



# MIDDLE LEVEL COMMISSIONERS

MIDDLE LEVEL COMMISSIONERS  
85 WHITTLESEY ROAD, MARCH,  
CAMBRIDGESHIRE, PE15 0AH

Telephone: (01354) 653232

Fax: (01354) 659619

E-mail: [admin@middlelevel.gov.uk](mailto:admin@middlelevel.gov.uk)

[www.middlelevel.gov.uk](http://www.middlelevel.gov.uk)

---

**I.A.D. SMITH** B.A., Solicitor  
**Clerk and Chief Executive**

*Our Ref.: 8/3h*

*Your Ref.:*

27 January 2011

Dear Sir

## The Proposed Draft Scheme of Membership for the Regional Flood and Coastal Committees

The Commissioners welcome the opportunity to comment on the above consultation, whilst recognising that the majority of the issues are those in which others, particularly Lead Local Flood Authorities will have a greater interest. We have had the opportunity to read the response of the Association of Drainage Authorities with which we agree but add the following comments.

We consider it important that those appointed are knowledgeable in the role and duties of the Committee and in the role that, as members, they will have to perform.

We share the views of Cambridgeshire County Council that the Committee's role in the allocation of local funding should be specifically referred to in their objectives. This is likely to become an even more significant objective if the proposed changes to the grant in aid arrangements take effect.

The upper limit of 25 on the membership of the Committee seems arbitrary but it is recognised that the Committee must be manageable and able to properly conduct its business. We therefore do not disagree with the suggestion. While we likewise have no reason to oppose the suggestion that the Environment Agency appoint the members of the Committee, this must be through an open and transparent process and must ensure that important and relevant interests within the Committee's area are represented on the Committee. The process by which such members are to be appointed should be specified.

We also consider that, where such Boards exist, membership of the Committee should also take account of the role and importance of Internal Drainage Boards (IDB). We consider the lack of such representation at present, a major shortcoming of the present Committee. IDBs are direct contributors to the present RFDCs and will be major direct contributors to the new RFCCs. Their set up and role also gives them a very local insight, which will grow more important given the government's localism agenda and the Committee's expanded role. The role of IDBs, as partners within the Lead Local Flood Authority's local strategy and their local sources of funding also increase their relevance. The Commissioners therefore strongly feel that, in areas of the new RFCCs where there is a material IDB presence, IDB interests should be directly represented on these Committees.

Yours faithfully

*Iain Smith*

Clerk and Chief Executive