

Internal Drainage Districts in Wales

NRW Response to Economy, Trade and Rural Affairs Committee, Senedd Cymru

March 2024

Background information and context

1. The role and purpose of Internal Drainage Boards (IDBs) and Internal Drainage Districts (IDDs) are defined in the Land Drainage Act 1991. The primary purpose of an IDB is to manage water levels in an area (the IDD) where there is a special need for drainage. IDDs are defined areas that “will derive benefit, or avoid danger as a result of drainage operations” (Part 1 section 1 sub-section 1 (a) of the Land Drainage Act). IDBs have powers to “exercise a general supervision over all matters relating to the drainage of land within their district” (Part 1 section 1 sub-section 2 (a)). IDBs are also a Risk Management Authority under the Floods and Water Management Act, with shared responsibilities to manage the risks of flooding alongside other RMAs.
2. There are 13 IDBs in Wales (see Figure 1) and Natural Resources Wales is the sole Internal Drainage Board for these 13 IDBs.
3. The drainage work in IDBs is funded through a combination of, drainage rates and special levies. All land and properties within a Drainage District are deemed to derive benefit from the activities of an IDB and therefore to contribute to its running costs. Local Authorities are charged a Special Levy by the Board in proportion to the annual value of non- agricultural land. Drainage Rates are paid by landowners, farmers and tenants in proportion to the annual value of agricultural land. A precept, as outlined in Section 141 of the Water Resources Act 1991, also applies, and this enables NRW to seek a contribution from IDBs for works essential to the Main River within, adjacent or flowing from or into an IDB.
4. Part of NRW’s role is to set our precept on the IDBs and to agree the special levies and drainage rates required to fund the work of the IDBs. NRW Board, in the role of the IDB, sets the rates and levies.
5. We have two non-executive Advisory Groups for Powysland and Gwent IDBs. The Gwent IDB comprises of Lower Wye and Caldicot & Wentlooge. We have a further five non-executive Advisory Groups for the eleven Districts located in north-west Wales.

6. The purpose of the IDD Advisory Groups is to engage with stakeholders and customers providing representative and independent advice to help inform NRW's executive decision making. Also, part of the purpose of the seven Advisory Groups is to recommend Drainage Rates and Special Levies for the NRW Board to consider and approve.

The current effectiveness of work undertaken within Drainage Districts

7. In its role as IDB, NRW undertakes operational activities within the IDBs to maintain watercourses and water management structures. These activities are funded from the rates and levies, with the precept being utilised for works on any designated Main Rivers in the area. NRW may also undertake flood risk management related work in these locations in its capacity as a Risk Management Authority.
8. These activities are undertaken in line with NRW's policies and procedures that apply in all locations, taking due account of regulatory, environmental, health and safety, procurement and accounting requirements. There are work schedules that are followed, and these are periodically reviewed.
9. We do at times receive feedback for more work to be done in the IDBs, but we must work within the ring-fenced budgets available (from the rates and levies). We are reviewing the costs we recover against each of the IDBs – we are aware of certain type of costs within certain IDBs where we are not covering all our costs and we plan to put proposals to our Board next winter to rectify that. The rates and levies in recent years have mostly been set at standstill, or below inflation, though we have had some IDBs request more work with charge payers willing to pay through greater increases in levies and drainage rates. The costs of our work have inevitably increased, whilst at the same time the drivers for doing more work are also increasing (e.g. increased rainfall rates, erosion rates and at times vegetation growth rates, all due to climate change). We do want to review our charges to ensure full cost recovery.
10. We also, at times, received feedback that our 'unit rates' for work is too expensive, but we have to work to the required standards and regulations, and to accounting and procurement rules.
11. We welcome feedback, and we work with and through the advisory groups to optimise our delivery, within the available budgets and within the remit of IDBs/IDBs.

The sustainability of the Drainage Districts approach in the long term

12. The evidence for global warming and the impacts of our changing climate are well documented. The impacts across the world are significant, and Wales is no different from anywhere else in seeing these impacts now, with the prospects of more frequent extreme weather events to come. Low-lying areas (inland or on the coast) are particularly susceptible to these impacts, including erosion and more frequent and

severe flooding, and (in coastal/tidal areas) sea-level rise. The size and scale of climate change impacts make it impossible to expect to be able to keep the status quo everywhere, and hold back these forces of nature. Even if we could, the costs of doing so will be huge.

13. NRW is required to follow UK Treasury investment rules, including when progressing its flood risk management work. This means that our flood risk management interventions need to be economically cost-beneficial. Government investment rules mean that the benefits are mostly valued in economic damage avoided to properties. It follows that locations with no or few properties that would benefit from flood risk management work have low cost-benefit, and in many cases the costs outweigh the benefits, meaning that investment is not economically justifiable.
14. We also need to follow Government requirements on prioritisation of our work. We are required to work on a prioritised risk basis, with flood risk being governed by the risk to properties. This means that our interventions will be prioritised to locations with the greatest levels of risk, heavily influenced by the number of properties at risk. The available budget is a limiting factor as to what is affordable, which means that interventions in locations with lower cost-benefit may not progress, on affordability and prioritisation grounds.
15. Combined, these economic and affordability considerations mean that areas with no or few properties benefitting are lower in the prioritisation for investment. This inevitably means that rural areas are less likely to receive flood risk management investment. If budgets are constrained further, then we will need to increasingly prioritise higher risk locations. Our recently published Long Term Investment Requirements work has drawn attention to the investment challenges ahead – see [Natural Resources Wales / Long-term Investment Requirements for Flood Defences in Wales](#)
16. The location of the 13 IDD areas are shown in Figure 1. Whilst they are often historically important agricultural land areas, they are typically in low lying flat land, next to a river and/or the sea. They are therefore in locations that are particularly susceptible to the impacts of climate change e.g. from flooding, erosion and/or (in coastal/tidal areas) sea level rise. They also will typically have fewer properties within them, and less likely to be prioritised for investment (see paras above). These two factors inevitably mean that the sustainability of these areas in the medium to long term is therefore uncertain; significant investment would be needed to prevent the impacts of climate change, and that investment is not likely to be prioritised under present Government rules.
17. It follows then that these IDD areas, like many locations across Wales and wider, will need to adapt to the changing climate. It calls into question the viability of continuing to focus on drainage in these areas and defending these areas from flooding. They are also often in environmentally designated or sensitive areas, which need careful consideration and management.

18. Equally, we are not saying that these areas are to be abandoned, with no investment. Nor are we saying that we are concluding that it is not viable to continue with drainage activities. But we cannot assume that the right approach is to keep the *status quo*. We are of the opinion that there should be a review of the purpose and role of IDBs/IDDs, and the operating model, and would be happy to play our part in such a review alongside all stakeholders. This sits within the need to continually review our collective flood risk management responses and future plans in all areas of Wales, and not just IDBs, as we respond to the significant challenges from the climate and nature emergencies.

Figure 1: Location of IDD in Wales (note that Caldicott & Wentlooge and Lower Wye areas are one IDD – the Gwent IDD)

