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Consultation - summary of responses

Internal Drainage Districts and Internal Drainage Boards Wholly or Mainly in Wales



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1. Introduction

1.1 Internal Drainage Boards (IDBs) are independent statutory bodies responsible for land drainage in areas of special drainage need in England and Wales, sometimes referred to as internal drainage districts. They are long established public bodies operating predominantly under the Land Drainage Act 1991, though many of them predate it with some having existed in one form or another for over 500 years.

1.2 The Land Drainage Act 1991 represents the last major review of legislation in relation to IDBs. Despite the move towards a flood and coastal erosion risk management system set out within the Flood and Water Management Act 2010, only smaller adjustments were made to the roles and responsibilities of IDBs.

1.3 The Welsh Government consulted on options for the future delivery of IDB functions in Wales set in the context of the Welsh Government's Living Wales agenda and the wider reform of public services.

1.4 The "*Internal Drainage Districts and Internal Drainage Boards Wholly or Mainly in Wales: A Consultation*" paper built on the proposals contained within the '*Natural Resources Wales*' consultation in relation to IDB functions and in particular, sought views on the following three options for the future delivery of IDB functions in Wales:

- Option 1 – Delivery through IDBs in line with current arrangements
- Option 2 – Delivery through IDBs, with changes to organisational arrangements
- Option 3 – Delivery through any new single body for natural resource management in Wales

1.3 The consultation invited respondent's comments and views on these options and any other matters that were considered as being relevant to the decision being considered by the Welsh Government.

1.4 The consultation ran from 29 May 2012 to 31 August 2012 ie for a period in excess of twelve weeks, and was available from the Welsh Government's website, accessed via the following link:

<http://wales.gov.uk/consultations/environmentandcountryside/internaldrainage/?lang=en&status=closed>

2. Consultation events

2.1 Prior to consultation launch, the Welsh Government organised meetings with key stakeholders to discuss the development of the consultation paper to raise both awareness of the intention to consult and ensure that an opportunity was provided to contribute in the discussions regarding the formulation of the options to be considered.

2.2 The meetings ensured that the following stakeholders were represented and their views considered in the development of the consultation paper:

- Caldicot and Wentlooge IDB.
- Lower Wye IDB.
- Powysland IDB.
- Association of Drainage Authorities.
- Cardiff City Council.
- Monmouthshire County Council.
- Newport City Council.
- Powys County Council.

2.3 A combination of both individual and joint stakeholder meetings were arranged so as to afford each stakeholder with the opportunity to provide their respective comments individually and as a group. Meetings with the three IDBs wholly or mainly in Wales were also held during the consultation period.

3. Key Findings

3.1 The consultation closed on the 31 August 2012 and received a total of 39 responses: 37 of which were received in advance of the closure date and two after it had closed.

3.2 It was agreed that the two responses received after the closure date would be taken into account.

3.3 A breakdown of the respondents, by sector, is provided below in Table 1 and a list of all the responders can be found in Annex A¹.

Responses received from:	
Members of the Public	8
Internal Drainage Boards	11
Local Authorities	3
Environmental Bodies	4
Community Groups	3
Water Companies	1
Professional Bodies	8
Local Businesses	1
TOTAL	39

Table 1.

3.4 In general terms this consultation considering the future delivery of the IDD and IDB functions was welcomed by both those who responded to the consultation directly and those who attended the consultation meetings facilitated by the Welsh Government.

3.5 The consultation paper invited responses to the following four questions:

Q1 Which of the three Options for the future delivery of IDB functions in Wales do you support and why?

Q2 Are there any other relevant matters for the future delivery of IDB functions in Wales that you think the Welsh Government should consider?

Q3 Do you have any further information or evidence which you feel the Welsh Government should consider in reaching their final decision on the future delivery of IDB functions in Wales?

Q4 Are there any other matters that you would like to draw to the attention of the Welsh Government in relation to the delivery of IDB functions in Wales?

¹ Please note that the consultation response form provided an opportunity for respondents to indicate a preference for their responses to be kept confidential and so this has been indicated in Annex A accordingly.

3.6 The responses to each question have been summarised below and a more detailed summary of the responses is provided in the next section. The formal Welsh Government Response is set out in the section on next steps.

Q1 - Which of the three Options for the future delivery of IDB functions in Wales do you support and why?

3.7 All of the responses provided comments in relation to this question.

3.8 No responses suggested that the continued delivery of the IDB functions in line with the current arrangements (Option 1) was the preferred way forward.

3.9 Delivery through IDBs, with changes to organisational arrangements (Option 2) was the most frequently selected option.

3.10 Delivery of the IDB functions through the new single body for natural resource management in Wales (Option 3) was the second most preferred option.

3.11 Some responses included alternative options for consideration and some gave no indication of the preferred option.

3.12 Table 2 below provides a breakdown of the preferred options in response to this question.

Preferred Option				
1	2	3	Other	None
0	30	4	2	3
0%	77%	10%	5%	8%

Table 2.

Q2 - Are there any other relevant matters for the future delivery of IDB functions in Wales that you think the Welsh Government should consider?

3.13 This section provided an opportunity to receive comments in relation to any other relevant matters for the future delivery of IDB functions in Wales that the Welsh Government should consider.

3.14 In total 13 of the 39 responses provided specific comments, with the remaining 26 providing a narrative, which included aspects that related to this question.

Q3 - Do you have any further information or evidence which you feel the Welsh Government should consider in reaching their final decision on the future delivery of IDB functions in Wales?

3.15 This section provided an opportunity to receive comments in relation to any further information or evidence that it was felt that the Welsh Government should consider in reaching their final decision on the future delivery of IDB functions in Wales.

3.16 In total 13 of the 39 responses provided specific comments with the remaining 26 providing a narrative, which included aspects that related to this question.

Q4 - Are there any other matters that you would like to draw to the attention of the Welsh Government in relation to the delivery of IDB functions in Wales?

3.17 This section provided an opportunity to receive comments on any other matters that it was felt should be drawn to the attention of the Welsh Government in relation to the delivery of IDB functions in Wales.

3.18 In total 7 of the 39 responses provided specific comments, 6 did not provide a response and 26 providing a narrative, which included aspects that related to this question.

4. Consultation Responses

Q1 - Which of the three Options for the future delivery of IDB functions in Wales do you support and why?

4.1 All of the respondents provided comments in relation to this question, which have been illustrated in table 3 and explained in more detail below:

Count of Preferred Option						
Sector responding	Preferred Option Expressed					Grand Total
	1	2	3	Other	None	
Community Group		3				3
Environmental Bodies		1	1		2	4
IDB		11				11
Local Authority		3				3
Local Business		1				1
Member of the Public		6	2			8
Professional Bodies		5		2	1	8
Water Companies			1			1
Grand Total	0	30	4	2	3	39
As a %age	0%	77%	10%	5%	8%	100%

Table 3

Option 1 - Delivery through IDBs in line with current arrangements (Do nothing approach).

4.2 None of the 39 responses received provided support for Option 1.

4.2 Comments made in relation to this option included:

- This option is unacceptable as the opportunity for change and modernisation of the IDB function would be lost;
- The Board is not opposed to change, and accepts that there is a need to simplify and modernise the size, shape and structure of Internal Drainage Boards as governing mechanisms so that IDBs can modernise and adapt in response both to local needs and to the Welsh Government's new approach to the management of the environment.

Option 2 – Delivery through IDBs, with changes to organisational arrangements

4.3 30 of the 39 responses provided their support for Option 2.

4.4 It was generally recognised that the current operational model could not proceed and that work was required to modernise and improve the organisational arrangements.

4.5 Comments made in support of this option included:

- Internal Drainage Boards provide locally representative bodies to manage water levels in these areas and have important experience, skills and expertise essential for managing the risks within their districts and wider catchments.
- Their focus on areas of special drainage need and relevant practical expertise go beyond those that could reasonably be expected to be provided by a single Natural Resources Body for Wales [Natural Resources Wales].
- IDBs have a proven track record for working closely with land managers in their districts and have the potential to be a useful partner in facilitating and supporting the delivery of a Living Wales agenda. Their understanding of local land use and needs could help unlock local issues in partnership with a Single Body for Natural Resources Management in Wales and local authorities in the future.
- Using the partnership working powers within the Flood and Water Management Act 2010, IDBs can be utilised to assist Lead Local Flood Authorities within and beyond their boundaries on local flood risk management plans, strategies, sustainable drainage systems, consenting and enforcement, and planning issues.
- [Option 2 is seen] as the most viable option as this will allow the IDBs the future flexibility to provide local solutions that are locally democratically accountable, whilst still retaining the ethos of partnership working promoted within the Flood and Water Management Act 2010.
- As a ratepayer in one of the eleven IDD's administered by the Environment Agency at present I can certify that the present system is not satisfactory. Local rate payers in the IDD's feel there is a lack of democracy with no rate payer or stake holder participation in the management of their area.
- There is clear value in including local communities in decisions that affect water level management in those parts of Wales with specific drainage needs.
- [It is accepted] that there is a need to simplify and modernise the size, shape and structure of IDBs as governing mechanisms so that IDBs can modernise and adapt in response both to local needs and to the Welsh Government's new approach to the management of the environment.

- Delivery through IDBs with changes to the organisational arrangements should be seriously considered to:
 - Ensure that local representation, knowledge and input is maintained potentially in a more stream-lined arrangement.
 - Ensure that there is consistency across the management and governance of all Internal Drainage Districts and Internal Drainage Boards wholly or mainly in Wales.
 - Ensure that the local experience and expertise currently within IDBs is retained and utilised for the water level and flood risk management functions within the IDB areas and shared with Local Authorities to support their new responsibilities under the Flood and Water Management Act 201.
 - Bring the management of all IDD's wholly or mainly in Wales under the administration of new or the current IDBs with a view to maintaining consistency across Wales, particularly if these current and/or new IDBs could have a coordinated administration for Wales.
 - Explore the viability of bringing the management and administration within the remit of Lead Local Flood Authority.
- IDBs appear largely funded by the rate payer, ie by levies, rather than by those farmers and landowners who actually benefit most directly from their work. While we support the principle that money for flood risk management should be available from sources other than grant, a new governance model would need to be capable of optimising this from all practical sources while benefiting all needy groups and people.
- For those IDBs that are partly in England -- Powysland and Lower Wye -- we foresee significant risk of conflict and confusion for local communities and Local Authorities on both sides of the border given the potential for differing governance, operational (including issuing Flood Defence consents) and legal arrangements.
- In considering the assessment against the criteria set [within the consultation paper], we fear that too much weight may be given to the scale of the single body which may be offset in practice by the multiplicity of its functions and the scope of its responsibilities to the cost of local flood risk management in current IDB areas.
- The opportunity exists, and should be seized, to instigate a programme of radical and wholesale change to the management and governance of the IDB and IDD functions throughout Wales. To implement only minimal change at this time to the current arrangements is not a realistic or desirable option.

4.6 In support of this option, principally the three IDBs and ADA, also promoted the development of a Water Management Alliance for Wales that would administer the three existing IDBs and any further IDBs in Wales created to administer the eleven IDD's in North Wales currently administered by the Environment Agency Wales.

4.7 The combined local authority response, in support of this option also suggested that an overarching framework for Wales should be established, providing suggestions on how this might be achieved. This included replacing the existing IDB structure with a new form of locally representative board supported by one or more of the funding local authorities in line with the wider collaboration agenda.

Option 3 – Delivery through any new single body for natural resource management in Wales

4.8 4 of the 39 responses provided their support for Option 3.

4.9 Comments made in relation to this option included:

- The creation of the SEB [Natural Resources Wales] provides a unique opportunity to integrate flood risk and environmental management in Wales.
- [Option 3] would only deliver positive gains for the three IDB areas if the local expertise and focus were retained and enhanced within the larger body.
- We agree that there is a strong case for enhancing the new body's flood risk management functions and for transferring these responsibilities.
- This option would not deliver a change in management in a reasonable timescale. No details of any transitional arrangements to maintain services have been provided.
- [Under Option 3] there is a significant chance that the local links and knowledge would be alienated and lost with consequential increases in flooding risk.
- [Option 3] would be a significant backwards step in terms of local democracy, community involvement and local expertise in addressing a uniquely local set of challenges. The flood prevention and agronomic focus of IDB's cannot be diluted by a blinkered and overriding focus on environmental delivery that any new natural resources body in Wales may have.
- Abolishing IDBs risks losing their established knowledge and effectiveness without achieving compensatory gains.
- If Option 3 was pursued, it would be important that the structure of local accountability and knowledge was built into whatever the new body emerges.
- The reported experience of IDD's managed by the Environment Agency does not suggest that management by a higher level body is effective.

Other

4.10 Two respondents provided alternative options along the lines of Option 3, but suggesting that rather than transferring the functions of IDBs into a single body the functions should be transferred to Local Authorities instead.

4.11 Comments included:

- We acknowledge that the Welsh Government has already decided that Local Authorities are best placed to lead on the management of local sources of flooding.
- Local Authorities are already implementing that statutory role and IDBs have to undertake their flood risk work in accordance with a Local Authority's Local flood risk Strategy.
- Governance and control of the three existing IDBs would best sit with the relevant Local Authority, rather than with the Single Body. This would also have the merit of clarity for all concerned and local connection and accountability which we support.

None - No preferred option expressed

4.12 Three of the respondents did not provide a preferred option.

4.13 Of these, two deliberately abstained from providing a preference due to their proximity to the situation and the other, whilst indicating that they did not support Option 3, did not then provide a preference between Options 1 or 2.

Q2 - Are there any other relevant matters for the future delivery of IDB functions in Wales that you think the Welsh Government should consider?

4.14 In total 13 of the 39 responses provided specific comments, with the remaining 26 providing a narrative, which included aspects that related to this question.

4.15 A selection of comments include:

- A strength of IDBs is their specific remit and local accountability. However, in Wales there will be significant accountability through the Welsh Government, the new SEB and also the Flood Risk Management Committee.
- In Wales, the proportion of income generated from rates is low, with the majority of funding coming from levies. The current membership of Boards does not reflect the fairly represent the source of funding nor the beneficiaries of an IDBs activities.
- The CWLIDB has already taken on the administration of smaller Boards in Wales and has built up a well of experience that could be used to build efficiency savings and a consistent approach to water level management

in Wales, this approach has been well documented in the response from the CWLIDB.

- The CWLIDB has a long history and over the years has built up a vast experience of water level management so much so that there have been no significant floods in the Boards area since 1605.
- Whilst I feel that IDB's are effective organisations, more could be done in terms of administrative efficiency.
- If either Option 1 or 2 are taken forward the Welsh Government and the new Single Body should support the IDBs in Wales operating within a consortium.
- Should the three separate IDBs be retained as the structure for delivering flood risk and water management within their respective areas, we would expect them to develop an enhanced focus upon management for biodiversity, working with appropriate partners.
- The Gwent Levels is a unique and important area for people and wildlife – in ecological, historical and landscape terms, warranting special focus and attention.

Q3 - Do you have any further information or evidence which you feel the Welsh Government should consider in reaching their final decision on the future delivery of IDB functions in Wales?

4.16 In total 13 of the 39 responses provided specific comments with the remaining 26 providing a narrative, which included aspects that related to this question.

4.17 A selection of comments include:

- The local knowledge provided by IDB members is important but its practical usefulness can be overstated. Often the local knowledge is based around the needs and views of particular landowners. It is possible to still tap in to this knowledge through 'local surgeries'.
- The direct work force of CWLIDB has been able to undertake maintenance in a cost effective manner (at least compared to the Environment Agency) – probably due to its local plant and expertise. However this cost has not been 'market tested' against private contractors.
- The administration costs of the Welsh IDBs, once fee income from non-statutory activities is deducted, is considerably higher than the average for English IDBs (currently circa 18% of operating income). This reflects the relatively small income.
- Whilst we do not dispute that an All-Wales level organisation would have more resources to address issues, no weight is given to the benefit of addressing flood risk locally, using organisations that are approachable and have considerable local knowledge.

- The contribution of the current work of the IDBs towards restoring biodiversity, thus maintaining ecosystem services, has not even been mentioned.
- The CWIDB is already an effective vehicle for delivery of the Living Wales agenda, especially as its boundaries encompass the whole of an ecosystem.
- The Welsh Government seems to be accusing the IDBs of failing to address concerns, but then stating that their current statutory arrangement prevents them from doing so.
- The Gwent Levels are unique in Wales. As such, it warrants the focus and attention of an individual IDB.
- As already stated, the CWIDB is involved in the biodiversity work across the Gwent Levels. The CWIDB is also able to promote the project through their contact with other landowners and their own media. Although EAW and CCW are also involved in the project, they are not able to offer this level of support, and it is doubtful that the Single Body would be able to do so when formed.
- If the IDBs are absorbed into the Single Body, it is very likely that their current management work will be undertaken by contractors. Contractors will only carry out set work, and are unlikely to have the means to address issues even if they did notice them.
- If the Welsh Government is determined to see the IDBs absorbed into the Single Body, why must the decision be made now?
- If the Welsh Government proceeds with their preferred option, we expect measures to ensure that expertise is not lost, and to ensure that the Gwent Levels continues to have high priority and sensitivity in terms of its management and relationship with local landowners.

Q4 - Are there any other matters that you would like to draw to the attention of the Welsh Government in relation to the delivery of IDB functions in Wales?

4.18 In total 7 of the 39 responses provided specific comments, 6 did not provide a response and 26 providing a narrative, which included aspects that related to this question.

4.19 Comments received included:

- Caldicot & Wentlooge Levels IDB currently provides engineering and administration services to the River Lugg IDB and Powysland IDB and engineering services to several English IDBs along the Severn. These services have been provided without competition and are potentially in breach of Public Procurement rules.
- There are existing partnerships established with the current C&WIDB in particular, where liaison with local environmental interest groups and organisations has led to the successful integration of biodiversity measures into waterway maintenance. These relationships are valued,

and should be recognised within the future management of IDB functions in Wales.

- We believe that the Welsh Government has not fully considered the implications of absorbing IDBs into the Single Body. Their considerable partnership work and contribution to conserving biodiversity have not been taken into account, and neither has weight been given to the benefit of addressing flooding and biodiversity issues locally.
- Following the case of *Attewell v. Environment Agency & others* (2011), heard in the High Court in Cardiff, CWLIDB is obliged to maintain the sea wall in pursuance of its duties under the Caldicot and Wentlooge Levels Act 1884. These duties would therefore be transferred to the Single Body if Option 3 is pursued.
- One very important point not even considered in the consultation document was the maintenance and running of pumping stations. Having made inquiries, river authorities do not run pumping stations, but as soon as possible leave pump care to the locals, who benefit...
- Many people are concerned with flooding risks, not necessarily from the sea but from the run-off from developments in the adjacent areas. Those concerns will increase should we find we no longer have a local IDB and that decisions affecting this unique area are being made elsewhere, without the important local knowledge.
- I believe it is customary when presenting such a document for it to set out the points to be consulted on in a fair and open manner, to maintain the integrity of the consultation process. Unfortunately this is not the case in this instance, due to the bias of the author towards option 3. I sincerely hope that the outcome of the consultation process is not a foregone conclusion.
- Should the Welsh Government decide to retain IDBs as a legal and/or operational entity we believe a change in the title would be beneficial to communicating their new purpose and direction. This should reflect their wider remit than drainage, encompassing flood risk management, biodiversity, the natural land and water resources of Wales and public access.

5. Other Considerations

5.1 As referred to within the consultation paper, there are also three other matters that will need to be considered along with the responses to this consultation before coming to a final decision on the future delivery of IDB functions in Wales.

5.2 These are as follows:

- Sustaining a Living Wales.
- Natural Resources Wales; and
- Wales Audit Office.

Sustaining a Living Wales²

5.3 *A Living Wales* is one of the major statements of policy principle by the Assembly Government. It is about more effective governance of environmental resources in Wales within the context of sustainable development, which is our central organising principle. It sits below the Sustainable Development Scheme and above the Environment Strategy and the individual environmental policies which set out present detailed actions. It seeks an integrated approach to managing environmental resources and integration with economic and social outcomes.

5.4 No specific questions in relation to IDBs were posed in this consultation. The consensus of the consultation responses was to welcome the proposed move to an ecosystem approach and many of the responses welcomed the establishment of a single body to oversee. However many responses queried different aspects of how this would be carried through in practice.

Natural Resources Wales³

5.5 The Welsh Government is committed to the establishment of the new single body for natural resource management in Wales, entitled "*Natural Resources Wales*", by 1 April 2013.

5.6 The 'Natural Resources Wales' consultation⁴, whilst not providing any specific question on this matter, did provide a proposal for consideration of the advantages of incorporating IDB functions within the Single Body.

5.7 Some respondents did take the opportunity to provide their comments on this proposal and whilst there were different views expressed, in general those who commented on this issue were supportive of the proposal.

² Sustaining a Living Wales - Green Paper available from:

<http://wales.gov.uk/consultations/environmentandcountryside/sustainingwales/?lang=en>

³ Natural Resource Wales - available from:

<http://wales.gov.uk/consultations/environmentandcountryside/singlebody/?lang=en>

⁴ Natural Resource Wales - available from:

<http://wales.gov.uk/consultations/environmentandcountryside/singlebody/?lang=en>

5.8 Some of the comments received included;

- I am concerned about the present arrangement for the Drainage Boards, wholly or mainly in Wales,[...] and consider that they should be incorporated into the new single body.
- I Agree with this proposal.
- I believe a far better option would be to form two IDBs from the eleven IDD's in North West Wales (which would ensure local ratepayer and local community representation), with these new Boards working in co-operation with the other three existing Boards.
- We think you should go further and consider transferring the flood risk management functions of local authorities, so making the single body responsible for delivering flood risk management in Wales. This would be more efficient and would facilitate a more holistic approach to flood risk management. It would also clarify where responsibilities lie – which is of critical importance during flooding emergencies.

5.9 The comments received as a part of the “*Natural resources Wales*” consultation were considered alongside the responses to this consultation.

Wales Audit Office

5.10 Following receipt of a number of concerns in relation to the administration and governance of the Caldicot & Wentlooge Levels Internal Drainage Board (CWLIDB), the Wales Audit Office (WAO) completed an audit of the CWLIDB to investigate these matters.

5.11 The WAO completed their investigation and published an “Audit of Accounts 2010-11 Caldicot and Wentlooge Levels Internal Drainage Board - Report in the Public Interest”⁵, to present their findings, on 8 October 2012.

5.12 The report highlights that for many years the CWLIDB was governed and managed ineffectively, and was unable to demonstrate that it has always spent public money wisely. It also suggests that the Board acted unlawfully on occasions, with some staff and members acting in a way which is likely to undermine public confidence. In short, the CWLIDB did not operate to the standards that the public has a right to expect from a public body.

⁵ WAO - “Audit of Accounts 2010-11 Caldicot and Wentlooge Levels Internal Drainage Board Report in the Public Interest” available from - http://www.wao.gov.uk/news/news_4805.asp

5.13 It also provided the following four recommendations for the CWLIDB to address:

- The Board should satisfy itself that the improvement programme it has put in place is effectively addressing the matters of concern raised within this report;
- The Board should commission an independent review to commence in 12 months' time to assess the impact and effectiveness of its improvement programme;
- The Board should regularly review its progress against the improvement programme and ensure that all actions are completed; and
- The Board should consider whether to seek recovery of salary overpayments made to the former Clerk and Engineer.

5.14 At the time of writing the Welsh Government is aware that the CWLIDB have accepted the report and whilst work is continuing to address the concerns raised, no formal CWLIDB response to the report has been published.

5.15 Whilst, the findings of the report formed a key part of the considerations into the future delivery of IDB functions in Wales, it must be stressed that the Welsh Government did not consider the findings from the CWLIDB to be indicative of the practices of the other IDBs, wholly or mainly in Wales.

6. Next Steps

6.1 The Welsh Government stated in the consultation paper that the preferred option for the future delivery of IDB functions in Wales was Option 3. The majority of respondents have expressed a preference for Option 2. However, several comments were made in relation to the perceived benefits of both options and there was an overall acceptance of the need for reform around governance and management structures.

6.2 After considering the comments received, and in particular the proposals from Cardiff, Monmouthshire and Newport and the three IDBs operating wholly or mainly in Wales the Welsh Government has concluded that more detailed work on the costs and benefits of Options 2 and 3 is now required. This will include consideration of the proposals referred to above.

6.3 This additional work, which will be similar in scope to that undertaken in advance of the decision to establish Natural Resources Wales, will take place in the Spring of 2013.

6.4 The additional work will also draw on the findings of the WAO report in the public interest in relation to CWLIDB.

6.5 The Welsh Government will work with key stakeholders in taking this work forward. A final decision will be made in May 2013.

Annex A – List of Respondents

Ref	Sector	-
IDB 1	Member of the Public	[Requested to Remain Anonymous]
IDB 2	Member of the Public	Mr Roger Park
IDB 3	Environmental Bodies	Pontypool Parks Estate Office
IDB 4	Professional Bodies	Wales Audit Office (WAO)
IDB 5	IDB	Lower Severn (2005) Internal Drainage Board
IDB 6	IDB	Cundalls on behalf of Muston and Yedingham IDB
IDB 7	IDB	Cundalls on behalf of Rye IDB
IDB 8	IDB	Cundalls on behalf of Thornton IDB
IDB 9	Environmental Bodies	RSPB
IDB 10	Environmental Bodies	Gwent Wildlife Trust
IDB 11	IDB	Association of Drainage Authorities (ADA)
IDB 12	Local Business	Intension (UK) Ltd
IDB 13	IDB	Bedford Group of Drainage Boards
IDB 14	Member of the Public	Mr James Harris
IDB 15	Member of the Public	Mr Hubert Jones
IDB 16	Community Group	Goldcliff Community Council
IDB 17	Member of the Public	Mr N Waters
IDB 18	IDB	Powysland IDB (PL IDB)
IDB 19	Community Group	LLandysilio Community Council
IDB 20	Community Group	Llandrinio & Arddleen Community Council

IDB 21	Member of the Public	[Requested to Remain Anonymous]
IDB 22	Professional Bodies	Environment Agency Wales
IDB 23	Water Companies	Dŵr Cymru Welsh Water
IDB 24	Member of the Public	Mr LH Attewell
IDB 25	Member of the Public	Mr DM Waters
IDB 26	IDB	Caldicot & Wentlooge Levels IDB (CWLIDB)
IDB 27	IDB	Lower Wye IDB (LW IDB)
IDB 28	IDB	Joint LW IDB, PL IDB & CWLIDB Response
IDB 29	Environmental Bodies	Countryside Council for Wales (CCW)
IDB 30	Local Authority	Welsh Local Government Association
IDB 31	Local Authority	Powys County Council
IDB 32	Professional Bodies	One Voice Wales
IDB 33	IDB	North Somerset Levels IDB
IDB 34	Professional Bodies	National Farmers Union (NFU)
IDB 35	Professional Bodies	Flood Risk Management Wales (FRMW)
IDB 36	Professional Bodies	Country Land and Business Association
IDB 37	Professional Bodies	The Central Association of Agricultural Valuers (CAAVs)
IDB 38	Professional Bodies	Farmers Union of Wales
IDB 39	Local Authority	Combined Response (Cardiff County Council, Newport City Council and Monmouthshire County Council)