



Submission to Defra consultation on improving our management of water in the environment

About the DCN

The District Council's Network (DCN) is a cross-party, member led network of 200 district councils. We are a Special Interest Group of the Local Government Association (LGA), and provide a single voice for district councils within the Local Government Association.

District Councils in England deliver 86 out of 137 essential local government services to over 22 million people – 40% of the population – and cover 68% of the country by area.

District Councils have a proven track record of building better lives and stronger economies in the areas that they serve. Districts protect and enhance quality of life by safeguarding our environment, promoting public health and leisure, whilst creating attractive places to live, raise families and build a stronger economy.

The DCN welcomes the opportunity to respond to this consultation. District Councils have statutory responsibility for flood risk management of minor watercourses under the Flood and Water Management Act 2010. This is undertaken in partnership with other local authorities, private companies and land owners, and in some instances with Internal Drainage Boards. There is also a statutory requirement to make contribution towards sustainable development when exercising their flooding and coastal risk management functions.

Key points

- Changes to Drainage and Water Management Plans should promote consistency across geographical areas
- It is essential that Local Authorities, including District Councils, are consulted meaningfully by companies when these plans are in development. Regulator oversight may be required to ensure this process is happening
- Any changes to the charging methodology by Internal Drainage Boards (IDBs) for the special levy on Local Authorities should not result in an unfunded pressure on these councils
- The Government should consider allowing the IDB to precept directly on taxpayers to create a more equitable system of levy

Long-term planning of water in our environment

Current completion of Drainage and Water Management Plans is patchy and there seems to be little consistency in the quality and standard of the plans that are produced. This poses a significant risk to both residents and Local Authorities, who may bear additional costs as an unintended consequence of these plans.

The DCN supports the view that these plans should become a statutory requirement to encourage their completion, but it is important that minimum standards and expectations are clearly set for these. This must be done in consultation with stakeholders including Local Authorities. It is our view that some degree of regulator oversight would be advantageous to ensure this consultation was happening effectively and to support companies in producing adequate plans.

Land Drainage: Internal Drainage Board charging methodology

Approximately 10% of England is presently covered by an Internal Drainage Board. IDBs currently charge a special levy to district councils to cover their costs of their land drainage and flood defence work within the district. Councils used to receive funding from Central Government for this through the Revenue Support Grant. As this grant has diminished (and will disappear entirely from April 2020), this funding has not been replaced, adding significant pressure on budgets for some Councils. This is further exacerbated by the fact that historically annual rises in the levy have outstripped both inflation and the percentage by which Councils may increase their Council Tax without a referendum. The amount to be levied is entirely in the gift of the IDB board; Councils find themselves having to raise Council Tax or make savings to cover increased costs over which they have no control.

The current charging mechanism is flawed as it uses historical property prices as the basis for the charge, rather than any correlation to the amount of work actually being carried out. The consultation proposes the alteration of the charging methodology by which these levies are calculated. The DCN are concerned that any change to the charging mechanism may create an additional cost burden for local authorities, and look to the Government to ensure that any changes are fully funded.

As part of these proposals, the Government should consider instead allowing IDBs to precept directly onto local taxpayers as precepting bodies in their own right. This would remove the current strain on Council budgets and would allow those residents who live in the areas that would benefit from the work of the IDB to be funding it. This aligns with the approach taken by Department to create the Somerset Rivers Authority, which shall become a major preceptor in their areas of responsibility. This would result in a levy system which is far more transparent for the local taxpayer and avoid distortions to Council Tax increases for Districts arising from IDB levies over which they have no control.

Flood and Coastal Erosion Risk Management: Raising local funds

The DCN would support Councils gaining additional powers to raise local funds to contribute to Flood and Coastal Erosion Risk Management, providing this is not seen as a way for the Government to reduce spending in this area. More than ever, a joined up approach to tackling this issue is required to ensure the continued survival of coastal towns and villages. Flood and Coastal Erosion Risk Management authorities should be allowed an additional ring-fenced precept as a way of raising local funds. This should sit outside the current referendum principles and be available to all types of local authority. Billing Authorities should also have the ability to add a supplement to Business rate bills of local businesses who also benefit from the works, so the cost does not fall entirely on the council taxpayers.