

**A MEETING OF THE PEVENSEY AND CUCKMERE WATER LEVEL MANAGEMENT BOARD WAS HELD AT THE SAFFRONS SPORTS CENTRE, COMPTON PLACE ROAD, EASTBOURNE, BN21 1EA ON TUESDAY, 8 OCTOBER 2019 AT 10.00 AM.**

**Elected Members**

**Pevensy Sub District**

- \* Bill Gower
- \* Martin Hole
- \* Robert Miles
- David Robinson
- \* Chris Wadman

**Cuckmere Sub District**

- \* Richard Brown
- \* Gill Hesselgrave

**Combe Haven District**

Monty Worssam

**Appointed Members**

**Eastbourne BC**

- \* Helen Burton
- Pat Rodohan
- \* Robert Smart
- Colin Swansborough
- Barry Taylor

Vacant Position

**Hastings BC/Rother DC**

- \* Robin Patten

**Wealden DC**

- Michael Lunn
- \* David White

- \* Present (59%)

Mr W Gower in the Chair

**Officers in Attendance**

**Environment Agency**

- \* Paul Levitt (Asset Performance Team Leader)

**East Sussex CC**

- \* Nick Claxton & Josie Bush, FRM Team

**Water Management Alliance**

- \* Phil Camamile (Chief Executive)
- \* Caroline Laburn (Environmental Manager)
- \* Matthew Philpot (Project Engineer)

**Pevensy & Cuckmere WLMB**

- \* Richard Dann (Operations Manager)
- Revai Kinsella (Flood and Water Officer)

**Local Authority**

- \* Peter Padget, Eastbourne BC/Lewis DC
- Cathy Beaumont, Rother DC

- \* Graham Kean & Jo Heading, Wealden DC

**Natural England**

- \* Cath Jackson

- \* Officers In Attendance

**35/19 WELCOME AND INTRODUCTIONS**

**35/19/01** The Chairman welcomed Helen Burton to her first meeting of the Pevensey and Cuckmere Water Level Management Board. Helen had been appointed by Eastbourne Borough Council to represent the interests of the urban drainage ratepayer (replacing Janet Coles).

**36/19 APOLOGIES**

**36/19/01** Apologies for absence were received on behalf of Messrs D Robinson, P Rodohan, C Swansborough, B Taylor and M Worssam.

**36/19/02** It was noted that Mr Jonathan Dow was no longer a member of the Board. Following the Council elections in May 2019, Eastbourne Borough Council had decided not to reappoint Mr Dow and had not appointed anyone else to take his place. Eastbourne Borough Council were therefore entitled to appoint another member to the Board and the Chief Executive was hopeful that they would soon do so.

**36/19/03** Mrs Shirley Mackinnon attended the meeting as a member of the public, in her capacity as a Pevensey CP Parish Councillor.

**37/19 DECLARATIONS OF INTEREST**

**37/19/01** There were no declarations of interest declared other than those already disclosed and recorded in the Register of Member's Interests.

**38/19 MINUTES OF THE LAST BOARD MEETING**

**38/19/01** The minutes of the last Pevensey and Cuckmere WLMB meeting held on 11 June 2019 were considered in detail, signed and approved as a true record. Arising therefrom:

**38/19/02 Risk Register (31/19/02)**

The Chief Executive confirmed that the risk of the Board being unable to fulfil its statutory function and constituent ratepayers choosing not to pay their drainage rates, as a result of the Environment Agency (EA) being unable to de-shingle the mouth of the Cuckmere River, had been added to the Risk Register. RESOLVED that this be noted.

**39/19 OPERATIONS REPORT**

**39/19/01** The Operations Report (a copy of which is filed in the Report Book), was considered in detail and approved. Arising therefrom:

**39/19/02 Cuckmere Catchment (3.1)**

The Board's letter and enclosures to the Secretary of State for the Environment, Food and Rural Affairs dated 28 June 2019 was considered in detail and approved (a copy of which<sup>2</sup>s filed in the Report Book).

ID	Pevensey and Cuckmere WLMB, Minute	Action
39/19/03	Defra's response of 12 August 2019 to the Board's letter and enclosures of 28 June 2019 was noted (a copy of which is filed in the Report Book). It was now clear that the Environment Agency (EA) would probably never de-shingle the mouth of the Cuckmere River and the protocol referred to in Defra's letter would only ever trigger further consideration of whether or not to de-shingle, rather than an immediate response to de-shingle. Therefore other options had to be considered to enable the Board to fulfil its statutory function in this part of its district, moving forward. RESOLVED that this be noted.	
39/19/04	Members considered the two options set out in the Operations Report. It was agreed and thereby RESOLVED to seek to carryout an urgent 'one-off' de-shingle of the river mouth at Cuckmere Haven. It was agreed that this work would be funded by fully utilising the Board's Reserves from its Cuckmere Sub District, should other funding sources not materialise.	
39/19/05	It was noted that in order to do this work the EA would have to agree to formally delegate its powers to the Board using the Public Sector Cooperation Agreement which the Board and the EA had set up at the time the Board was constituted 3 years ago. Paul Levitt (EA) confirmed that the EA would support this approach. RESOLVED that this be noted.	MP/PJC
39/19/06	Assuming the EA agreed to delegate its powers to the Board, we would then need to apply for the necessary permissions from the Marine Management Organisation (MMO licence), Natural England (NE assent) and the EA (we would probably also need a Flood Risk Activity Permit from them). The Chief Executive advised members that this could take anything up to 3 months to achieve, however we would be asking for 5-year permits, so that we would not need to repeat this process in the immediate future, should we find ourselves in the position of needing to carryout the de-shingling work again and having the finances in place to do so (which the Board did not currently have). RESOLVED that this be noted.	CL
39/19/07	It was agreed and thereby RESOLVED that the Chief Executive alert Wealden District Council to the possibility of having to significantly increase the special levy next year to fund the de-shingling work, moving forward.	PJC
40/19	<b>ENVIRONMENTAL REPORT</b>	
40/19/01	The Environmental Report (a copy of which is filed in the Report Book), was considered in detail and approved. Arising therefrom:	
40/19/02	<p><b>Water Transfer and Impoundment Licencing – New Authorisations</b></p> <p>The Environmental Manager was pleased to report that after careful consideration of the legislation the wording precluded the Pevensey and Cuckmere WLMB from requiring any water transfer licences. This view had very recently been supported ADA and by a recent publication from the Environment Agency (EA): "Abstractions within an IDD (including wetlands) under New Authorisations". RESOLVED that this be noted.</p>	
40/10/03	Concerns were raised as to whether farmers would also be exempt and it was agreed to follow this up with the National Farmers Union (NFU).	CJ

**40/19/04 Water Environment Grant (WEG)  
Startup Meeting – Floating Pennywort (10.2)**

It was agreed and thereby RESOLVED to advise Board member Mr D Robinson when the work programme would start, as he had been experiencing major issues as a result of the uncontrolled build up of Floating Pennywort.

**CL/RD**

**41/19 PLANNING REPORT**

**41/19/01** The Planning Report (a copy of which is filed in the Report Book), was considered in detail and approved. Arising therefrom:

**41/19/02 Surveying and Modelling Programme**

The Surveying and Modelling Programme was considered in detail and approved in principle (a copy of which is filed in the Report Book). Arising therefrom:

**41/19/03** It was agreed and thereby RESOLVED to approve the phased approach as set out in the 5 year Surveying and Modelling Programme, as presented, and agree the allocation of funding from the Development Reserve to start phase 1 (estimated to be £235k), subject to the Board approving the contract before it was signed off and awarded.

**RK/PJC**

**41/19/04** It was agreed and thereby RESOLVED to clarify what decisions could be taken by officers and what decisions could only be taken by the Board at the next meeting. It was important that the governance around the consenting process was clarified, particularly with respect to Byelaw 3.

**PJC**

**42/19 FINANCIAL REPORT**

**42/19/01** The Financial Report for the period 1 April 2019 to 31 August 2019, was considered in detail and approved, (a copy of which is filed in the Report Book). Arising therefrom:

**42/19/02 In-year Financial Reports**

It was agreed that in future the In-year Financial Report for the October meeting be referred to as a Management Report, where the financial position was reported by exception only (where the projected out-turn was significantly different to the budget). RESOLVED that this be noted.

**PJC**

**43/19 IDB/EA LIAISON**

**43/19/01** The Project Engineer (WMA/WLMB) and Operations Manager (EA) reported that the regular monthly catch ups with the WLMB and the EA continued to work well.

**44/19 DATA PROTECTION POLICY**

**44/19/01** It was agreed and thereby RESOLVED to approve the revised Data Protection Policy (a copy of which is filed in the Report Book).

**45/19 WHISTLEBLOWING POLICY**

**45/19/01** It was agreed and thereby RESOLVED to approve the revised Whistleblowing Policy (a copy of which is filed in the Report Book).

**46/19 RISK REGISTER**

**46/19/01** The abbreviated Risk Register showing those risks with a risk assessment matrix score of  $\geq 6$  was considered in detail and approved (a copy of which is filed in the Report Book). There were no matter arising.

**47/19 AUDITED ANNUAL GOVERNANCE AND ACCOUNTABILITY RETURN YEAR ENDING 31 MARCH 2019**

**47/19/01** The External Auditor Report and Certificate forming part of the audited Annual Governance and Accountability Return for the year ended 31 March 2019, (a copy of which is filed in the Report Book), was considered in detail and approved. There were no matters arising.

**48/19 MEETINGS 2020**

**48/19/01** Meeting dates for 2020 were confirmed as being:

28 January 2020

16 June 2020

6 October 2020

All meetings would start at 10 am and be held at the Saffrons Sports Centre in Eastbourne.

**49/19 NEXT MEETING**

**49/19/01** The next meeting of the Board was confirmed to be at 10 am on 28 January 2020 at Saffrons Sports Centre in Eastbourne.

**50/19 OTHER BUSINESS**

**50/19/01** Cath Jackson from Natural England apprised members of the new and developing Environmental Land Management Scheme pilots, which, it was envisaged would replace the EU funded schemes post Brexit. A number of these trials were taking place in the Board's area and it was suggested that one of these trials should cover the same area as phase 1 of the Surveying and Modelling programme that was agreed earlier in the meeting.

**51/19 CONFIDENTIAL BUSINESS**

**51/19/01** There was no confidential business to discuss.

# PEVENSEY AND CUCKMERE WLMB

## OPERATIONS REPORT

1. The following information pertains to work carried out for the Pevensey and Cuckmere WLMB involving the Operations Manager (Richard Dann), Project Engineer (Matthew Philpot) and Environmental Manager (Caroline Laburn) between May 2019 – September 2019:

Machine based maintenance works, to remove vegetation from the watercourses in order to sustain and improve conveyance, have been undertaken in the following areas:

Weedcutting on:

CMT214P - Pevensey; Horse Eye & Down

- The Rickney Sewer
- Snapsons Sewer
- Whelpley
- Horse Eye
- White Dyke
- Lewens Sewer
- Crossing Sewer
- Down Sewer

CMT215P - Pevensey; Glynleigh

- Drockmill Hill Gut
- Winters Cut
- Otham Feed
- Otham Court Ditch
- Duck Puddle
- Wadham New Cut
- Marland Sewer

CMT213P - Pevensey; Whepley

- Magham Sewer
- Bowley Sewer
- Sackville Sewer

## 2. PUMPING STATIONS

### **Manxey**

No issues to report

### **Drockmill**

No issues to report

### **Star Inn**

No issues to report

### **Rickney**

No issues to report

### **Horsebridge**

No issues to report.

### **Barnhorn**

No issues to report.

### **3. OPERATIONAL ISSUES**

#### **3.1 Cuckmere Catchment**

For most of this year the Board has been limited in its ability to manage water levels in the Cuckmere catchment due to the high river levels, caused by the shingle in the mouth of the river on the beach south of Exceat. The consequent high water levels in the river upstream are preventing our tidal flaps from operating, thus preventing the gravity system behind being able to function.

In June 2019, the Board wrote to the DEFRA Secretary of State to try to resolve the issue and obtain action (Appendix A, Agenda Item 14). The response from DEFRA/EA was hopelessly disappointing and completely unproductive (please see Appendix A, Agenda Item 14).

Since the letter was sent Board officers have spoken with the local EA teams who remain in the position that there is no money or will to de-shingle the Exceat. Therefore, in reality, it is clear that the EA have neither the funds nor the appetite to ever de-shingle the Exceat. This is a position which has been forthcoming from the local team and to which their national team is also supporting. It is unlikely to change without Alfriston flooding, power/comms outages or loss of life arising from flooding. Further time and expense attempting to persuade the EA to finance and deliver this work is considered to be futile and the Board therefore needs to consider other options, moving forward:

##### Option 1

Install a mobile pump at Dickerman's Wharf and over-pump in times of high flows. The EA have said that they will provide and pay for running such a pump if they have one available, but there are no guarantees. If the EA were not able to provide such a pump, the WMA could provide one at an internal recharge rate of £160/day.

Whilst the installation of a temporary pump would enable the Board to fulfil its statutory function most of the time, it would not make sense to run the pump if the river banks breached or overtopped because we would just end up pumping water around in circles, which would add cost and achieve nothing.

So what would this cost? If we assume that the catchment will be under water for 3 months every year (as it was earlier this year) then provision of a standby mobile pump for 3 months could cost £15k pa, if the EA were unable to provide such a pump at no cost to the Board for the whole time. If the Board felt that this option was better than option 2 below, it would be prudent to raise an additional £15k pa from the Board's Cuckmere Sub District with effect from 2020/21, so that this could be paid for if necessary (Drainage Ratepayers = £9,501 and Wealden District Council = £5,499).

##### Option 2

Obtain the necessary permissions from the MMO, NE and EA to de-shingle the Exceat as soon as possible, with the shingle being moved to the East of the river mouth (and attempt to obtain a 5 year licence). Carryout the work ourselves and fund this from the Board's Cuckmere Sub District General and Development Reserves (assuming we were able to secure the necessary permissions before 31 March 2020).

Raise an additional £40k pa from the Board's Cuckmere Sub District with effect from 2020/21, to be reviewed annually (Drainage Ratepayers = £25,337 and Wealden District Council = £14,663). This additional money would fund an annual de-shingle in the short term, should this be necessary, together with

other targeted maintenance activities and the Board would carry out this work, subject to obtaining all of the necessary permissions as previously stated.

Work closely with the South Downs National Park Authority and the National Trust to secure contributions towards the cost of de-shingling in the short term and develop a sustainable plan for managing and maintaining the river in the longer term.

Provide assistance to the local community in setting up a registered charity (eg The Cuckmere River Trust) to fund de-shingling work, other targeted maintenance activities and, where appropriate, the capital work that we've previously identified (and costed) as needing to be done before de-maining is considered further. This is likely to take up to 5 years to achieve.

Review the position annually and reduce the additional burden of £40k pa if contributions from local businesses and the charity had been forthcoming.

Reconsider de-maining in 5 years time when a longer term sustainable management plan for the river had been established and, where appropriate, all of the necessary restorative work had been completed and paid for.

#### **4. HEALTH & SAFETY**

No accidents, incidents or near misses this period within the Pevensey area.

Learning events from other boards managed by the WMA have been shared including tool box talks on;

- Awareness around livestock
- Access risks around non-official bridges over watercourses

Annual Hand Arm Vibration monitoring completed this quarter

#### **5. PLANT**

Small Tools - New electric circular saw purchased for various fencing work.

No major plant purchases.

#### **6. CAPITAL SCHEMES**

Drawings and briefings are completed ready for the start of our WEG work on the Pennywort removal from side ditches. This work is due to start in November 2019, taking circa 2 months.

#### **7. MAINTENANCE SCHEMES**

Richard Dann and Danny Boorer have continued their water management activities, including repairing Water Level Control Structures and renewing fencing when required.

Richard continues to have weekly meetings with the Environment Agency to update them on our activities, which are in addition to the monthly face to face meetings held between officers and other EA staff.

The agreement for us to operate EA structures, further to communicating such activities continues to work well.

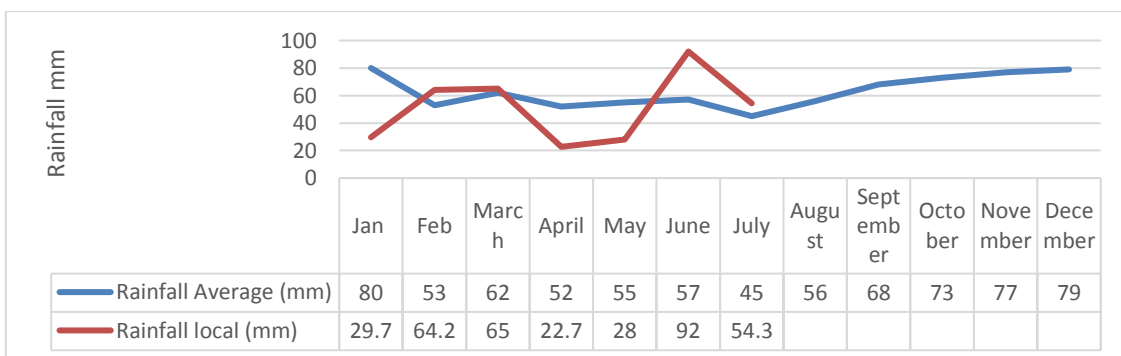


New Fencing and Signage at Horsebridge Grill



New Dam Boards at two sites on the Marland

## 8. HYDROLOGY –



## 9. COMPLAINTS

None this period

## **10. ENVIRONMENTAL REPORT**

### **10.1 Water Transfer and Impoundment Licencing – New Authorisations**

From the 1st January 2018, new regulations came into effect as the result of amendments to water resources legislation by the implementation of the Water Act 2003. This new legislation has removed many previously exempt activities to abstract water without a licence, such as the transfer or abstraction of water into Internal drainage districts. These activities will now require an Environment Agency water resources abstraction / transfer licence depending on the location and definition of the Board's Boundary.

Special transitional arrangements are currently in place, which requires application to be made to the Environment Agency to legalise these transfer points and impoundments. Applications need to be with the EA by 31 December 2019.

ADA have been in consultation with the EA over the last 2 years, however, it is only in the recent couple of months that some clarification and guidance has been released.

The Environmental Manager has conducted a WMA wide audit on IDB abstraction infrastructure.

The Operations Manager and Environmental Manager have been working closely together to discuss the 78 structures within the WLMP and established 38 actively used transfer structures within the Pevensey and Cuckmere IDD. Careful scrutinisation of the primary legislation by the Flood and Water Manager suggested that the wording of the legislation precluded the Pevensey and Cuckmere IDD's from requiring transfer licences. This has been backed up by a recently released publication from the EA (see Appendix 1).

The Environmental Manager will continue to appraise the Board of any further guidance and information as it is released.

### **10.2 WEG Bid Startup Meeting – Floating Pennywort**

A startup meeting was held with the IDB, NE and the contractor on 11 June to discuss the Floating Pennywort Project.

**MATTHEW PHILPOT – ENGINEER**

**CAROLINE LABURN – ENVIRONMENTAL MANAGER**

# Abstractions within an IDD (including wetlands) under New Authorisations



To define the regulatory approach for multi operator previously exempt IDB abstractions into and within Internal Drainage Districts (IDDs), and third party abstractions solely for Managed Wetland Systems (MWSs).

## New Authorisations – The removal of abstraction exemptions

The intention of the Water Act 2003 was that all significant abstractions are brought into regulation to ensure compliance with the requirements of the Water Framework Directive, including abstractions by Internal Drainage Boards. As a consequence of the legal changes to the definition of land drainage, the changes also mean that other categories of abstraction which we have generically called “Managed Wetland Systems” are also brought into regulation<sup>1</sup>. This includes operations such as Water Level Management Plans, Wetlands, National Nature Reserves and Environmental Stewardship Schemes.

There have been a number of cases where the regulatory intention is being challenged on points of legal interpretation resulting in a lack of clarity as to when an abstraction licence is required. This relates to how the definition of an IDD or MWS is being interpreted and whether abstractions that are taking place are within or sit outside (of mapped boundaries) such districts/systems.

Our position in these cases is that it would be unwise to risk not having a licence in place on what are legally debateable grounds, especially in borderline cases. The transitional arrangements allow a low risk entry into regulation and these arrangements will end on 31<sup>st</sup> December 2019. After that date there is no guarantee that a licence will be granted or may only be granted on more restrictive terms and you may be unable to secure the right to your current lawful use of water through the normal licensing arrangements.

This document looks to address two key issues; main river abstractions into IDDs, and third party abstractions within IDDs to support MWSs.

### 1) Main River abstractions within IDDs

Where an IDB abstracts water **into** its district, then it becomes a licensable activity under the new regulations, but abstractions **within** its district (if by or on behalf of the board) remain outside of regulation (Section 7 of the Water Act 2003).

As we have looked into some of the legal and operational detail around these sites, it appears that a number of the primary abstractions from “main rivers” into the IDD’s actually take place within the district, as the “main river” itself forms part of that district. This means, that according to the wording above, they stay out of regulation.

<sup>1</sup> Under “The Water Abstraction (Transitional Provisions) Regulations 2017”

## Licensing Approach

Where the “main river” is not considered to be within the boundary<sup>2</sup> of an IDD, a licence is required under the transitional arrangements for abstractions from that “main river” into the IDD. Where the “main river” is considered to be within the boundary of an IDD, then no licence is required for abstractions into the IDD. However, in order to meet the regulatory intent of managing all significant water abstractions, we will seek an agreed approach to managing these abstractions in accordance with the jointly agreed Memorandum of Understanding (MoU) between the Environment Agency and Association of Drainage Authorities (ADA).

This approach is represented in Figures 1 and 2 below.

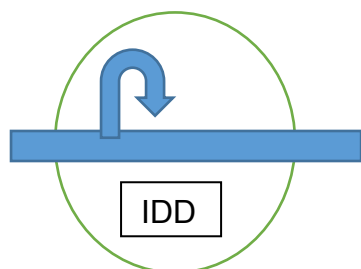


Fig.1 River not part of IDD

Licence required for abstraction into IDD

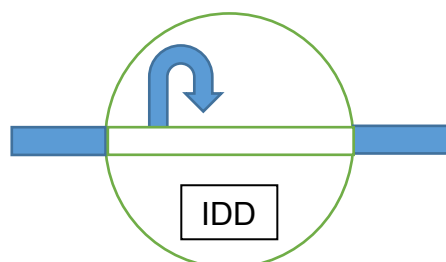


Fig.2 River part of IDD

No licence required

This approach applies to both IDB's, and third parties abstract on behalf of an IDB who can demonstrate that they meet the continued exemption outlined by Section 7 of the Water Act 2003.

## 2) Third Party abstractions within IDDs to support MWSs

One of the key changes under Water Act 2003 was that it introduced the concept of “water systems” and “drainage districts” into licensing considerations through the primary and secondary legislation which embodies the policy principle that initial (primary) abstraction into such systems/districts was a licensable activity and the subsequent (secondary) abstractions within the districts would remain exempt (subject to meeting certain criteria).

In relation to MWSs, it was recognised that these secondary abstractions would no longer be exempt as there was nothing in the primary legislation that provided for an exemption from licensing control. This meant that each abstraction within a MWS would have required a separate abstraction licence. This would have resulted in multiple applications and licences being required for each MWS site.

In order to provide a sensible and equitable regulatory outcome, we secured a further exemption for MWSs so that the same principles could be applied as for navigation and IDB's, where the movement of water within these systems would remain exempt from the need for a licence. This now applies to a multitude of operations such as water meadows, water level management plans, HLS schemes, managed wetlands etc. This is embodied in paragraph 8 of the 2017 exemption regulations which states that a licence is not required for these secondary movements of water if the abstractions within the MWS are for the sole purpose of the management, operation or maintenance of water levels or flows in that MWS<sup>3</sup>.

<sup>2</sup> For the purposes of this approach we take this mean the boundary identified on the statutory maps held by Internal Drainage Boards for which the IDD has operational functions, or the digitised IDD boundary maps held on the [ada.org.uk](https://www.ada.org.uk) website.

[https://www.ada.org.uk/member\\_type/idbs/](https://www.ada.org.uk/member_type/idbs/)

<sup>3</sup> A consent may be required under Regulation 102 of The Conservation of Habitats and Species Regulations 2017 where the abstractions may impact a European site. Please discuss this potential need with the Environment Agency.

A MWS is defined within the regulations as:

- (a) an area of land that is periodically inundated or saturated by abstracted water in order to provide ecological benefits to flora and fauna, or
- (b) an area of land through which abstracted water flows, through a system of channels, sluices, carriers or other apparatus in order to provide ecological benefits to flora and fauna.

Considering that abstractions within an IDD (if by or on behalf of the board) remain outside of regulation (Section 7 of the Water Act 2003), this definition of a MWS raises the question as to whether “environmental abstractions” undertaken by Natural England, the Agency or other third parties within an IDD to support MWS can be said to be “on behalf of” the IDB and “in connection with its functions”. Such interpretation is potentially wider than the regulations intended.

Discussions with stakeholders affected by these regulatory changes has raised questions about how these exemptions are to be interpreted and applied. This is because the managed wetland exemption and definition does not distinguish between primary and secondary abstractions, it just refers to abstractions within a “Managed Wetland System” as being exempt. In particular, clarity is required over:

- (i) What dictates the boundary of a managed wetland system in the application of these new regulations and whether there is a licensing requirement where managed wetlands are within the drainage district of an IDB? Depending on how this is defined/interpreted and at what scale affects who has responsibility for seeking a new authorisation and how many licences might be needed.
- (ii) Where water level management activities are undertaken within a larger IDD system controlled by an IDB to an agreed water level management plan specifying summer and winter operating levels, can those water level management activities be regarded as being undertaken on behalf of the IDB and hence remain exempt?
- (iii) Where there isn't a formal Water Level Management Plan in place can the third party abstraction into a Managed Wetland System reasonably be said to be “by or on behalf of” an IDB?

The wording in the exemption didn't envisage a two tiered system i.e. a MWS within an IDD. It sought to give those operating “Managed Wetland Systems” parity with IDBs and relies on the abstraction being for the sole purpose of the management, operation or maintenance of water levels or flows in that managed wetland system.

## Licensing Approach

Our approach to regulating these cases is as follows:

Where the primary abstraction into the IDD requires a licence, we will not seek licences for third party abstractions to support MWSs where it can be demonstrated through formal agreements, that these are undertaken by or on behalf of an IDB as part of meeting PSA targets for SSSIs.

Where the primary abstraction into the IDD does not require a licence under the terms of the Water Resources Act 1991 (because the abstraction itself is within the IDD boundary), we will seek licences for the primary abstraction into each third party MWS within the IDD.

For the sake of clarity, where a MWS is contained within the Internal Drainage District (IDD) of an Internal Drainage Board, then the extent of the MWS owned or operated jointly or individually by any third party will be limited to the boundary or curtilage of each individually managed wetland site and not the whole of the IDD area.

**We have produced the flow chart below to help assist with the decision as to whether an application for an abstraction licence under the Transitional Regulations is required. We emphasise that this should be a quick method of assessment, and again in borderline cases would recommend an application for a licence be submitted.**

**Flow chart to help determine whether you require a licence or not.**



## General licensing principles for IDB's

- We will licence the primary abstraction into the IDB district where the abstraction point is outside of the IDD boundary.
- We will not licence subsequent abstractions between drains within the district (by or on behalf of the IDB).
- We will not licence IDB structures within the district.
- We will licence abstractions out of the IDB district where **it is not** for the purpose of land drainage.
- We will licence abstractions from one IDB to another where **it is not** for the purpose of land drainage.
- All Land drainage activities will remain exempt.
- Different sources of supply will require separate licences.

## How much will my licence application cost?

In most circumstances, schemes of this nature will require a transfer abstraction licence application which costs £1,500. A transfer licence incurs no annual subsistence charge for the quantity of water you abstract. More details on abstraction charges can be found at;

<https://www.gov.uk/government/publications/abstraction-charges-scheme>

## More Questions - who to contact?

If having read the .gov.uk guidance you are still unsure if you require a licence or have questions about your preparing your application, please call our dedicated New Authorisations hotline on 03708506506. For detailed information on how to apply for a licence for previously exempt activities please go to;

<https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence#apply-for-a-licence-for-a-previously-exempt-abstraction>

## PLANNING REPORT

### 1. SUMMARY OF ACTIVITY IN REPORTING PERIOD

- 1.1 This planning report covers the reporting period 15 May 2019 to 19 September 2019. There are currently 13 consent applications being processed. The most common types of consent that the Board receive and determine in its regulatory capacity are set out in the table below alongside the current breakdown of cases.

Application Type	Number
Byelaw 3 (B3) – Discharge of Treated Foul Water (TFW):	1
Byelaw 3 (B3) – Discharge of Surface Water (SW):	12
Byelaw 4 (B4) / Section 23 (S23), LDA 1991 – Alteration of watercourse	0
Byelaw 10 (B10)– Works within 9 m of a Board’s maintained watercourse:	0
<b>Total:</b>	<b>13</b>

- 1.2 The table below gives the current status of these applications.

Application Type	B3 - TFW	B3 - SW	B4/S23	B10	Total
Awaiting further information from the applicant:	1	3	0	0	4
Awaiting applicants acceptance of conditions:	0	5	0	0	5
Being processed by officers:	0	4	0	0	4
To be determined by the Board in this report:	0	0	0	0	0
<b>Total:</b>	<b>1</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>13</b>

- 1.3 As is highlighted by the table immediately above there are no applications requiring consideration by the Board in this report.
- 1.4 There was one enforcement case which was investigated, its details are given in the table below. This case was also raised by Councillor White at the previous Board meeting and the landowner explained the work done to the Board.
- 1.5 The work did not affect the Board’s ability to manage its adopted watercourses and enabled the repair of some water control structures. Therefore no enforcement action was taken, but a letter was send to the landowner to inform them of the need for consent from the Board if similar works are proposed in the future.

Case. Ref.	Case File Sub-type	Location / Site Name	Description of works
19_01693_N	Section 24, LDA 1991	Plantation, Ersham Road, Stone Cross, East Sussex BN24 5BT	Reinstate land by raising it approximately 0.75m to the level it was prior to it being used for turf production for many years

## 2. DELEGATED CONSENTS DETERMINED

- 2.1. During this reporting period, the consents outlined on table below were processed under the Land Drainage Act 1991 and Board's Byelaws. Four consents were determined by Officers in accordance with their delegated authority.

Application Type	Number
Byelaw 3 (B3) – Discharge of Treated Foul Water (TFW):	0
Byelaw 3 (B3) – Discharge of Surface Water (SW):	4
Byelaw 4 (B4) / Section 23 (S23), LDA 1991 – Alteration of watercourse	0
Byelaw 10 (B10)– Works within 9 m of a Board's maintained watercourse:	0
Total:	4

- 2.2. The table below gives the details of the four consents determined by Officers. These cases concerned four sites located in Hailsham, Hastings and Bexhill. They all proposed surface water discharges into the Board's internal drainage district.

Case. Ref.	Case File Sub-type	Location	Description of proposal	Determination
19_01475_C	Byelaw 3 Surface Water	Land off Reef Way, Hailsham	Discharge of surface water from 6,540m <sup>2</sup> of new impermeable area at 11.2 l/s	Granted 13/06/2019
19_01524_C	Byelaw 3 Surface Water	130 Bexhill Road, St Leonards-on-sea, Hastings, East Sussex, TN38 8BL	Discharge of surface water from 2,775m <sup>2</sup> of new impermeable area at 5 l/s into Hollington Stream via 150mm diameter outfall	Granted 17/07/2019
19_01470_C	Byelaw 3 Surface Water	Barnhorn Road - Land North of, Bexhill	Discharge of surface water from 275 dwellings	Granted 06/08/2019
19_01258_C	Byelaw 3 Surface Water	Oaklands, Ersham Road, Hailsham	Discharge of surface water from new impermeable area of 28,630 m <sup>2</sup> at a maximum rate of 31.8 l/s via a 150mm outfall pipe and associated headwall	Granted 19/09/2019

### 3. ENQUIRIES

3.1. Officers have responded to eight enquires during the reporting period, outlined below;

<b>Case. Ref.</b>	<b>Case File Sub-type</b>	<b>Location</b>	<b>Description</b>
19_01477_Q	About Regulation	Gloucester Avenue, Bexhill	Enquiry regarding grants to do works to clear riparian watercourse
19_01542_Q	About Regulation	116 London Road, Hailsham, BN27 3AL	Proposed discharge of surface water from 3,109 m <sup>2</sup> of impermeable area from construction of 60 bed care home at 2 l/s via 100mm diameter outfall pipe
19_01583_Q	About works	Milland Farm, Church Road, Herstmonceux, BN2 1QJ	Enquiry regarding unauthorised access to land and works on watercourse
19_01637_Q	About Infrastructure	Land on the north side of Coast Road, Pevensey Bay, Pevensey	Enquiry regarding land ownership
19_01648_Q	About Regulation	Development at Windmill Hill, Hersmonceux, BN27 4ST	proposed 20 residential dwellings development
19_01672_Q	About Regulation	Wood's Cottages, Langney Rise, Eastbourne	Enquiry regarding surface water discharge into IDD
19_01692_Q	About works	Exceat bridge	Replacement of Exceat bridge

#### 4. PLANNING COMMENTS

- 4.1. Officers have provided comments on 78 planning applications that are either in or potentially has an impact on the Boards Internal Drainage District. The tables below give an indication of the number of consultations received from each local planning authority and the planning stage of the applications. These table and numbers do not capture those planning applications where there are several re-consultations due to the insufficiency of the initial information submitted with the planning application.

Local Planning Authority	Number of consultations
Eastbourne Borough Council	13
East Sussex County Council	2
Hastings Borough Council	18
Rother District Council	13
South Downs National Park Authority	4
Wealden District Council	28

Planning stage	Number of consultations
Outline planning	5
Full planning	43
Reserved matters	4
Discharge of planning conditions	16
Pre-application	10

- 4.2. The majority of planning consultations from Hastings Borough Council and Eastbourne Borough Council are not major developments with regards to total site area.

## 5. FEES ASSOCIATED WITH CONSENTS GRANTED

5.1. There have been five fees invoiced during the reporting period. These fees are all Surface Water Development Contributions and are detailed below;

Case ref.	Location	Amount (no VAT)	Date invoiced	Invoice Paid? Y/N	"Trigger" and reason for payment
19_01524_C	130 Bexhill Road, St Leonards-on- sea, Hastings, East Sussex, TN38 8BL	£ 8,394.00	22/07/2019  Or 14/08/2019	Yes 30/08/2019	Granting of consent for the discharge of surface water from 2,775m <sup>2</sup> of new impermeable area at 5 l/s into Hollington Stream via 150mm diameter outfall
19_01470_C	Land North of Barnhorn Road, Bexhill	£ 54,584.00	14/08/2019	No	Granting of consent to discharge surface water from 275 dwellings
19_01475_C	Land off Reef Way, Hailsham	£ 19,783.50	27/06/2019	No	Granting of consent to discharge surface water from 6,540m <sup>2</sup> of new impermeable area at 11.2 l/s
19_01659_C	Bedes Senior School	£ 9,075.00	TBC	Yes 13/06/2019	Granting of consent to discharge surface water from 2,500m <sup>2</sup> at 5l/s
19_01258_C	Oaklands, Ersham Road, Hailsham	£ 66,981.20	19/09/2019	No	Granting of consent to discharge surface water from new impermeable area of 28,630 m <sup>2</sup> at a maximum rate of 31.8 l/s
<b>Total:</b>		<b>£ 158,817.70</b>			

## **6. Surveying and modelling programme**

- 6.1. A report by the Board's Flood and Water Officer proposing a survey and modelling programme of adopted watercourses was circulated to the Board by email on 11 September 2019. The report detailed the potential approach to the survey and modelling Board watercourses in order to improve understanding and potential impacts of development. It also included indicative costs and the timescales.
- 6.2. A limited response to this report was received from members and as such the report is included as an appendix to this planning report. Members attention is drawn to the recommendation included in Appendix A under section 9 and a determination is sought from the Board on the funding and phasing options highlighted.

## **Survey and Modelling Programme for the Pevensey and Cuckmere Water Level Management Drainage District**

### **1. Introduction**

- 1.1. There is significant development underway, with planning permission or planned within the natural catchment of the Board's drainage district. Hailsham, Polegate, Stone Cross, Hellingly, Horam, Bexhill and the western part of Hastings are the main focus of development for all the local planning authorities within the Board's natural catchment. Although the majority of the development proposed is not within the extent of the drainage district, it has the potential to contribute surface water runoff into the district. If surface water runoff from these developments is not managed appropriately, the Board could end up having to manage the impacts of increased surface water runoff into its network.
- 1.2. The Board has a byelaw (byelaw 3) which prohibits the increase of water (flow rate or volume) directly or indirectly into its district without written consent. These discharge consents are issued when the proposed surface water management measures have been assessed to be appropriate and reasonable. One of the conditions of a discharge consent is a surface water development contribution payable to the Board proportionate to the impact of the discharge proposed on the Board's district.
- 1.3. Currently, an assessment of the impacts of increased surface water volume is based on limited knowledge of how the adopted watercourses and structures would react. Therefore there is a need for the Board to have a good understanding of the impact of activities undertaken by others on its adopted network and structures. This will inform how the Board chooses to relax its byelaws that are affected by such activities such as byelaw 3.

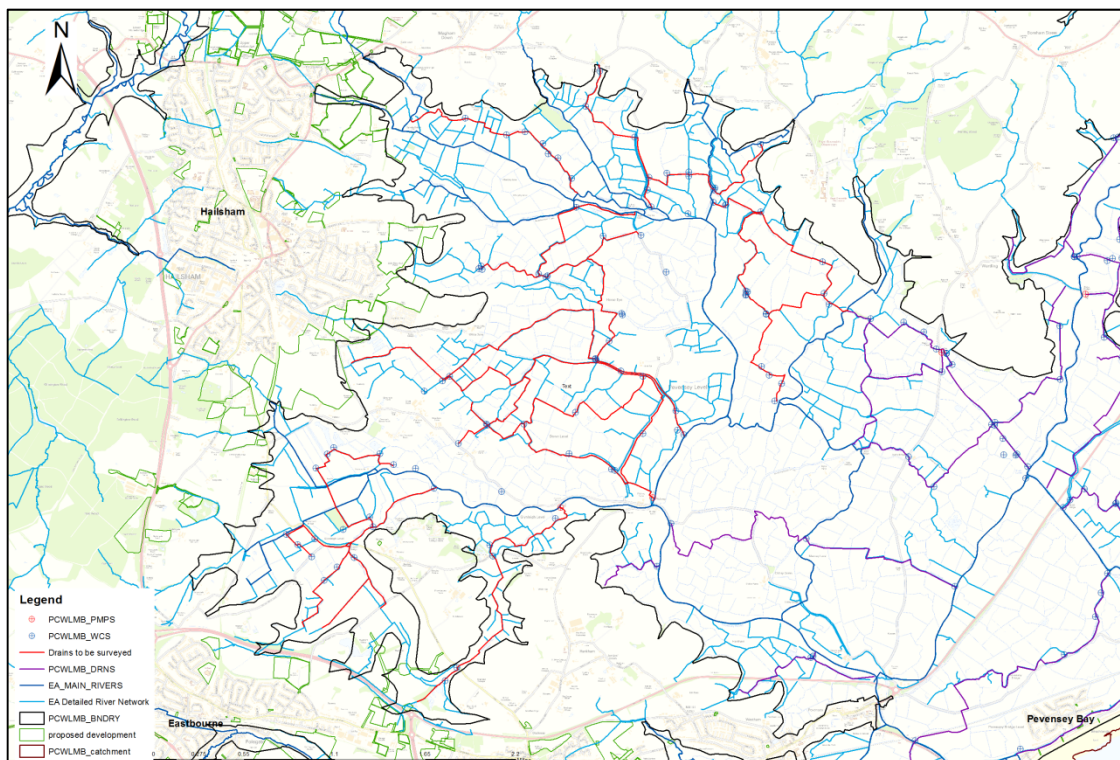
### **2. Survey Requirement**

- 2.1. Given the need set out above, it is intended to carry out detailed surveys of the Board adopted watercourses and structures. The survey findings will inform detailed hydraulic modelling, which will establish the current performance of the watercourses and structures. This will provide a good understanding of the potential impact of development on the watercourses and their operations.
- 2.2. The survey findings will also inform applications for water abstraction permits, transfer licences or exemptions, which the Board has to make to the Environment Agency (EA) for all water transfers from inland waters outside of its district.
- 2.3. The survey and hydraulic modelling work has been broken into four phases. These phases are detailed below. Appendix 1 shows an example of the details of the drains' cross-sections which will be produced by the survey.
- 2.4. Please note that the watercourses around the Polegate/Willingdon area and Eastbourne have not been included within the survey and hydraulic modelling programme, given that the majority of the watercourses are main rivers. However, the current fluvial model for the area requires updating. Eastbourne Borough Council

officers are considering options to undertake this work as it is a necessary element of the evidence base informing the local plan review. It is assumed that this work will be carried out over the coming year.

### 3. Phase 1

- 3.1. The majority of development with planning permission, undergoing planning or planned in a planning authority's local plan is located around the Hailsham area. Southern Water has also submitted a planning application for the Hailsham North sewage treatment works, which is part of the works planned to increase capacity to allow new development to discharge to the public sewer network.
- 3.2. The development from the eastern part of Hailsham indirectly discharges surface water runoff into Magham Sewer, Rickney Sewer, Horse Eye Sewer, Marland Sewer, Puddle Duck stream and Drockmill Hill Gut which are Board adopted watercourses. Some of these watercourses also indirectly receive water from the proposed development within the Polegate and Willingdon areas. Consequently, the proposal for Phase 1 recommends that the drains to the east of Hailsham should be surveyed first. Figure 1 below shows all the drains and structures that are proposed to be covered by the first phase of surveying. The survey will include some EA structures where their operation affects the water levels within the IDB drains. However, if the EA has survey information for these structures, they will not be included in the survey work.



**Figure 1: Phase 1 drains and structures to be surveyed**

- 3.3. Table 1 overleaf gives an estimation of the costs associated with the survey work proposed as part of Phase 1 and the subsequent hydraulic modelling. These costs have been estimated on the basis of similar projects recently undertaken by the Lead Local Flood Authority, however these were for shorter watercourses. The EA has a

very coarse 2D hydraulic model (based on LiDAR data) which was undertaken as part of the Water Level Management Plan in 2014. This model could be utilised as the starting point of the modelling exercise.

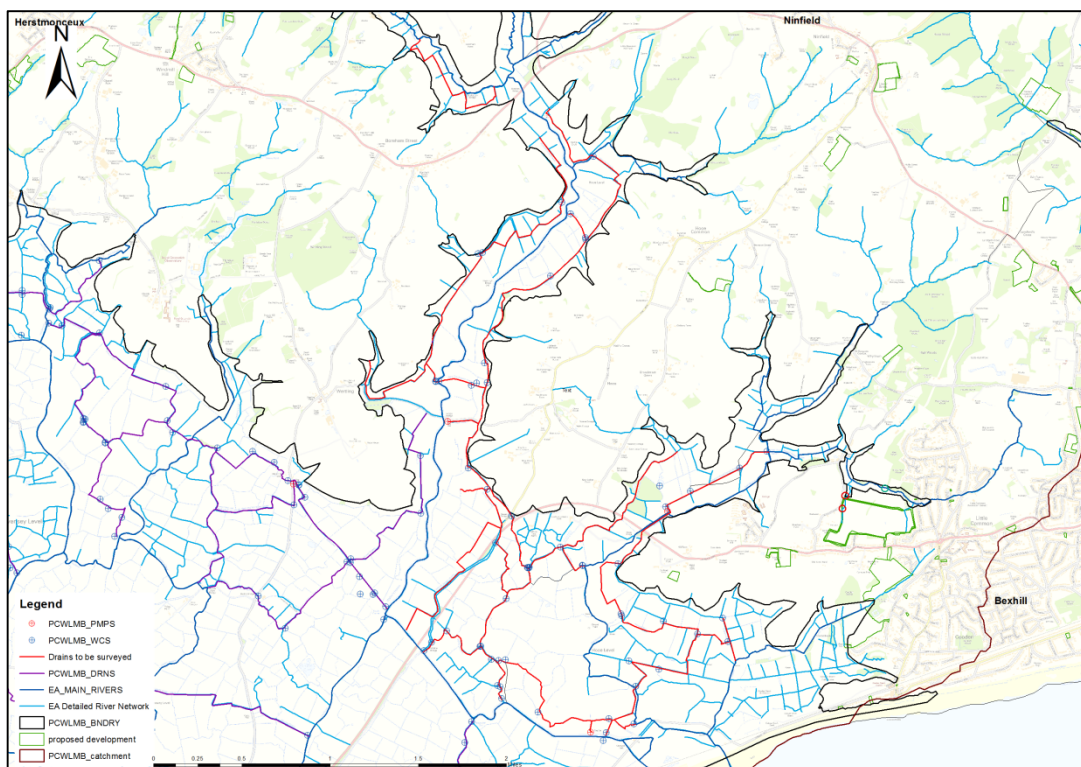
- 3.4. Due to the connectivity of the watercourses (main river, IDB watercourse and ordinary watercourse) as well as the water control structures there will be a need to carry out a scoping study. The scoping study will review the Water Level Management Plan, existing information the EA has on main rivers and structures, and understand how the IDB operates the watercourses and structures. This will be used to determine the extent of survey to be undertaken around main rivers and EA operated structures which have a significant impact on water levels within IDB watercourses.

**Table 1: Cost estimates for Phase 1 work**

Total length of watercourse	Number of water control structures	Number of pumps	Cost estimates	
			Surveying work	Hydraulic modelling
40.2km	93	2	£175,000	£60,000

## 4. Phase 2

- 4.1. Phase 2 of the survey and hydraulic modelling work covers the IDB drains to the western part of Bexhill where there is significant development either underway, has planning permission or undergoing planning. Figure 2 below shows the drains and water control structures proposed to be surveyed.



**Figure 2: Phase 2 drains and structures to be surveyed**

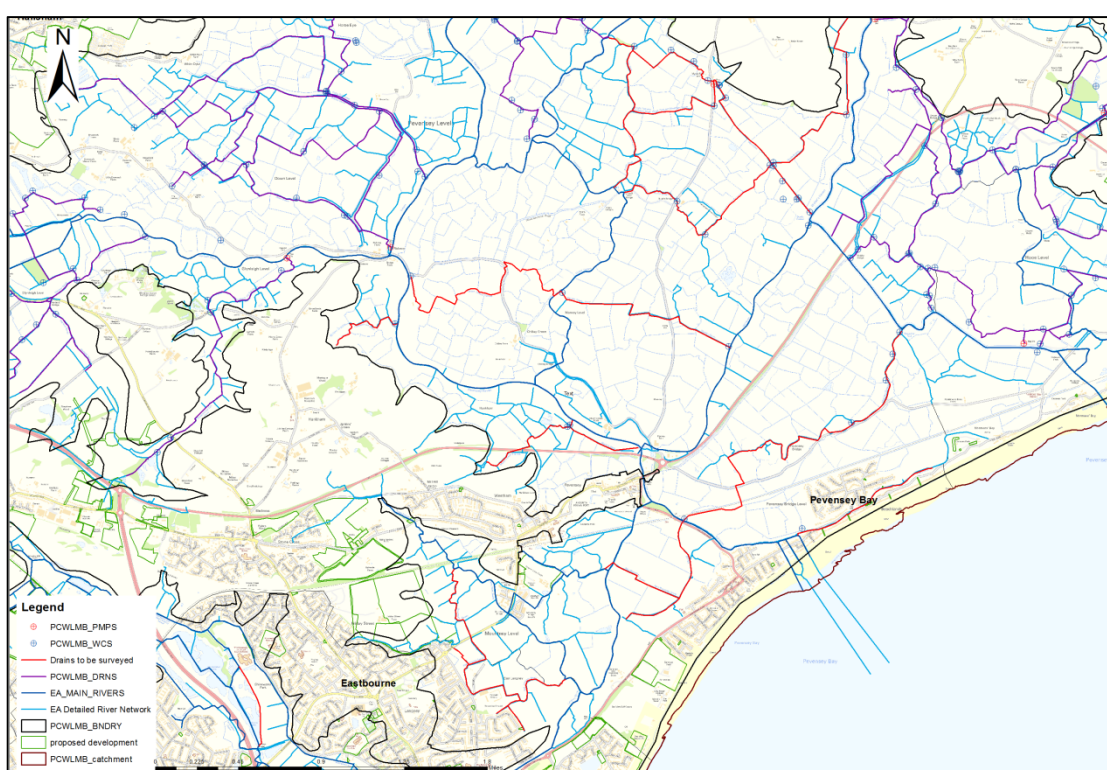
- 4.2. Table 2 overleaf gives an estimation of the costs associated with the Phase 2 survey work proposed and the subsequent hydraulic modelling.

**Table 2: Cost estimates for Phase 2 work**

Total length of watercourse	Number of water control structures	Number of pumps	Cost estimates	
			Survey work	Hydraulic modelling
28.4 km	58	3	£125,000	£25,000

## 5. Phase 3

- 5.1. Phase 3 is proposed to concentrate on the remainder of the drains within the Pevensey Levels which will not have been covered by phases 1 and 2. This will be useful in understanding the impact of development proposed around Westham and the Stone Cross area. Figure 3 below shows the extent of the survey and modelling work proposed as part of phase 3.



**Figure 3: Phase 3 drains and structures to be surveyed**

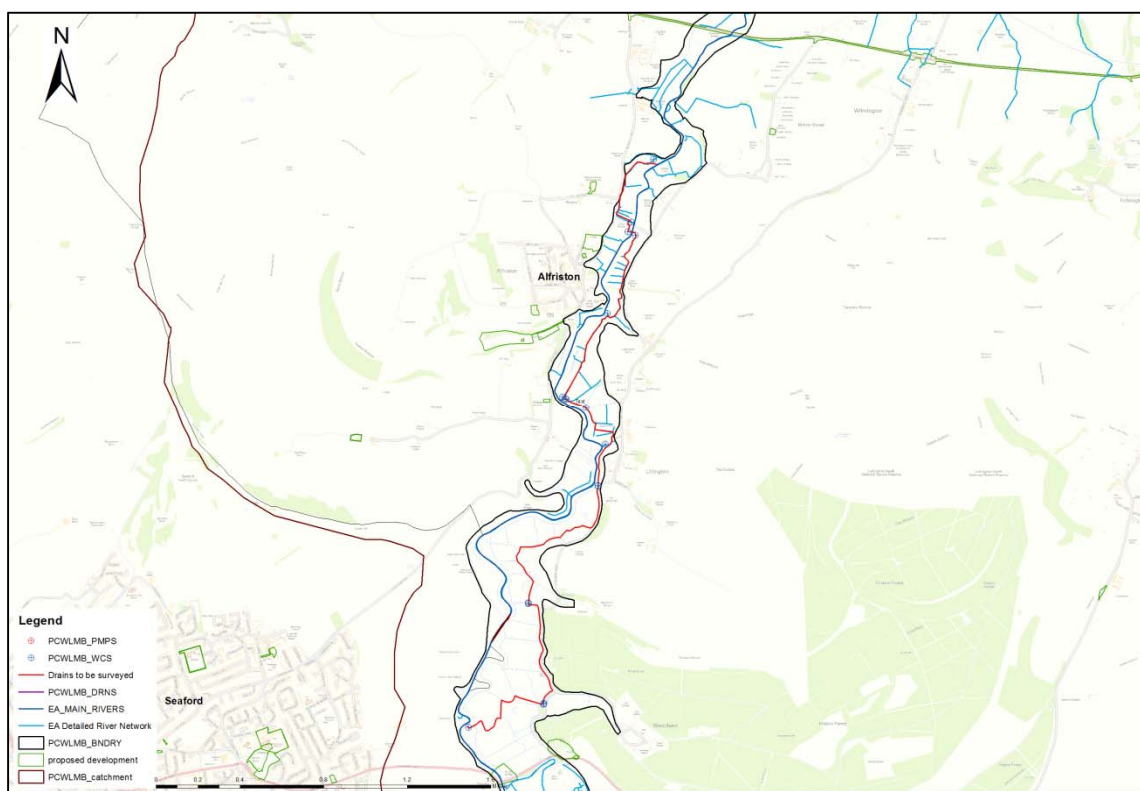
- 5.2. Table 3 below gives an estimation of the costs associated with the survey work and the subsequent hydraulic modelling.

**Table 3: Cost estimates for Phase 3 work**

Total length of watercourse	Number of water control structures	Number of pumps	Cost estimates	
			Survey work	Hydraulic modelling
27.1 km	34	1	£120,000	£25,000

## 6. Phase 4

- 6.1. There is significant development proposed in Hellingly, the western side of Hailsham, Horam, Upper and Lower Dicker and Berwick. The surface water runoff from these developments is likely to discharge directly and indirectly into the Cuckmere River. The Cuckmere and the IDB drain, the Freshwater Stream, are hydraulically linked. Therefore increased surface water volume into the Cuckmere will have an impact on the IDB drain. Consequently, the hydraulic modelling would have to incorporate the main river. Figure 4 below gives the extent of the survey work proposed.
- 6.2. It is understood that East Sussex Highways (ESH) are looking into the hydraulic modelling of the Cuckmere River as part of the proposed replacement of the Exceat Bridge. Therefore depending on how far the hydraulic modelling and surveying undertaken by ESH is taken (both geographically and in complexity) the majority of the work the Board needs to undertake may have already been carried out by ESH.



**Figure 4: Phase 4 drains and structures to be surveyed**

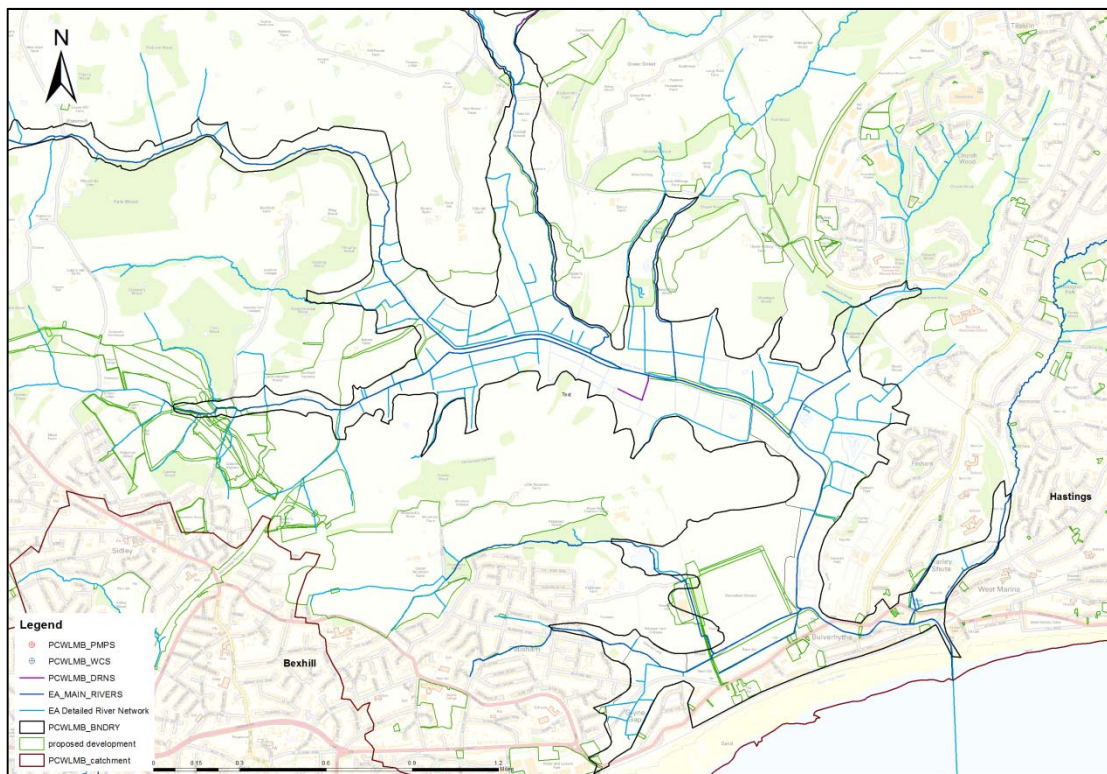
- 6.3. Table 4 below gives an estimation of the costs associated with the survey work and the subsequent hydraulic modelling. Depending on the extent of modelling to be undertaken by ESH and the costs associated with the intellectual property rights of this work, the costs below may be significantly reduced.

**Table 4: Cost estimates for Phase 4 work**

Total length of watercourse	Number of water control structures	Number of pumps	Cost estimates	
			Survey work	Hydraulic modelling
7.2 km	18	0	£35,000	£20,000

## 7. Phase 5

- 7.1. There is significant development proposed to the east of Bexhill which contributes surface water runoff to the Combe Haven. The majority of the proposed development in Hastings is within the Queensway and the Ridge areas which both drain into the Board's drainage district. However, there are hardly any IDB adopted watercourses within that part of the district apart from a short section of the Rackwell Stream and Russell Stream. The majority of the designated watercourses within this catchment are Environment Agency main rivers. The Environment Agency has a coastal model for the Bulverhythe area which was undertaken in 2011.
- 7.2. Since the designated watercourses in the catchment are principally main river, the Board would need to work closely with the Environment Agency in order to agree a scope for survey and modelling. Once this has been agreed, the extent and cost of the survey work would be better understood. Therefore no costs have been estimated for this part of the district yet, but Figure 5 below shows the potential area that can be covered by the survey and modelling.



**Figure 5: Indicative extent of the survey and hydraulic modelling**

## 8. Programme

8.1. Table 5 below gives an indicative programme for the first four phases.

**Table 5: Indicative programme**

Item	Description	Timeframe	Completion date
1.1	Project start up and tendering for Phase 1	1 month	08/11/2019
1.2	Scoping study and survey scope for Phase 1	1 month	06/12/2019
1.3	Tendering surveys	3 weeks	06/01/2020
1.4	Surveying	3 months	30/03/2020
1.5	hydraulic modelling	4 months	31/07/2020
<b>1.6</b>	<b>Phase 1 complete/closing</b>	<b>1 month</b>	<b>31/08/2020</b>
2.1	Project start up and tendering for Phase 2	1 month	30/09/2020
2.2	Tendering surveys	3 weeks	23/10/2020
2.3	Surveying	2 months	23/12/2020
2.4	hydraulic modelling	3 months	31/03/2021
<b>2.5</b>	<b>Phase 2 complete/closing</b>	<b>1 month</b>	<b>30/04/2021</b>
3.1	Project start up and tendering for Phase 3	1 month	30/09/2021
3.2	Tendering surveys	3 weeks	22/10/2021
3.3	Surveying	2 months	24/12/2021
3.4	hydraulic modelling	3 months	31/03/2022
<b>3.5</b>	<b>Phase 3 complete/closing</b>	<b>1 month</b>	<b>30/04/2022</b>
4.1	Project start up and tendering for Phase 3	1 month	30/09/2022
4.2	Tendering surveys	3 weeks	21/10/2022
4.3	Surveying	1.5 months	15/12/2022
4.4	hydraulic modelling	3 months	31/03/2023
<b>4.5</b>	<b>Phase 4 complete/closing</b>	<b>1 month</b>	<b>30/04/2023</b>

## 9. Recommendation

9.1. There are two options for the Board, which are :

- Option 1: Do nothing
- Option 2: Adopt the phased approach to surveying as set out in the document

9.2. Although doing nothing will ensure that the Board does not incur any additional expenses, it leaves the Board with very little understanding of the impact of third party activities on its assets. This includes any potential increase in operational activities in order to manage increased surface water volumes.

**Recommendation:** Officer recommendation is for the approval of Option 2 as this best reflects the geographical demands placed on the Board's district by the current concentration of development proposed by Local Plans and developers.

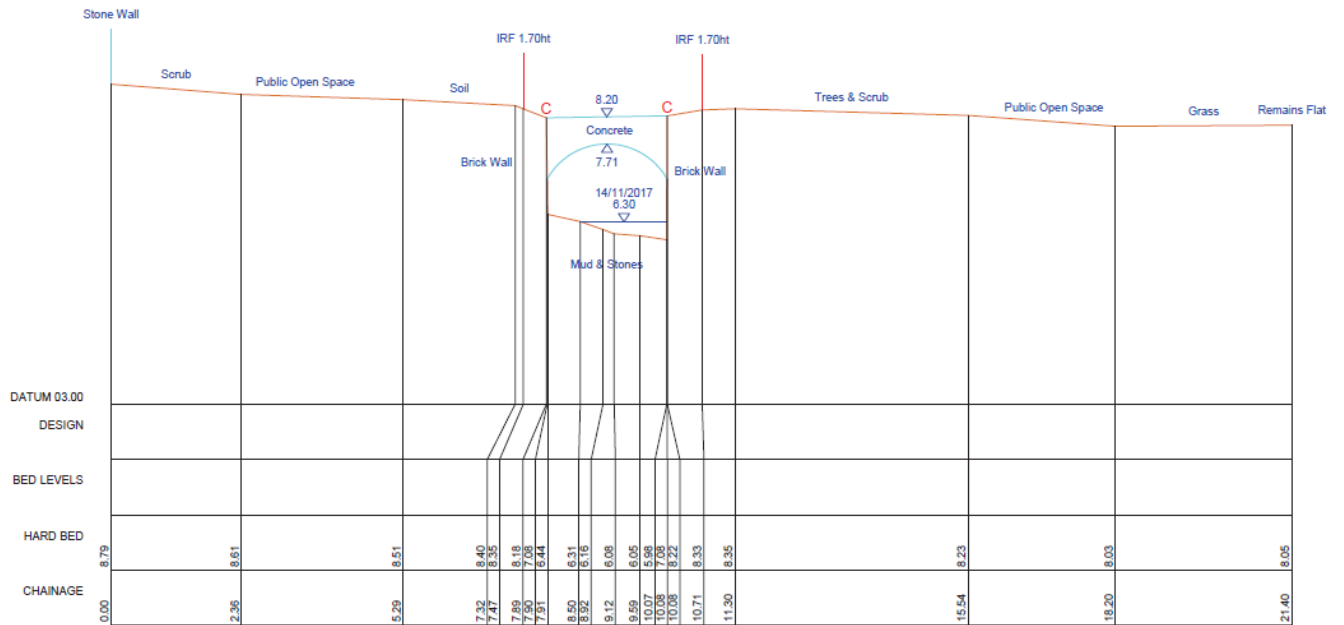
9.3. The survey and hydraulic modelling should be funded by the surface water development contributions which have been collected to date. There are two potential approaches that can be adopted in funding the work which are:

- Option 1: agree the allocation of £235,000 (£175K for surveying and £60K for hydraulic modelling) from the Development Reserve.
- Option 2: suggest and agree an alternative allocation of funds.

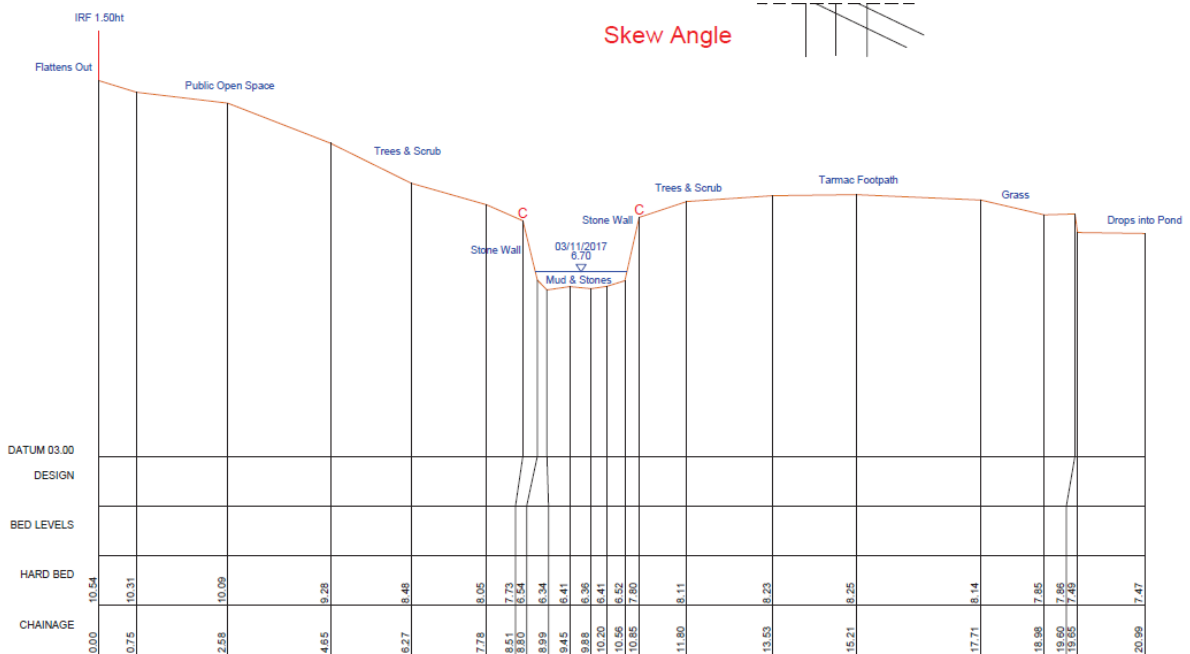
9.4. Agreeing the allocation of funds for Phase 1 will ensure that the surveying can be undertaken this winter which is the ideal time as there will be very little vegetation. Suggesting and agreeing an alternative allocation of funds potentially affects the programme and could result in surveying being undertaken in the spring when there is too much vegetation to make it useful or potentially delay the programme by a year.

**Recommendation:** Officer recommendation is for the approval of Option 1 as this would enable the timely capture of survey data to adequately inform development management and planning policy decisions.

### APPENDIX 1 – Example survey cross-sections



1.002  
581816.09mE 110174.15mN Brg 224  
Chainage:9.9  
Wall Crossing  
Tunnel Length = 0.46m



1.007  
581767.01mE 110216.05mN Brg 209  
Chainage:76.1  
Open Channel

From: 01 April 2019  
To: 31 August 2019

Period To: 5  
Year Ending: 31 March 2020

NOTE	INCOME AND EXPENDITURE ACCOUNT	PEVENSEY				CUCKMERE				TOTAL			
		ACTUAL 2018/19	BUDGET 2019/20	ACTUAL 2019/20	VARIANCE 2019/20	ACTUAL 2018/19	BUDGET 2019/20	ACTUAL 2019/20	VARIANCE 2019/20	ACTUAL 2018/19	BUDGET 2019/20	ACTUAL 2019/20	VARIANCE 2019/20
<b>INCOME</b>													
1	Drainage Rates	11,595	13,357	13,357	0	12,661	15,013	15,013	0	24,255	28,370	28,370	0
2	<u>Special Levies:</u>												
	Eastbourne Borough Council	222,302	229,617	229,617	0	0	0	0	0	222,302	229,617	229,617	0
	Hastings Borough Council	11,252	11,622	11,622	0	0	0	0	0	11,252	11,622	11,622	0
	Rother District Council	4,124	4,260	4,260	0	0	0	0	0	4,124	4,260	4,260	0
	Wealden District Council	44,228	45,683	45,683	0	8,411	8,688	8,688	0	52,639	54,371	54,371	0
		281,906	291,182	291,182	0	8,411	8,688	8,688	0	290,317	299,870	299,870	0
	<u>Other Income:</u>												
3	Surface Water Development Contributions	299,379	78,500	74,368	-4,132	27,308	0	21,210	21,210	326,687	78,500	95,578	17,078
4	Highland Water Contributions from the Environment Agency	73,429	89,441	89,441	0	2,466	2,066	2,066	0	75,895	91,507	91,507	0
5	Grants Applied	995	0	0	0	0	0	0	0	9,995	0	0	0
6	Consent Fees	600	250	600	350	200	200	200	0	800	450	800	350
7	Bank and Investment Interest	336	225	886	661	80	56	98	42	416	281	984	703
8	Other Income	5,957	0	2	2	543	0	0	0	6,500	0	2	2
9	Income from Rechargeable Works	89,838	0	10,286	10,286	0	0	0	0	89,838	0	10,286	10,286
		479,534	168,416	175,583	7,167	30,597	2,322	23,574	21,252	510,131	170,738	199,157	28,419
		<b>773,034</b>	<b>472,955</b>	<b>480,122</b>	<b>7,167</b>	<b>51,669</b>	<b>26,023</b>	<b>47,275</b>	<b>21,252</b>	<b>824,703</b>	<b>498,978</b>	<b>527,397</b>	<b>28,419</b>
<b>(-) EXPENDITURE</b>													
<b>Directly Allocated Expenditure</b>													
5	Grant Work	9,995	0	180	-180	0	0	0	0	9,995	0	180	-180
9	Cost of Rechargeable Works	66,423	0	10,286	-10,286	0	0	0	0	66,423	0	10,286	-10,286
10	New and Improvement Works	0	0	0	0	0	0	0	0	0	0	0	0
11	Contributions to the Environment Agency	68,405	69,004	39,431	29,573	1,595	996	569	427	70,000	70,000	40,000	30,000
12	Maintenance Works	161,086	178,522	46,028	132,494	8,164	8,169	2,108	6,061	169,250	186,691	48,136	138,555
		<b>305,909</b>	<b>247,526</b>	<b>95,925</b>	<b>151,601</b>	<b>9,759</b>	<b>9,165</b>	<b>2,677</b>	<b>6,488</b>	<b>315,668</b>	<b>256,691</b>	<b>98,602</b>	<b>158,089</b>
<b>Apportioned Expenditure</b>													
13	Operations Delivery Staff Costs	45,821	77,067	34,927	42,140	5,091	8,563	3,881	4,682	50,912	85,630	38,808	46,822
14	WMA Technical Support Staff Costs	33,472	25,394	26,069	-675	3,719	3,297	2,896	401	37,191	28,691	28,965	-274
15	Other Technical Support Staff Costs	53,149	79,945	35,278	44,667	4,848	0	10,066	-10,066	57,997	79,945	45,344	34,601
16	WMA Administration Staff Costs	34,495	21,996	7,391	14,605	3,833	2,444	821	1,623	38,328	24,440	8,212	16,228
17	Audit Fees	1,000	1,000	1,000	0	200	200	200	0	1,200	1,200	1,200	0
18	Depreciation	5,036	9,402	4,606	4,796	560	1,044	512	532	5,596	10,446	5,118	5,328
19	General Insurances	1,677	2,925	4,301	-1,376	187	325	477	-152	1,864	3,250	4,778	-1,528
20	Accommodation and Meeting Room Hire	3,190	2,000	637	1,363	355	200	71	129	3,545	2,200	708	1,492
21	Postages and Stationery	364	525	635	-110	40	210	70	140	404	735	705	30
22	Advertising and Public Notices	0	900	0	900	0	100	0	100	0	1,000	0	1,000
23	ADA Subscriptions and Other Expenses	5,247	4,275	1,387	2,888	583	475	154	321	5,830	4,750	1,541	3,209
		<b>183,451</b>	<b>225,429</b>	<b>116,231</b>	<b>109,198</b>	<b>19,415</b>	<b>16,858</b>	<b>19,150</b>	<b>-2,291</b>	<b>202,866</b>	<b>242,287</b>	<b>135,381</b>	<b>106,906</b>
		<b>489,360</b>	<b>472,955</b>	<b>212,156</b>	<b>260,799</b>	<b>29,174</b>	<b>26,023</b>	<b>21,827</b>	<b>4,196</b>	<b>518,534</b>	<b>498,978</b>	<b>233,983</b>	<b>264,995</b>
	<b>(=) Net Surplus/(Deficit) for the Period</b>	<b>£283,674</b>	<b>£0</b>	<b>£267,966</b>	<b>£267,966</b>	<b>£22,495</b>	<b>£0</b>	<b>£25,448</b>	<b>£25,448</b>	<b>£306,169</b>	<b>£0</b>	<b>£293,414</b>	<b>£293,414</b>



**From: 01 April 2019**  
**To: 31 August 2019**

**Period To: 5**  
**Year Ending: 31 March 2020**

NOTE	BALANCE SHEET, AS AT 31-8-2019	£ 01/04/2019	£ MOVEMENT	£ 31/08/2019
<b>24 Fixed Assets:</b>				
(i)	Vehicles and Trailers	11,321	-2,332	8,989
(ii)	Lockup and Equipment	0	0	0
(iii)	Pumping Stations	6	0	6
		<b>11,327</b>	<b>-2,332</b>	<b>8,995</b>
<b>Current Assets:</b>				
25(i)	Bank Account	201,861	18,178	220,039
25(ii)	Short-Term Investments	310,479	984	311,463
26	Trade Debtors and Ratepayers Due	30,716	284,452	315,167
27	Vat Due from HMRC	10,522	-572	9,950
		<b>553,578</b>	<b>303,042</b>	<b>856,620</b>
<b>Current Liabilities:</b>				
28	Trade Creditors	100,884	-33,904	66,980
29	Accruals	69,867	41,200	111,067
		<b>170,751</b>	<b>7,296</b>	<b>178,047</b>
	<b>Net Current Assets</b>	<b>382,827</b>	<b>295,746</b>	<b>678,573</b>
	<b>Net Assets</b>	<b>£394,154</b>	<b>£293,414</b>	<b>£687,568</b>
<b>Financed by:</b>				
30	Grant Reserve	0	0	0
31	General Reserves	74,390	293,414	367,804
32	Development Reserve	319,758	0	319,758
33	Revaluation Reserve	6	0	6
		<b>£394,154</b>	<b>£293,414</b>	<b>£687,568</b>

P J CAMAMILE MA FCIS  
CHIEF EXECUTIVE

S JEFFREY BSc (Hons) FCCA  
FINANCE & RATING MANAGER

**From:** 01 April 2019  
**To:** 31 August 2019

**Period To:** 5  
**Year Ending:** 31 March 2020

**Note** **Notes to the Accounts**

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**Income**

- 1 Drainage Rate Demands for 2019/20 were issued by the Board on 1 April 2019. The Board has received approx 95% of the drainage rates levied, with a diminishing number of legacy queries regarding land ownership and land occupancy still to resolve.
- 2 Special Levies for 2019/20 were issued by the Board on 1 April 2019. These are due for payment in two instalments on the 01st May and 01st November.
- 3 Surface Water Development Contributions invoiced during the year:

	<u>Pevensy</u>	<u>Cuckmere</u>	<u>Status</u>	<u>Case Reference</u>
HA0001	0	3,641	PAID 17.4.19	19_01542_C
LE0001	0	9,175	PAID 13.6.19	In Advance
WI0001	19,784	0	O/S (Paid 04.9.19)	19_01475_C
BDW001	54,584	0	O/S (Paid 17.9.19)	19_01470_C
STL0001	0	8,394	PAID 30.8.19	19_01524_C
	<b>74,368</b>	<b>21,210</b>		

- 4 The Board has issued its highland water contributions claim from the EA for the year 2019/20. Highland water contributions are intended to reimburse the Board its costs for managing surface water that enters the district from outside the district, in accordance with s57 of the Land Drainage Act 1991.
- 5 The Board has received no Grant Funding during 2019/20. The Board has funding approved by Natural England for two WEG projects that will begin later in this Financial Year. The claim for this funding will be submitted in due course.
- 6 The Board has issued 8 consent fees so far in 2019/20, in accordance with powers afforded by s23 of the Land Drainage Act 1991. These have been paid in full.
- 7 Bank and Investment Interest arises from temporary cash surpluses being invested on the short term money market, in accordance with the Board's Investment Policy. This income has been apportioned to each of the Rating Sub Districts based on each District's proportion of the closing balances brought forward, as at 31 March 2019. (Pevensy 90% = £354,610 and Cuckmere 10% = £39,538).
- 8 There is no other income for 2019/20.
- 9 Income from Rechargeable Works comes from work we have done for the Environment Agency and the costs attributed to this are also split out separately.

**Directly Allocated Expenditure**

- 10 There have been no New Works and Improvement Works carried out by the Board during the reporting period.
- 11 The Board has not received a Precept Invoice from the EA for 2018/19 or 2019/20, but has accrued for the amount we expect to be charged for the year. The EA has power to levy such a charge on the Board annually, in accordance with s141 of the Water Resources Act 1991.
- 12 All drain maintenance work has been done by the Contractor AMH and supervised by the Board's Operations Manager. All pumping station maintenance has been carried out by Williams M&E.

**Apportioned Expenditure**

Non directly allocated expenditure has been apportioned between the Pevensy and Cuckmere Rating Sub Districts according to an assessment of the time spent working in each area, as budgeted: 90% for Pevensy and 10% for Cuckmere. Other Technical Support Staff Costs have been apportioned to each Sub District according to the amount of Surface Water Development Contributions received from development within each Sub District and watershed catchment.

- 13 These costs relate to the employment costs of the Board's Operations Manager and Water Level Management Operative, which includes all Health & Safety PPE, fuel and maintenance costs for two 4 x 4 vehicles. One vehicle is owned by the Board as indicated in the FAR, the other is currently hired in, with the new 4 x 4 ordered arriving in October 2019.

**From:** 01 April 2019  
**To:** 31 August 2019

**Period To:** 5  
**Year Ending:** 31 March 2020

**Note Notes to the Accounts**

- 14 These costs relate to the time the WMA Engineer, Flood and Water Manager and Environmental Manager have spent working for the Board.
- 15 This relates to the gross cost of employing a full time Flood and Water Officer and net Consultancy Costs from the Ardent Consultancy to cover a period of maternity leave. This period of maternity leave ended July 2019.
- 16 These costs relate to the time the WMA Chief Executive, Finance & Rating Manager, Rating Officer, the Chief Executive's PA and the Data Manager have spent working for the Board.
- 17 Audit Fees for 2019/20 have been accrued for the full 12 Months.
- 18 The Operations Manager's 4 x 4 vehicle and trailer is being depreciated by £4,850 and £745.75 per year respectively. The Storage Container and all small tools and equipment are shown in the Fixed Assets Register and have been fully depreciated.
- 19 The insurance costs relate to the Pumping Stations and general insurance such as Employer and Public Liability Insurance.
- 20 These costs relate to overnight accommodation charges for WMA staff, for hiring meeting rooms and for providing refreshments at Board meetings, site visits and inspections.
- 21 These costs relate to the printing and posting of Board meeting papers and Drainage Rate Demands.
- 22 These costs relate to the public notices that need to be advertised in the local press.
- 23 These costs include the Board's subscription for membership of the Association of Drainage Authorities (ADA), members expenses and licence fees payable to the Information Commissioner's Office for Data Protection and to the WMA for the use of the DRS Online software.

**Balance Sheet**

24 Fixed Assets	Vehicles and Trailers	Lockup and Equipment	Pumping Stations	Total
<b>Cost</b>				
Opening Balance as at 1-4-2019	22,383	4,598	6	26,987
(+) Additions	0	2,787	0	2,787
(+) Revaluations	0	0	0	0
(-) Disposals	0	0	0	0
Closing Balance as at 31-8-2019	<b>22,383</b>	<b>7,385</b>	<b>6</b>	<b>29,774</b>
<b>Depreciation</b>				
Opening Balance as at 1-4-2019	11,062	4,598	0	15,660
(+) Depreciation Charge	2,332	2,787	0	5,118
(-) Accumulated depreciation written out on disposal	0	0	0	0
Closing Balance as at 31-8-2019	<b>13,394</b>	<b>7,385</b>	<b>0</b>	<b>20,779</b>
<b>Net Book Value</b>				
Net Book Value as at 31-3-2019	<b>11,321</b>	<b>0</b>	<b>6</b>	<b>11,327</b>
Net Book Value as at 31-8-2019	<b>8,989</b>	<b>0</b>	<b>6</b>	<b>8,995</b>

- (i) The trailer is being depreciated over 4 years: straight line on cost and 5 months of depreciation has been charged to the accounts. The Operations Manager's vehicle has 5 months of depreciation in the reporting period to 31.08.19.
- (ii) The Board has purchased a storage container which is located at the EAs Pevensy Depot. This lockup facility secures all of the Board's equipment used by the Operations Manager. This has been fully depreciated in the accounting period April 2017-March 2018.
- (iii) The Board owns 6 pumping stations, and these have been revalued in the manner set out in the Practitioners Guide 2019. These assets were received from the EA at zero cost, and have been included in the Fixed Assets Register with a nominal one pound (£1) value, as a proxy for the zero cost.

25(i) **Bank Account**

From: 01 April 2019  
To: 31 August 2019

Period To: 5  
Year Ending: 31 March 2020

**Note Notes to the Accounts**

The Board's Bank Account is reconciled as follows:

	<u>2018/19</u>	<u>Movement</u>	<u>2019/20</u>
Opening Balance as at 1-4-2019 b/fwd	26,045	175,816	201,861
(+) Receipts	841,193	-579,738	261,455
(-) Payments	-665,377	422,100	-243,277
Closing Balance as at 31-8-2019 c/fwd	<b>201,861</b>	<b>18,178</b>	<b>220,039</b>
Balance on Bank Statement as at 31-8-2019	201,861	18,146	220,007
Less: Unpresented Payments	0	0	0
Add: Unpresented Receipts	0	32	32
Closing Balance as at 31-8-2019 c/fwd	<b>201,861</b>	<b>18,178</b>	<b>220,039</b>

25(ii) **Short Term Investments**

	<u>2018/19</u>	<u>Movement</u>	<u>2019/20</u>
32 Day Deposit Account - Lloyds plc	<b>310,479</b>	<b>984</b>	<b>311,463</b>

26 **Trade Debtors and Ratepayers Due**

	<u>Pevensy</u>	<u>Cuckmere</u>	<u>2019/20</u>
Trade Debtors	74,368	0	74,368
HWC 2019/20	89,441	2,066	91,507
	<b>163,809</b>	<b>2,066</b>	<b>165,875</b>

Aged Debtor Profile is currently as follows:

	<u>Pevensy</u>	<u>Cuckmere</u>	<u>No of Debtors</u>
Debt period			
<=30 days	74,368	0	2
>30 days and <=60 days	0	0	-
>60 days and <=90 days	0	0	-
>90 days	0	0	-
	<b>74,368</b>	<b>0</b>	<b>2</b>

Drainage Rates (less Worldpay amounts, in abeyance)

	942	545	1,487
	<b>942</b>	<b>545</b>	<b>1,487</b>

Special Levies:

Eastbourne Borough Council	114,811	0	114,811
Hastings Borough Council	5,811	0	5,811
Rother District Council	0	0	0
Wealden District Council	22,840	4,343	27,184
	<b>143,462</b>	<b>4,343</b>	<b>147,805</b>
	<b>£308,212</b>	<b>£6,955</b>	<b>£315,167</b>

27 **Vat Due from HMRC**

The Board is Vat Registered and therefore able to reclaim the Vat that it has paid to its suppliers. Drainage Rates, Special Levies and Surface Water Development Contributions are statutory charges and are beyond the scope for Vat purposes, so the Board should therefore be in a repayment position most of the time.

28 **Trade Creditors**

The Trade Creditors at the end of the reporting period are as follows:

	<u>2018/19</u>	<u>Movement</u>	<u>2019/20</u>
WMA	8,514	-1,377	7,138
Norfolk Rivers IDB	0	1,248	1,248
Broads IDB	0	589	589
ESCC	0	5,000	5,000
AMH Contractor	39,454	-2,672	36,782
Williams M&E Ltd	32,756	-28,278	4,478
Ardent Consulting Engineers	15,695	-5,695	10,000
Vodafone	52	16	68
PKF Littlejohn External Auditors	0	0	0

From: 01 April 2019  
To: 31 August 2019

Period To: 5  
Year Ending: 31 March 2020

**Note Notes to the Accounts**

Lloyds Plc	8	5	13
British Gas Business	3,367	-2,052	1,315
Screwfix	38	142	179
Southern Farmers	629	-629	0
Allstar Business Solutions	373	-202	172
	<b>100,884</b>	<b>-33,903</b>	<b>66,980</b>
<b>29 Accruals</b>			
	<b>2018/19</b>	<b>Movement</b>	<b>2019/20</b>
Audit Fees	1,700	1,200	2,900
Biodiversity Costs	2,000	0	2,000
EA Precept Charge for 2018/19 + 2019/20	70,000	40,000	110,000
Pumping Station Insurances	2,667	0	2,667
Income receivable from ESCC	-6,500	0	-6,500
	<b>69,867</b>	<b>41,200</b>	<b>111,067</b>
<b>30 Grant Reserve</b>			
	<b>Pevensy</b>	<b>Cuckmere</b>	<b>2019/20</b>
Opening Balance, as at 1-4-2019 b/fwd	0	0	0
(+) Grants Received	0	0	0
(-) Grants Applied to Income & Expenditure Account	0	0	0
Closing Balance, as at 31-8-2019 c/fwd	<b>0</b>	<b>0</b>	<b>0</b>
<b>31 General Reserve</b>			
	<b>Pevensy</b>	<b>Cuckmere</b>	<b>2019/20</b>
Opening Balance, as at 1-4-2019 b/fwd	57,312	17,079	74,390
(+) Net Surplus/(Deficit) for the Period	267,966	25,448	293,414
* (-) Transferred to Earmarked Development Reserve	0	0	0
Closing Balance, as at 31-8-2019 c/fwd	<b>325,278</b>	<b>42,527</b>	<b>367,804</b>
* Surface Water Development Contributions Invoiced during the year	74,368	21,210	95,578
(-) Collection Costs:			
Gross cost of employing Flood and Water Officer	23,608	6,736	30,344
East Sussex County Council (ESCC) Hosting Costs	3,890	1,110	5,000
Provision of laptop and software to access ESCC data network	0	0	0
Net consultancy costs to cover maternity leave	7,780	2,220	10,000
	<b>35,278</b>	<b>10,066</b>	<b>45,344</b>
* (=) Transferred to Earmarked Development Reserve	<b>39,090</b>	<b>11,144</b>	<b>50,234</b>
<b>32 Development Reserve</b>			
	<b>Pevensy</b>	<b>Cuckmere</b>	<b>2019/20</b>
Opening Balance, as at 1-4-2019 b/fwd	297,298	22,460	319,758
* Transferred from General Reserve, as detailed in Note 31 above	0	0	0
Closing Balance, as at 31-8-2019 c/fwd	<b>297,298</b>	<b>22,460</b>	<b>319,758</b>
<b>33 Revaluation Reserve</b>			
	<b>2018/19</b>	<b>Movement</b>	<b>2019/20</b>
Star Inn Pumping Station	1	0	1
Barnhorn Pumping Station	1	0	1
Drockmill Pumping Station	1	0	1
Horsebridge Pumping Station	1	0	1
Rickney Pumping Station	1	0	1
Manxey Pumping Station	1	0	1
	<b>6</b>	<b>0</b>	<b>6</b>

**Related Party Transactions**

- 34 The Board uses Rating Software for the collection of Drainage Rates known as DRS. This software is owned by South Holland IDB and was developed by Mr P J Camamile, the Chief Executive. The software is supported by Byzantine Ltd at an annual cost to the Board of £873.09. Mr P J Camamile is the Company Secretary of Byzantine Ltd and his wife Mrs P Camamile is a Director. Both are shareholders.



**Pevensey and  
Cuckmere**  
Water Level Management Board

**From: 01 April 2019**  
**To: 31 August 2019**

**Period To: 5**  
**Year Ending: 31 March 2020**

**Note Notes to the Accounts**

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P J CAMAMILE MA FCIS  
CHIEF EXECUTIVE

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FINANCE & RATING MANAGER

**PEVENSEY AND CUCKMERE WATER LEVEL MANAGEMENT BOARD  
RISK REGISTER**

STRATEGIC OBJECTIVES	RISK	IMPACT	LIKELIHOOD SCORE (1 – 3)	IMPACT SCORE (1 – 3)	RISK RATING (HIGH, MEDIUM, LOW)	RESPONSE (ACTIONS PLANNED/TAKEN)
	<p>(1b) Reduction in, or insufficient finance, grant and income</p> <p>(1c) If EA ceases to pay highland water contributions to IDBs</p>	<p>Reduction in FCERM service the Board is able to provide</p> <p>Unable to replace assets as scheduled in asset management plan</p>	2	3	High 6 ↓	<p>Explore alternative funding streams including partnership working with other RMAs and access to local levy funding:</p> <ol style="list-style-type: none"> <li>1) Partnership working with ESCC on planning matters</li> <li>2) Precept works programme with EA to benefit the Board's infrastructure.</li> <li>3) Sharing access to technical support staff through the WMA Consortium.</li> </ol> <p>2 of the 3 WEG bids for funding approved in 2019/20.</p> <p>Review asset management plan provided by EA.</p> <p>Lobby Defra to update the Land Drainage Act 1991 to refer to current rating lists used by billing authorities for levying agricultural drainage rates and special levies, as this would support the extension of the Board's area to its watershed catchment. This would provide additional rates to the Board from the upland area (and negate the need for HWCs). Defra does support the Rivers Authority and Land Drainage Private Members Bill, which, if enacted could facilitate these aims. The Board has responded to Defra's</p>

**PEVENSEY AND CUCKMERE WATER LEVEL MANAGEMENT BOARD  
RISK REGISTER**

STRATEGIC OBJECTIVES	RISK	IMPACT	LIKELIHOOD SCORE (1 – 3)	IMPACT SCORE (1 – 3)	RISK RATING (HIGH, MEDIUM, LOW)	RESPONSE (ACTIONS PLANNED/TAKEN)
						consultation on ‘Improving Management of Water in the Environment’ which included support for the new charging methodology to enable the extension or creation of new IDD/ IDBs.
	(1d) EA’s operation of the water control structures has an adverse impact on water levels in the IDD	Impacts on the IDB’s ability to carry out its statutory function	2	3	High 6 ↓	Liaison between WLMB and EA officers has resulted in the EA permitting WLMB to operate on its behalf, the EA water control structures that affect the IDD. A protocol for this will be produced by EA/WLMB officers.
	(1e) No confirmation from EA of the prescriptive rights of access to each of the Board’s pumping stations or rights to bring in services across privately owned land.	Potential to reduce ability to fulfil statutory function	2	3	High 6 →	Land Drainage Act 1991 gives IDBs powers of entry for access to undertake required works.  EA has provided copies of paperwork concerning ownership and rights of access, which WLMB officers will review.
	(1f) EA no longer undertakes de-shingling works in the Cuckmere Estuary	IDB is unable to fulfil its statutory function in the Cuckmere River Sub District during periods of high rainfall	3	3	High 9 ↑	Discuss with EA potential for WLMB to do works in the Estuary on behalf of EA via a public sector cooperation agreement (if the Board can raise the money to pay for the work).

**PEVENSEY AND CUCKMERE WATER LEVEL MANAGEMENT BOARD  
RISK REGISTER**

STRATEGIC OBJECTIVES	RISK	IMPACT	LIKELIHOOD SCORE (1 – 3)	IMPACT SCORE (1 – 3)	RISK RATING (HIGH, MEDIUM, LOW)	RESPONSE (ACTIONS PLANNED/TAKEN)
		on a saturated catchment and constituent ratepayers push for an Exemption from Rating order, as a result.				Develop protocol with EA that will trigger a de-shingle at the mouth of the Cuckmere River, as opposed to just a consideration of carrying out a de-shingle (aka euphemism for doing nothing).
	(1g) Operations works constrained by the Water Framework Directive legislation and Habitat Regulations Assessments	IDB could incur penalties/fines	2	3	High 6 →	<p>Work with EA, NE and voluntary sector orgs to meet WFD requirements.</p> <p>Agree interpretation of Habitat Regulations Assessments with NE.</p> <p>Standard Maintenance Operations (SMO) document that is WFD compliant has been approved by the Board on October 2018.</p> <p>Regular SMO update training for employees.</p> <p>Ensure affected landowners are aware of agreed water levels and operate the Pevensey WLMP.</p>
	(1h) Landowners and or developers undertake non-consented works on watercourses	Potential to adversely affect the capability of the IDB to effectively manage the discharge of	2	3	High 6 ↓	Promote the work of the IDB within the local community to create understanding of how the IDB system manages flood risk and facilitates land use.

**PEVENSEY AND CUCKMERE WATER LEVEL MANAGEMENT BOARD  
RISK REGISTER**

STRATEGIC OBJECTIVES	RISK	IMPACT	LIKELIHOOD SCORE (1 – 3)	IMPACT SCORE (1 – 3)	RISK RATING (HIGH, MEDIUM, LOW)	RESPONSE (ACTIONS PLANNED/TAKEN)
	in the IDD	water through its system				<p>Use of the Board's Byelaws for consenting or refusing works affecting the Board's infrastructure.</p> <p>Work closely with LLFA and LPAs to provide a joined up consenting/advice service.</p>
To enable and facilitate land use for residential, commercial, recreational and environmental purposes by guiding and regulating activities, which have the potential to increase flood risk	<p>(3a) Planning Authorities ignore advice provided by Board, which leads to increased flood risk</p> <p>(3b) Potential for developers to hand over management of SUDs to private management companies, who may fail in their responsibility to maintain them in the long term</p> <p>(3c) Increase in the volume of planned housing in the district</p>	<p>Potential for increased flood risk</p> <p>Lost income from SWDCs and commuted sums</p> <p>Inadequate or total lack of maintenance of SUDs could have an adverse impact on the IDB infrastructure and subsequently increase the risk of flooding</p> <p>FTE planning resource may become unsustainable</p>	2	3	High 6 ↓	<p>Planning/Enforcement is undertaken by the Board's Flood and Water Officer and issues are raised at Board and Committee meetings.</p> <p>Partnership working with LLFA on planning applications affecting the IDD.</p> <p>Get involved with each constituent Planning Authority to better integrate/ coordinate planning and flood risk management issues.</p> <p>Officers' comments on planning applications are available on Local Authority websites.</p> <p>Promote IDB services for adoption of SUDs in planning consents to ensure they are maintained in perpetuity.</p> <p>Introduction of a SUDs adoption and charging policy, approved by the Board on 31</p>

**PEVENSEY AND CUCKMERE WATER LEVEL MANAGEMENT BOARD  
RISK REGISTER**

STRATEGIC OBJECTIVES	RISK	IMPACT	LIKELIHOOD SCORE (1 – 3)	IMPACT SCORE (1 – 3)	RISK RATING (HIGH, MEDIUM, LOW)	RESPONSE (ACTIONS PLANNED/TAKEN)
	(3d) Insufficient surface water development contributions collected to cover employment cost of one FTE planning resource					January 2017.  The Board adopted the variable SWDC rate and banding arising from the 2018 WMA review. New rates and banding introduced wef 1 November 2018 which will support the SWDC income stream.

# Annual Governance and Accountability Return 2018/19 Part 3

## To be completed by Local Councils, Internal Drainage Boards and other Smaller Authorities\*:

- where the higher of gross income or gross expenditure exceeded £25,000 but did not exceed £6.5 million; or
- where the higher of gross income or gross expenditure was £25,000 or less but:
  - are unable to certify themselves as exempt (fee payable); or
  - have requested a limited assurance review (fee payable)

## Guidance notes on completing Part 3 of the Annual Governance and Accountability Return 2018/19

1. Every smaller authority in England that either received gross income or incurred gross expenditure exceeding £25,000 **must** complete Part 3 of the Annual Governance and Accountability Return at the end of each financial year in accordance with Proper Practices.
2. **The Annual Governance and Accountability Return is made up of three parts, pages 3 to 6:**
  - The **annual internal audit report** is completed by the authority's internal auditor.
  - **Sections 1 and 2** are to be completed and approved by the authority.
  - **Section 3** is completed by the external auditor and will be returned to the authority.
3. The authority **must** approve Section 1, Annual Governance Statement, before approving Section 2, Accounting Statements, and both **must** be approved and published **before 1 July 2019**.
4. An authority with either gross income or gross expenditure exceeding £25,000 or an authority with neither income nor expenditure exceeding £25,000, but which is unable to certify itself as exempt, or is requesting a limited assurance review, **must** return to the external auditor by email or post (not both):
  - the Annual Governance and Accountability Return Sections 1 and 2, together with
  - a bank reconciliation as at 31 March 2019
  - an explanation of any significant year on year variances in the accounting statements
  - notification of the commencement date of the period for the exercise of public rights
  - Annual Internal Audit Report 2018/19

Unless requested, do not send any additional documents to your external auditor. Your external auditor will ask for any additional documents needed.

Once the external auditor has completed the review and is able to give an opinion on the limited assurance review, the Annual Governance and Accountability **Section 1, Section 2 and Section 3 – External Auditor Report and Certificate** will be returned to the authority by email or post.

## Publication Requirements

Under the Accounts and Audit Regulations 2015, authorities must publish the following information on a publicly accessible website:

Before 1 July 2019 authorities **must** publish:

- Notice of the period for the exercise of public rights and a declaration that the accounting statements are as yet unaudited;
- **Section 1 - Annual Governance Statement 2018/19**, approved and signed, page 4
- **Section 2 - Accounting Statements 2018/19**, approved and signed, page 5

Not later than 30 September 2019 authorities **must** publish:

- Notice of conclusion of audit
- **Section 3 - External Auditor Report and Certificate**
- **Sections 1 & 2 of AGAR** including any amendments as a result of the limited assurance review.

It is recommended as best practice, to avoid any potential confusion by local electors and interested parties, that you also publish the Annual Internal Audit Report, page 3.

The Annual Governance and Accountability Return constitutes the annual return referred to in the Accounts and Audit Regulations 2015. Throughout, the words 'external auditor' have the same meaning as the words 'local auditor' in the Accounts and Audit Regulations 2015.

\*for a complete list of bodies that may be smaller authorities refer to schedule 2 to the Local Audit and Accountability Act 2014.

## Guidance notes on completing Part 3 of the Annual Governance and Accountability Return 2018/19

- The authority **must** comply with *Proper Practices* in completing Sections 1 and 2 of this Annual Governance and Accountability Return. *Proper Practices* are found in the *Practitioners' Guide\** which is updated from time to time and contains everything needed to prepare successfully for the financial year-end and the subsequent work by the external auditor.
- Make sure that the Annual Governance and Accountability Return is complete (i.e. no empty highlighted boxes), and is properly signed and dated. Where amendments are made by the authority to the AGAR after it has been approved by the authority and before it has been reviewed by the external auditor, the Chairman and RFO should initial the amendments and if necessary republish the amended AGAR and recommence the period for the exercise of public rights. If the Annual Governance and Accountability Return contains unapproved or unexplained amendments, it may be returned and additional costs will be incurred.
- The authority **should** receive and note the annual internal audit report if possible prior to approving the annual governance statement and before approving the accounts.
- Use the checklist provided below to review the Annual Governance and Accountability Return for completeness before returning it to the external auditor by email or post (not both).
- Do not send the external auditor any information not specifically requested. However, **you must inform your external auditor about any change of Clerk, Responsible Financial Officer or Chairman, and provide relevant email addresses and telephone numbers.**
- Make sure that the copy of the bank reconciliation to be sent to your external auditor with the Annual Governance and Accountability Return covers all the bank accounts. If the authority holds any short-term investments, note their value on the bank reconciliation. The external auditor must be able to agree the bank reconciliation to Box 8 on the accounting statements (**Section 2, page 5**). An explanation **must** be provided of any difference between Box 7 and Box 8. More help on bank reconciliation is available in the *Practitioners' Guide\**.
- Explain fully significant variances in the accounting statements on **page 5**. Do not just send a copy of the detailed accounting records instead of this explanation. The external auditor wants to know that you understand the reasons for all variances. Include complete numerical and narrative analysis to support the full variance.
- If the external auditor has to review unsolicited information, or receives an incomplete bank reconciliation, or variances are not fully explained, additional costs may be incurred.
- Make sure that the accounting statements add up and that the balance carried forward from the previous year (Box 7 of 2018) equals the balance brought forward in the current year (Box 1 of 2019).
- The Responsible Financial Officer (RFO), on behalf of the authority, **must** set the period for the exercise of public rights. From the commencement date for a single period of 30 consecutive working days, the approved accounts and accounting records can be inspected. Whatever period the RFO sets it **must** include a common inspection period – during which the accounts and accounting records of all smaller authorities must be available for public inspection – of the first ten working days of July.
- The authority **must** publish the information required by Regulation 15 (2), Accounts and Audit Regulations 2015, including the period for the exercise of public rights and the name and address of the external auditor **before 1 July 2019**.

Completion checklist – 'No' answers mean you may not have met requirements		Yes	No
All sections	Have all highlighted boxes have been completed?		
	Has all additional information requested, including <b>the dates set for the period for the exercise of public rights</b> , been provided for the external auditor?		
Internal Audit Report	Have all highlighted boxes been completed by the internal auditor and explanations provided?		
Section 1	For any statement to which the response is 'no', is an explanation provided?		
Section 2	Has the authority's approval of the accounting statements been confirmed by the signature of the Chairman of the approval meeting?		
	Has an explanation of significant variations from last year to this year been provided?		
	Has the bank reconciliation as at <b>31 March 2019</b> been reconciled to Box 8?		
	Has an explanation of any difference between Box 7 and Box 8 been provided?		
Sections 1 and 2	Trust funds – have all disclosures been made if the authority as a body corporate is a sole managing trustee? <b>NB:</b> do not send trust accounting statements unless requested.		

*\*Governance and Accountability for Smaller Authorities in England – a Practitioners' Guide to Proper Practices*, can be downloaded from [www.nalc.gov.uk](http://www.nalc.gov.uk) or from [www.ada.org.uk](http://www.ada.org.uk)

## Annual Internal Audit Report 2018/19

PEVENSEY AND TICKMARETH WLMNS

This authority's internal auditor, acting independently and on the basis of an assessment of risk, carried out a selective assessment of compliance with relevant procedures and controls to be in operation during the financial year ended 31 March 2019.

The internal audit for 2018/19 has been carried out in accordance with this authority's needs and planned coverage. On the basis of the findings in the areas examined, the internal audit conclusions are summarised in this table. Set out below are the objectives of internal control and alongside are the internal audit conclusions on whether, in all significant respects, the control objectives were being achieved throughout the financial year to a standard adequate to meet the needs of this authority.

Internal control objective	Agreed? Please choose one of the following		
	Yes	No*	Not covered**
A. Appropriate accounting records have been properly kept throughout the financial year.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B. This authority complied with its financial regulations, payments were supported by invoices, all expenditure was approved and VAT was appropriately accounted for.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C. This authority assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D. The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E. Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
F. Petty cash payments were properly supported by receipts, all petty cash expenditure was approved and VAT appropriately accounted for.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
G. Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
H. Asset and investments registers were complete and accurate and properly maintained.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I. Periodic and year-end bank account reconciliations were properly carried out.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
J. Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cash book, supported by an adequate audit trail from underlying records and where appropriate debtors and creditors were properly recorded.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
K. IF the authority certified itself as exempt from a limited assurance review in 2017/18, it met the exemption criteria and correctly declared itself exempt. ( <i>"Not Covered" should only be ticked where the authority had a limited assurance review of its 2017/18 AGAR</i> )	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
L. During summer 2018 this authority has correctly provided the proper opportunity for the exercise of public rights in accordance with the requirements of the Accounts and Audit Regulations.	<input type="checkbox"/>	<input type="checkbox"/>	Not applicable <input checked="" type="checkbox"/>
M. (For local councils only) Trust funds (including charitable) – The council met its responsibilities as a trustee.	<input type="checkbox"/>	<input type="checkbox"/>	Not applicable <input checked="" type="checkbox"/>

For any other risk areas identified by this authority adequate controls existed (list any other risk areas on separate sheets if needed).

Date(s) internal audit undertaken

25/03/19 - 18/04/19

DD/MM/YY

Name of person who carried out the internal audit

E. Kathy Woodward INTERNAL AUDITOR

Signature of person who carried out the internal audit

K Woodward

Date

29/04/19

\*If the response is 'no' you must include a note to state the implications and action being taken to address any weakness in control identified (add separate sheets if needed).

\*\*Note: If the response is 'not covered' please state when the most recent internal audit work was done in this area and when it is next planned, or, if coverage is not required, the annual internal audit report must explain why not (add separate sheets if needed).

## Annual Governance and Accountability Return 2018/19

### Annual Internal Audit Report 2018/19 – additional sheet

Following on from three years of Internal Audits providing substantial assurance on the level of controls identified for:

East Suffolk Internal Draining Board

The Internal Auditor agreed with the Management to rotate the frequency of the standard internal control objective audits and include additional governance related audits.

The audit areas not covered in 2018/19 were:

*D. The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.*

*F. Petty cash payments were properly supported by receipts, all petty cash expenditure was approved and VAT was appropriately accounted for.*

*I. Periodic and year-end bank account reconciliations were properly carried out.*

These audits were previously covered in the 2017/18 audit and will be included within the 2019/20 audit.

Additional internal control objectives audited during the 2018/19 audit were:

- *GDPR – robustness of the policy and procedural documents, and adequacy of training provided to staff and members.*
- *Board Members' declarations of interest – review of the process for members declaring interests.*
- *Write-offs – review of the process for the write-off of debts.*
- *Succession Planning – review of the succession planning process.*

## Section 1 – Annual Governance Statement 2018/19

We acknowledge as the members of:

PEVENSEY AND CUCKMERE UTWENTH

our responsibility for ensuring that there is a sound system of internal control, including arrangements for the preparation of the Accounting Statements. We confirm, to the best of our knowledge and belief, with respect to the Accounting Statements for the year ended 31 March 2019, that:

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

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

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

11/06/19

and recorded as minute reference:

M 28/19/01

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

Chairman

W. A. Gower

Clerk

P. Lemanite

### Other information required by the Transparency Codes (not part of Annual Governance Statement)

Authority web address

www.wlma.org.uk/pevensey-cuckmere/home

## Section 2 – Accounting Statements 2018/19 for

PCWENSEY AND CUCKMERT WLMBS ENTERED NAME OF AUTHORITY

	Year ending		Notes and guidance
	31 March 2018 £	31 March 2019 £	
1. Balances brought forward	2,809	81,474	Total balances and reserves at the beginning of the year as recorded in the financial records. Value must agree to Box 7 of previous year.
2. (+) Precept or Rates and Levies	294,895	314,572	Total amount of precept (or for IDBs rates and levies) received or receivable in the year. Exclude any grants received.
3. (+) Total other receipts	147,939	500,136	Total income or receipts as recorded in the cashbook less the precept or rates/levies received (line 2). Include any grants received.
4. (-) Staff costs	113,074	184,428	Total expenditure or payments made to and on behalf of all employees. Include salaries and wages, PAYE and NI (employees and employers), pension contributions and employment expenses.
5. (-) Loan interest/capital repayments	0	0	Total expenditure or payments of capital and interest made during the year on the authority's borrowings (if any).
6. (-) All other payments	251,045	328,927	Total expenditure or payments as recorded in the cashbook less staff costs (line 4) and loan interest/capital repayments (line 5).
7. (=) Balances carried forward	81,474	382,827	Total balances and reserves at the end of the year. Must equal (1+2+3) - (4+5+6).
8. Total value of cash and short term investments	86,108	512,340	The sum of all current and deposit bank accounts, cash holdings and short term investments held as at 31 March – To agree with bank reconciliation.
9. Total fixed assets plus long term investments and assets	26,571	26,987	The value of all the property the authority owns – it is made up of all its fixed assets and long term investments as at 31 March.
10. Total borrowings	0	0	The outstanding capital balance as at 31 March of all loans from third parties (including PWLB).
11. (For Local Councils Only) Disclosure note re Trust funds (including charitable)	Yes	No	The Council, as a body corporate, acts as sole trustee for and is responsible for managing Trust funds or assets. N.B. The figures in the accounting statements above do not include any Trust transactions.

I certify that for the year ended 31 March 2019 the Accounting Statements in this Annual Governance and Accountability Return have been prepared on either a receipts and payments or income and expenditure basis following the guidance in Governance and Accountability for Smaller Authorities – a Practitioners' Guide to Proper Practices and present fairly the financial position of this authority.

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

*P. Lomanile* REQUIRED

Date

21/05/19

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

11/06/19

as recorded in minute reference:

M 29/19/01 REFERENCE

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

*M. A. Gower* REQUIRED

### Section 3 – External Auditor Report and Certificate 2018/19

In respect of **Pevensey and Cuckmere Water Level Management Board – DB0074**

#### 1 Respective responsibilities of the body and the auditor

This authority is responsible for ensuring that its financial management is adequate and effective and that it has a sound system of internal control. The authority prepares an Annual Governance and Accountability Return in accordance with *Proper Practices* which:

- summarises the accounting records for the year ended 31 March 2019; and
- confirms and provides assurance on those matters that are relevant to our duties and responsibilities as external auditors.

Our responsibility is to review Sections 1 and 2 of the Annual Governance and Accountability Return in accordance with guidance issued by the National Audit Office (NAO) on behalf of the Comptroller and Auditor General (see note below). Our work **does not** constitute an audit carried out in accordance with International Standards on Auditing (UK & Ireland) and **does not** provide the same level of assurance that such an audit would do.

#### 2 External auditor report 2018/19

On the basis of our review of Sections 1 and 2 of the Annual Governance and Accountability Return (AGAR), in our opinion the information in Sections 1 and 2 of the AGAR is in accordance with Proper Practices and no other matters have come to our attention giving cause for concern that relevant legislation and regulatory requirements have not been met.

Other matters not affecting our opinion which we draw to the attention of the authority:

- The annual internal audit report focuses on a series of internal control objectives covering an authority's key financial and accounting systems and concludes whether, in all significant respects, the internal control objectives were being achieved throughout the financial year to a standard adequate to meet the needs of the authority. We note that the internal auditor has not provided a conclusion on the following internal control objectives: D and I. The annual internal audit report will inform the authority's response to assertions 2 and 6 in the annual governance statement. As a result, the authority must ensure that assurance that has not been provided via these control objectives has been sought elsewhere.

#### 3 External auditor certificate 2018/19

We certify that we have completed our review of Sections 1 and 2 of the Annual Governance and Accountability Return, and discharged our responsibilities under the Local Audit and Accountability Act 2014, for the year ended 31 March 2019.

External Auditor Name

**PKF LITTLEJOHN LLP**

External Auditor Signature

*PKF Littlejohn LLP*

Date







03/09/2019

\* Note: the NAO issued guidance applicable to external auditors' work on limited assurance reviews for 2018/19 in Auditor Guidance Note AGN/02. The AGN is available from the NAO website ([www.nao.org.uk](http://www.nao.org.uk))

# WMA

## CALENDAR OF MEETINGS FOR 2020

	2019 December	2020 January	February	March	April	May	June	July	August	September	October	November	December	
M							1							M
Tu							2			1			1	Tu
W		1 Bhol			1		3	1		2			2	W
Th		2			2		4	2		3	1		3	Th
F		3			3	1	5	3		4	2		4	F
Sa	1	4	1		4	2	6	4	1	5	3		5	Sa
Su	2	5	2	1	5	3	7	5	2	6	4	1	6	Su
M	3	6	3	2	6	4	8	6	3	7	5	2	7	M
Tu	4	7	4	3	7	5 SHIDB	9	7	4 SHIDB	8	6 PCWLMB	3 SHIDB	8	Tu
W	5	8	5	4	8	6	10	8	5	9	7	4	9	W
Th	6	9	6	5	9	7	11	9	6	10	8	5	10	Th
F	7	10	7	6 WMA Pay	10 Bhol	8 Bhol	12	10 KLIDB	7	11	9	6	11 WMA	F
Sa	8	11	8	7	11	9	13	11	8	12	10	7	12	Sa
Su	9	12	9	8	12	10	14	12	9	13	11	8	13	Su
M	10 Deben Com	13 ESIDB	10	9	13 Bhol	11	15	13	10 BIDB	14	12	9	14	M
Tu	11	14	11 SHIDB	10	14	12	16 PCWLMB	14	11	15	13	10	15	Tu
W	12	15	12	11	15	13	17 ESIDB	15	12	16	14	11	16	W
Th	13 WMA	16	13	12	16	14	18 NRIDB	16	13 NRIDB	17	15 NRIDB	12	17	Th
F	14	17 KLIDB	14 ACom	13 KLIDB	17	15	19	17	14	18 KLIDB	16	13 KLIDB	18	F
Sa	15	18	15	14	18	16	20	18	15	19	17	14	19	Sa
Su	16	19	16	15	19	17	21	19	16	20	18	15	20	Su
M	17	20 SH Per/Ch	17	16	20	18 BIDB	22 SH Cons	20	17	21	19	16	21	M
Tu	18	21	18	17	21	19 Deben Co	23	21	18	22	20 SHH&S/PD	17	22	Tu
W	19	22	19	18	22	20	24	22	19	23	21	18	23	W
Th	20	23	20 ADAWN/Li	19	23	21	25	23	20	24	22	19	24	Th
F	21	24 BIDB	21	20	24	22 KLIDB	26 WMA	24	21	25 WMA	23	20	25 Bhol	F
Sa	22	25	22	21	25	23	27	25	22	26	24	21	26	Sa
Su	23	26	23	22	26	24	28	26	23	27	25	22	27	Su
M	24	27	24	23	27	25 Bhol	29	27	24	28	26 BIDB	23	28	M
Tu	25 Bhol	28 PCWLMB	25	24	28	26	30	28	25	29	27	24	29	Tu
W	26 Bhol	29	26	25	29	27		29	26	30	28 ESIDB	25	30	W
Th	27	30 NRIDB	27	26	30	28		30	27		29	26	31	Th
F	28	31	28	27 WMA		29		31	28		30	27	1 Bhol	F
Sa	29		29	28		30			29		31	28		Sa
Su	30			29		31			30			29		Su
M	31			30					31 Bhol			30		M
Tu				31										Tu
W														W
Th														Th

	Kettlewell House		Breckland DC		Hickling Barn/Village Hall		Marsh Reeves
	Full Board Venue East Suffolk DC Offices, Melton Deben Com. Kirton or Bromeswell AO Com Orford Town Hall		Saffrons Sports Centre				



**Pevensy and  
Cuckmere**  
Water Level Management Board

Kettlewell House  
Austin Fields Industrial Estate  
KING'S LYNN  
Norfolk  
PE30 1PH

**t:** +44(0)1553 819600  
**f:** +44(0)1553 819639  
**e:** [info@wlma.org.uk](mailto:info@wlma.org.uk)  
**w:** [www.wlma.org.uk](http://www.wlma.org.uk)

Our Ref: PJC/MP/CuckmereRiver

Your Ref:

Rt Hon. Michael Gove MP  
Secretary of State for Defra  
2 Marsham Street  
London

28 June 2019

Dear Mr Gove

Further to the last meeting of this Board on 11 June 2019 I write to inform you of a critical situation which persists in the Cuckmere Estuary, caused by the Environment Agency's apparent inability to de-shingle the river mouth at Cuckmere Haven. We understand that this operation should cost circa £30k a year to undertake if it is done annually and that the Environment Agency (EA) has now had its grant funding to carry out this vital operation withdrawn. We respectfully request that the EA is given the necessary resources to continue de-shingling, in accordance with the previous assurances they have given to the local communities within the Cuckmere valley. The current position of not de-shingling is contrary to guarantees previously provided by the EA and has led to part of our newly constituted Water Level Management Board (WLMB) being entirely unable to fulfil its statutory function:

The Pevensy and Cuckmere WLMB was constituted on 1 October 2016 from an amalgamation of 2 Internal Drainage Districts (IDDs), which were previously administered by the EA (the Pevensy and Cuckmere IDDs). The EA promoted and supported the formation of the new Board which now manages over 100 km of ordinary watercourse, 6 pumping stations and around 200 other key water level control structures. The Board also now employs three full time staff.

In the Cuckmere valley the Board have over 7 km of adopted ordinary watercourse, which provides essential drainage and water level management for farmland and communities, as well as contributing to the habitat and landscape features which are of national importance and international interest. The valley system drains by gravity into the Cuckmere River, which should flow out to sea via the Exceat at Cuckmere Haven. However the river mouth at Cuckmere Haven has not been cleared for circa 3 years and is now severely blocked.

The river levels have now increased to such an extent that the Board's outfall structures remain completely tide-locked and unable to provide any drainage function whatsoever. This has been the case for the last 16 weeks, with little prospect of the situation changing anytime soon. The EA's position of waiting for the summer to arrive in the hope that the water levels will reduce and alleviate the current situation does not provide a sustainable solution to this problem. During the most recent period of flooding this year the EA have provided a mobile pump to assist with the drainage of the area, which, whilst greatly appreciated, we recognise is also an unsustainable and ineffective response.

The land south of Litlington to Cuckmere Haven is part of the Seaford to Beachy Head SSSI. During the period between 2008 and 2010, (notably at a time when the EA were able to carry out the annual practice of de-shingling the river mouth), two of the SSSI units were recorded by Natural England as being in favourable condition. With this in mind, understanding the recent cessation of annual maintenance at the river mouth and increased longevity of these SSSI land parcels remaining in flood throughout the year, the Board considers that the EA's current position risks the permanent damage of 226

Mr W Gower (Chairman)   Mr C Wadman (Vice-Chairman)

Mr P J Camamile (Chief Executive)

hectares of neutral and calcareous lowland grassland, (habitats of principal importance) as a direct result of their change in maintenance practices.

The EAs Shoreline Management Plan for this section of coastline states that beach-recycling (aka de-shingling) will continue ahead of the development of longer term options and a more sustainable solution. A letter was sent from Lord Smith, EA Chairman to the local MP, dated 20 August 2014 providing assurances to the local communities that de-shingling of the river mouth “would continue for as long as was necessary” (please see Appendix A to this letter). However the local EA team now states that although these published commitments have been given in the recent past (on which decisions with respect to farming, tourism, business and the creation of the WLMB itself have been made) they are no longer in a position to undertake the river mouth clearance work, due to budget cuts and internal changes in policy that appear to have been made unilaterally and without consultation with key partners and stakeholders.

The Board feels that this is a wholly unacceptable position and that the commitments made previously should be honoured, until such time as the wider aspirations of the strategy are achieved (if indeed they ever will be). The Board respectfully requests that resources be made available to the EA so they can de-shingle the river mouth at the earliest opportunity and that in future, the clearing of the river mouth be assessed and then undertaken by following a series of steps, which we have developed with the EA locally (please see Appendix B to this letter).

We believe that £30k a year is a relatively small sum of money to ask for from the Environment Agency, which would enable the newly formed Board to fulfil its statutory function, protect a SSSI and parts of Alfriston village and crucially ensure the public safety and wellbeing of over 400,000 tourists that we estimate visit Cuckmere Haven and the Seven Sisters Country Park every year.

If you would like any further information on this, please do not hesitate in making contact.

Yours sincerely



P J CAMAMILE  
CHIEF EXECUTIVE

cc

Maria Caulfield MP for Lewes, [maria.caulfield.mp@parliament.uk](mailto:maria.caulfield.mp@parliament.uk)

Steven Lloyd MP for Eastbourne, [stephen.lloyd.mp@parliament.uk](mailto:stephen.lloyd.mp@parliament.uk)

Trevor Beattie, Chief Executive, South Downs National Park Authority, [trevor.beattie@southdowns.gov.uk](mailto:trevor.beattie@southdowns.gov.uk)

Innes Thomson, Chief Executive of the Association of Drainage Authorities, [innes.thomson@ada.org.uk](mailto:innes.thomson@ada.org.uk)

creating a better place



Mr Norman Baker MP  
23 East Street  
Lewes  
East Sussex  
BN7 2LJ

Our ref: LSF/rh/JAH

Your ref: BR2407/le

Date: 20 August 2014

Dear Mr Baker

### Cuckmere Estuary

Thank you for your letter of 25 July 2014 enclosing further comments from the Cuckmere Valley Parish Council. It is clear that their wish is for the existing man made landscape to be preserved in the long term. Unfortunately, this is unlikely to be possible due to rising sea levels and the impact of climate change, even if significant funding could be raised.

The Environment Agency operates within clear guidelines set by central government. Defra and Treasury rules on spending state that we must prioritise investment in flood risk management projects which will contribute most towards reducing the risk of flooding for people and their property. Our evidence based technical work at Cuckmere shows that the Cuckmere Estuary does not meet this criterion. As such, whilst preservation of the landscape may be desirable, we are unable to commit money from our flood risk budget to support this.

In their letter, the Parish Council has requested an 'objective analysis of long term management options for the Cuckmere'. I can confirm that we have developed and implemented a flood risk management strategy for the Estuary. This strategy sets out what works we are able to justify in the area, including completing any necessary maintenance work. This work will include clearing shingle from the river mouth for as long as necessary. Unfortunately, we will not be able to fund the other works which have been identified by the Parish Council in their letter of 30 June 2014.

I can confirm however, that upstream of the A259, we have an ongoing programme of maintenance work to key structures. This work includes removing silt from tidal outfalls to allow for the free drainage of water from the adjacent agricultural land back into the Cuckmere.

The most appropriate way of managing future change in the Cuckmere Estuary will be through adopting a partnership approach. The Environment Agency is part of the 'Post-Pathfinder Group' and will continue to attend meetings so that staff may listen to local opinion and provide advice and support to sustainable and economically viable options. We will still be unable to guarantee any financial support however.

In order to clarify the position, James Humphrys, local Area Manager and Deputy Director, would be willing to host a meeting with a small group of key Parish Council officers and address their concerns directly. If you or your constituents feel that this would be helpful, please contact James on 01903 832001 or at [james.humphrys@environment-agency.gov.uk](mailto:james.humphrys@environment-agency.gov.uk)

Yours sincerely



*EA Mclean*

*pp.* RT HON LORD SMITH OF FINSBURY  
CHAIRMAN

Approved by Lord Smith and signed on his behalf

## **Cuckmere River De-shingle Protocol**

The Environment Agency's Flood Risk and Coastal Strategy documents for the lower Cuckmere state that the de-shingling of the Cuckmere mouth at Exceat will be carried out as required until such a time as the estuary system is big enough for this not to be required any more, due to a self-cleansing, tidal-prism being formed.

The details around when the de-shingling operation will be completed have not however been defined and this procedure is to be used to better define a protocol between Risk Management Authorities for when de-shingling is to be undertaken.

As mentioned the premise of the strategy was to allow for a tidal prism to be formed at Exceat, which would allow for a self-cleansing river mouth at the beach to be formed. This procedure is designed to ensure that this strategic aim is not compromised through unnecessary interventions, but also to ensure that in achieving this objective the statutory functions of the Pevensey & Cuckmere Water Level Management Board (WLMB) and public infrastructure within Alfriston and surrounding areas can still operate.

It is proposed that when the following criteria is met, in part or in total, then de-shingling at the river mouth will be undertaken by/on behalf of the Environment Agency (EA):

Criteria to be met:

1. Based on gauge boards installed on the WLMB district drains, at the outfalls at Dickerman's Wall and at Alfriston, no fall in water level has been seen for a period of two weeks since overtopping has stopped. This indicates that the WLMB's gravity outfalls are tide-locked and that the WLMB is therefore unable to manage water levels within the district and fulfil its statutory function.
2. Areas of road at Alfriston are flooded and hindering traffic flows through the area.
3. Infrastructure such as phone lines and electricity supplies are being affected by flood waters, adversely impacting people's lives and livelihoods.
4. Any other event deemed significant by the EA, Natural England or the WLMB and following mutual agreement by all parties.

The de-shingling will constitute removal of sufficient quantity of material, such that the points mentioned above are prevented or removed.

M Philpot CEng MICE  
Engineer, Pevensey & Cuckmere WLMB

P Levitt  
Asset Performance Team Leader, Environment Agency, Ouse & Pevensey



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PE30 1PH

Our ref: TO2019/14406/AL

12 August 2019

Dear Mr Camamile,

Thank you for your email of 28 June to the Secretary of State about the de-shingling of the river mouth at Cuckmere Haven. I have been asked to reply.

As you know, it is for the Environment Agency (EA) to prioritise its funding to maintain flood and coastal risk management structures according to risk, and the EA adopts the most suitable maintenance procedure for each stretch of river, coastline or defence.

The aim of the Cuckmere Estuary Strategy is to manage flood risk in the Cuckmere Valley by working with natural processes, reducing the need for human intervention, and that since the Strategy was completed in 2008, the foreshore has become part of a Marine Conservation Zone. Although the water levels are currently higher in the river as a result of a natural shingle build up in the river mouth, the EA does not believe there is any increased risk of flooding in Alfriston, and it is therefore, not necessary to take any action at this time.

I understand the EA has drafted a protocol with the Pevensey and Cuckmere Water Level Management Board for agreeing when shingle clearance would take place in the Estuary, and I encourage you to continue to work with the EA on this matter.

Yours sincerely,

Adrian Lacey  
Ministerial Contact Unit

**Distributed to:**

**Pevensey & Cuckmere WLMB Members**

Brown, R  
Burton, Ms H  
Gower, W (Chairman)  
Hesselgrave, G  
Hole, M  
Lunn M  
Miles, R  
Patten, R  
Robinson, D  
Rodohan, P  
Smart, R  
Swansborough, C  
Taylor, B  
Wadman, C (Vice-Chairman)  
White, D  
Worssam, M  
**Vacancy**

**Key Partners/Supporting Officers**

Beaumont, Ms C (Rother DC)  
Padget, P (Eastbourne BC)  
Kean, G (Wealden DC)

Claxton, N (E.Sussex CC - LLFA)

Jackson, Ms C (NE)

Levitt, P (EA)  
Robinson, D (EA)

Dann, R (Operations Manager)  
Kinsella, Mrs R (Flood and Water Officer)  
Brown, G (WMA)  
Camamile, P (WMA)  
Philpot, M (WMA)  
Laburn, Ms C (WMA)

Pevensey & Cuckmere WLMB  
Meeting 8 October 2019