in what the risks are and how to minimise them. Risk management approaches include avoiding vegetation disturbance during the bird nesting season (March-August inclusive), surveying works areas before non-routine works to identify any species present that need to be considered and avoiding disturbance around the waterline where water voles will be found. There are many other adaptations, mitigations and processes that are integrated in our every-day working that help us to demonstrate that we have taken all reasonable steps to prevent committing an offence during the course of our lawful operations.

The role of the Ecology and Environmental Services Department is to know and understand these risks and to develop and implement ways to enable works to take place compliantly and to protect MLC employees and Middle Level Commissioners from prosecution.

There has recently been an increase in landowner and IDB Board Member feedback regarding water vole displacements.

Local Nature Recovery Strategy (LNRS)

The developing Cambridgeshire and Peterborough Local Nature Recovery Strategy will be key to focussing efforts to conserve and enhance biodiversity in our local area. Priority areas for biodiversity in the intensively cultivated fens are, unsurprisingly, fen ditches and drains. Therefore, we were pleased to be recognised as the experts in this area and to be asked to lead the development of this part of the Strategy. This has been key to ensuring that we can better inform the measures that are being mapped and promoted within and around IDB channels so that they are compatible with, and compliment, IDB operations. For IDBs, the strategy could generate significant funding opportunities where the IDB can demonstrate that biodiversity will be enhanced by improving flood risk and water level management. Such measures may include the funding of additional or improved water level control structures, such as solar-powered tilting weirs, which could provide more localised and flexible water level management within IDB catchments in a more efficient and dynamic way. The Strategy is also likely to encourage more funding for riparian margins to be taken out of cultivation to benefit biodiversity but will also allow more flexible and efficient management access for IDB operations. The Strategy is due to launch later this year.

Efficiencies from in-house services

The Department has a number of protected species licences which allow us to undertake licenced protected species mitigations in order to progress some essential works. The estimated cost of a badger sett closure can be upwards of £20,000 when undertaken by a licenced external ecological consultancy. The Department used its own licences in 2024 to close a number of badger setts along Woodwalton Fen Reservoir banks (which is likely to be an annual occurrence) and this resulted in, and will continue to result in, a significant cost saving to MLC.

Similarly, for DEFRA funded projects that required water vole mitigations undertaken by external ecological consultants this year, the cost difference has been on average around £5,000 per site. This has meant a cost saving of at least £30,000 over the last year for water vole mitigations progressed by MLC.

The Department will also be able to provide a number of other additional qualified ecological surveys, advice and guidance going forward, such as bat surveys for trees and River Condition Assessments for BNG which will also

result in similar considerable savings to MLC against the provisions of the same services from external ecological contractors.

Biodiversity Net Gain (BNG)

There is a regional shortage of off-site ditch habit enhancement opportunities, which currently pay approximately £164k per ditch “unit”. Harnessing this funding to create new ditches or improve existing IDB ditches could deliver multiple benefits, improving system capacity, climate change resilience and significant biodiversity enhancements.

We will be undertaking some targeted habitat condition assessments to develop some shovel-ready projects that are available for BNG funding. It is crucial we maintain and enhance our reputation to become a viable delivery partner to open up this potentially new source of income.

BNG Pricing - England (South)			
Habitat Type	Habitat Distinctiveness	In LPA / NCA Price	Supply Levels
Other Neutral Grassland	Medium	£28,875	Abundant
Woodland and forest	Medium	£33,075	Uncommon
Heathland & Scrub	Medium	£31,500	Abundant
Lakes / Ponds Non Priority Habitat	Medium	£65,625	Uncommon
Lowland Meadow	Very High	£39,375	Uncommon
Watercourses - All Watercourses	High	£164,575	Very Rare
Individual Trees'	Medium	£33,075	Uncommon
Woodland and forest	High	£48,300	Scarce
Traditional Orchard	High	£42,425	Scarce
Wet woodland	Medium	£38,325	Scarce
Mixed Deciduous Woodland	High	£55,125	Uncommon

Pollution

We have seen some success in progressing long-standing historical pollution hot spots this year with Anglian Water and the Environment Agency. The Environment Agency supported by Anglian Water have stepped up their regulatory role in trying to identify and resolve several sources of industrial pollution around the catchment, particularly in Wisbech. Our discussions with the Environment Agency have improved the understanding of their own staff around the role and responsibilities of MLC and the IDBs, as they really were very uninformed. This has resulted in the implementation of a new communications process where MLC are notified immediately of any pollution incident reported to the Environment Agency concerning our channels.

We continue to apply pressure to Anglian Water directly to prioritise the improvement of some of their weak infrastructure which discharges raw sewerage into our systems either under licence or not. This not only disrupts much of our planned work, but it undermines many of the approaches we are taking to conserve and enhance the water environment in our channels.

Anglian Water and the Environment Agency are positively engaging with us, however practical improvements take time and therefore create risk for us. We will continue our efforts this year.

Badger Licence Challenges

In 2024/25, a number of IDB ecologists teamed up to engage the services of a barrister to challenge Natural England (NE) on their interpretation and enforcement of conditions within the CL27 IDB badger licence. The new interpretation had led to the issue of some unreasonable warnings this year to several IDBs and made it very difficult for IDBs to remain compliant with licence conditions. This licence is available to IDBs and allows them to undertake some routine channel maintenance works which would otherwise be classed as an offence under wildlife law. Our

MLC operatives hold the licence, and we were about to roll out training to help other IDBs to access the licence, with the option of MLC administering the licence for them. However, the worrying new interpretation of conditions by NE made us hold off until clarification was received.

The challenge was successful and has led to NE clarifying the activities that are licensable and which are not classed as disturbance so do not need to be reported. It has also paved the way for further improvements to be made to the licence later this year around licence roles and responsibilities, licence administration and the licenced period for activities. Only the IDBs who contributed towards the challenge are able to benefit from the full details of the updates and clarifications.

Ecological Service Provision to IDBs

The launch of the Ecology and Environmental Services Package from April 2025 ensures that IDBs are covering the costs of their service provision more accurately. This also ensures that the Middle Level Commissioners are not under-writing other IDBs' environmental responsibilities.

The services included within the minimum package are carefully defined and additional services that can be provided on a time and materials basis are also offered at a very competitive rate compared to other ecological consultants. The previous income from 34 IDBs for annual ecological service provision was approximately £18,000. We expect income from the new package to be approximately £55,000 annually for 25 IDBs. The details of the new package are set out below. These services will be regularly reviewed to ensure that we continue to provide the most appropriate and efficient support to IDBs to help them achieve minimum statutory environmental compliance.

Service Package:

Ref:	Category:	Details:	Days Equivalent:
1.	General Consultancy (inc. retained service)	Up to 2 days general consultancy which can be used for: - Screening and assessment of non-routine works using the ESR (Environmental Screening Report) process. - Preliminary habitat and species surveys & reporting* - Ad-hoc advice and guidance. - Initial advice & communications for pollution incidents - INNS identification and advice. - Biodiversity Action Plan BAP ditch survey & reporting**	2
2.	Environmental Compliance Health Checking	- One environmental review with MLC Ecology and Environment Services staff per year & subsequent reporting. - Review must include budget setting & expenditure recording for reporting to Defra (IDB1). - Review & assessment of proposed annual programme of works prior to Board approval. - BAP report & review for Board.	1.25
3.	Planning Ecology Services	- Up to 1 day for consent applications advice & guidance^ - Over 1 day will be charged on a time and materials basis. This includes responses to Local Plans and Strategies on the IDBs behalf.	1
4.	Keeping up-to-date	Communication of relevant updates in policy, legislation, regulation and best practice.	1

5.	Training	Attendance for up to 2 candidates at 1 environmental training day per year.	1
Total:			6.25 days p.a.
Cost (2025/26)			£2,375
Notes: *Any surveys or mitigations that follow on from preliminary surveys, including licenced work such as water vole displacement, will be charged on a time and materials basis or can be contracted out if MLC staff are fully booked. ** Any unused consultancy balance can be used to cover the recommended annual 1-day BAP ditch survey, with any shortfall charged separately. If any pre-works surveys (ESRs) are undertaken in the year, they will be extended so that they count as the BAP ditch survey for efficiency. ^ For activity not rechargeable to developers/consent applicants. Unused category balances can be used to cover shortfalls in other categories within the financial year as mutually agreed. Unused balances cannot be carried forward outside the financial year but its use can be discussed with MLC with potential for it to be used to contribute towards assisting the IDB to progress a BAP objective instead if capacity allows. For IDBs who also contract operational services from MLC (via Morgan Lakey, Operations Manager), there will be a 16% reduction in fees, reflective of the efficiency gained from being able to integrate your environmental compliance procedures into our operational processes and communicate freely with your other service providers, taking the annual charge down to £1995 (2025/26).			

St Germans Eel Pass Refurbishment

The new eel pass has been installed at St Germans. Due to its bespoke design and lack of suppliers, there have been some delays with securing the last small but significant parts to complete it and switch back on. As expected, there are also challenges around maintaining egress from the eel pass chamber to the upstream side due to zebra mussels colonising inside pipework but this will be a constant challenge that regular maintenance and checks will need to manage. However, trial runs have proven that the main set-up is generally successful so we are confident that we will be up and running within Q1 2025/26 when the last mesh is installed and sealing is complete.

Horsey Toll (Lowland Agricultural Peat Small Infrastructure Pilot)

We were unable to secure Cadent approval and install the tilting weir before March 2025. Balfour Beatty has developed a construction methodology and is currently liaising with Cadent to get their approval. Balfour Beatty was also unable to provide construction services due to their internal governance requirements and the small scale of the project. However, once Cadent approval has been secured, we will have enough information to put the work out to tender, hopefully with better returns than before. We have also prepared a briefing note to issue to local residents immediately ahead of the works.

Grant claims were submitted in March 2025 which cover the costs of materials purchase and project planning. Our Engineer will prepare contract documents ready for tender.

The next environmental window for construction is autumn 2025, so tenders would need to be sent out in May to ensure that contractors have adequate time to programme the work, although lead times could delay work until spring 2026.

The current drivers for the installation of this structure are primarily water resource management and potential peat recovery, however the structure will also play an important role within any water transfer associated with the Fens Reservoir. Therefore, it is proposed to develop the tender documents but only go out to tender once we have a costed delivery approach and have assessed external funding opportunities. This means that the tilting weir may not be installed this year.

The Board is asked to support the approach to the installation of Horsey Toll tilting weir.

Pig Water Study (Lowland Agricultural Peat Water Discovery Pilot)

The Defra funded study was completed in January 2025 and the report submitted to Fenland SOIL. It provides us with more information about the system which is critical to future management for flood risk and the environment.

Two outcomes from the report are being taken forward with funding from Tranche 2B. These will develop designs for replacement structures, the construction of which will need to be funded in partnership with other beneficiaries in future years.

Navigation

Navigation Advisory Committee (NAC)

Chris Howes stepped down as Chair of the NAC, with Alan Wildman taking his place and Mike Daines becoming Vice Chair.

Members of the NAC joined a Fund Britain's Waterways session focussed on the Middle Level where Paul Burrows was invited to discuss our navigation offer and the associated challenges and opportunities. This received a very positive reception from the Inland Waterways Association and within the navigation press.

Supported by the NAC, we are also working with a volunteer group to enable minor improvements that will allow improved navigation along Monks Lode.

Boater Facilities

We have a commitment to ringfence 25% of licence income and invest this in provision of facilities for boaters on the link route to meet IWA standards.

As a reminder, the IWA's minimum standards are:

Water points, rubbish disposal points including recycling points, portable chemical toilet disposal points and electricity (shore power mains connection charging sites) at the following frequency:

Every 5 hours of cruising across most of the inland waterways system, including between waterways managed by neighbouring navigation authorities.

For the Middle Level navigation, this means facilities at Stanground Lock, in March, and at Salter's Lode Lock. Given there are good public facilities in March town, our focus is at Stanground and Salter's Lode.

The new water point and visitor mooring at our office has been well used and well received. At Stanground we have installed the access track for the eventual hosting of boater and relief lock-keeper facilities. Subject to continued delay in receiving an easement from Peterborough City Council and agreement with Anglian Water, we aim to install a water point as soon as practical and hopefully identify a suitable mobile unit for relief lock-keeping. Further plans will develop following these two aspects.

At Salter's Lode, the ability to install facilities is constrained by our lack of landholding. In Q4 2024/25 we finally secured agreement from the Environment Agency to install a water point on their land at the lock along Well Creek. This is now in the development and planning phase.

Additionally, we have provided Fenland District Council capital funding to install a water point at their mooring in Whittlesey.

As time allows, we are also exploring the other opportunities along our navigation where boater facilities may be possible. Ramsey Town Council has ambitions for the Ramsey Basin that we are supportive of. We have asked the Well Creek Trust to lead on identifying suitable locations for facilities through the villages along Well Creek.

Whilst moorings were not a boater facility that we had commitment to improve as part of the Middle Level Act (2018), the lack of public moorings on our system does inhibit the development and enjoyment of our system and

is a source of regular constructive feedback from our license holders and visitors alike. Fenland District Council have plans to refurbish their Whittlesey and March moorings in March 2025.

Rural moorings (sometimes called wild moorings) have been installed on our system since licensing was introduced as a relatively cheap and expedient way of increasing mooring provision on our system. We are limited as to where we can accommodate these moorings by bank and bank-top ownership and public accessibility. Ideally, we want provision where it is useful to boaters and/or where there is something of interest within walking distance and a Public Right of Way.

There are currently ten designated rural moorings on the Middle Level navigation. These are 24-hour stay moorings where mooring is allowed without seeking prior permission. They generally consist of a 32m long mooring with 5 timber mooring posts located at the toe of the bank slope. They are identified by MLC mooring signs and mowed vegetation. The rural moorings are designed to be simple, and no other facilities are provided. Boaters may choose to stay overnight or simply stop for a short break before recommencing their journey.

We have received a range of feedback about the rural moorings since they were introduced, some boaters love them and others the opposite. For certain size/type of boats, solo boaters and boaters with mobility challenges, some moorings can prove challenging in terms of channel siltation limiting access, the ability to tie up to the posts and the steepness of the banks. We have no log of how little or often the moorings are used. From an MLC maintenance perspective, not all the moorings are as easy or as cost effective to maintain as they could be. We have therefore reviewed our approach to rural moorings and will enact improvements when we have suitable plant, equipment and resources in the specific area to keep costs to a minimum. Adjustments to the rural mooring at Skylark on the Sixteen Foot Drain were undertaken in December 2024.

Middle Level Licensing

In the 2024/25 licensing season we issued 309 navigation licences, compared to the 297 issued in 2023/24 and 283 in 2022/23. This includes 243 renewals, 66 new customers and 24 vessels leaving our navigation and/or lifted out of the water. A navigation financial summary for 2023/24 has been published.

The Navigation Advisory Committee reviewed and confirmed a fee model for 2025/26. To date we have mirrored the Environment Agency (Anglian Waterways) fee model, however with their 9% increase, it was felt that it is time to differentiate our model from the Environment Agency.

A simplified license fee model, with 3.2% (rounded) CPI increase has been adopted along with a simplification of visitor license fees. We hope that this will attract more vessels to our waters, licensing with us and/or reduce the number of boaters that leave the local system due to affordability and or Nene/Great Ouse river condition concerns. Early indications are positive in this regard as licensing has opened for the 2025/26 season.

Anglian Pass

An Anglian Pass partnership agreement was signed to cover a five-year period from 1 April 2024. With a couple of critical closures on our collective network it is likely that pass numbers and income will be reduced.

Canal & River Trust (CRT) Gold Licence

It has become clear in discussions with the Canal & River Trust that there is insufficient demand to adjust their systems and to renegotiate a partnerships arrangement. Therefore, the Middle Level Commissioners will not become a formal part of their Gold Licensing arrangements with the Environment Agency.

However, CRT has adjusted their systems such that their licence holders can confirm if their 'home waters' are on the Middle Level. We anticipate there may be circa 15-25 boats in this category. We now have a data sharing agreement in place with CRT to provide us with the details of their Gold Licence holders who have confirmed their home waters as Middle Level.

Currently the Environment Agency receives the Gold Licence income for these boaters, however they have verbally agreed to an arrangement with the Commissioners to see that income, less an administration fee, is provided annually to us.

We are waiting for this offer to be made formally as it is dependent upon the Environment Agency and CRT re-affirming their GOLD license partnership arrangements.

Unlicensed and abandoned boats

Our approach to unlicensed boats is having a positive effect, albeit not at the pace, visibility and scale of impact we would like. We have re-published our updated boat removal protocol and are trialling a new approach to debt management, hoping to increase success and reduce external solicitor cost. We estimate that there are circa 60 unlicensed vessels on our system. In the last few years, we have recovered three abandoned vessels.

Paddle UK

We are in Year 2 of a 3-year agreement with Paddle UK for the Middle Level navigation to be formally included as part of their waterways licence. The income we receive from Paddle UK is being ringfenced and re-invested into improved portage. We have secured 50% funding contribution from the Canoe Foundation to supplement this income to install canoe portage at Stanground Lock. The portage has been installed and subject to a risk assessment will be made available to licence holders this coming season.

Weed Management

Weed continues to be the topic of most significant feedback from boaters. In terms of in-channel management of aquatic weed, we have five boats – two as weed cutters and three as weed lifters. Ideally, we form two crews, a crew of three boats generally focussed on the wider waterways and a crew of two boats focussed on the link route.

Our ability to have two crews active during a working week is dependent upon weather conditions, mechanical issues and crew availability.

To maximise our efficiency and effectiveness, within 2024/25 we:

- Actively re-deployed members of our workforce to be part of our boat crews by using contractors for some other activities (e.g. rural mooring maintenance).
- Appointed and trained two temporary boat operators for the summer.
- Maximised boat 'cutting time' rather than 'travel time'. This meant less responding to 'hotspot' weed-growth reports from boaters which has previously resulted in lost 'cutting time' and greater 'travel time'.
- Improved logistics and fuelling support to our boat crews and the way we tackled minor repairs.

We also regularly posted updates on Facebook to which we received positive feedback, and this reduced the number of calls and complaints so was more resource efficient.

Marmont Priory Lock

Although the new steel doors are of good quality, have a longer lifespan than timber doors and are more cost effective, they do not perform in the same way once installed. As previously reported, the use of the new downstream doors by users throughout the 2024 boating season identified intermittent issues with the gates becoming stuck and therefore challenging to operate.



Photo showing damaged door post at Marmont Priory

Following a joint site meeting with the contractor, and with no signs of improvement in the manual effort required to operate the doors, the decision was made for the lock to be closed and dewatered to allow for a more thorough investigation. The new doors were lifted revealing the original masonry (concrete) walls around and behind the door posts had previously been grouted to fit the bespoke timber gates. High spots in the grout on both sides of the lock had scrubbed the protective coating and paint finish to a point where the door posts were 'gouged' on the high spots.

To remedy this issue, the contractor suggested removing the grout 'fill' material, returning the masonry lock chamber walls back to a vertical plane, and employing a specialist concrete repair company to recoat the rough concrete wall with a smooth masonry compound to fit the steel doors. The remedial masonry works were completed and the lock doors returned to site for refitting. Some additional ancillary works were also completed and the doors appear to be successfully operating. The navigation closure was lifted on 11 April.

Lessons learned on this project will be applied as we develop packages for the next set of lock door replacements planned at Ashline Lock.

Salter's Lode Lock

See Upcoming Works and Closures.

Stanground Lock

See Boater Facilities.

Ashline Lock

The upstream doors are no longer sealing as they should and are leaking badly. Similarly, the downstream doors are also in very poor condition (see following photo) the doors have previously been 'patched up' with a skin of Marine Ply timber boarding to keep them operational for a few more years, but they have now reached a point where the timber frame mortice and tenon joints are visibly rotten and could be susceptible to failure at any time.

A full appraisal of all the Commissioners' navigational lock assets still needs to be undertaken but an outline strategic lock door replacement programme has been drafted based on budgetary estimates from Marmot Priory, which will assist with financial and navigational planning over future years. However, in no conditional order, the lock doors that are known to require inspection and probable replacement are:

- Stanground Lock – Downstream
- Ashline Lock – Upstream & Downstream
- Marmont Priory Lock – Upstream
- Salter's Lode – Downstream (potentially both sets of pointing doors)



Photo showing damage to downstream doors

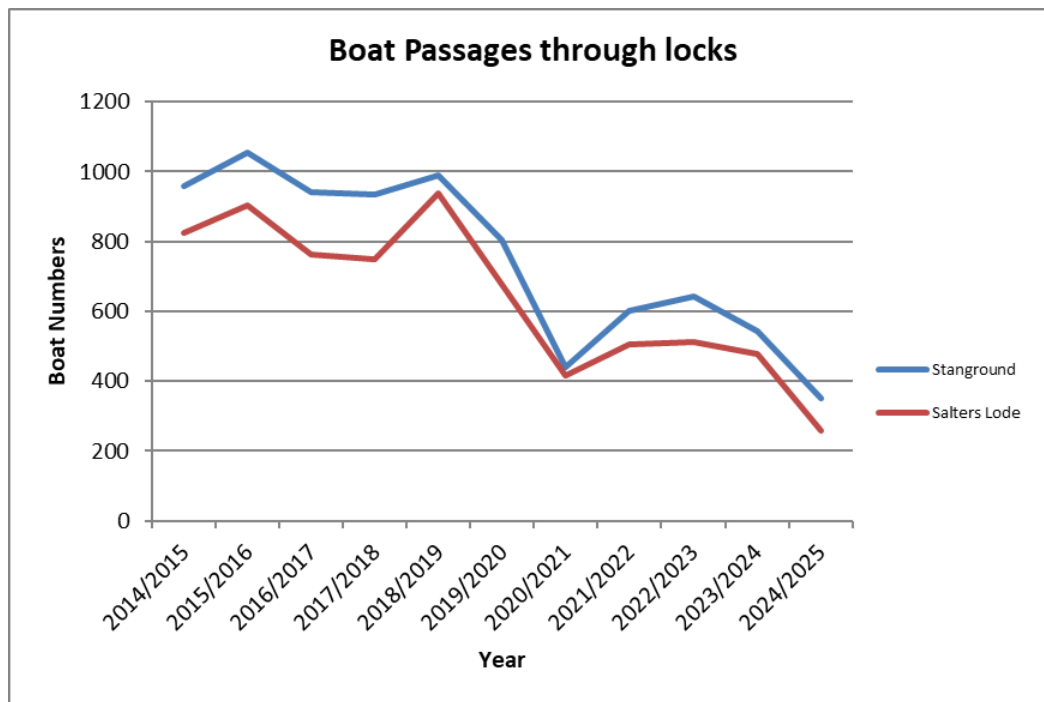
It is proposed that both sets of doors at Ashline Lock are replaced in 2025/26. Their poor condition increases the risk of damage during the boating season and if this happens, the navigation will have to be closed until the doors can be replaced. Replacing both doors at the same time will be more efficient than replacing one set each year as a temporary access road and crane pads will need to be installed and public and local residential access managed around the site.

The Board is asked to approve the use of their Asset Improvement Fund for the planning of the works in 2025/26 and subsequent replacement of both sets of doors at Ashline Lock this year or next year depending on condition, affordability and deliverability.

Boat Passages

Boat movements through Stanground and Salter's Lode Locks are shown below (the figures for the previous year are shown in brackets):

Boat Passages 2024/2025				
	Salter's Lode Lock		Stanground Lock	
Month	In	Out	In	Out
April	0 (18)	0 (11)	4 (6)	4 (26)
May	0 (36)	0 (52)	18 (45)	22 (46)
June	22 (32)	23 (41)	31 (49)	33 (48)
July	35 (44)	44 (39)	41 (41)	39 (46)
August	48 (54)	35 (48)	50 (54)	64 (51)
September	26 (42)	26 (37)	26 (51)	19 (47)
October	3 (12)	9 (13)	9 (13)	6 (11)
November	4 (0)	1 (0)	7 (3)	0 (3)
December	0 (0)	0 (0)	0 (0)	0 (0)
January	0 (0)	0 (0)	0 (0)	0 (0)
February	0 (0)	0 (0)	0 (1)	0 (0)
March	0 (0)	0 (0)	3 (0)	6 (1)
TOTAL	131 (238)	128 (241)	173 (263)	187 (279)



Old Bedford – Environment Agency

The Middle Level system is afforded flood protection by the Environment Agency tidal defences. During high tides in October 2023, we observed significant leakage through Old Bedford Sluice which is close to our lock at Salter's Lode. This was reported to the Environment Agency. Similar issues occurred again during the suite of high tides in September 2024 and the integrity concerns have been reported again.

We are also working with the Environment Agency to clarify ownership and responsibilities for the Old Bedford Overspill. The Old Bedford Overspill is a flood risk asset in the village of Salter's Lode that connects the Old Bedford River (EA Main River) with Well Creek (an MLC watercourse) and it is located on land that is largely owned by the Environment Agency. Records recovered so far are incomplete and inconclusive. The ownership of the asset is currently uncertain and therefore maintenance and management of the structure have effectively ceased.

MLC Services to IDBs

We previously made the business decision to focus our clerking and technical services offer to IDBs within the Middle Level where there is water management connectivity with the Middle Level Commissioners' catchment.

The continued service offer to IDBs is contingent on their open-mindedness, support and leadership within the reform/amalgamation agenda, as this is needed to create a more sustainable medium/long term business model between the MLC and IDBs.

It is also contingent on IDBs taking active decisions to manage their risks appropriately to sustain and/or improve their health. In terms of the latter, there will likely be some difficult upcoming conversations with some IDBs as we need to drive improved standards, be mindful of affordability and manage our interests and reputation.

Therefore, the following eight IDBs have been provided with notice that our service offer will be discontinued:

- Bluntisham IDB
- Over & Willingham IDB
- Haddenham Level Drainage Commissioners

- Swavesey IDB
- Hundred Foot Washes IDB
- Hundred of Wisbech IDB
- Waldersey IDB
- Feldale IDB (administered by the Whittlesey Consortium of IDBs)

This covers all the services offered by MLC, i.e. clerking (admin, governance and finance), environment, M&E, planning & consenting, operations, survey, GIS and capital works.

To provide each IDB with sufficient time to source alternative suppliers and to enable us to work with those suppliers and the IDB on a transition plan, the termination of services will come into force on 1 April 2026 at the latest. We will however conclude the year-end accounts and annual returns for 2025/26 which happens after 1 April 2026. It is likely that there will be certain activities or pieces of work that may need to be continued beyond this date until a suitable milestone is reached. This will be agreed as part of a transition plan and a bespoke fee arrangement will be agreed for each of these.

The seven IDBs in question that we currently administer are finalising their choice of future provider. We will then develop a transition plan and secure associated resolutions from the IDBs. The transition of services is not straightforward and will be a challenge to resource within business-as-usual workloads.

We are continuing discussions with Ramsey IDB with a view to taking on their clerkship.

To recap, we are refocussing because:

- There has been significant incremental change over the last 10-20 years in terms of IDB governance standards, financial requirements, health & safety and environmental legislation.
- The scale of M&E and capital works is increasing as a generation of assets deteriorate and come to the end of their reliable life.
- Development pressures and the squeeze on Byelaws have intensified over the last 15 years.
- There is now much more of a need than in the past to work in partnership with a wider range of bodies across an increasingly diversifying suite of agendas.
- The active member inputs around many IDBs have reduced given the changes in farming and age demographic and some Boards are now struggling for attendance.
- The scale of strategic issues facing the Middle Level catchment has and will continue to increase exponentially and will require more focussed working with a broader range of partners locally, regionally and nationally than ever before (e.g. scale and impact of development, pressure on water resources, Fens Reservoir, scale of MLC capital works, impact of climate change on our system, lowland peat, environmental enhancement).
- We are not exploiting the opportunity to maximise sources of income beyond the drainage rate and special levy funding base.

All of the above means that MLC staffing resource is currently spread far too thinly and has been for some time. We consider that the organisation broadly has the staff capacity to provide a good level of service for the Middle Level Commissioners' responsibilities alone. Many staff are working well beyond their contracted hours to provide as good a service as possible for the MLC and the IDBs we currently have a service provision relationship with.

This all means that our service provision to IDBs is now having a direct impact on the delivery of the Middle Level Commissioners' responsibilities, therefore increasing their risks, liabilities and costs. The quality of service provided to all IDBs is also not where we feel it needs to be, which affects all IDBs.

The shorter-term measures to mitigate this are:

- Focussing our service provision.
- Creating a new MLC Service Catalogue, including a review of fee arrangements, targeted improvements in efficiency, effectiveness and productivity.
- Introducing Key Health Indicators to better enable IDBs to manage their risks and enable comparison across the Middle Level.
- Targeted increase of staff capacity and use of 'bought in service'.
- Developing a 'case for change' in terms of IDB reform/amalgamation across the Middle Level (this needs resourcing).
- Ongoing amalgamation of March East & Euximoor IDBs and reconstitutions of Conington & Holme IDB and Warboys, Somersham & Pidley IDB.

The medium-term measures to mitigate this are:

- IDB reform/amalgamation across the Middle Level, including a review of the business model between the MLC and IDBs.
- Increasing and diversifying income, including a review of our charges associated with planning and consenting.

In terms of developing a new catalogue and associated fee structure, this is underway but not yet developed as hoped given workload challenges. New staff are also bringing a new perspective to this. The intent is to have a new catalogue in place for implementation in 2026/27. The Environmental Services Package has already been reviewed and updated for implementation in 2025/26.

There are a few significant gaps in service provision emerging that need to be explored with the IDBs and would require resourcing (finance and people) and training. These include:

- Consent compliance.
- Enforcement (including complex cases and legacy issues).
- Major development and sites of concern (including multi-agency working).
- Authorisations and powers of entry.
- Proactively formalising land registry, easements and agreements.
- Communications and engagement.

Fens 2100+

Fens 2100+ is a £9.8m programme to develop a Fens-wide flood resilience investment strategy that achieves long-term value for money and generates regional and national benefits. It is being developed with, and for, Flood Risk Management Authorities so we can plan for the next 20-25 years of flood risk management and is a key commitment within the National Flood & Coastal Erosion Risk Management Strategy. Paul Burrows is a member of the Programme Board.

Our premise

Transforming our approach to investing in flood and coastal resilience for the future of the UK Fens



...The following is not questionable and not negotiable:

- The Fens are a **valuable landscape** both nationally and regionally
- The FCERM assets that underpin the fens **are critical** in securing its value
- But **sustaining them** is getting more and more **challenging**
- There is a need to **act now (urgency)** to ensure we maintain this valuable landscape
- **No single organisation** can solve this challenge alone

“The right **money**, at the right **time**, in the right **places**, on the right **things**, in the hands of the right **people** – that’s how we achieve a **vibrant and climate resilient Fens** – *the alternative is failure*”

There are three key deliverables of the programme due in autumn 2025, that in combination are intended to underpin flood management investment decisions over the next 25 years and hopefully influence major change in the underpinning policy and investment approach that is needed.

1. Fens catchment baseline reports
2. A Case for Change (previously called Partnership Investment Plan)
3. Fens Flood Resilience Strategy (previously called Asset Investment Strategy)



The Environment Agency will be seeking suitable support or endorsement from the IDBs within the Fens, albeit the nature and avenue for this are yet to be confirmed.

The Board is asked to delegate any decision on the support or endorsement for Fens 2100+ to the Chief Executive in discussion with the Chairman.

In September 2024, we hosted the project team and a delegation from Anglian (Northern) and Anglian (Great Ouse) Regional Flood & Coastal Committees (RFCCs) at St Germans.

In November 2024, a Climate Change Risk Assessment for the Fens was published by the Future Fens: Integrated Adaptation (FFIA) partnership. Some of the key findings were recently presented to the RFCC.

Fens Climate Change Risk Assessment: key findings

- The Fens is highly vulnerable to a wide range of climate hazards
- Present day risks in the Fens may double by the 2080s
- Without upgrades to existing defences and limited maintenance, flood risk may increase ~16-fold over that period (with a ~7-fold increase by the 2050s)
- Flood defences will be increasingly exposed
- A strategic approach to flood risk management will be needed – simply investing in the current defence system may not be sufficient

2 degrees is **expected** 2040s rather than being a risk

3 degrees is **probable** (2050s-2070s) > 7-fold increase in flood risk

4 degrees is a **risk** (2080s+) > 15-fold increase in flood risk



Contact: Fens2100@environment-agency.gov.uk

5

Fens Reservoir

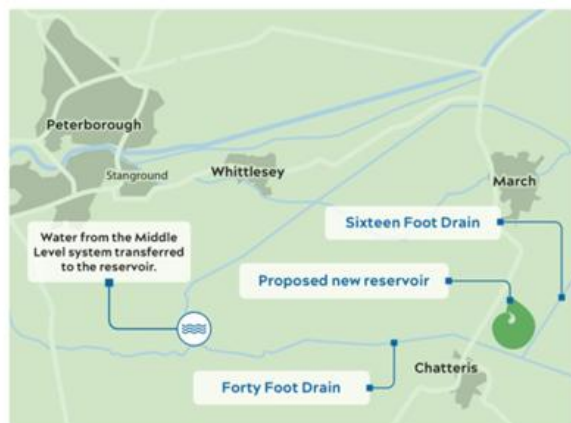
Using the Middle Level system

We're proposing to use available water from the drainage network operated by the Middle Level Commissioners as the main source for filling the reservoir.

We've identified that the Middle Level system has water available that could be used as public supply, rather than being drained away. Using this water to help fill the reservoir could also help reduce surface water flooding in the areas near the reservoir.

We'll need to build a new pumping station to lift water from these Middle Level channels into the reservoir, but this will be located at the reservoir site and is part of our emerging design proposals.

We also plan to use parts of the Middle Level system to transfer water from other sources further away from the reservoir. This helps us reduce the amount of new infrastructure needed in other places too.



This shows the proposed reservoir in relation to the Middle Level system

The Middle Level Commissioners control 120 miles of canals and drains across the Cambridgeshire Fens and are responsible for managing drainage and water levels across this network.

We've been working closely with the Middle Level Commissioners throughout this phase of our work to assess ways of getting water to the reservoir and exploring how the reservoir can integrate into a historic landscape for water management.

You can find out more about the Middle Level Commissioners here: www.middlelevel.gov.uk

During 2024/25, we responded to the phase two public consultation and, having worked closely with Anglian Water over the last 18-months, what is now clear within the proposals is that in terms of water source, water transfer, site flood resilience, emergency drawdown and downstream water transfer routes, the planning, construction and

operation of the Reservoir will be dependent on the Middle Level Commissioners' infrastructure, our operations and our resources. These need to be ready and resilient for this enhanced future role.

We have been recovering our staff time costs associated with many aspects of supporting Anglian Water develop the Fens Reservoir proposals. Our existing Service Level Agreement (SLA) came to an end, and we are now in negotiations in terms of an updated agreement. We have now agreed to a bespoke SLA with Anglian Water to fund a dedicated Fens Reservoir Project Support Officer to bolster our capacity. The technical and non-technical inputs into the Fens Reservoir are considerable and are scaling up.

By spring 2025 Anglian Water aim to have a whole scheme solution identified ahead of another design freeze and third non statutory public consultation.

In parallel with this we need to work with them to develop a draft 'Statement of Common Ground' and identify any 'Principal Areas of Disagreement'.

In terms of our external legal costs, Anglian Water have confirmed that they are prepared to cover the reasonable costs associated with activities that assist in the Development Consent Order (DCO) process/implementation of the scheme. We have identified a suitable legal firm to represent us and IDBs and aim to finalise the contract with them by the end of April 2025.

In preparing for the BBC Politics East focus on the Fens Reservoir, we developed the following key messages and supporting messages:

MLC Key Messages

1. The Middle Level Commissioners' infrastructure and operations are key in enabling the Fens Reservoir and the Reservoir will need to work hand in glove with our operations.
2. The 'rural' Middle Level of the Fens is now not only crucial for national food security, but also in enabling and unlocking the regional housing ambition and associated economic growth that is being constrained by a lack of water.
3. We need a devolved funding package from government to invest efficiently, collaboratively and proactively in the Middle Level system so it becomes resilient and fit to host the Reservoir.

Supporting Messages

- a. The Fens Reservoir is arguably the most transformative infrastructure investment in this part of the world since the original Great Drainage of the Fens commenced in 1630 (nearly 400 hundred years ago) – hopefully less controversial.
- b. Enabling and sponsoring the Reservoir is a bold statement by government about the importance of the Fens in the face of considerable and accelerating climate change uncertainty.
- c. The Reservoir means that not only will our infrastructure and operations be critical for national food security, but the Middle Level is now key to serving the housing and economic growth within the wider region (and Oxford- Cambridge Arc) that is so reliant on the Fens Reservoir to address water scarcity constraints to development.
- d. It is not a traditional landscape to host a reservoir – so it is key that it is fused into our highly managed and manmade system rather than being an alien piece of significant infrastructure divorced from the landscape.
- e. Over the last two years we have been working very closely and positively with Anglian Water to inform their plans and help them understand the nuances of water management in the Fens.
- f. Given society will be losing grade 1 agricultural land to host the Reservoir, we feel it's important that the Reservoir also off-sets for this and provides benefit to the agricultural sector through provision of water to serve local irrigators and growers. Our system can facilitate this.

- g. The site would not be a viable location for a reservoir were it not for our infrastructure and operations.
- h. Our infrastructure and operations will provide the site a degree of flood resilience.
- i. Excess water from within the Middle Level is now the Reservoir's proposed primary source. Our infrastructure provides an existing route for excess water in our system available for abstraction at the Reservoir site.
- j. Our infrastructure enables the River Nene catchment to be a viable secondary source of water and would also provide an open water option for water transfer from the Ouse Washes.
- k. Our infrastructure, particularly St Germans Pumping Station, will be critical in terms of the statutory requirement to be able to drawdown the level in the Reservoir in any emergency.
- l. We want to make sure that our infrastructure and operations are able to host the Reservoir – they therefore need to be in a resilient condition.
- m. We consider our system as at capacity – it was very close to this in 2023/24 – it only needs to be exceeded/breached once for there to be a catastrophe.
- n. There is approximately £170m of capital works investment needed in our infrastructure over the next 15-20 years just to keep it ticking over and sustaining our existing standards of service. This is needed regardless of the Reservoir. Generational 'renewal' investment is required.
- o. In addition, the smaller IDB pumps that provide water into our system are mostly of an age that means they are beyond their reliable life. Generational 'renewal' investment is required.
- p. There is no funding settlement, business case or delivery approach in place for these critical works – flood capital grant via Defra provides the traditional and primary source of funding.
- q. Scaling to deliver a programme of works to this scale is a huge challenge, especially in parallel with enabling the Fens Reservoir.
- r. £170m-£200m is a huge investment for ourselves and IDBs (and beyond our reach) but is small fry in the scale of the £2-3bn Fens Reservoir, the other enabling infrastructure for a growing Cambridgeshire and the economic returns made from improving water resilience to enable growth and help unlock the potential in the Oxford-Cambridge Arc.
- s. This short window (now to 2050) is highlighted as crucial for bold action within the [Fens Climate Change Risk Assessment](#) otherwise society will have lost the ability to influence adaptation proactively.

Great Fen

We continue to support the development and delivery of the Great Fen vision. The Chief Engineer attended an access workshop in June 2024 with partners looking at a range of options to open up public access to the whole site. Options include creating new access routes leading north from Alconbury Weald to Speechly's and south from the New Decoy visitor hub. These might include new footbridges over the Commissioners' drains along with viewing platforms and other infrastructure.

Chief Engineer's Summary

Middle Level System River Management Scheme (MLSRMS)

Further assessment of the project scope, programme and costs was completed in Q1 2024/25 by our contractor, Balfour Beatty, and presented to the Project Board at a meeting in June 2024, which included representatives from the Environment Agency. In summary, the approved Outline Business Case (OBC) estimated a total project cost of £23.9m (£12.5m plus £11.4m contingency), and the revised estimate for the works is over £142m. The project team considers this estimate to be more realistic than the original cost presented in the OBC, but it is based on incomplete data.

The Project Board agreed a new phasing approach to deliver the project and escalated an 'Early Warning' note to the Environment Agency in May 2024:

- Phase 1: Desilting of the Middle Level Main Drain.
- Phase 2: Rescoping – Determining which further sections of desilting and bank raising could be delivered by March 2027 using the existing OBC approval (access to approved contingency sum needed).
- Phase 3: Rescoping - Prioritised desilting, bank raising and hard defences above OBC funding approval (new business case needed).

In response to the 'Early Warning' the Environment Agency confirmed their support for us to commence the contract with Balfour Beatty for the delivery of the Middle Level Main Drain Desilting and the construction contract was let for Phase 1.

However, in October/November 2024, given inflationary pressures across the Environment Agency's national flood risk management investment programme, it was outlined to us that there was insufficient grant available in 2024/25, and most likely 2025/26, to continue with all the planned rescoping activities. This meant we were unable to robustly identify the next phase of delivery and therefore unable to move efficiently from the Middle Level Main Drain Desilting works whilst having the confidence of being able to deliver to time and budget. Desilting the Old Nene through the town of March, as well as works on the Twenty Foot Drain and Pophams Eau, had been earmarked for the next phase (Phase 2). Due to this uncertainty, we lost delivery momentum on this large, complex scheme. Therefore, to ensure we use public funding wisely, we made the difficult decision to close the scheme following delivery of the Main Drain Desilting.

As at late March 2025, 50% of the Middle Level Main Drain had been desilted. Balfour Beatty expect to finish by mid-May 2025 and then demobilise site. We will take the management of the silt arisings in-house and once dried, the material will be spread on the adjacent banks and grass-seeded.

We are awaiting a proposal from Royal Smals to use the cutter suction dredging method to complete desilting from areas where Balfour Beatty's equipment was unable to work, i.e. between St Mary's Bridge and the pumping station and underneath the road bridges. It is anticipated that this work will be delivered in autumn 2025, completing desilting of the whole Middle Level Main Drain to reinstate the design bed level to sustain its standard of service.

Using the original business case and some more recent survey data, Balfour Beatty completed their concept design, outline design for defence raising Package 1 and budget pricing for the remainder of the scheme. They presented their findings to the Project Team and a representative from the Environment Agency in February 2025.

The budget cost estimate for the whole scheme is £264 million, including 30% optimism bias. A value engineering exercise was also undertaken that removed 'controlled watercourses' from the scope, reduced desilting volumes based on new surveys, and limited the number of hard defences to be installed. This reduced the overall budget cost estimate to £150 million, including 30% optimism bias. Further work now needs to be done to design each work package in more detail, identify efficiency savings, plan the delivery approach and securing funding for delivery.

Asset Investment Programme (AIP)

There are significant, necessary and some urgent asset works needed over the next 20 years to sustain the current operation and standard of service of the Middle Level System, as well as address health & safety risks.

In addition to the Middle Level System River Management Scheme, St Germans Pumping Station is due extensive refurbishment, as is Bevill's Leam Pumping Station; work to develop the alternative site for Woodwalton Fen needs to be progressed; lock gates and aging water management structures need replacing; and improvements to the system are required to adapt to the impacts of climate change which have yet to be fully assessed.

We are still developing a comprehensive Asset Management System (as described in previous reports) to allow us to robustly record asset condition and inform an improvement budget plan. Development of the asset database was delayed when we lost the bought-in-service provided by Blue Compass at the end of 2024.

The programme identifies the initial assessment, planning and design requirements to be undertaken ahead of any construction works and will enable us to identify *potential* funding streams from other sources. However, it should be noted that there is a significant financial and resource liability on the Commissioners just to sustain the Middle Level assets in a safe and operable condition.

An initial assessment of prioritisation has been made which shows the following anticipated expenditure profile:

Annual Asset Investment Profile £M	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	Future years
MLC funded projects	3.03	1.04	13.77	37.79	29.62	26.42	32.70	24.05	145.52
IDB T2B funded projects	1.33	0	0	0	0	0	0	0	0
Other	0.00	Alternative funding streams to be identified							
Total annual expenditure	4.37	1.04	13.77	37.79	29.62	26.42	32.70	24.05	145.52

Future investment needs will be refined and alternative funding identified and secured where possible. Next phases of the River Management Scheme, Alternative Water Storage Woodwalton Fen and Bevill's Leam and St Germans Pumping Station Refurbishments will be submitted for inclusion in the Environment Agency's next Grant in Aid capital programme. It is proposed that smaller projects will be developed to a point ready for delivery when funding becomes available.

Expenditure in 2025/26 includes completion of the Main Drain Desilting and high priority works to other assets, including for navigation and public safety. There is an additional £1.33m of work funded by the IDB Fund Tranche 2B. In addition, we now have a further £1.2m of funding approved for Mobile Pumps Phase 2. Key in-year projects are summarised below:

Key in-year Projects		
Middle Level System River Management Scheme	Complete Main Drain Desilt and develop new OBC	£2,247,000
Ashline Lock	Lock door replacement (both sets)	£320,000
St Germans Pumping Station	Pump inverters and air circuit breakers refurbishment	£200,000
Bevills Leam Pumping Station	Pump Overhauls	£100,000
Yaxley Overspill Footbridge	Structural repairs and safety works	£25,000
Twenty Foot River Bathing Sheds	Safety Works inspection and planning	£10,000

The Board is asked to approve the Asset Investment Plan for 2025/26.

Although the programme for future years is still in draft, and more needs are being identified on a regular basis, it highlights the considerable financial liabilities ahead. There is currently only approximately £400k within the Commissioners' Asset Improvement Fund. However, it is important to note that external funding, including government grant, cannot be guaranteed in the current financial climate.

The Board is asked to support the development and design of options to address their liabilities for the 'Bathing Sheds' on the Twenty Foot River via funding from their Asset Improvement Fund.

As we begin to look in more detail and gather more data about our assets, we can refine the investment needs. We also need to look at structures within MLC ownership to determine if they should be handed over to other parties who are in a better position to maintain them (e.g. road bridges).

Delivering projects on this scale requires significant skilled technical, project management and delivery resources; we do not currently have the capacity to deliver these schemes in-house. A resource plan will need to be developed alongside the AIP to ensure the programme can be delivered.

Further detail and options will be presented at the November meeting.

The Board is asked to consider how it will finance future capital works, lever external funding and resource their development and delivery.

MLC Pumping Stations

Optimising St Germans Pumping Station

St Germans Pumping Station represents between 9-27% of our overall annual expenditure. Our overall budget performance is largely determined by the volume and cost of pumping at St Germans which is influenced by the cost of power, the weather and the tide.

Whilst it is currently semi-intelligent, the Station is reactive in its automated mode and does not operate in the most power and cost-effective way. The first major refurbishment is due in the next 5-10 years. We have insufficient depth of knowledge to scope this and as described below, there is also increasingly complex and costly investment ahead of the major refurbishment needed. Sea level rise and an increase in the Tidal River bed level will increase the power needed and therefore the cost of pumping over the medium and long term.

The Station will be critical in operating with the Fens Reservoir and we lack data and knowledge to optimise this future inter-relationship. We must not underestimate the transformation that the Fens Reservoir will bring to how water levels need to be micro-managed across our entire system.

We have had a general hands-off approach to managing and operating the Station since it was constructed and have been reactive to issues at site which have then been costly to respond to, including drawing M&E time away from chargeable work for IDBs and proactive work on MLC plant and assets.

We trialled manual intervention at the pumping station during 2023/24 and 2024/25. This involved:

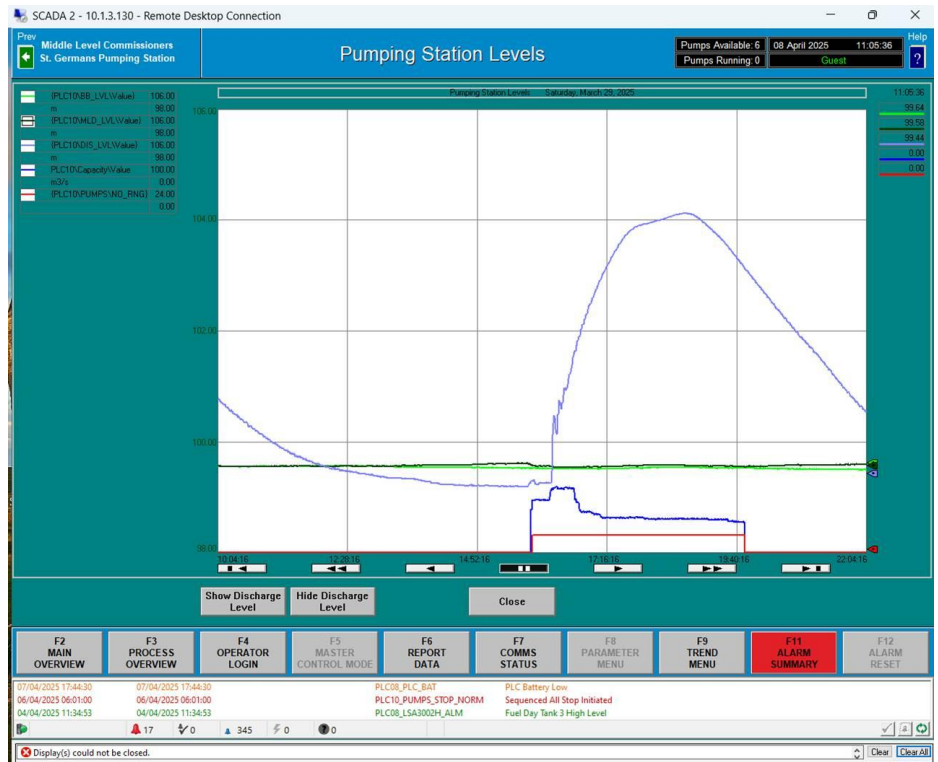
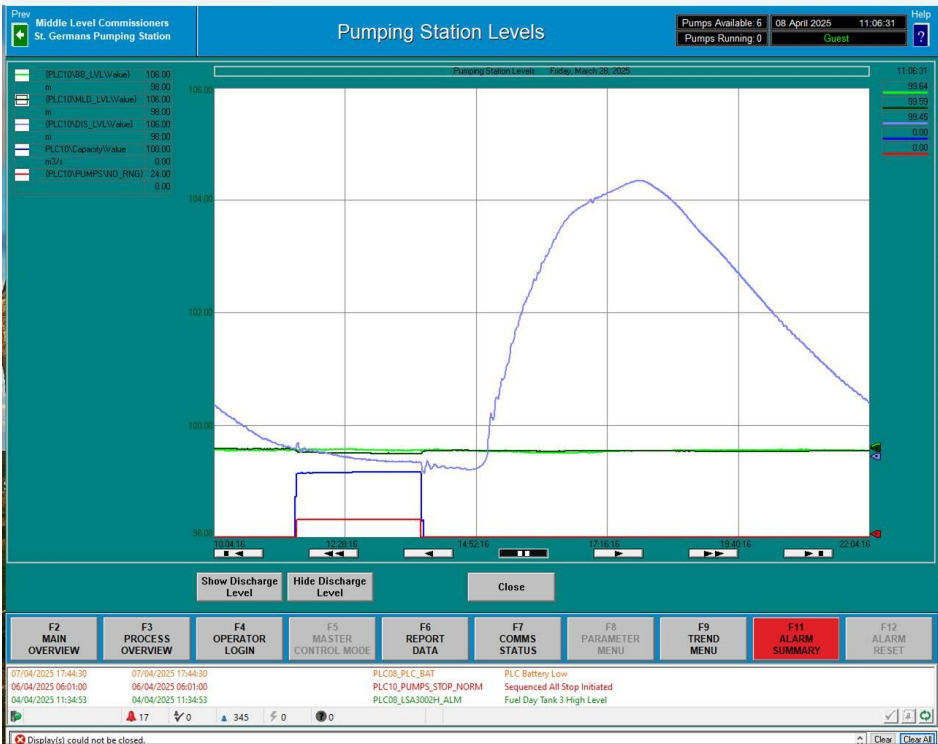
- Having an operative based on site – redeployed from the workforce with temporary backfill.
- Enhanced catchment forecasting and daily pump operating parameters directed by the Head of Operations & Water Level Management.
- A proactive overview by the Head of M&E Services.
- Four other employees trained and actively covering for operative's leave and providing duty rosters for 24/7 operations when needed.
- Increased public and boater social media communication of operations.

Pumping tomorrow's water today

The primary driver for having a skilled person on site has always been to reduce operational costs by tailoring our pumping to take advantage of low tide and low tariff pumping windows, and avoid high tide windows which are costly in energy terms as well as wear and tear on the plant. The aim is to re-apply any learning into the future improvements of the automated control system. Who knows what Artificial Intelligence may offer in future? However, with today's technology there will always be a need for skilled on-site presence as it is unrealistic to be

able to program all of the variables. This is because the system can only run on actual values rather than make assessments of upcoming influences such as wind, predicted rainfall, irrigation needs, storm surge conditions etc. Once we have the solar array installed and operational there becomes another variable that will require onsite skilled assessment, as we will want to tailor pumping to the availability of ‘free’ onsite produced electricity.

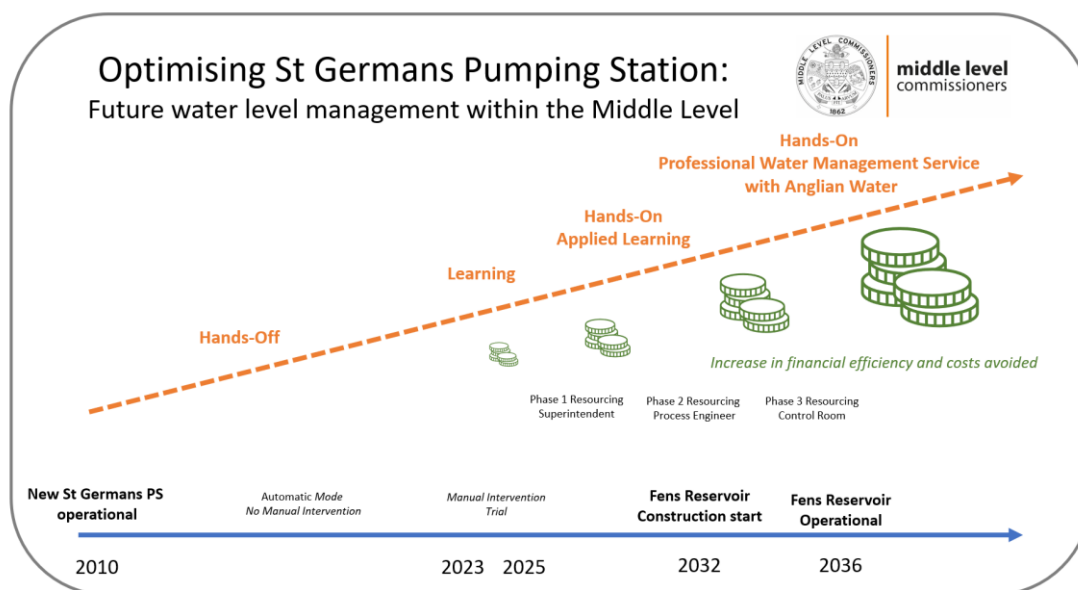
The screenshots below demonstrate what we are achieving. The first screenshot shows the manual intervention and pumping on the low tide so that there is no need to pump on the high tide. The second screenshot shows the automatic system pumping in reaction to a level increase and then having to pump through a high tide. The onsite operator could have predicted this need to pump and done it early to increase efficiency and reduce costs.



Benefits of a hands-on approach

The direct and indirect financial benefit of the manual trial and having an operative permanently on site have been significant. We would not have successfully navigated the exceptionally wet winter of 2023/24 without this approach, nor been able to deliver the works associated with the IDB Fund in 2024/25.

The benefit:cost and return on investment are incredibly strong, albeit difficult to fully quantify. An outline assessment is provided in the table below. In addition to the estimated quantified benefits associated with the trial, the financial benefits associated with reducing component loading, extending the life of the Station and informing a financially positive outcome from the Fens Reservoir are huge. Spin-off benefits include improved security, reduced cost of eel pass operations, and improved ability to host at the Station enhancing our reputation. It is also key in enabling some of the income generation opportunities.



Estimated cost per annum	£k
Salary & overheads	51
Operational monitoring	10
Total	61

Estimated Cost avoided (Benefits) per annum		£k	
Primary	Optimising tide window pumping	23	By reducing the kWh/ML by just 1 (current 3-10 range)
Primary	Reduced M&E and Ecology onsite	18	Inc reduced mileage costs and their freed time partially on cost recoverable activity
Primary	Reduced loading - Extending life of components/stn	88	Reduced component wear by 10-20%. A refurb cost every 20yrs equates to £880k per annum cash cost (based on the original business case)
Primary	Optimising with solar generated electricity	TBC	Manual operations to coincide with solar elec generation - main benefit to Spring/Summer/Autumn pumping
Primary	Value of Learning	???	Improved scoping of improvement works and inter-relationship with Fens Reservoir. Worth £000ks if not £millions
Secondary	Overseeing contractors	6	Assumes moving forward there will be activity on site 3 days per week. So additional benefit to reduced M&E/Ecological time at site
Secondary	Optimising elec:diesel pumping	5	£250k saved in 2023/24 (a situation that could be repeated)
Secondary	Improved security and customer interface	3	Nominal value
Total		143	

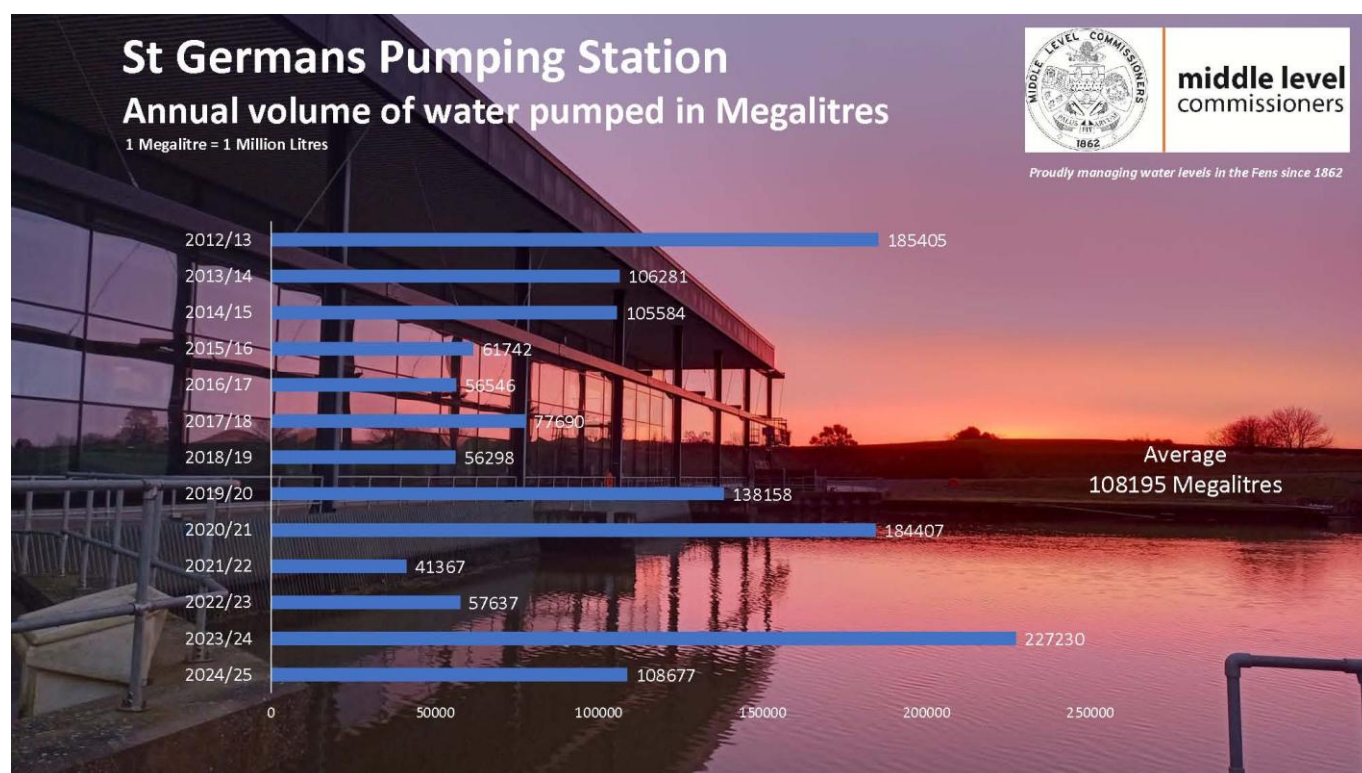
It is recommended that the trial becomes a permanent arrangement and Phase 1 Resourcing as described above is enacted so we take a 'Hands On' approach to the operations of the Station to further develop and apply our learning, increase the financial efficiency of our operations and reduce future costs. This will include:

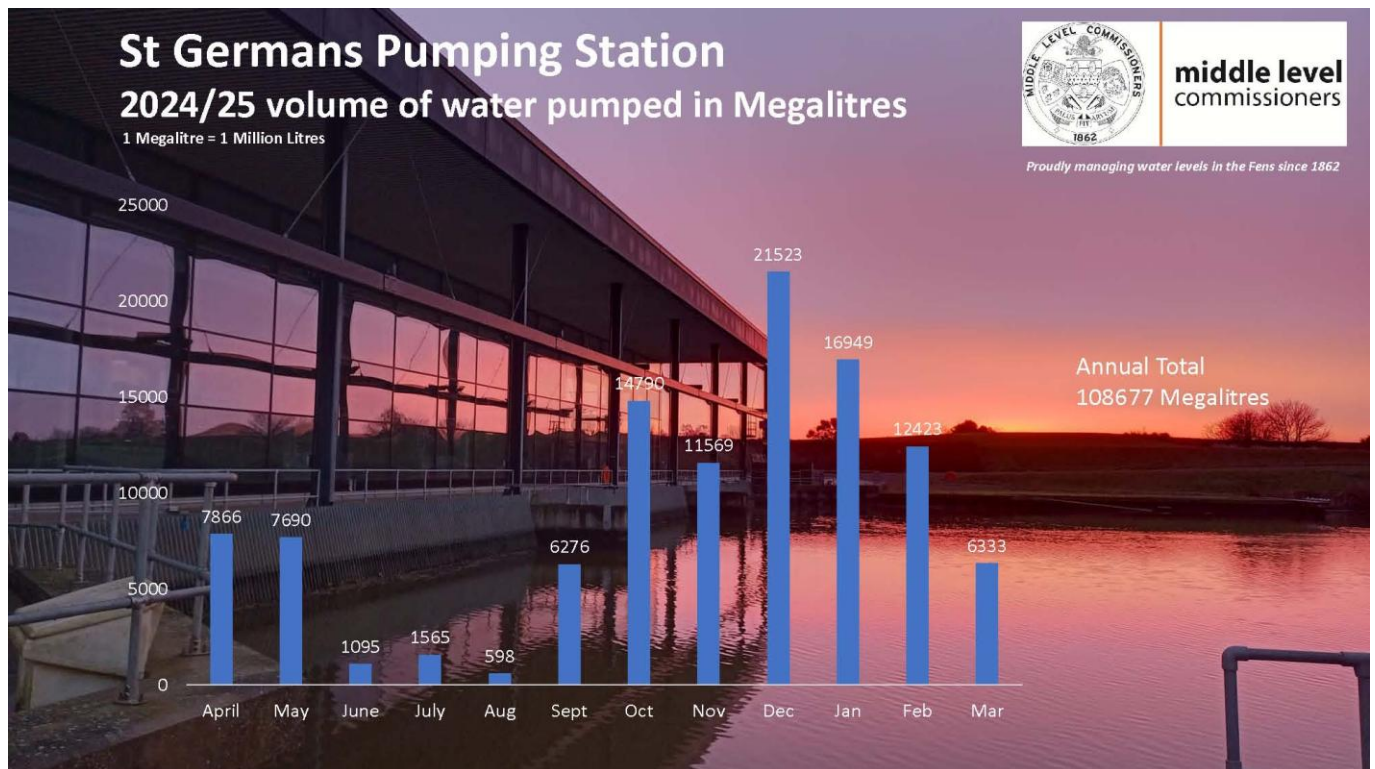
- a) Making the St Germans superintendent role permanent with a new job description (including reviewing the salary range), permanently redeploying the individual with a new contract of employment and permanently backfilling them within the workforce.
- b) Developing protocols and parameters for manual and automatic operation, including for out of hours working and triggers for moving to/from shift patterns.
- c) Reviewing and adjusting our approach for operational monitoring, operational oversight, superintendent cover and shift pattern operations, including the number of staff trained and available and the associated remuneration.
- d) Developing a plan for Phase 2 Resourcing.

The Board is asked to support taking a hands-on approach to the management of operations at St Germans Pumping Station and delegate the implementation of Phase 1 Resourcing to the Chief Executive and Chief Engineer to enact, with advice from the MLC Executive Committee as appropriate.

St Germans Pumping Volumes

During the twelve-month period (April 2024 to March 2025) 108,678 and 25,264 megalitres (million litres) of water were pumped at St Germans and Bevill's Leam respectively. These annual figures are slightly above average, based on the data back to 2012, the first full year of pumping at St Germans. The following graphs show pumping data for St Germans.





St Germans Pumping Station – Issues, faults and fixes

As previously highlighted, faults are becoming more regular as the Station ages and stock of spare parts must be increased. Within the original business case, the Station is assumed to have a design life of 80 years (replacement due in 2088) and major refurbishments are expected every 20 years (next due 2028). Many of the electronic components within the Station are now showing their age with faults becoming more common and standard replacement parts becoming obsolete. Plans need to be started for the next major refurbishment, and it is likely that it is going to be more cost effective for the refurbishment to begin in 2026 to ensure major components are replaced before failure.

Pump 6 has had intermittent faults with the 1250 amp Air Circuit Breaker (ACB) for the pump inverter. These units are now obsolete. The ACB was stripped, cleaned, lubricated and tested onsite by a specialist contractor and is now back in service. The remaining 22 ACBs will need to undergo this maintenance during summer 2025 to assess their condition, ensure their reliability and make decisions on their replacement.

The 6 pump speed control inverters are at an age where reliability is a concern, and a specialist contractor is drawing up a proposal for preventative maintenance on these units focused on failures they have seen on other sites operating inverters of this type and age.

The plans to inspect the pump impellers and wear rings was postponed as an initial survey showed around 600mm of silt build up in each of the intakes and over the stop log grooves, making it difficult to dewater the intakes. Desilting of the sumps needs to be after the Main Drain is desilted or they will refill with silt very quickly. Bosman Pumps carried out vibration analysis during February 2024 and there were no immediate causes for concern. The vibration analysis has not yet been scheduled for this year. The timing will be influenced by desilting works in the Main Drain.

The radiator on generator 5 has now been replaced and the generator is back in service. The replacement of the radiator in-situ was a complex task that involved a bespoke lifting beam being installed to allow the safe removal and refitting of the header tank and the 8 core panels which make up the main radiator and aftercooler. We now hold a full stock of radiator spares onsite and the bespoke lifting beam. Refurbishment of the remaining 5 radiators should be included in the Station's major refurbishment.

During April 2024 we had several faults with the Master/Slave station controllers, they had to be replaced to ensure their reliability. We have also had issues with the main SCADA PCs which are being replaced imminently. Faults like these are becoming more regular as the Station approaches its fifteenth pumping season and the control system will need updating and replacing in the next few years as part of the major refurbishment.

Notes:

- Pump 4 has had an intermittent fault on startup which is ongoing, the parts that were believed to be causing this were replaced but it is still occurring intermittently and will be investigated further.
- All the generator engines have been serviced this winter.
- The lights at the Station have all been replaced with LEDs which has reduced power consumption considerably, improved the lighting levels and increased the emergency lighting provision.
- The diesel supply control valves have been failing regularly and now the 7 main valves have been replaced and the remaining 4 will be replaced this spring.
- Flow sensors for seal water flow have also been failing more than previously so stock will be increased and a planned replacement of these units arranged.

Electricity use at St Germans is being monitored to better understand the way in which the Station uses electricity so that we can ensure we are running efficiently and explore opportunities for improvements. During the 2023/24 and 2024/25 pumping seasons the Station has been manned to allow more in-depth trials to take place and data collected so that we can identify the most efficient ways to run and then control the Station. The overall goal is to reduce energy used per megalitre of pumping both on electricity and diesel with a long-term view to reducing costs and carbon footprint, hopefully extending the life of the Station. This will be achieved by allowing us to react to changes in weather that the automatic control system cannot foresee, and then adapt pumping to suit tides, tariffs, and energy sources. Software has been modified to improve out of hours control in relation to low tide and low tariff conditions, and to trend the kW per megalitre.

St Germans Solar Installation

There has been 160kWp of rooftop solar installed during winter under Tranche 2a of the IDB Fund. This installation is forecast to produce 138,000 kWh of electricity annually, of this it is forecast that 75% will be used onsite. We are currently developing plans for ground mounted solar at St Germans under Tranche 2b of the IDB Fund for delivery in 2025/26.

Bevill's Leam Pumping Station

Pump 1 Faults

The anti-condensation heater on electric pump 1 has failed and the insulation resistance of the windings started to drop to a level that causes concern. This pump was then set to duty which improved the readings considerably. The settings had to be changed, and this pump reduced to duty 3 as we have identified the thrust bearing starting to fail. The pump is still in running condition, but the bearing will need to be replaced in spring. It is not always possible to replace these in situ so the pump may need to be removed for overhaul. This highlights that we need to have a planned pump overhaul schedule in place for all pumps as we cannot be without a pump during the winter season.

The IDB Fund has enabled the following refurbishment works at the Station:

- Pump main contactors and power factor correction units.
- Weed screen cleaner and control panel.
- Level control equipment providing increased pump data.
- Engine controls panels.

Taking account of the current GiA funding uncertainty, we will take stock of needs at Bevill's Leam Pumping Station, within the context of the wider Bevill's Pond, and develop a plan to ensure the Station remains as effective and efficient as possible until the next major investment.

Investments needs at both Bevills and St Germans will be included in the Asset Investment Programme.

Woodwalton Fen Reservoir

The Inspecting Engineer undertook the first Section 10 inspection in February 2025. Safety improvements to the access to the evacuation penstock had been completed ahead of the inspection. His report is due in May 2025. He indicated it was unlikely that there would be any recommendations made in the Interests of Safety, which would place a statutory duty on the Commissioners to undertake. There will however be a requirement to undertake enhanced, more frequent, maintenance works on the embankments and to continue to proactively manage the impact of badgers on embankment stability.

Our Operations and Ecology & Environmental Services Departments are working with Natural England to ensure maintenance works can take place compliantly.

Alternative Flood Storage (Woodwalton Fen)

Hydraulic modelling and economic assessment of potential storage sites has now been completed and the final reports have been received. We will then need to consider, in partnership with Natural England, what the next steps are to move the project forward with an aim to construct and commission a new site before the Agreement ends in 2052.

There is much preparatory work to do in conjunction with partners, landowners and other stakeholders before construction can start, not least the identification of funding sources. However, the cost of initial planning work may need to be borne by the Commissioners. These next stages have been added to the Asset Investment Programme.

Catchment Conditions

Water Resources and Control of Water Levels

Spring/Summer 2024

Rainfall

Mean rainfall over the area for the twelve-month reporting period was 631.98mm which is 71.5mm more than the standard average.

We experienced what can only be described as 'exceptional' weather conditions throughout the first six months of the reporting window. Cold, wet conditions extended from early March to early June last year. The result being the requirement for additional reactionary pumping at both pumping stations well into the traditional summer period, giving us very little respite. June 2024 was notable as the start of a 'compressed summer' in terms of warmer, drier weather conditions. The Soil Moisture Deficit (SMD) rose during July, as settled weather generally prevailed, ending the month with a value of 111mm. The first half of August continued generally warm and dry and the SMD value continued to increase as expected. The SMD month end value for August was 137mm. Above average rainfall totals were experienced during September, with the most significant rainfall events during the last 9 days of the month resulting in a recess of the SMD value to 117mm by the month end. The highest SMD value for the 2024 season was recorded during the first week of September at 140mm. From mid-October, a succession of Atlantic weather fronts continued to bring generally wet and unsettled conditions. The SMD value on 8 October was 60mm, albeit the MLC catchment seemed generally much wetter, with the catchment reacting spontaneously to the wet conditions.

Water Resources

Last summer brought with it the usual water abstraction pressures and increased water demand as drier weather conditions prevailed during July. This necessitated both bottom and top intake penstocks at Stanground Lock to be open simultaneously which, in itself, is quite unusual. Additional volumes of water were made available to us

following requests to Anglian Water for the 'Give and Take' arrangement to be enacted. Fortunately, this action was sufficient to equalise the heightened abstraction demands in the MLC system.

Physical operational interventions, (IDB slacker closures) were also required as and when water levels in the MLC system fell to pre-determined level triggers. The IDB text messaging system was utilised on seven separate occasions to advise of voluntary inlet slacker restrictions and closures. Compliance with the messaging system remains very good.

The latter part of the abstraction season passed without notable incident. A gradual reduction in demand was experienced as weather conditions dictated into August. Wet weather from mid-September negated any requirements for late season irrigation or pre-harvest soil conditioning.

The excellent communication channel emulating from the weekly (twice weekly during pressure points), Lower Nene Users Group, via MS Teams meetings, continues to be a major key to success in making the most of available water supply in the Environment Agency controlled Lower Nene. It allows us the opportunity to predict and discuss our own system wide requirements with the Environment Agency and Anglian Water, along with North Level IDB and the Nene Washes, giving Anglian Water appropriate prior notice to consider the 'Give and Take' procedure being enacted when required to provide additional water resource.

Autumn/Winter 2024/25

Rainfall

Wet conditions prevailed during most of November 2024, with more significant rainfall during the second half of the month. Cumulative rainfall totals for the month were however in the 'normal' range according to EA data. The SMD value reduced considerably as a consequence of the rainfall. The first week of December continued with generally wet conditions, however the remainder of the month was close to average in terms of rainfall. Similarly, due to the conditions the SMD decreased to 15mm by the end of the month. Further heavy rain was experienced during the first week of January, with the rest of the month returning near average rainfall totals. The SMD value reduced to 7mm during the second week of February and was the lowest recorded SMD value during the autumn and winter period. Rainfall during February was again close to average.

The general buzzword for the winter rainfall in the Middle Level catchment during our traditional pumping season is 'average'. This has however provided a welcome relief compared to the previous wet winter. It's worth noting that during several forecast heavy rainfall events, the Middle Level catchment escaped the worst of the weather, including five named winter storms, (Ashley, Bert, Conall, Darragh and Eowyn), although adjacent counties to the north, west and south of the catchment didn't fare as well.

The Middle Level system generally reacted as anticipated throughout the winter period. Choreographed manual intervention of levels in both ponds was less pressured and problematic in terms of maintaining water level consistency, with a reduced requirement for large volumes of water to be pre-emptively pumped through Bevill's Leam and St Germans Pumping Stations than during the previous winter.

Bevill's Leam – pump 1 has been 'nursed' through the period due to a 'noisy' top bearing requiring the pump to only be operated on a 'needs must' basis and when the Station is manned.

The requirement for 'human intervention' with regards to the manual pumping trial at St Germans Pumping Station has relied on additional out of hours management requirements, including close monitoring of the Station parameters and MLC system in general. Whilst the trial has created opportunities to operate pumps at optimal timings and tide states in order to maximise cost savings in terms of power usage outside of normal working hours, it has become apparent the level of manual and pre-emptive control required to enable safe operating parameters of St Germans Pumping Station and the MLC system in manual pumping mode is not achievable utilising the current MLC Scada algorithm.

Works Delivery

Watercourse Categorisation

We will be categorising our watercourses into three risk categories. This will allow us to better manage risks during high rainfall events and to inform the type and prioritisation of maintenance activities. These will be captured in the Asset Management System and inform future updates to the Operations Manual.

Catchwater Drain Maintenance Strategy

The Catchwater Drain will be categorised as a high-risk channel in terms of conveyance and capacity for flood risk management. Channel maintenance is currently on a rolling 3-year programme (1/3 of length cleaned out each year). However, this increases the risk of vegetation blocking the weed screen at Bevill's Leam Pumping Station (BLPS) following high flows. The vegetation most at risk of mobilisation in high flows is likely to be the marginal and in-channel vegetation which is rooted in loose sediment in the water rather than the rooted grasses on the banks.

We are now focussing on the reduction of marginal and in-channel vegetation and propose to change our maintenance approach to an annual programme to cleanse the whole length. After 3 years, in-channel vegetation growth is very dense and hard to clear, annual removal will make it easier, giving it less chance to establish. This will reduce the impact on the BLPS weed screen and risk of damage.

Upcoming Works and Closures

Salter's Lode Lock was subject to an emergency closure in the early part of 2024 because the build-up of silt made it unsafe to operate the guillotine gate. The Environment Agency started their desilting work on the Tidal River to clear Denver Lock on 9 April 2024 and then started desilting work on the tidal side at Salter's Lode on 31 May 2024, concluding on 7 June 2024 with the closure then rescinded on 10 June 2024.

As of 11 September 2024, tidal silt built up again at Salter's Lode meaning vessels over 63 feet could not be practically or safely locked through. There was continued build-up of silt over winter and spring with Environment Agency desilting required to enable tidal river passage for the 2025 boating season.

In terms of suspensions to navigation, navigation under March Town Bridge on the Old Nene, March was closed from 13 January 2025 to 28 March 2025. This was to enable Cambridgeshire County Council to undertake remedial works which included vegetation removal from the structure, cleaning and repointing brickwork, replacement of deteriorated brickwork, localised reinforced concrete repairs, strengthening of bridge structure and supports, and bridge repainting. Hall Bridge on Well Creek was repaired by Norfolk County Council with a closure over the period 17 March 2025 to 11 April 2025. Norfolk County Council also approached us regarding works to bridges across the navigable sections of the Middle Level Main Drain which we had to reject because of the capital works that are ongoing on the Main Drain.

We are pleased to report that the Environment Agency completed clearing the build-up of sediment and siltation from the Great Ouse tidal entrance of Salter's Lode Lock, prior to the commencement of the 2025 navigation season.

Bank Seepage

The north bank of New Dyke has been monitored over the winter. Due to the sporadic nature of seepage it remains somewhat difficult to justify remedial action. However, whilst it is unlikely the historic seepage will self-heal in the short term, the aspiration will be to intervene with a traditional methodology of bank puddling at some point in the future.

Weed and Grass Control on Banks & Channels

A concerted effort to clear problem areas of submerged aquatic weed, in a timely manner, was undertaken throughout the MLC system during the warmer summer months, with the worst affected reaches being cleared on a priority basis. It has been most useful, when labour allocation allowed, for two boat gangs to operate simultaneously, a team of three boats (one cutter and two attendant lifter boats) in larger, wider channels, along with a second team (one cutter and one attendant lifter boat) in the smaller, shallower channels.

Azolla - no visual signs of this weed were noted last season.

Reed/Lily/Drain Bed Spraying – no aquatic applications were made to MLC controlled watercourses last summer. However, a greater emphasis was placed, using all available labour resources, on clearing submerged weed from channels with the work boats. This extra effort took up additional workforce capacity over the summer months.

We have recently resubmitted our annual herbicide application permit to the Environment Agency. The application has been successful and it is envisaged applications will be undertaken again in 2025, as and when they are required.

Weed-cutting (boats) - the Commissioners' fleet of five weed cutting and lifting boats continued to operate successfully throughout the summer months last season. The two Conver boats (2019 & 2020), fitted with trailing blades proved themselves to be invaluable again last season cutting submerged weed lower in the water channels, and extending the subsequent return cutting time considerably from the older Hemos T cutters. Marginal vegetation management commenced from mid-September, with side cutting arms being deployed to cut back emergent marginal vegetation to protocols set out in the MLC Operations Manual. All marginal vegetation cutting was completed by mid-December last year.

It is becoming more noticeable that although the older Hemos boats continue to operate reasonably well, downtime continues to give cause for concern along with an increasing amount of Fitter's time, contract lifting arrangements and associated expenditure required year on year to keep them operating. Given the oldest is a 2005 model, and has completed 19 seasons' work, the additional expenditure is not surprising. In order to keep the work boat fleet in good working order, and hence maximise the Commissioners' reactive weed cutting capability, it is proposed to renew one of the Hemos boats in 2025. At this point, given the limited residual value of the old 2005 Hemos Boat, and having fitted a new 'short' engine last year, it is proposed to retain the 2005 Hemos within the boat fleet and for it to be deployed as a backup/replacement work boat should we experience a major breakdown with the remaining fleet. A periodic review of the 2005 boat's serviceability and retention can be considered via the Plant Replacement Strategy.

Flail Mowing - the Commissioners' three flail mowing units have generally worked successfully and only experienced reasonably minor breakdowns last season. Prolific vegetative growth along many of the bank sides proved challenging to the machines. Slow forward speeds were required to prevent flail head rotors from stalling, and to allow vegetation to be properly cut and mulched back to the bank.

Careful consideration will need to be given towards the replacement of the 2017 Massey Ferguson & Herder Cavalier mowing unit. The machine is on a 10-year replacement strategy and has three seasons' mowing left prior to proposed replacement. It has become increasingly obvious that bankside vegetative growth seems prolific now in most growing seasons, this requires a heavy-duty mower to cope with the vegetation mass.

The KRM 5-metre wide Top Mower was delivered last August and operated well during the first couple of months' use. B W Mack Ltd kindly offered and supplied us with a 'free loan' tractor until the new Claas Arion 630 CIS tractor was delivered in mid-October. The KRM mowing unit gives us the capability of mowing bank tops during the early spring.

Maintenance Works Spring/Summer 2024

Pigwater Drain

A contractor's 18-metre-long reach machine was employed in early July and again in October last season to clear Rigid Hornwort and other submerged aquatic vegetation from the Pigwater Drain. The return visit was necessary to clear the residual weed mass prior to it blocking the manually cleansed downstream 'Tin Dump' weed screen at Yaxley again.

Catchwater Drain (Manor Farm to Great Raveley Confluence & Southern Spur)

Phased machine cleansing works were undertaken this season along the aforementioned reaches. The works forming part of the old 3-year return weed cleansing programme.

Catchwater Drain (Glatton Road)

A prolific infestation of emergent vegetation required a contractor's machine to remove the weed mass from the watercourse during July along the Glatton Road reach. The weed was deposited along the bank crest and left to naturally decompose.

Bank Slips

Catchwater Drain

Two separate sites where bank slippage is prevalent have been identified along the Catchwater Drain post-harvest this year. It is envisaged both sites will require the Commissioners' intervention and the installation of timber piling to stabilise the affected banks and return them to their original bank profiles.

Yards End Dyke

The bank slips previously reported, both upstream and downstream of Wykes bridge, have been monitored for signs of further deterioration during the summer months. Fortunately, the affected areas have stabilised and no further fresh subsidence is evident. A recent inspection by the MLC Ecology and Environmental Services Manager has identified the presence of water voles on site. Water vole mitigation measures will be undertaken in February 2026 prior to remedial revetment works to return the banks to their original profile.

Sixteen Foot

Of the four bank slips that occurred following the de-silting works along the Sixteen Foot watercourse, from the confluence of the Forty Foot River to Wimblington Common Pumping Station, three have been addressed with the installation of timber piles and timber boarding at the bank toe and a mid row on the side sloping bank. Given the challenging and variable ground conditions in the local vicinity, it is anticipated the timber revetment will pin the affected lengths of bank sufficiently to prevent further bank deterioration and slips. The remaining bank slip area, in the vicinity of Honey Farm Bridge is due to be dealt with using the same technique in the near future- the delay being due to the presence of water vole habitat and timings required when working in close proximity of the habitat.

Inspections/advice/assistance

Middle Level operatives undertook herbicide applications, on a rechargeable contract basis, to IDBs/DDCs on 13 occasions last season.

Maintenance Dredging and Associated Channel Works

Work has been organised and co-ordinated in 13 IDB/DDC areas and the Swavesey IDB/MLC PSCA area since the April 2024 meeting.

Public Sector Co-operation Agreement (PSCA) Works

A joint site inspection to ascertain the maintenance works required to the Environment Agency controlled watercourses in the Swavesey area was undertaken during the summer. The inspection highlighted the generally good condition of most water channels, with evidence of previous Roundup applications having been particularly effective last autumn controlling emergent vegetation. Flail mowing of channels utilising the Commissioners' plant and workforce was undertaken in early September. Weed raking is programmed for completion during November and will be completed using a contractor's hydraulic excavator and weed basket.

The further additional length of bank mowing and bush trimming works included in last year's PSCA schedule was successfully completed in February this year, again utilising contractor's plant and labour, to the Environment Agency's satisfaction. All works undertaken within the entire PSCA agreement are on a fully re-chargeable basis to the Environment Agency.

Planning & Consenting

Charging for planning & consenting

As previously reported, we have for a long time been reactive and had insufficient resources to cater for the amount and range of planning and consenting workload for the Commissioners and IDBs and inability to step back and identify and implement improvements. Our reputation has suffered, and we receive regular complaints.

With new leadership capacity and capability within Technical Services, we are now in a healthier position to identify and drive improvements. A key foundation of improvement is a review and implementation of our charging approach for developers and consent applicants. We have identified that we are significantly out of sync with neighbours and have been missing out on substantial income over many years. This is income that could, in part, be reinvested into developing our capacity and capability to improve our service, as well as contributing to asset improvement budgets.

A new charging and fee model has been developed and approved by the MLC Executive Committee ready for implementation from 1 April 2025. In addition, IDB Chairmen had opportunity to comment on the model before it was finalised. The model needs to be adopted universally, in particular for IDBs within the Middle Level catchment.

The key changes and expected outcomes from adoption of this new model are:

- a) A major change to Surface Water Development Contributions, charging for volume as well as for flow, plus multiple pumping. Baselined against the Water Management Alliance's approach.
- b) A clearer positioning of fees for developers discharging into IDBs that then outfall into MLC system.
- c) The introduction of commuted maintenance fees that are baselined against other IDBs.
- d) Improved clarity about our pre and post application and information provision service enabling us to strengthen cost recovery from developers and further reduce the MLC staff costs billed to IDBs.
- e) A simplified model for staff rates that will be more time efficient for us administratively.
- f) Ensuring we have transparency as to where the fees are then invested and/or ringfenced. This also supports a standardisation of fund/reserve naming we want to introduce across MLC/IDBs.

The Board is asked to endorse the MLC Executive Committee's approval to the new planning and consenting charging model and the approach to income re-investment.

Efficiencies and Improvements

Since Q2 2024/25, we have reviewed the backlog of planning and consent applications, resulting in a greatly reduced number outstanding. This has also identified improvements around overhauling processes and optimising all aspects of how we undertake this work. A more robust approach has been taken in refusing unacceptable applications and we are resolving legacy issues on the more complex outstanding cases. Our existing catalogue of conditions has been reviewed within legislation to make these fit for purpose, streamline the issuing of consents and reduce unnecessary costs and delays. Information on our website is also being improved.

These changes, along with the cessation of bought-in-services, has meant a considerable reduction in costs for these services, realisation of further efficiencies and greater control over workload, timescales and quality.

To ensure we are compliant with legislation, a constantly improving process of review and training will continue. This will focus on demonstrable needs such as compliance with legislation, powers of entry, legal notices, consenting timescales, complaints, non-consented activity and regulation. A draft compliance and enforcement policy is being developed and we are engaging with the Boards we serve regarding expectations and services that we can provide, including the potential costs and appropriate mechanisms.

A review of PPE was completed within Technical Services and all team members have been issued with replacement items where necessary. New ID cards have been issued alongside externally provided conflict resolution and hostile

situations training as part of a review of authorisations and powers of entry, to ensure we are compliant with legislation and develop a suitable capacity for regulation of activity within our powers.

Standing Advice

We continue to develop our standing advice but with other pressures and prioritisation of the new charging model, we have not made as much progress as we would have liked. The ambition will be to develop further Standing Advice notes in 2025/26.

Compliance & Enforcement

As part of the review of Technical Services and our service provision to IDBs, it has been identified that we should be checking whether sites are complying with consent conditions and taking appropriate action if they do not. As regulators we have a duty to ensure activities are lawful, that permit conditions are adhered to and non-compliance is dealt with in a consistent manner.

Compliance checking and associated enforcement is a specialist role that requires the correct resources which we do not currently have. There are, increasingly, areas where large contentious developments will require an enforcement-based approach to resolve. We receive many anecdotal reports of compliance concerns, and it is a service that IDBs are wanting us to perform. Our new charging model means that proactively addressing compliance and reactively addressing past non-compliance in a prioritised manner, will result in increased income as the asset owners will need to address any deficiencies via a new consent application.

In the case of unconsented activities or breaches of byelaws, we should be taking enforcement action to rectify the situation and bring into compliance with the legislation. Otherwise, there is no deterrent to unauthorised activity.

A dedicated enforcement and compliance role would enable us to better control flood risk, manage areas of concern and contentious developments, and protect and enhance our income through charges. This will ensure consent conditions are adhered to, or that appropriate enforcement action could be taken. Additionally, it would increase income through fees and enable enforcement of riparian responsibilities, thus reducing maintenance costs to the MLC and IDBs, or allowing recovery of costs in some circumstances.

Our powers to enforce, consent and recharge are set out in the relevant legislation. Enforcement and compliance are a critical part of regulation and protecting income through chargeable activities. The formal enforcement process would enable remedial action to be recharged to the offender if required.

As of April 2025, there are three sites with a potential £4-6m of unconsented surface water drainage fees that we should seek to recover. The intent is that this activity will become self-funding within a relatively short period of time. The assumption is that the salary and overhead costs for this dedicated role will be recovered from increased charging income after the first 9 months. We will track and report performance and success to provide reassurance as to the value of the role.

The Board is asked to support the creation and recruitment of a dedicated compliance and enforcement officer to benefit the MLC and improve our service offer to IDBs.

Planning Matters

During the reporting period 436 planning applications and 1961 planning enquiries have been dealt with.

Byelaw Applications

As with planning and consenting, a review of outstanding Byelaw applications has been completed within 2024/25, resulting in a number being deemed as consented due to statutory timescales for issue or refusal not having been met. Others which had tied up considerable resources have now been robustly refused as they were unacceptable, incomplete or had not been correctly paid and were therefore not duly made. As part of this review all outstanding debts were identified and passed for invoicing.

Several improvements simplifying or streamlining the consenting process have been implemented, which will enable applications to be properly processed more effectively and ensure we are compliant with legislative requirements while also reducing cost to the business.

The following applications for Byelaw Consent to undertake works in and around watercourses have been granted during the reporting period:

<u>Consent Number</u>	<u>Name of Applicant</u>	<u>Description of Works</u>	<u>Date Consent Granted</u>
BC/701	Spreyer Holiday Parks	Installation of 13 floating landing stages at Staffurths Bridge, March – Old River Nene	25/4/2024
BC/702	Whittlesey Sports Association	Installation maximum of 14 fishing platforms at The Bower (behind the Manor Cricket field) -- Whittlesey Dyke	10/6/2024
BC/703	Cambridgeshire County Council	Erect a “low bridge” information sign to warn drivers about Stonea Railway Crossing Bridge on the riverside road verge on the southern approach to the railway bridge – Sixteen Foot	25/6/2024
BC/704	Steve & Karen Beesley	Repairs to retaining walls, a composite decking platform and steps on the riverbank and other associated minor work – Old River Nene	1/7/2024
BC/705	David Russell	Construction of landing stage including construction of timber toe boarding, placement of pre-established coir rolls and construction of 1.2m timber walkway to provide access to boat – Well Creek	23/7/2024
BC/706	W G Beaumont & Son Ltd	To undertake maintenance painting works to Cadent Gas pipe attached to the downstream side of Marylebone Footbridge – Old River Nene	23/7/2024
BC/707	W G Beaumont & Son Ltd	To undertake maintenance painting works to Cadent Gas pipe - Counter Drain	8/8/2024
BC/708	Mr P Braam	Erection of dwelling, including demolition of store, within 20m of watercourse at West End, March – Old River Nene	19/9/2024
BC/709	Mr & Mrs Clements	Installation of new fishing platform with concrete steps and balustrade west of Church Bridge, St Peters Road, Upwell – Well Creek	24/10/2024
BC/710	Cambridgeshire County Council	Remedial works of March Town Bridge – Old River Nene	18/12/2024
BC/711	Cambridgeshire County Council	Installation of 50 mph speed signs and to implement a new 30 mph speed restriction – Forty Foot Drain	18/12/2024
BC/712	Norfolk County Council	Remedial and permanent works of Hall Footbridge, March Riverside, Upwell – Well Creek	10/3/2025
BC/713	Mr S Starr	Replacement of mooring with semi-permanent structural works at Riverdown, March – Old River Nene	2/4/2025

<u>Consent Number</u>	<u>Name of Applicant</u>	<u>Description of Works</u>	<u>Date Consent Granted</u>
BC/715	Proedge Construction Ltd	Permanent works at Swan Bridge, Downham Road, Outwell – Well Creek	2/4/2025

The following applications for Byelaw Consent to discharge to a watercourse have been granted during the reporting period:

<u>Consent Number</u>	<u>Name of Applicant</u>	<u>Description of Works</u>	<u>Date Consent Granted</u>
DC/73	Mr S Fradley	Erection of a dwelling at Linley Road, Whittlesey – Treated Effluent	3/4/2024
DC/74	Mr S Brown	Erection of a dwelling at Upwell Road, March – Treated Effluent	30/4/2024
DC/75	Metropolitan Housing Trust Ltd	Erection of 55 dwellings and installation of a pumping station, sub-station and two attenuation pond area at Gaul Road, March – Treated Effluent	13/5/2024
DC/76	Metropolitan Housing Trust Ltd	Erection of 55 dwellings and installation of a pumping station, sub-station and two attenuation pond area at Gaul Road, March – Surface Water	6/6/2024
DC/77	Mr A Gibbons	Conversion of 3 agricultural barns into two large dwellings and one small dwelling at Bridge Road, Broughton – Treated Effluent	6/6/2024
DC/78	Mr T Goakes	Erection of extensions to existing dwelling at Orchard Road, March – Treated Effluent	1/7/2024
DC/79	R J B East Ltd	Erection of dwelling at Scaldgate, Whittlesey – Treated Effluent	26/7/2024
DC/80	Millfield Developments March Ltd	Erection of dwelling at Gaul Road, March – Treated Effluent	26/7/2024
DC/81	Mrs N Woodward	Erection of extension to existing dwelling at Bellmans Road, Whittlesey – Treated Effluent	30/7/2024
DC/82	Mr P Braam	Erection of dwelling at West End, March – Treated Effluent	8/8/2024
DC/83	Millfield Developments March Ltd	Erection of dwelling at Elm Road, March – Treated Effluent	8/8/2024
DC/84	Mr C Milne	Erection of 17 dwellings at Coates Road, Eastrea – Treated Effluent	16/9/2024
DC/85	Mrs N Anderson	Erection of extension to existing dwelling at South Walk, Ramsey – Surface Water and Treated Effluent	8/11/2024
DC/86	Mr B Hinson	Erection of dwelling and detached store at Wimblington Road, March – Treated Effluent	21/11/2024

<u>Consent Number</u>	<u>Name of Applicant</u>	<u>Description of Works</u>	<u>Date Consent Granted</u>
DC/87	Burmor Construction	Erection of 48 dwellings at Wimblington Road, March – Treated Effluent	10/2/2025
DC/88	Ms D B Deng	Replacement of septic tank with sewage treatment plant at Kings Delph – Treated Effluent	24/3/2025

Plant & Vehicles

Plant

The Commissioners' plant and machinery has generally operated satisfactorily during the reporting period.

The ongoing overheating issue with the 2017 Massey Ferguson/Herder Cavalier Mowing unit has been improved with the Herder dealership's suggestion of changing the hydraulic oil specification in the mower unit to a higher viscosity grade oil, (from ISO 46 to ISO 68).

Diesel fuel issues on numerous items of plant have been improved with the introduction and use of GTO (Gas To Oil) grade fuel, which although slightly more expensive, has reduced downtime and loss of plant work time considerably. It is suggested that we continue with the use of GTO fuels and monitor any further fuel issues.

The Claas tractor/loader, procured to replace the insurance write-off of the New Holland T6 155 tractor/loader, was delivered last September. The local Claas dealership, B W Mack Ltd, kindly offered us the free use of a loan tractor from their stock fleet during the lead-in to the new tractor's delivery. The loan tractor was put to use during the late summer months operating the newly purchased KRM Atlas 5-metre-wide flail mower. The feedback from the use of the KRM mower to date is that the wider cut enables a single pass to be undertaken on the majority of our more uniformed width bank tops, which should save both mowing time and expenditure in the longer term.

A second weed grab to fit the euro3 headstock of the new Claas tractor/loader has been purchased. This will allow for a weed clearing grab to be permanently located at both Bevill's Leam and St Germans stations, effectively negating the future need to travel between our March Depot and our pumping station sites with the attachment fitted to the loader – hence eliminating the risk of a future issue with any accidental detachment of the weed grab from the loader during the transport phase.

A second-hand flatbed trailer has been purchased following the Board's approval of the MLC Plant Replacement Strategy at the April 2024 meeting. The trailer has a 10-tonne load capacity and will require a detachable steel frame to be added to allow the safe and efficient transportation of timber piles and construction timbers from the MLC Depot to site and comply with our current Health & Safety requirements. A detachable steel frame has been fabricated and fitted to allow the trailer to be used for the transportation of piles and piling materials from the March depot to any site within the MLC catchment.

Vehicles

A replacement vehicle allocated for the Operations Manager's use has recently been sourced and delivered. The old, replaced, vehicle was initially retained as a second Pool Truck for use by members of office staff or workforce who need the use of a 4x4 vehicle for onsite activities. However, given the vehicle's age and mileage, it has been sold via BCA vehicle auctions.

Following MLC Executive Committee review and approval, investment has been brought forward and three new 4x4 Ford Ranger Pickup trucks have recently been procured prior to a change in vehicle taxation which comes into effect from April 2025. Following this date new crew cab Pickup vehicles are to be reclassified as cars and not commercial vehicles for taxation purposes. Currently one of the replaced vehicles has been sold via BCA vehicle

auctions. It is proposed the remaining 2020 and 2021 4x4 trucks will be retained in the pool for use by the newly appointed Operations Manager (H & S) and other staff undertaking site visits and monitoring.

Plant Replacement Strategy

A review of the current MLC Plant Replacement Strategy is ongoing. As reported at the April 2024 meeting, the Commissioners' three Hemos weed boats are non-compliant with current marine engineering safety requirements (location of hydraulic controls). Hemos are no longer on the market, so it is proposed to eventually replace the fleet with Conver boats. The Plant Replacement Strategy indicates one of the three Hemos boats currently in the Commissioners' fleet is due for replacement in 2025. In line with the current strategy a quotation for a new Hemos boat has been sought.

Following the Board's approval in April 2024, an order was placed for a 3.5 tonne Transit tipper to replace the 7 tonne Iveco tipper truck. The Transit tipper has recently been delivered. The old Iveco tipper truck will be disposed of via BCA commercial vehicle auction imminently.

ADA Summary

The transfer of the administration of the ADA Great Ouse Branch from the Commissioners to the Water Management Alliance (on behalf of the Bedford Group of IDBs) took place in 2024/25.

Jonathan Brown
Chairman

17 October 2025