

Proposed extension of King's Lynn Internal Drainage District

1. Key Recommendations

The Regional Flood & Coastal Committee (RFCC or the Committee) is asked to support the following key recommendations, in principle:

- 1.1 To prepare and submit a scheme to DEFRA for confirmation, which alters the boundary of King's Lynn Internal Drainage District as shown in Appendix 1, by using powers afforded to the Environment Agency (EA) set out in section 3(2)(a) of the Land Drainage Act 1991, subject to the IDB receiving letters of support from the Borough Council of King's Lynn & West Norfolk (BCKL&WN), Norfolk County Council (NCC) and the National Farmers Union (NFU).
- 1.2 To support the Board's application to DEFRA for an Order which subdivides the new Internal Drainage District (IDD) for the purposes of raising and apportioning expenses in the new area, in accordance with section 38(1) of the Land Drainage Act 1991 (Appendix 2).
- 1.3 To subdivide the new IDD into 3 electoral districts for the purposes of ensuring that occupiers of agricultural land and/or buildings in the new IDD are fairly represented, in accordance with Regulation 1 of the Land Drainage (Election of Drainage Boards) Regulations, 1938 (as amended by the Land Drainage (Election of Internal Drainage Boards) (Amendment) Regulations 1977). It is proposed that the 3 electoral districts are the same as the 3 rating sub-districts shown in Appendix 2, with the number of members to be elected by each electoral district being as follows: electoral district 1 = 7 members, electoral district 2 = 1 member, and electoral district 3 = 2 members. (The total number of directly elected members is 10, as set out in the Reconstitution of King's Lynn Internal Drainage Board Order 2013 [SI 2013 No.3317] and the number of such members apportioned to each electoral district has been based on the total estimated amount of agricultural drainage rates that would be due from each district, with every district being entitled to at least one member).

2. Vision

- 2.1 One of the Board's strategic aims is to become the "one stop shop" for delivering all drainage and water level management services within its hydraulic watershed catchment area, to simplify delivery and accountability. The Board has previously sought to de-main all low-to-medium-consequence EA main-rivers and has then adopted them as IDB maintained ordinary watercourses (phase 1). The Board is now looking to complete phase 2 and extend its Drainage District to the hydraulic watershed catchment boundary.

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3. Criteria that would need to be met to extend the Drainage District

- 3.1 The statutory definition of an Internal Drainage District is set out in section 1(a) of the Land Drainage Act 1991: IDD's shall be such areas within the Committee's area that will derive benefit, or avoid danger, as a result of drainage operations. In submitting a scheme to DEFRA to alter the existing boundary of King's Lynn Internal Drainage District, it will therefore be important to demonstrate that the upland area shall derive some benefit, or avoid danger, as a result of drainage operations.
- 3.2 Historically the principles set out in the 'Medway Letter' have been used by DEFRA and its predecessor MAFF to interpret this statutory definition for establishing the extent of IDD's (a letter giving the decision of the Minister on an appeal against a proposed scheme prepared by the River Medway Catchment Board in 1933): in non-tidal areas the Minister considered that agricultural land up to eight feet above the highest known flood should be brought within an IDD, while in urban areas only land below flood level, but including areas that may be cut off by floods, should be incorporated within an IDD. In tidal areas the normal practice was to include agricultural land up to a limit of five feet above the level of ordinary spring tides and urban land to tidal levels only. Most of the Board's area is tidal and its boundary was last reviewed, in accordance with the Medway Letter and criteria set out in the Green Paper on Financing and Administration of Land Drainage in 1985.
- 3.3 DEFRA now appear to have acknowledged the merits of organising IDD's on the basis of wider hydraulic catchments and have recently indicated that the beneficiaries of drainage operations could also be identified by using a 'toolkit' they've developed (please note the highlighted section in Appendix 3: Letter dated 9 February 2015 to all IDB Chairmen from Dan Rogerson MP, Parliamentary Under Secretary of State for Water, Forestry, Rural Affairs and Resource Management).

4. Powers, Process and timescale for extending the Drainage District

Powers

- 4.1 The EA has express powers to prepare and submit schemes to DEFRA for confirmation to reorganise IDD's by virtue of section 3 of the Land Drainage Act 1991. Specifically the EA is able to prepare and submit schemes to alter the boundaries of IDD's, in accordance with section 3(2)(a) of the Land Drainage Act 1991.
- 4.2 The EA values the support of its RFCCs, hence before exercising these powers it is normal practice to consult its Anglian (Central) RFCC on the proposal to extend King's Lynn Internal Drainage District.

Process

- 4.3 If the Committee supports the scheme in principle, the IDB then proposes to consult all those who might potentially object to the scheme (mainly those who could be financially

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impacted) e.g. occupiers of non-agricultural land and/or buildings via constituent Billing Authorities who pay or would pay Special Levies to the IDB (BCKL&WN, Fenland District Council [FDC] and South Holland District Council [SHDC]), occupiers of agricultural land and/or buildings both in and external to the existing IDD via the NFU who pay or would pay Drainage Rates to the IDB. The IDB also proposes to consult with the Lead Local Flood Authority (LLFA; Norfolk County Council [NCC]), Natural England (NE) and the 42 constituent Parish Councils.

- 4.4 Assuming that the IDB did not receive any substantive objections to the proposals in response to the consultation process, the IDB and the EA would then need to satisfy DEFRA's legal section that the new IDD accords with the statutory definition of "deriving benefit, or avoiding danger, as a result of drainage operations."
- 4.5 Assuming that DEFRA's legal team were satisfied with what was being proposed, the statutory procedures would then need to be followed, as set out in Schedule 3 of the Land Drainage Act 1991 and amended by section 85 of the Water Act 2014. The statutory procedures have been summarised by DEFRA as follows:
- 1) Advertisement of the Scheme by the EA locally, calling for objections and representations (1 month for any representations);
 - 2) Advertisement of the Draft Order by DEFRA in the London Gazette, calling for objections and representations, as well as ensuring the Order is advertised locally by other means (1 month advertisement for making representations);
 - 3) Once the Order has been made and taken effect, DEFRA will then advertise this fact in the London Gazette (allowing 6-weeks for challenge to the High Court).

Timescale

- 4.6 Assuming that the IDB, EA or DEFRA did not receive any substantive objections to the scheme, DEFRA have advised that the statutory process may take between 4 to 6 months to complete. It would therefore seem sensible to aim for a start date of 1 April next, albeit sufficient lead time will need to be factored in to adjust billing systems. However, extending the Board's area may take much longer to complete, if DEFRA received substantive objections to the draft Order reconstituting the Board, hence the importance of the IDB consulting before starting the formal statutory process set out in paragraph 4.5 above.

5. Case for extending the Board's Drainage District

To the IDB

Benefits to the existing IDD

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- 5.1 The Board's existing Drainage District does not extend to its full catchment area (the watershed), which means that the Board finds it more difficult to control development outside the area and manage flows coming into the District than it would do if it had jurisdiction over its upland area and full hydraulic catchment.
- 5.2 The Board currently receives a contribution from the Committee for managing surface water draining to the existing IDD from its upland area (highland water contributions), in accordance with section 57(1) of the Land Drainage Act 1991. This procedure for making such contributions to IDBs is discretionary and may therefore either reduce or cease to exist in future. Hence other ways of controlling highland water at source should also be considered, to reduce net operating costs within the existing IDD: extending the area to the watershed and levying Drainage Rates and Special Levies in the upland area is likely to give the Board a more certain source of income, longer term.

Benefits to the upland area

- 5.3 The upland area extends to some 28,752 hectares and is largely rural (approx. 95%). Ordinary watercourses also include a number of pipelines in and around Heacham, Snettisham and Dersingham. We know that there are some existing drainage problems in these villages that are all currently outside the Drainage District, which have been reflected in the LLFAs Preliminary Flood Risk Assessment for Norfolk.
- 5.4 The Board has carried out a preliminary watercourse assessment of its upland area and used DEFRA's toolkit; to assess the level of need and consider whether this warranted its incorporation within the IDD. Not unsurprisingly, the level of need is thought to be significant, which is a risk to the Board if involvement in its upland area increases costs locally – for example, by having to employ additional staff to apply its Byelaws across a greater area. Furthermore if the Drainage District was extended to include Heacham, Snettisham and Dersingham the Board would have a supervisory duty to get involved and broker a solution, as opposed to merely having a duty to cooperate with other Flood Risk Management Authorities (primarily Norfolk County Council and Anglian Water). There are no quick fixes here and the Board recognises these risks as well as the need to exercise its permissive powers pragmatically and manage expectation locally to plan and deliver a programme of works etc. over a 20+ year period in partnership with other Flood Risk Management Authorities to get the upland area 'in shape'.
- 5.5 Extending the IDD to the watershed is therefore one of the Board's strategic objectives set out in its current Business Plan (2014 to 2017).

Benefits to the existing IDD, the upland area and hydraulic catchment

- 5.6 The Board's Drainage District is currently based in part on the principles established by the Medway Letter, as previously referred to. However the benefits of catchment IDBs has been made by the Association of Drainage Authorities (ADA) and the EA, following the floods which occurred in Cumbria during 2007 and more recently by Risk Management Authorities in Somerset, resulting in the formation of the Somerset Rivers Authority partnership in 2015. Catchment Boards are considered to be a robust model for

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'climate change proofing' the country, reducing flood risk, improving water quality and increasing biodiversity.

- 5.7 It should not be a surprise that IDBs have historically had limited opportunity to demonstrate their environmental credentials in existing IDD's, given that their jurisdiction has been confined to the 'plug hole' or downstream section of their catchments where conveyance is and will remain key. By extending the Drainage District to include its upland area a more integrated and balanced approach across the whole hydraulic catchment becomes possible, which will deliver many benefits. The Board's environmental aspirations are reflected in its Water Framework Directive compliant Standard Maintenance Operations policy document and by its commitment to the existing partnership arrangement with the Norfolk Rivers Trust.
- 5.8 The Board should be able to cost-effectively control surface water in the upper reaches of the catchment that would not only reduce the risk of flooding both upstream and downstream, but also improve water quality in a greater number of waterbodies for the purposes of the Water Framework Directive and increase biodiversity within an extended network of adopted and privately maintained ordinary watercourses. This could be achieved by employing restorative techniques such as river narrowing, berm/wetland creation, re-meandering etc. and adopting a more targeted approach to maintenance activities in the upland area.

To the EA RFCC

- 5.9 The EA have no FCERM Assets in the Board's upland area, however the Committee collects General Drainage Charge Income from agricultural land occupiers. This presents a degree of reputational risk to the Committee, which would in time disappear if the upland area became part of the IDD.
- 5.10 The Board would no longer request the EA to make highland water contributions (HWC) for managing surface water draining to the Drainage District, which will reduce the financial risk to the Committee if its FDGiA HWC allocation was ever reduced or abolished by EA nationally in the future. However the EA would be unable to continue collecting the General Drainage Charge from land occupiers in the upland area because it would become part of the IDD and land occupiers would therefore pay Drainage Rates to the Board instead. The net effect of these two transactions is estimated to be cost-neutral (please see the Financial Implications section below).
- 5.11 By preparing and submitting a scheme to extend the Board's Internal Drainage District the EA would be implementing the government's localism policy, which appears to have cross-party support and the process of devolution/de-centralisation is therefore likely to continue, post 7 May 2015.

To the LLFA

- 5.12 Extension of the IDD into the upland area appears to accord with the LLFA's draft Local Flood Risk Management Strategy.

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- 5.13 The Board would be in a better position to assist Norfolk County Council as the LLFA for Norfolk in delivering the county's Local Flood Risk Management Strategy (by covering a greater part of Norfolk), for example, when consenting works affecting ordinary watercourses in the upland area (section 23 of the Land Drainage Act 1991) or in assisting the LLFA to fulfil its statutory role on the use of Sustainable Drainage Systems (SuDS). Currently 20% of Norfolk is covered by IDD, which would increase to 28% if the proposed extension in area takes place.

To the Billing Authorities and occupiers of non-agricultural land and/or buildings in the upland area

- 5.14 All of the Board's upland catchment falls into one Billing Authority area: the Borough Council for King's Lynn & West Norfolk (BCKL&WN). A greater part of the Borough Council's area would be covered by IDD, which will reduce the risk of flooding to its constituents and help facilitate sustainable economic development in future. Those living in and around the villages of Heacham, Dersingham, Snettersham, Hillington, Sedgeford, Congham and West Newton would start to receive an improved drainage service and in time would begin to see some of the long standing drainage issues being tackled.
- 5.15 The risk of the Board either frustrating economic development by overzealously applying its byelaws etc. and/or having to increase Special Levies significantly over time, as a direct result of carrying out pioneering work in the upland area is, in reality, a low risk because the Council can control the Board's decision-making by exercising its entitlement to appoint the majority of King's Lynn IDB members. This control of the Board-room and the decision making process is unlikely to change, following any extension in IDD, valuation of agricultural land in the upland area or revaluation of agricultural land within the existing IDD.

To the Occupiers of agricultural land and/or buildings in the upland area

- 5.16 Occupiers of agricultural land and/or buildings in the upland area would start to receive an improved drainage and water level management service, in return for paying an upland Drainage Rate to the Board. This would seem to be more equitable than the present arrangement, where it is perceived in some quarters that income from the General Drainage Charge payer is used in part to prop-up the short fall in national funding to pay for work on 'high-consequence' systems elsewhere in the Committee's area.
- 5.17 Elections for membership of the Board are held every 3 years, so if land occupiers were unhappy with the Board's performance they would have the opportunity to do something about it, either by exercising their vote as a ratepayer or standing for election themselves. This appears to be a more locally and directly democratically accountable approach.
- 5.18 If the Board's area increased in size as proposed it would look to subdivide the new IDD into 3 electoral districts for the purposes of ensuring that occupiers of agricultural land and/or buildings in the new IDD are fairly represented, in accordance with Regulation 1 of

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the Land Drainage (Election of Drainage Boards) Regulations, 1938 (as amended by the Land Drainage (Election of Internal Drainage Boards) (Amendment) Regulations 1977). It is proposed that these 3 electoral districts are the same as the 3 rating sub-districts shown in Appendix 2, with the number of members to be elected by each electoral district being as follows: electoral district 1 = 7 members, electoral district 2 = 1 member, and electoral district 3 = 2 members. (The total number of directly elected members is 10, as set out in the Reconstitution of King's Lynn Internal Drainage Board Order 2013 [SI 2013 No.3317] and the number of such members apportioned to each electoral district has been based on the total estimated amount of agricultural drainage rates that would be due from each district, with every district being entitled to at least one member). This proposal to subdivide the new IDD into 3 electoral districts will not change the constituent billing authorities' entitlement to appoint members.

6. Financial Implications

To the Board

- 6.1 Inclusion of the upland area would increase the size of the Board's IDD from 35,771 ha to 64,523 ha, which may require additional funding to properly service in future, i.e. a sum over and above the total amount currently collected from General Drainage Charge payers in this area. However the Board would not look to increase costs within the first 2 years over and above what is already collected from this area. This would allow time for the Board to undertake a thorough investigation of all drainage issues in the upland area, which would provide a more accurate assessment of the level of activity/intervention required. Norfolk County Council have carried out a preliminary flood risk assessment for Norfolk and have prepared a number of Surface Water Management Plans, which could be a valuable source of information when assessing need and focussing resources accordingly.
- 6.2 During the first 2 years the Board would not therefore be looking to undertake any work that required additional funding locally. After 2 years, the risk of the Board then imposing unsustainable increases is, in reality, a low risk because the Board that levies the Drainage Rates and Special Levies is made up of and controlled by representatives of those that pay for the service.
- 6.3 Current Income from General Drainage Charges (GDC) has been estimated to be £53,825¹ pa, which would cover the Board's budgeted costs each year for the next 2 years, as set out in paragraph 6.4 below (the EA are not readily able to calculate the amount of GDC which is raised and collected in this area, so we have had to estimate this sum). Drainage

¹ In the absence of accurate information, Income from General Drainage Charges in the upland area has been estimated by multiplying the Environment Agency's General Drainage Charge/Hectare for 2015/16 (£2.34) by 80% of the upland area (80% of 28,752 ha = 23,002 hectares). Approx. 95% of the area is agricultural and not all of this land will be subject to GDC.

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Rates from the upland area would therefore be calculated to raise £53,825 each year for the first 2 years.

- 6.4 To prevent any cross-subsidisation between the existing IDD and the new IDD and to protect the Board's existing Drainage Ratepayers and constituent Billing Authorities for the area within the existing IDD from any future increases in Drainage Rates and Special Levies that may be needed to fund work done in its upland area, an Order sub-dividing the new IDD would be required under section 38(1) of the Land Drainage Act 1991 (a Differential Rating Order).
- 6.5 For the avoidance of doubt the Board would want to introduce a Differential Rating Order that included 3 discrete rating sub-districts in the new IDD: the 2 existing sub-districts, together with 1 new upland sub-district (please see Appendix 2). The Differential Rating Order would be DEFRA's Model A; where the proportion of the Board's expenses to be raised in the 3 sub-districts are not set out in the Order: therefore all maintenance and improvement work that takes place in the upland area would be directly charged to sub-district 3. For example, the net costs of jetting part of a piped watercourse in Dersingham would only be charged to the occupiers of agricultural land within sub-district 3 and BCKL&WN, being the one constituent Billing Authority for that area. This would protect agricultural Drainage Ratepayers and constituent Billing Authorities in the existing IDD (sub-districts 1 and 2), as shown below:

Net Expenditure	Sub-District 1	Sub-District 2	Sub-District 3	Total
Detailed R & D (Investigations etc.)	0	0	40,000	40,000
Maintenance Work ²	0	0	10,000	10,000
ADA Subscriptions	0	0	3,825	3,825
Increase/(Decrease) in Net Exp.	£0	£0	£53,825	£53,825

- 6.6 If the Board extended its area to the watershed to include the full extent of its upland catchment, it would no longer be able to collect highland water contributions (HWC). The Board would argue that this reduction of HWC should be phased in over a number of years, to allow work to take place in the upland area that controlled flows coming into the existing IDD. However it is recognised that the Committee would probably not agree to this.
- 6.7 The Board would therefore look to treat the loss in HWC as an investment in its upland catchment; to control water at source and ultimately reduce pumping and drain maintenance costs within its existing IDD (sub-districts 1 and 2). This investment would amount to approx. £53,247 pa, which has been calculated by averaging the Board's annual HWC claim over the last 5 years. To put this sum into context, the HWC investment represents a relatively small part of the Board's annual maintenance programme (3.8%), which would not cause there to be any deterioration in the level of service provided to Ratepayers and Billing Authorities within the existing IDD.

² As estimated by the Board in its preliminary watercourse assessment of the upland area.

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- 6.8 The net result of extending the IDD is therefore estimated to be cost-neutral for the Board as a whole (£53,825k less £53,247k) and crucially all of this money would be spent in the area from which it was raised. However it is recognised that Drainage Rates and Special Levies may ultimately need to increase in sub-district 3 (the upland area) after completing the detailed investigations, or if ratepayers request more activity in this area, BCKL&WN/occupiers of non-agricultural land decide they want to resolve issues in and around Heacham, Snettersham and Dersingham and there is insufficient other funding available to meet the cost of this additional work.

To the EA RFCC

- 6.9 The EA would lose the ability to collect General Drainage Charges from occupiers of agricultural land and buildings in the upland area forming part of the new IDD, which has been estimated as amounting to £53,825 pa. However the EA would no longer be expected to pay HWC to the Board, which would save the EA £53,247 on average every year.
- 6.10 Therefore if the proposed scheme went ahead it is likely to be cost-neutral to the EA, (£53,825 less £53,247). That said, there may be a local impact because HWC comes from national Flood Defence Grant in Aid (FDGiA), whereas GDC is local funding which the RFCC can use for additional maintenance that would not otherwise be funded by FDGiA. It is highly unlikely that the RFCC would be given the FDGiA resulting from the reduction in HWC, so there would probably be a reduction in funding for maintenance in the RFCC's area.

To the LLFA

- 6.11 The LLFA would be able to redeploy its in-house resource elsewhere in Norfolk where there were no IDD's. The financial impact of this should therefore result in reduced opportunity costs for Norfolk County Council.

To the Billing Authorities and occupiers of non-agricultural land and/or buildings

- 6.12 Most of the upland area is agricultural land (approx. 95%) and the financial impact on special levies for BCKL&WN should therefore be minimal. The proportion of expenditure payable by BCKL&WN for sub-district 3 will depend on the resulting fraction: the amount of aggregate non-agricultural land values in the upland area as a proportion of total land values in the upland area (which includes both agricultural and non-agricultural land), and, crucially the ability to source the rating lists for the upland area referred to in section 37 of the Land Drainage Act 1991.
- 6.13 The financial risk to existing agricultural ratepayers, to FDC and SHDC can be mitigated by introducing differential rating in the new IDD, but it is recognised that BCKL&WN would need to be sure that extending the IDD will not lead to successive recommendations from the Board's management team to significantly increase special levies without consulting with the Council beforehand.

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To the Occupiers of agricultural land and/or buildings in the upland area

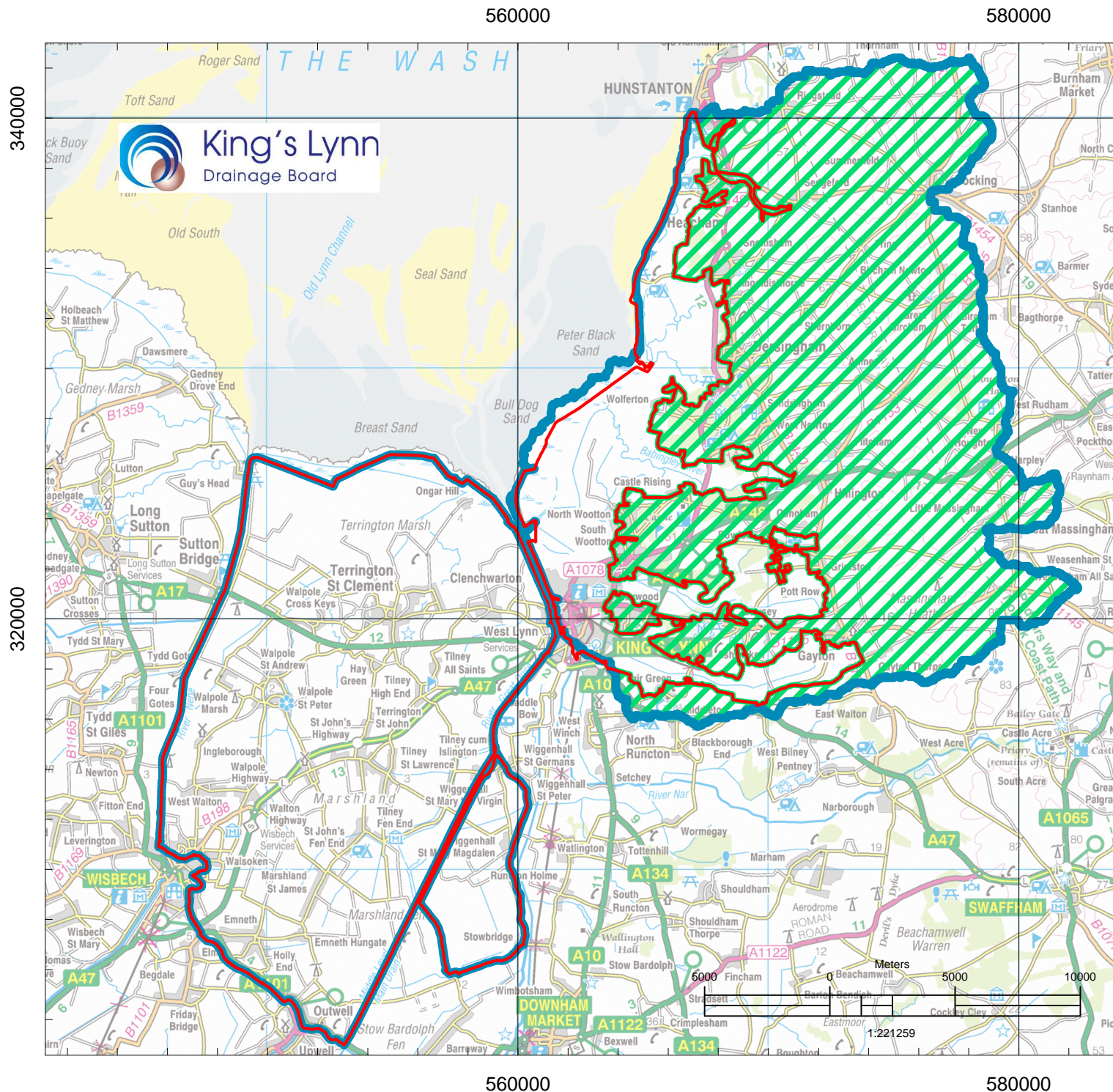
- 6.14 Occupiers would not be expected to pay any more in total than they are doing now, however individual occupiers may each be required to pay more or less, as a result of moving away from an area-based charge to a value-based charge: The General Drainage Charge is an area charge (currently £2.34/hectare for 2015/16). Whereas Drainage Rates are based on the land's annual rental value, which may differ and will not just depend on its area in hectares, particularly for those occupiers that have specialist agricultural buildings on their land that are not Business Rated.
- 6.15 Occupiers of agricultural land and/or buildings in the upland area currently only pay the General Drainage Charge if they occupy at least 4 hectares of certain types of land, whilst the IDB would ordinarily charge Drainage Rates on all those occupying at least 0.5 acres of most types of agricultural land. Therefore, potentially a number of occupiers that currently pay nothing could be expected to start paying something. It will therefore be important for the IDB to consult with all occupiers through the NFU, as part of the process previously outlined in this report.

7. Further Information

Further information about these proposals can be obtained by contacting the Board's Chief Executive. Contact details are as follows:

Mr Phil Camamile
Chief Executive
King's Lynn IDB
Kettlewell House
Austin Fields Industrial Estate
King's Lynn
PE30 1PH
Norfolk

e: phil@wlma.org.uk
dd: 01553 819624



Appendix 1

IDD Watershed Catchment Area

LEGEND

- Existing IDD Boundary

- Watershed Catchment Area

- Proposed IDD Extended Area

KEY MAP

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SCALE

Best fit

PLOT DATE

12/03/2015

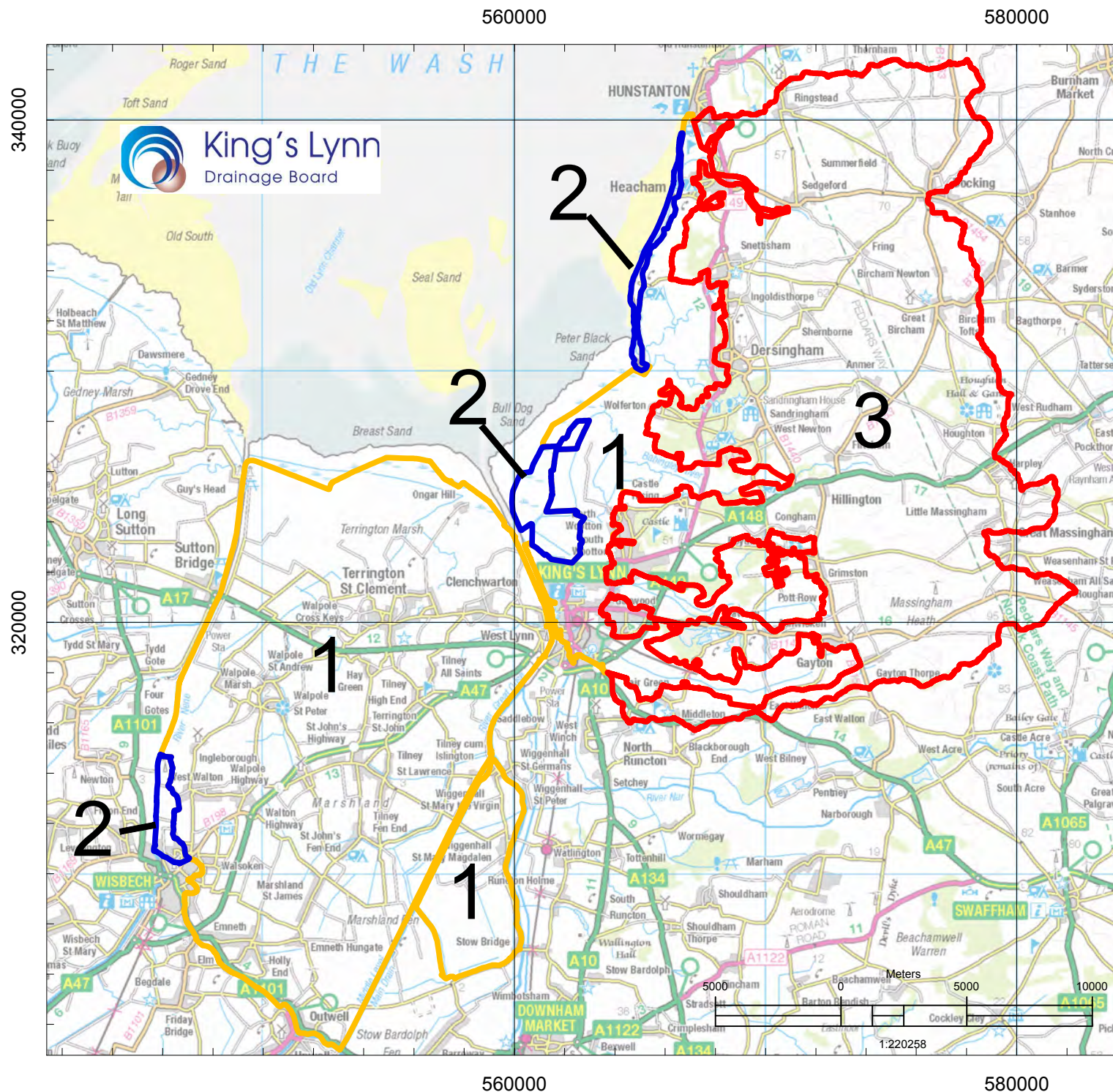
FILE NAME

Watershed

SHEET NUMBER

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1



Appendix 2

Proposed Rating Districts in New IDD

LEGEND

- 1 - Sub-district 1
- 2 - Sub-district 2
- 3 - Sub-district 3

KEY MAP

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SCALE	SHEET NUMBER
Best fit	1
PLOT DATE	
12/03/2015	
FILE NAME	
DiffdistKLIDB	



**Department
for Environment
Food & Rural Affairs**

Nobel House
17 Smith Square
London SW1P 3JR

T 03459 335577
helpline@defra.gsi.gov.uk
www.gov.uk/defra

To: The Chairs of all Internal Drainage Boards in
England

9 February 2015

From Dan Rogerson MP

Parliamentary Under Secretary of State for Water, Forestry, Rural Affairs and Resource Management

I am writing as a follow up to my predecessor Richard Benyon MP's letter of 19 July 2012 to bring you up to date in a number of areas. I would also like to take this opportunity to congratulate ADA and all of you for your work in sharing best practice and continuing to drive improvements across the IDB sector over the past couple of years.

As you may know the Government has been undertaking a public bodies reform programme using powers in the Public Bodies Act 2011, where appropriate. IDBs were included in section 3 and 5 of the 2011 Act as bodies for which powers to modify constitutional arrangements or functions were provided. However we made it clear in 2012 that we were not intending to use the powers within the Act to make any reforms to IDBs' functions. It was felt that IDBs and ADA should achieve reforms and outcomes through working collaboratively and sharing best practice instead. Cabinet Office colleagues, who lead on public bodies reform, have been taking a close interest in ADA and IDBs' recent actions and voluntary reforms and we have been engaging with them to ensure that they are fully informed of your continuing progress.

Governance and Accountability

As Richard Benyon highlighted in his letter, IDBs need to be fully accountable to the communities they serve and able to demonstrate that they are well governed, representative of local interests and delivering a range of substantial benefits. I greatly welcome the recent action taken by ADA in driving governance and accountability across all IDBs. This has included the development of model governance documents and guidance covering a range of issues such as members' code of conduct; duties of members and officers; registers of members' interests; and schemes of delegation, etc, which are all available on ADA's web site.

As you know over the past couple of years, IDBs have been asked to confirm whether they have adopted a members' code of conduct, financial regulations and register of members' interests through their annual statutory IDB1 returns. We and ADA will continue to review progress on the uptake of these documents when IDBs report back to us each year. We will also be providing information to Cabinet Office on this for their information.



**INVESTORS
IN PEOPLE**

Accessing Environmental and other Specialist Expertise

You will recall that Richard Benyon sought IDBs' input on issues relating to IDB membership and representation, in particular, stressing the need for you to have access to the right specialist expertise, including in relation to conservation, and the environment to enable you to deliver your full potential in achieving sustainable development. Questionnaire responses indicated that the majority of IDBs have access to appropriate specialist expertise which is derived from a range of different sources. As a result, it was felt it would be useful to capture lessons learnt from the questionnaire and I am very pleased to see that ADA has now published their best practice guide on accessing environmental and other specialist expertise.

We will continue to keep a close interest in this area and intend to include a question on environmental and other specialist expertise in the IDB1 annual proforma which we will consult ADA on. We will also provide information on this to Cabinet Office in due course.

As I have indicated, we have agreed with Cabinet Office that we will provide them with a report in September 2015 which will set out IDBs' progress in continuing to make improvements to the way they operate, particularly covering the areas as mentioned above.

Enabling IDBs to identify beneficiaries and demonstrate value for money

As you also know, Defra commissioned research to enable IDBs to identify the range of beneficiaries of their work and demonstrate their value. I am pleased to inform you that the research has now been published and the outputs of this work which include a voluntary toolkit and a set of performance indicators are available on Defra's web page GOV.uk page at:- <http://randd.defra.gov.uk/Default.aspx?Location=None&Module=FilterSearchNewLook&Completed=0> (in the Keywords box please type FD2659 for the first report/annexes and type in FD2673 for the final reports and toolkit spreadsheet and guidance and the report on the indicators).

The toolkit and the performance indicators are also available on ADA's website and I would encourage you to make use of these tools as you see fit in helping you with your work. **The toolkit might be particularly useful for those IDBs seeking to extend their boundaries in identifying beneficiaries or for local groups seeking to create new IDBs.**

Finally, I understand that there are a number of issues that have been raised by ADA on your behalf that need to be addressed, including rating lists and the Medway Letter. I am very keen that Defra continues to support your work and have asked Defra officials to work with ADA and you on these important issues.



DAN ROGERSON MP