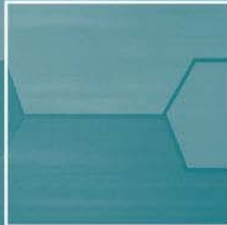


Defra

# FL0224: Update of the 2006 Review of the Internal Drainage Boards Efficiency Evidence

January 2010



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## Report for

Ella Thomason, Defra Flood Management Division  
2D Ergon House  
Horseferry Road  
Westminster  
London  
SW1P 2AL

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## Main Contributors

Paige Alumbaugh  
Liz Buchanan  
Nick Jarritt

---

## Issued by

.....  
Liz Buchanan

---

## Approved by

.....  
Nick Jarritt

---

## Entec UK Limited

17 Angel Gate  
City Road  
London EC1V 2SH  
England  
Tel: +44 (0) 207 843 1400  
Fax: +44 (0) 207 843 1410

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## Defra

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January 2010

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## 1. Introduction

### 1.1 Context to Project

Internal Drainage Boards (IDBs) are responsible for land drainage in areas of special drainage need that extends to 1.2 million hectares of lowland England. They are long established bodies operating predominantly under the Land Drainage Act 1991 and have permissive powers to undertake works to secure drainage and water level management of their districts.

A review of Internal Drainage Boards (IDBs) was announced in June 2005 when Elliot Morley, Minister of State (Environment and Climate Change), wrote to IDB Chairmen advising them that Defra intended to engage consultants who, in consultation with the Environment Agency (Environment Agency), Association of Drainage Authorities (ADA) and others, would advise on the present IDB arrangements and how well each IDB fits into a broad model of how IDBs should be operating in the present day.

In August 2005, Defra appointed JBA Consulting to undertake an independent review of Internal Drainage Boards. The consultants were asked to make recommendations on suitable organisational arrangements that would ensure boards are efficient, accountable and representative of the interests of both drainage ratepayers and wider interests in delivering their flood management and other responsibilities, and to assess existing boards against these.

JBA Consulting undertook a detailed consultation within the sector including the IDBs themselves, Defra, Environment Agency, English Nature (now Natural England), the RSPB, the rate and levy payers and their representative organisations (National Farmers Union, Country Land and Business Association and the Local Government Association (LGA)), and all the other stakeholders who have a direct or indirect interest in water level and flood management in IDB districts. Following substantial consultation and analysis, JBA Consulting submitted their report to Defra on 28 February 2006.

The 2006 Review presents a comprehensive review of the structure and performance of IDBs across England. The Review aimed to make recommendations on suitable organisational arrangements that would ensure boards are efficient, accountable and representative of the interests of both drainage ratepayers and wider interests in delivering their flood management and other responsibilities.

The 2006 Review's conclusions were based on substantial consultation with IDBs, supported by analysis of 2004-5 audit returns (via IDB1 forms). A large number of conclusions were drawn from the Review, including:

- There is a need to ensure that IDBs meet a minimum size to allow them sufficient financial and administrative resources to meet future requirements. This could be achieved through further grouping/amalgamation of smaller IDBs;
- Amalgamation of smaller IDBs provides the opportunity for further saving in administrative costs;



- The main opportunities for further cost savings and improvements across IDBs exist particularly in Yorkshire, the Midlands and parts of the Fens.

The IDB Review Project Board has continued to review and assess these conclusions following the publication of the Review report in 2006. This ongoing work has focussed on delivering greater group-working between IDBs within sub-catchments, with a view to ultimately amalgamating IDBs to a single management organisation for each sub-catchment unit. Proposed sub-catchments were published by Defra in early 2008.

In 2008, the then Minister for the Environment, Phil Woolas MP, wrote to IDBs supporting the concept of water level management based on managing water levels through the whole catchment to achieve a reduction in flood risk to both urban and rural communities. He highlighted important role that IDBs have in the future of flood risk and water level management arrangements, and the recommendations of the Pitt Review. Most importantly, the letter encouraged IDBs to work together within the identified sub-catchments and re-iterated the ultimate goal that there should only be one IDB for each sub-catchment unit ensuring that each individual board has the best technical and financial capability to meet the future challenges of climate change. It was proposed that the new sub-catchment Boards be in place by 1<sup>st</sup> April 2013.

## 1.2 Purpose of Project

The purpose of this project is to expand the evidence base underpinning these recommendations, with a particular focus on IDB efficiency and how this could be improved through amalgamation. This report has been produced for the purpose of providing a brief summary of these analyses for Defra. The analyses undertaken in 2006 were based on a single year of IDB1 returns. The availability of a further five years of audit data provides the opportunity to undertake a more rigorous analysis of IDB efficiency and to assess the robustness of the analyses underpinning the Review's conclusions.

The 2006 Review assessed the performance of existing boards against a series of measures of:

- Administrative Costs
- Maintenance Costs
- Cost of Capital Scheme
- Use of Forward Planning
- Dealing with information requests
- Use of IT & Telemetry

These assessments were described in Section IV of the JBA report. It has been possible to extend or modify the 2006 Review analysis as part of this work for all of these indicators of financial performance with the exception of the cost of capital schemes and the use of forward planning.





The information used in the 2006 Review came from the Defra database of grant aided schemes which at that time included data from 1999-2004. The measure of efficacy used here was to look at the arithmetic mean of the total fees as proportion of scheme cost and the variation in the out-turn of IDB scheme costs. This analysis was undertaken for all schemes, but also separately for schemes <£200K, £200K-£1million and >£1 million.

The indicators used in the 2006 Review were to asses if convincing measures to manage asset condition were also feeding through to submitted forward profiles of expenditure to Defra and were being integrated, where appropriate, into Flood Management Strategy Studies undertaken by the Environment Agency. All IDBs were individually assessed to see if they fulfilled this category, this assessment was also undertaken from IDBs in management groups and stand-alone IDBs. Environment Agency managed IDBs were excluded from this analysis. The information on which these analyses were based in the 2006 Review has not been updated as part of this report and, as such, these analyses have not been revisited.



## 2. Administrative Costs

### 2.1 Methodology from 2006 Review

Administrative costs as a percentage of total expenditure were looked at as a function of total expenditure and IDB size. In addition the minimum, maximum and mean of administrative costs as a percentage of total expenditure and administrative costs per hectare were also detailed. This analysis was done for all IDBs, but also separately for Grouped IDBs, Stand Alone IDBs where income >£100K, Stand Alone IDBs where income < £100K and Environment Agency administered IDBs. Microsoft excel was used to draw simple trend lines for each of these data to attempt to establish whether any of these categories could be viewed as more efficient. This analysis was based on 2004-05 audit data (IDB1), or the latest available year at that time.

### 2.2 Methodology used in this project

The analysis that was undertaken comprised both a reproduction of the 2006 Review work and extension of this work to investigate temporal trends in amalgamated, consortia and individual IDBs and IDBs of different income brackets. Income categories have been defined as <£100K, £100-£500K and >£500K to reflect the 2006 Review and the £500K figure used in Defra proposals. Environment Agency IDBs have not been looked at separately as there is no data for Environment Agency IDBs after the 2004/05 IDB1 returns. A summary of the key findings is presented below. The full analyses undertaken are shown in Appendix A.

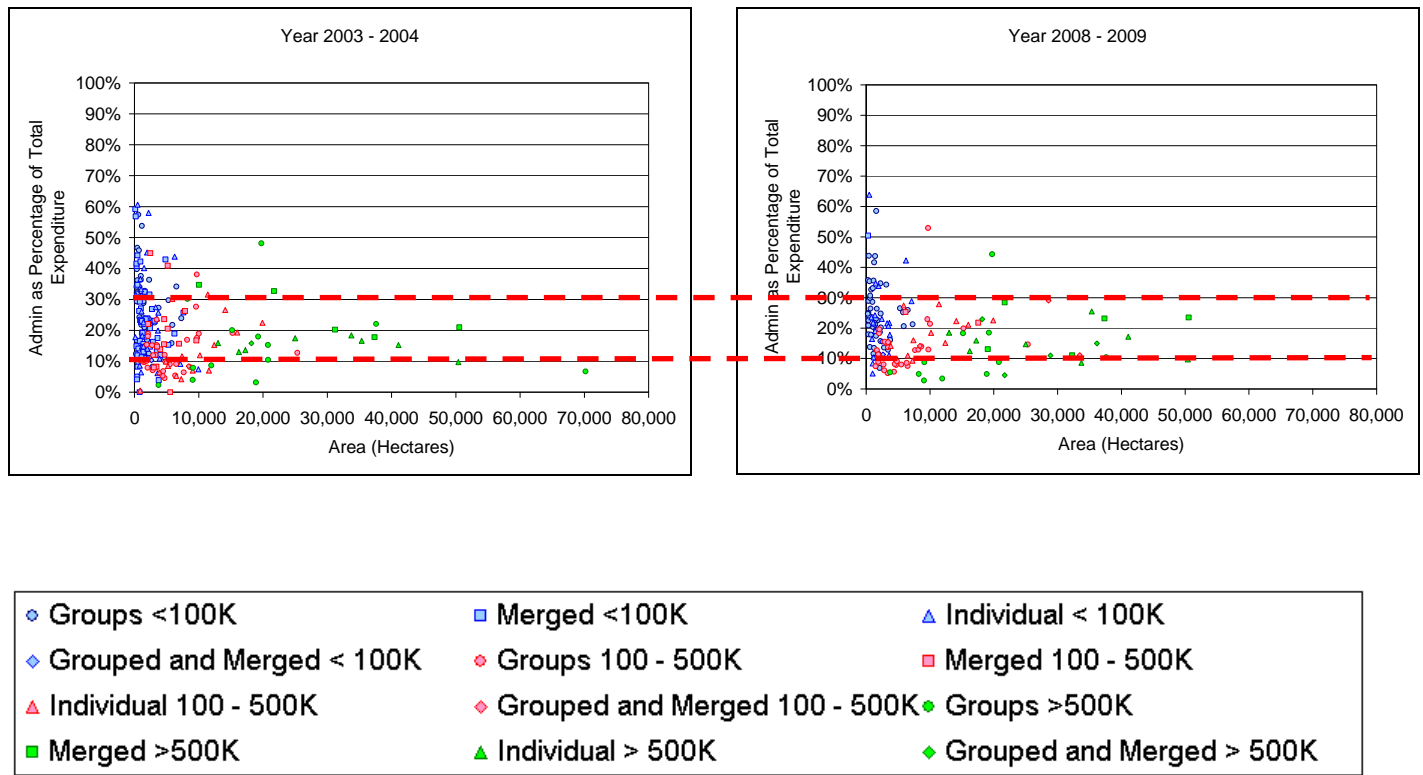
#### 2.2.1 Reproduction of the 2006 Review

Figure 2.1 plots the change in administration costs as a proportion of total expenditure within the available dataset. These graphs indicate the following points:

- The decrease in IDB numbers between 2003/04 and 2008/09.
- The increase in the number of larger IDBs
- The decrease in outliers over the six year period and the clumping of percentage administration costs between 10-30% (see red dotted lines in Figure 2.1). 60% of IDBs lay between these limits in 2003/04 compared to 69% in 2008/09.



**Figure 2.1 Administration cost's as a proportion of total expenditure as a function of IDB size for all IDBs 2003/2004 and 2008/2009**



## 2.2.2 Amalgamated IDBs

There has been a large amount of amalgamation amongst IDBs in the last six years. Pre- and post-amalgamation trends have been looked at for each amalgamated group to inform the effect of amalgamation on administrative costs. Typically it was found that after amalgamation administrative costs as a proportion of total expenditure tended to the mean or just less than the mean of the amalgamated components. An example of this for the Parrett IDB amalgamation is shown below (Figure 2.2).

The total administrative costs per year are also shown for the Parret IDB (Figure 2.3). These indicate that total administrative costs increased immediately after amalgamation and then decreased in later years. The level of analysis undertaken does not allow the cause for this to be ascertained, but it does appear to be consistent with the pattern for other amalgamated groups and occurs at the same time as an increase in total expenditure.

It should be noted that though this individual case does show a decrease in percentage administrative costs in the most recent set of IDB1 returns the amalgamated datasets do not show a clear trend. This is very likely because, in most cases, insufficient time has passed since amalgamation for significant cost efficiencies to be realised.



Figure 2.2 Parrett IDB Amalgamation\*: Administrative costs as a proportion of total expenditure

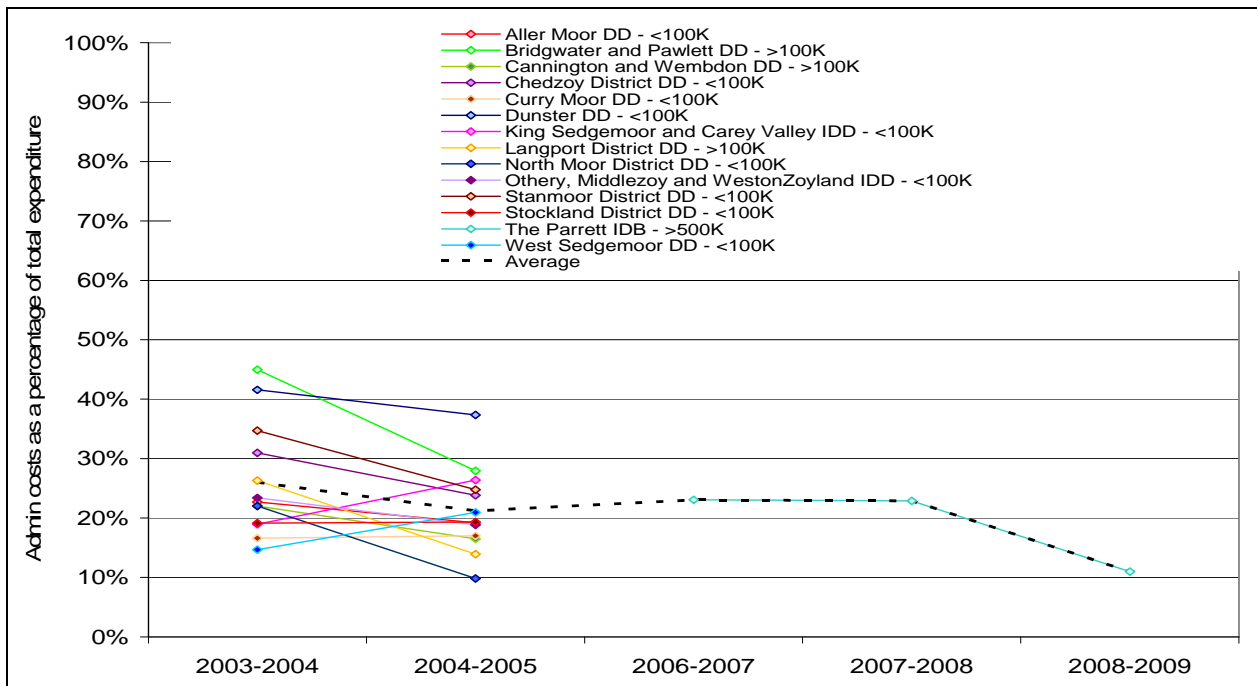
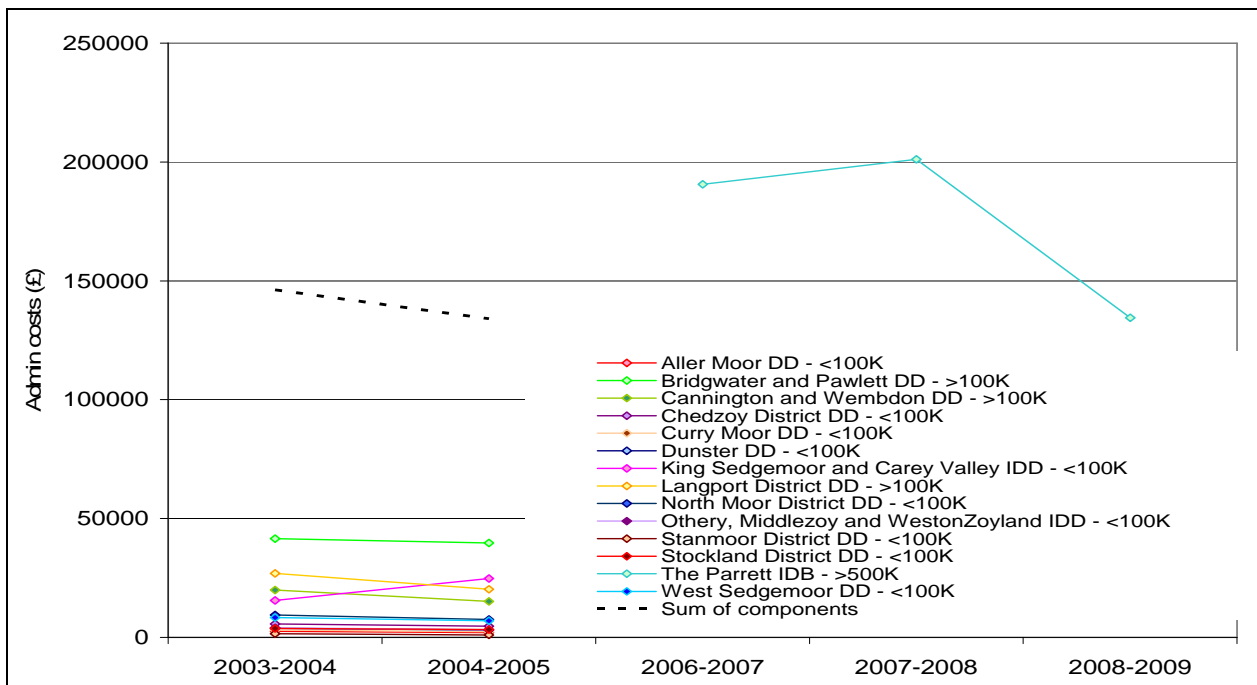


Figure 2.3 Parrett IDB Amalgamation\*: Administrative costs



\*The cost boundaries shown are for average income for the period covered by IDB1 returns data.



## 2.2.3 Consortia IDBs

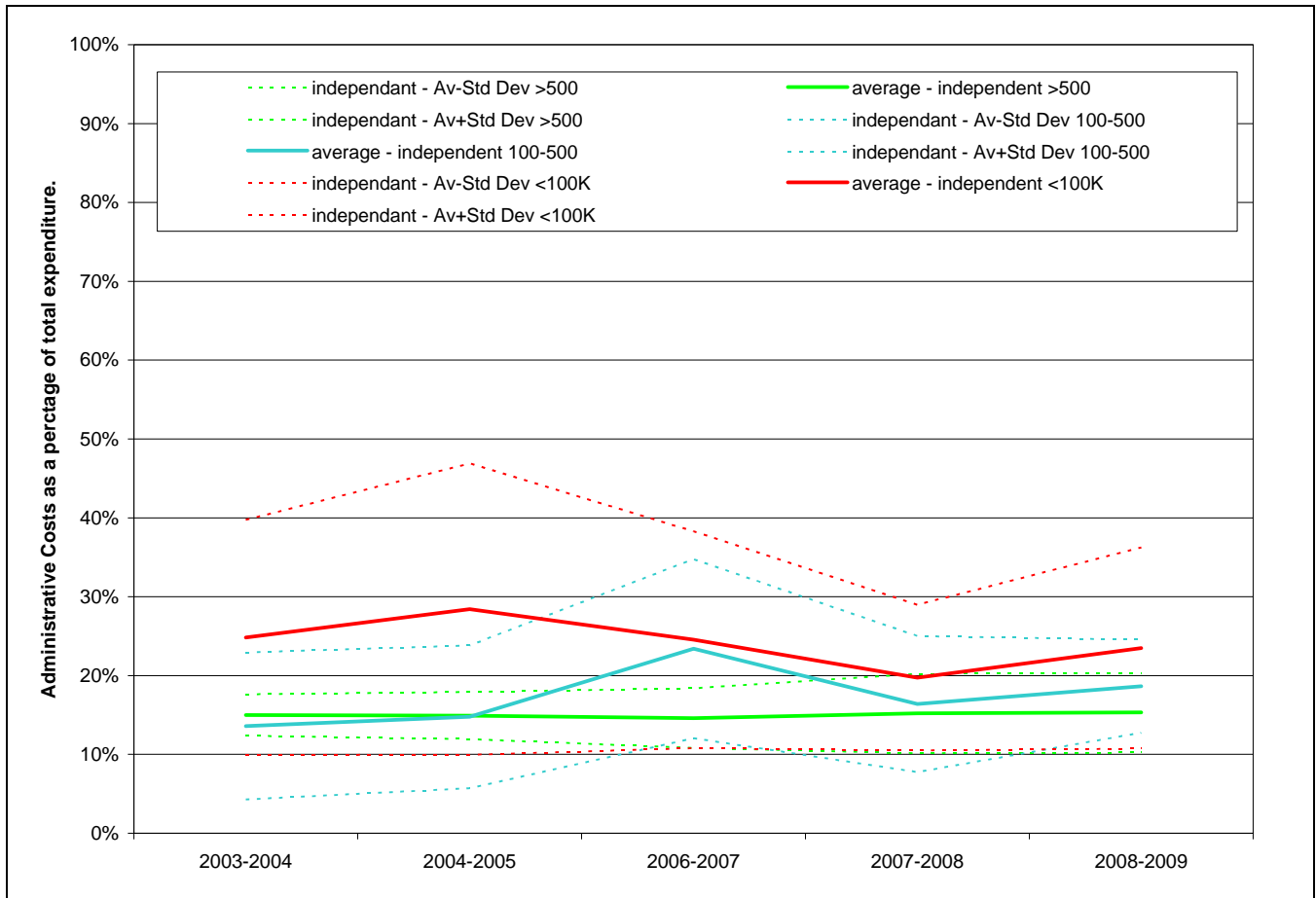
A number of IDBs have formed consortia to share resources, for this review a simple measure of consortia has been used, that of those IDBs which have shared websites. In total 10 consortia have been identified, plus the Middle Level Commissioners. Analysis similar to that displayed above has been undertaken for consortia groups. Administrative percentages tended to vary widely in consortia groups and no trends were noted, however it is important to note that the nature of each consortia could be very different depending on the level of integration involved. Benefits of consortia would need to be judged on a case by case basis and with a deeper understanding of the mechanisms in place that was possible to compile for this review. Details of consortia analysis can be found in Appendix A.

## 2.2.4 Influence of IDB Income on trends

In progressing the understanding of the evolution of the IDB sector over the last six years it is important to understand the influence that income has on overall trends. The plot below shows administration costs as a percentage of total expenditure for each of the five years being looked at for those IDBs which have remained as individual (that is have not amalgamated or become part of consortia). This data is useful in understanding the underlying trends in the IDB sector, separate from the consortia and amalgamation operations.



**Figure 2.4 Administrative costs as a percentage of total expenditure for individual IDBs**



This plot indicates that:

- Larger IDBs generally have slightly lower percentage administrative costs than smaller IDBs – though this is not consistently the case, as can be seen by the range in the standard deviation lines.
- Larger IDBs are generally more stable in their administrative expenditure; this can be seen by less fluctuation in the means and smaller standard deviation limits.

This analysis was also undertaken for amalgamated and consortia IDBs (see Appendix A). The same trends with regard to increasing stability with size were also noted in these analyses. Amalgamated IDBs did not show the cost differential between the different IDB income brackets and average costs for all IDBs sat between 20-30%. A likely cause of this is temporarily increased costs as a result of recent amalgamation activities. Longer term benefits of amalgamation will need to be analysed from future IDB1 returns.



## 3. Maintenance Costs

### 3.1 Methodology from 2006 Review

The analysis of maintenance costs was solely undertaken for those costs pertaining to the maintenance of watercourses. It excluded costs related to pumping as these were found to be too variable and location specific. Pumping costs can also not be applied to all IDBs. Maintenance costs as a percentage of total expenditure were looked at as a function of total expenditure and maintenance costs as a percentage of total IDB area were looked at as a function of IDB size. In addition the minimum, maximum and mean of maintenance costs as a percentage of total expenditure and the mean of maintenance costs per kilometre of watercourse were also detailed. This latter piece of analysis only used the mean because the minimum and maximum were found to be too influenced by individual events within the dataset. In addition it was only undertaken for those IDBs that has supplied length of watercourse in their Questionnaire responses. This analysis was done for all IDBs, but also separately for Grouped IDBs, Stand Alone IDBs where income >£100K, Stand Alone IDBs where income < £100K and Environment Agency administered IDBs. Microsoft excel was used to draw simple trend lines for each of these data to attempt to establish whether any of these categories could be viewed as more efficient. This analysis was based on 2004-05 audit data, or the latest available year at that time.

### 3.2 Methodology used in this project

Using the same methodology as for administration costs, the analysis that was undertaken comprised both a reproduction of the 2006 Review work and extension of this work to investigate temporal trends in amalgamated, consortia and individual IDBs and IDBs of different income brackets. Income categories have been defined as <£100K, £100-£500K and >£500K to reflect the 2006 Review and the £500K figure used in Defra proposals. Environment Agency IDBs have not been looked at separately as there is no data for Environment Agency IDBs after the 2004/05 IDB1 returns. A summary of the key findings is presented below. The full analyses undertaken are detailed in Appendix A.

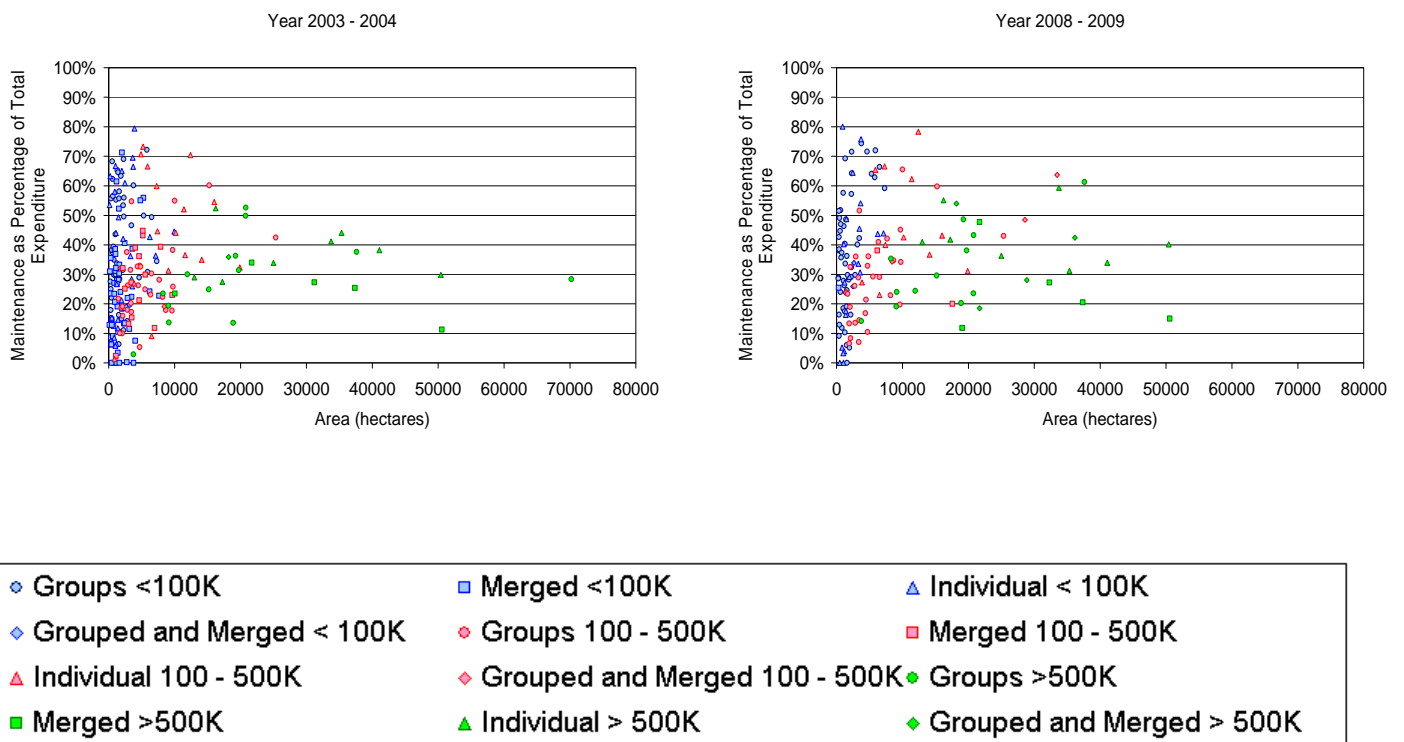
It should be noted that there may be a large number of factors which will influence watercourse maintenance spend, this could include the cyclical nature of maintenance cycles, historic levels of maintenance or age of assets, as well as any changes brought about by the forming of amalgamations or consortia. The analysis presented here is useful in that it provides insight into the year to year activities of IDBs, however the possible influence of external factors, outside of the scope of this report means that no conclusions should be drawn based on maintenance figures alone. Increasing maintenance costs as a result of the forming of consortia or amalgamation could be a sign of the utilisation of a broadened resource pool, in the same way as decreasing costs could be a result of improvements in efficiencies.



### 3.2.1 Reproduction of the 2006 Review

Figure 2.1 plots the change in maintenance costs as a proportion of total expenditure within the available dataset. In the same way as the similar plots for administration, these plots demonstrate the decrease in the numbers of IDBs over the time period. However they do not demonstrate any particular trend in the distribution of maintenance costs with IDB size or with wet and dry years.

**Figure 3.1 Maintenance costs as a proportion of total expenditure as a function of IDB size for all IDBs 2003/2004 and 2008/2009**



### 3.2.2 Amalgamated and Consortia IDBs

Maintenance costs per hectare and as a proportion for total expenditure were looked at for amalgamated and consortia IDBs. Percentage costs were found to be very variable with no clear trends from the pre- to post-amalgamation stages.

Total maintenance costs have also been looked at for a selection of consortia IDBs, these appear to show that maintenance costs increase after amalgamation. Anecdotal evidence suggests a factor in this may be that many smaller IDBs have very low maintenance costs pre-amalgamation, which could be a result of work by landowners for their collective benefit through small IDBs, which is less likely once the IDBs become larger organisations.

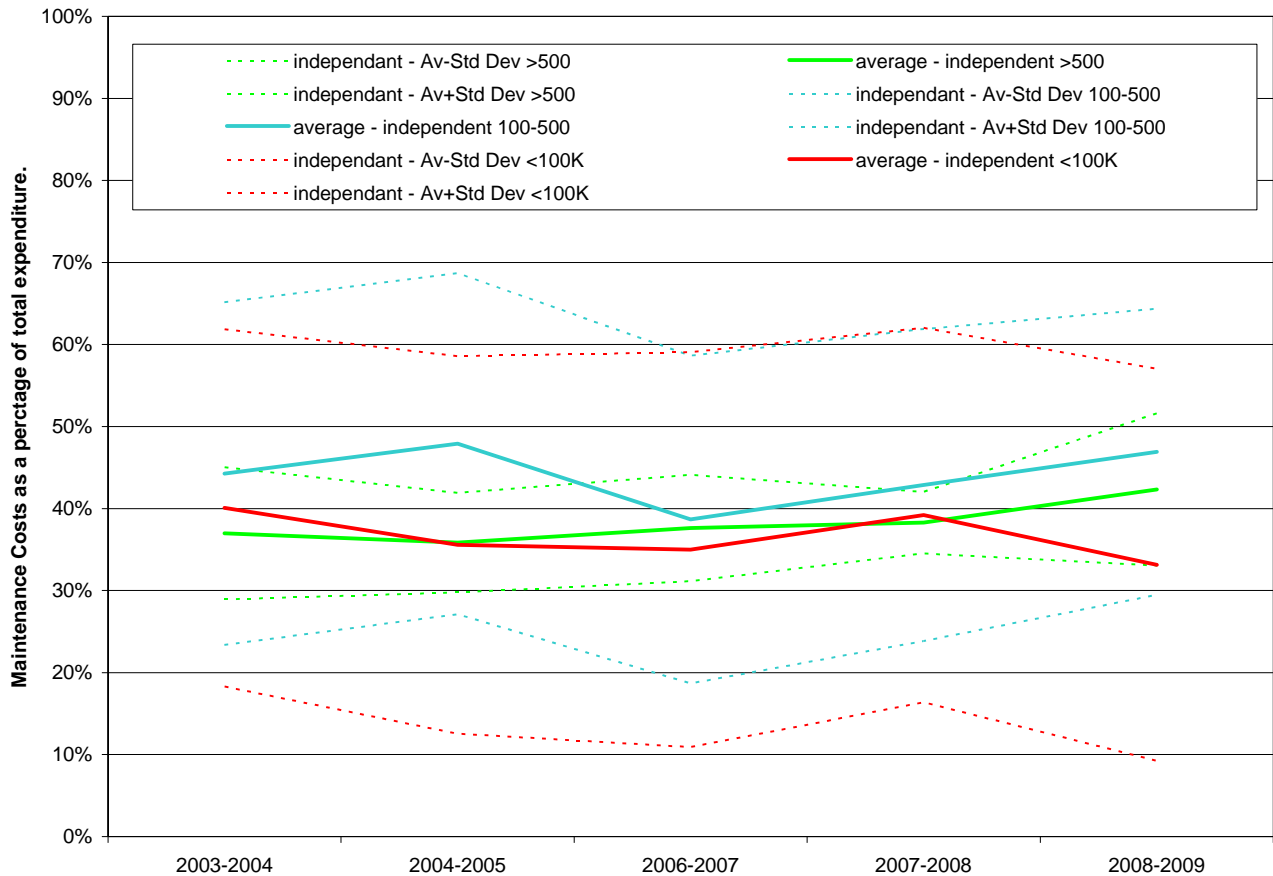




### 3.2.3 Influence of IDB income on trends

In the same way as for administration costs, it is useful to look at the influence of IDB income on maintenance costs. The figure below shows this influence for individual IDBs.

**Figure 3.2 Maintenance costs as a percentage of total expenditure for individual IDBs**



This plot indicates that:

- Maintenance spend as a proportion of total expenditure is broadly independent of size, though IDBs with an income between £100-£500K do seem to have consistently high maintenance spends.
- Larger IDBs are generally more stable in their maintenance expenditure; this can be seen by less fluctuation in the smaller standard deviation limits.

This analysis was also undertaken for amalgamated and consortia IDBs (see Appendix A). These IDBs seem to have a slightly lower maintenance spend over time, with mean spend sitting around 20-30% for all types of IDBs. For consortia IDBs maintenance spend for those IDBs with an income >£100K was between 20-30%, whereas for those with an income of <£100K spend was around 40-50%.



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## 4. Dealing with Information Requests

### 4.1 Methodology from 2006 Review

The indicators used in the 2006 Review were stakeholder opinion, timely submission of the IDB1 returns to Defra and the provision of data for the National Flood and Coastal Defence Database (NFCDD) database. Statistics and conclusions were generated for IDBs as a whole.

### 4.2 Methodology used in this project

For the purposes of this study the timely submission of IDB1 returns to Defra has been reviewed. Further stakeholder consultation is outside of the remit/timescale of this study, as is assessment of the NFCDD database updates. With regard to the submission of the IDB1 returns, analysis of percentage of IDBs meeting the submission deadline from the 2006 Review has been extended to look for any trends in the timely submission of IDB1 returns, given the ongoing program of amalgamation. The timely submission of returns has been considered for IDBs of different size categories.

#### 4.2.1 Analysis of IDB1 returns

Data regarding the timely submission of IDB1 returns is summarised in Table 4.1. With the exception of the southern Environment Agency-run IDBs there have only been three missed IDB1 returns in the five years of data supplied.

**Table 4.1 Timely Submission of IDB1 Returns**

	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09
No. Forms Received (outstanding)	223	229		186	172	163
Overall	0	0	No returns data available	9(1)*	8(0)*	10(2)*
Number of outstanding returns <£100K	0	0		5(1)*	4(0)*	5(1)*
£100K - £500K	0	0		4(0)*	4(0)*	4(0)*
> £500K	0	0		0	0	1(1)*

\*Eight of these are Environment Agency run IDBs from 2006-07 onwards. The numbers in brackets reflect the number of non-Environment Agency IDBs that have not submitted returns.

Information is available from 2003-04 regarding the number of reminder letters that were sent to chase IDB1 returns. This indicated that 72% of IDBs received reminder letters (74% of <£100K; 80% £100-£500K; 44% >£500K)



## 5. Use of IT and Telemetry

### 5.1 Methodology from 2006 Review

With regard to IT, the indicators used in the 2006 Review were the availability of e-mail and computerised accounting systems. This information appears to have been gathered from the questionnaires sent out as a part of the study. Availability of e-mail access was looked at from clerks, general workforce and board members for all IDBs and additionally for IDBs in management groups, stand alone IDBs and Environment Agency administered IDBs. The use of computerised accounting systems was also analysed across the same categories.

With regard to telemetry, the indicator used was the use of telemetry for pump control across all IDBs, and also across IDBs in management groups and stand-alone IDBs. This indicator was used, because even though it is not always appropriate for every pump, and some IDBs don't operate pumps, its use correlated well with the uses of IT. This information appears to have been gathered from the questionnaires sent out as a part of the study

### 5.2 Methodology used in this project

The 2006 Review obtained its data for both IT and telemetry from a questionnaire which was distributed to all IDBs at the time of the study (2005-2006). Similar data has not been collected since and therefore, a new set of criteria was used to assess IT in this review. There was no updated telemetry information available. Therefore, an analysis looking for trends in the use of telemetry between amalgamated, independent and consortium IDBs could not be undertaken.

To assess IT use by IDBs in this review, analysis was undertaken on the number of currently operating IDB websites and the information available on them. A list of current IDBs as well as any current IDB web links is available on the Association of Drainage Boards Authority (ADA) webpage ([www.ada.org.uk](http://www.ada.org.uk)). For each IDB which currently has an operating website, a matrix was created to assess the presence or absence of information freely available to the public.

#### 5.2.1 Website Analysis

The ADA webpage contains information for 152 IDBs. Of these, 134 have links to current websites, with 107 of the IDBs included into one of 12 consortiums (see Table 5.1) and the remainder having individual websites. The total number of IDBs in the 2008/09 IDB1 returns is 163, the missing 11 IDBs are explained as follows:

- The eight Environment Agency IDBs do not have websites;
- Three IDBs (Over and Willingham IDB, Earby and Salterforth IDB and Thorngumbald DB) are not listed in the full list of IDB links on the ADA website.



**Table 5.1: Consortia Size**

Consortium	Number of Member IDBs
Bedford Group	3
Downham Market	6
Ely Group	10
Lower Aire and Don consortia of IDBs	5
Medway Internal Drainage Boards	2
Middle Level Commissioners	30
Shire Group of IDBs	24
Somerset Drainage Boards Consortium	3
Vale of Pickering	3
Water Management Alliance	5
Whittlesey Consortium of IDBs	5
York Consortium*	11

\*The ADA webpage links the Appleton, Roebuck, and Copmanthorpe IDB to the York Consortium. The York Consortium webpage however, does not mention the Appleton, Roebuck, and Copmanthorpe IDB as an affiliate. For the purposes of this review it is assumed that Appleton, Roebuck, and Copmanthorpe IDB is a new member of the consortium however as the IDB is not currently included on the consortia webpage, it has been considered to be without a website.

A general breakdown of the information found in all consortiums and single site IDBs can be seen in Table 5.2. The percentage information present represents the percentage out of the total number of IDBs with websites which have the relevant information available. The only exception to this is the “Location of Assets on Map” which represents the percentage of maps which show assets.



**Table 5.2 Information available on websites**

Criteria	Consortia = 12			Single Site =46		
	Yes	No	% Yes	Yes	No	% Yes*
Website?	12	0		27	19	
Map?	12	0	100	23	4	85
Locations of Assets on Map?	4	8	33	9	14	39
Context Info Individual IDB	9	3	75	27	0	100
Board Members Named?	11	1	92	25	2	93
Meeting dates?	12	0	100	22	5	81
Organisation chart/description?	9	3	75	17	10	63
Policy Statement?	12	0	100	19	8	70
Standing Orders?	6	6	50	13	14	48
Byelaws?	11	1	92	26	1	96
Finance?	7	5	58	19	8	70
Drainage Rates?	7	5	58	13	14	48
Maintenance Works?	8	4	67	18	9	67
Consent Form?	8	4	67	14	13	52
Complaint Procedure?	7	5	58	12	15	44
Contact Information?	12	0	100	27	0	100

\*Percentage of 27 sites found

To assess if the size of the single site IDB influenced the amount of information available on its webpage, single site IDBs were separated into three groups (<£100k, £100-£500k, and >£500k), based on their average income (Table 5.3). Key points are as follows:

- 19 of the 20 IDBs without websites fall within the single site criteria. Of these, 14 fall within the <£100k income group while the remaining five are within the £100k to £500k income group.
- All of the IDBs with incomes greater than £500K in both the single site and consortia have websites.



**Table 5.3 Single Site IDB Average Income Group Information Breakdown**

Criteria	Average Income (£)	Yes	No	% Yes
Website?*	<100K	5	14	26
	100-500k	8	5	62
	>500K	13	0	100
Map?	<100K	4	1	80
	100-500k	6	2	75
	>500K	12	1	92
Locations of Assets on Map?	<100K	2	2	50
	100-500k	3	3	50
	>500K	4	8	33
Context Info for Individual IDB	<100K	5	0	100
	100-500k	8	0	100
	>500K	13	0	100
Board Members Named?	<100K	5	0	100
	100-500k	7	1	88
	>500K	12	1	92
Meeting Dates?	<100K	5	0	100
	100-500k	7	1	88
	>500K	9	4	69
Organisation chart/description?	<100K	2	3	40
	100-500k	4	4	50
	>500K	10	3	77
Policy Statement?	<100K	2	3	40
	100-500k	5	3	63
	>500K	11	2	85
Standing Orders?	<100K	2	3	40
	100-500k	3	5	38
	>500K	7	6	54
Byelaws?	<100K	5	0	100
	100-500k	8	0	100
	>500K	12	1	92
Finance?	<100K	5	0	100
	100-500k	5	3	63
	>500K	8	5	62



Criteria	Average Income (£)	Yes	No	% Yes
Drainage Rates?	<100K	3	2	60
	100-500k	5	3	63
	>500K	5	8	38
Maintenance Works?	<100K	4	1	80
	100-500k	5	3	63
	>500K	8	5	62
Consent Form?	<100K	1	4	20
	100-500k	3	5	38
	>500K	9	4	69
Complaint Procedure?	<100K	1	4	20
	100-500k	1	7	13
	>500K	9	4	69
Contact Information?	<100K	5	0	100
	100-500k	8	0	100
	>500K	13	0	100

\*Caldicot and Wentlodge Levels IDB (Wales) is not included in any of the data provided by Defra, therefore its size is unknown and has been excluded from this table





## 6. Summary of Findings

The key findings of this study are as follows:

- **Administrative costs:** Based on the analysis presented in Figure 2.4, it can be seen that, on average, larger independent IDBs (>£500K) turnover have lower administration costs as a percentage of turnover than smaller independent IDBs (<£100K). It should be noted, however, that this is not the case for all IDBs and that there are individual examples within the dataset where smaller IDBs had lower percentage administration costs than larger IDBs. However, the key finding of this analysis is that larger IDBs have more stable administrative costs. This is partly supported by some particular examples in the amalgamated data.
- **Maintenance Costs:** Maintenance costs are subject to a large degree of fluctuation and do not appear to be consistently effected by the forming of consortia or amalgamation. There is generally less fluctuation in costs for the largest (>£500K) IDBs, but IDB income does not appear to have a significant effect on watercourse maintenance spend.
- **Dealing with information requests:** IDBs are generally good at submitting their returns to Defra, with only a couple of exceptions. Southern Environment Agency IDBs no longer return information to Defra so comparison between Environment Agency and independent IDBs is no longer possible.
- **IT and telemetry:** Consortia websites generally provided more information and were easier to navigate. Some information about most IDBs is available on line and in an accessible manner. Some smaller individual IDBs are yet to develop websites.

In conclusion the changes in the IDB sector over the last six years have been beneficial in reducing the number of smaller income IDBs and increasing the number of larger IDBs. The analysis here indicates that with regard to administrative spend these larger IDBs are likely to have a greater stability which will be of assistance in their forward planning. A longer post-amalgamation dataset will help to verify the scale of administrative savings and wider benefits from IDB amalgamation.



## Appendix A Graphs used in analysis

In CD



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