

**Future Organisational Structure  
for the  
Levels and Moors and  
Parrett Catchment**

*DRAFT*

**Prepared for the Funding Partners  
by  
Land Use Consultants**

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## EXECUTIVE SUMMARY

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This review has examined the suitability of the existing organisational structures for community liaison (in the form of the Levels and Moors Partnership and Parrett Catchment Project) to meet the needs for future strategic decisions in the Somerset Levels and Moors. Where there is a direct interrelationship the review has also considered the roles of the National Agencies (for instance the Environment Agency, English Nature and Countryside Agency) and those of central and local government.

The review concludes that both LAMP and PCP have made major contributions in easing community tensions and developing project work in the area of the Levels and Moors, but they have failed to represent the communities in a sufficiently focused way on major issues. This failure is by no means the sole responsibility of these organisations, but also reflects the difficulties that national agencies and local government sometimes have in communicating their policies and proposals.

The review concludes that all parties need to respond with a greater sense of urgency to the pressures facing the Levels and Moors over the next fifty years as a result of global warming, climate change and risks of increased flooding. This analysis has led to the following conclusions and recommendations:

### **Creating a shared understanding of the challenges and options facing the Levels and Moors**

- 1 In order to focus debate on the fundamental challenges that are emerging from the anticipated rise in sea level and increased winter rainfall, the bodies which commissioned this study should prepare and circulate an options appraisal which outlines different land use scenarios (led by the Environment Agency), and then quantifies the likely economic, social and environmental consequences arising from them (led by Somerset County Council). This work should cover the core areas of the Brue and the Parrett Catchments, including the whole of the Levels and Moors and the coastal belt.**

### **Developing integrated strategies for the Levels and Moors**

- 2 Government Agencies and local authorities (County Council, relevant district councils and parishes) should agree to integrate their policies for strategic land and water management for the Levels and Moors, including transport, infrastructure and economic development. These integrated policies must take account of, and be informed by, the views of local communities.**
- 3 In order to most effectively and transparently implement Recommendation 2, a Standing Conference should be established for the Levels and Moors to co-ordinate the development and adoption of integrated policies for the area.**

## **The continuing need for a body to represent communities on the Levels and Moors**

- 4 In order to give voice to the interests of the communities within the Levels and Moors, a single organisation should exist, drawing representatives from the six parish groups currently recognised by LAMP. In recognition of the narrower remit of this organisation (being limited to representation), it is referred to as the Somerset Levels Community Forum to distinguish it from LAMP, which it should replace.**
- 5 The Somerset Levels Community Forum should be given official recognition, as a consultee on all plans affecting the area by national agencies and local government.**
- 6 The Somerset Levels Community Forum should focus its attention on responding to the strategic issues affecting the area, and should not be directly engaged in project management of rural regeneration initiatives.**

## **Continuation of project work within the Levels and Moors**

- 7 Arrangements for promoting rural regeneration and development projects in the Levels and Moors should be re-examined by Somerset County Council, the four district councils and national agencies, in consultation with the steering groups of LAMP and PCP, to determine the most effective way of taking forward this area of work.**

**There will be a particular need to ensure that successful work currently being undertaken by LAMP and PCP is continued and in some cases expanded, albeit under different ownership.**

## **Management, financial and staffing implications**

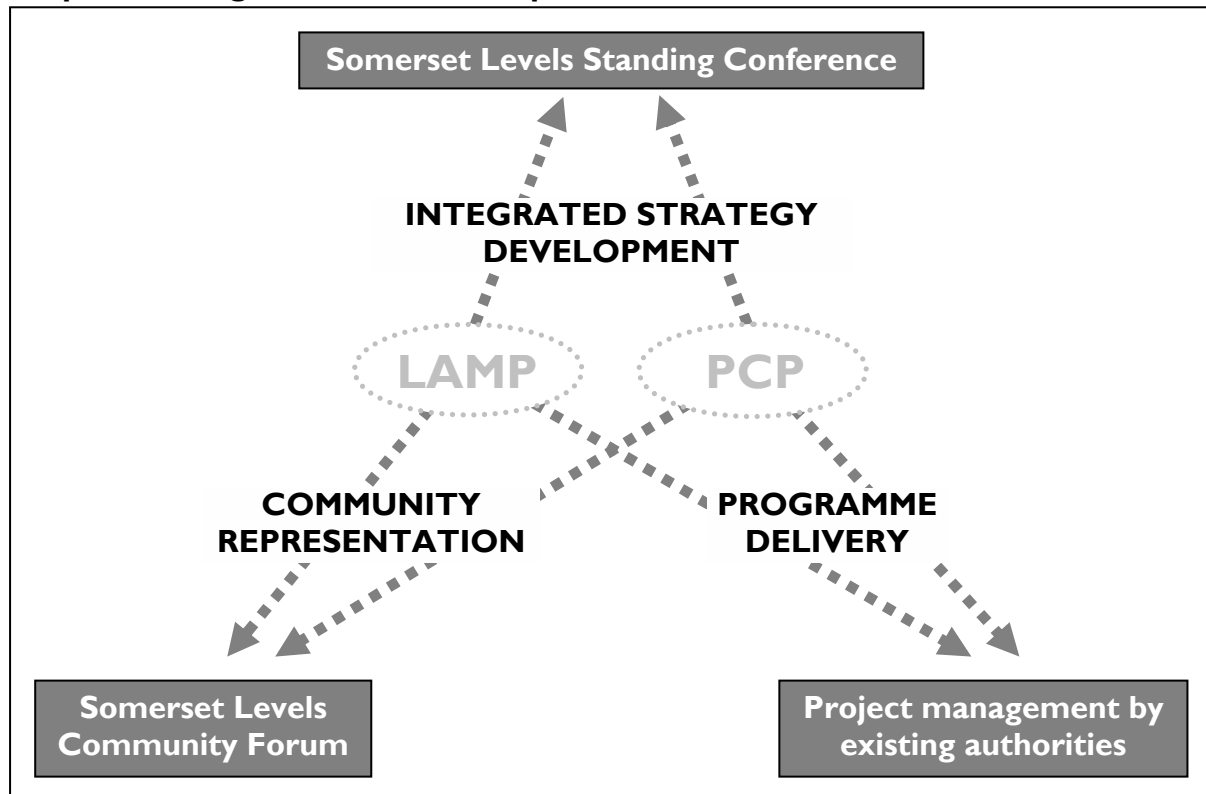
- 8 Somerset County Council should consider nominating a senior officer to act as the Executive Officer to the Standing Conference.**
- 9 Somerset County Council should appoint a Community Forum Officer to assist the SLCF executive committee and to represent the Forum in all relevant meetings and discussions about emerging policies, plans and programmes.**

**In summary**, the overall conclusion of this review is that, while LAMP and PCP have achieved much, their weaknesses stem from a blurring of the different roles that both have pursued of integrated strategy development, advocacy of particular views and delivery of programmes of work. Each of these functions is essential to the future of the Levels and Moors but there must be greater clarity about the boundaries between them. If this is done,

there should be fewer distractions and a greater focus from all parties on addressing the critical challenges that face the Levels and Moors in the next 50 years.

The recommendations of the review are therefore founded on the premise that a new organisational structure is required that separates out these functions but builds on the achievements and experience that have been developed by LAMP and PCP. These changes to the functional responsibilities currently held by LAMP and PCP are shown diagrammatically below.

#### **Proposed changes to functional responsibilities of LAMP and PCP**



If the functions of LAMP and PCP are successfully transferred in this way, the reviewers believe the objectives of these organisations will be more effectively met through the new organisational structure, at which time LAMP and PCP can therefore be wound up.





# I. THE ISSUES

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## INTRODUCTION

- I.1. This is the report of a short review into the roles, responsibilities and organisational structures of the two community based partnerships, the Parrett Catchment Project (PCP) and Levels and Moors Partnership (LAMP). The review has been commissioned by Somerset County Council, the Environment Agency, English Nature and the Rural Development Service, and conducted by Land Use Consultants during July and August 2005.
- I.2. The objective of this review has been *“To recommend future organisational arrangements for efficient and effective consultative decision making in the Parrett Catchment and Levels and Moors Areas appropriate to the study funders’ needs, both short term and to address the longer term issues, such as climate change, to create a sustainable future”*.
- I.3. The first part of this review has sought to identify the strengths and weakness of existing organisations which exist, in broad terms, to achieve an interface between local community aspirations for the future of the Somerset Levels and Moors (including the Parrett Catchment) and the responsibilities and agendas of the national agencies and local authorities, including Somerset County Council and four district councils. The two organisations are the Levels and Moors Partnership (LAMP), which has existed since 1995, and the Parrett Catchment Partnership which was created in 2001.
- I.4. The second part of the study has entailed thinking about the sorts of options that might be pursued in future to improve the effectiveness of these organisations or other structures that might replace them.
- I.5. Land Use Consultants has played a role in various aspects of the work of both the Levels and Moors Partnership and the Parrett Catchment Partnership over a number of years. As a result the company cannot be described as totally independent. On the other hand our close association with the area does help to ensure that the complex interrelationships between its social economic and environmental characteristics are reasonably well understood. The review team from Land Use Consultants has comprised Peter Nelson and Robert Deane, both of whom have worked within the area and are familiar with the background issues.

## THE NATURE OF CURRENT CONCERNS

- I.6. One of the features of the Somerset Levels and Moors is the directness with which people express their feelings, and this approach has been followed in this report. There are clearly a number of worries and concerns about the way that existing organisational arrangements operate both from the standpoint of the national agencies and local authorities and from the communities and interested parties. These concerns are examined in detail in **Chapter 3**, but are briefly introduced here in order to establish the context for the review.

- 1.7. The commissioning bodies explained their reasons for initiating the study in the following terms:

### **The Parrett Catchment Project**

- The Parrett Catchment Project will reach the end of its current JAF funding by March 2005. This raises the question of whether or not to maintain the Partnership in its present form, to disband it or to continue its work under a modified structure.
- PCP has been a valuable catalyst and pilot for new ideas about whole catchment management, and the benefits have fully justified its role and existence to date, but some feel the organisation has become preoccupied with experimentation on small scale water management on farms, with the result that the returns, in terms of flood prevention and regulation, have not justified the high investment in staff time or cost. (This situation has been aggravated by excessively cumbersome contractual arrangements for minor works).
- It is argued by some that certain interest groups have become increasingly focussed on specific issues like the case for the Parrett Sluice, and are pursuing single objectives rather than considering the wider needs of the area.
- English Nature has withdrawn from the Partnership because it found that the current focus and direction of Partnership is not assisting its own objectives of achieving favourable conditions in the statutory nature conservation areas.
- Difficulties have arisen in relating the work of water and land management and biodiversity enhancement in the lower floodplain to those in the wider catchment.

### **The Levels and Moors Partnership**

- The Levels and Moors Partnership has served a number of roles over the last ten years, including coordination of responses to planning documents, facilitation of debates over farming, land and water management and nature conservation and the promotion of local tourism and cultural projects.
- There is a widely held view that the Levels and Moors Project, under instruction from the Partnership, has spread its resources too thinly and has sometimes overreached itself. It is also said that the Partnership does not represent the collective voice of the area but a number of factional interests.
- The Partnership has concentrated its attention over the last three years on seeking to achieve a special status for the area of the Somerset Levels and Moors. (Some argue that this status is not deserved on the grounds that there are other large low-lying parts of the United Kingdom with the same qualities, but there are also strong champions for the view that the levels have a unique character. Land Use Consultants undertook a detailed study of

recognition options in 1999 which presented the case for pursuing special recognition modelled on the French Natural Regional Parks).

- Efforts to secure a Man and Biosphere award in 2004 (which would have attracted substantial international funding) proved controversial, with both the agencies and authorities and the Partnership itself feeling strongly that a break-down in communications, which undoubtedly occurred, was not of their making.
- The collapse of the Man and Biosphere bid and resignation of the Levels and Moors Project Officer has left the organisation feeling rudderless and uncertain about its own future.

- I.8. The reviewers have held a number of meetings on a one-to one basis with members of both Partnerships and with the Agencies and Local Government at which all of these topics have been explored. Understandably each individual holds their own opinion about the strengths and weaknesses and the factors influencing success or failure of particular initiatives. This report therefore represents an amalgam of views, and it is doubtful whether any of the summaries of the relative strengths and weaknesses of the two organisations (or the agencies themselves) will be universally accepted. Nevertheless the review team has sought to present an objective record of stakeholders' opinions in the first part of the report, and it is only in the sections dealing with future challenges and conclusions and recommendations that the Consultants have expressed their own opinions.
- I.9. A list of the people who have contributed their experience and views to this review is given in an Appendix to this report.



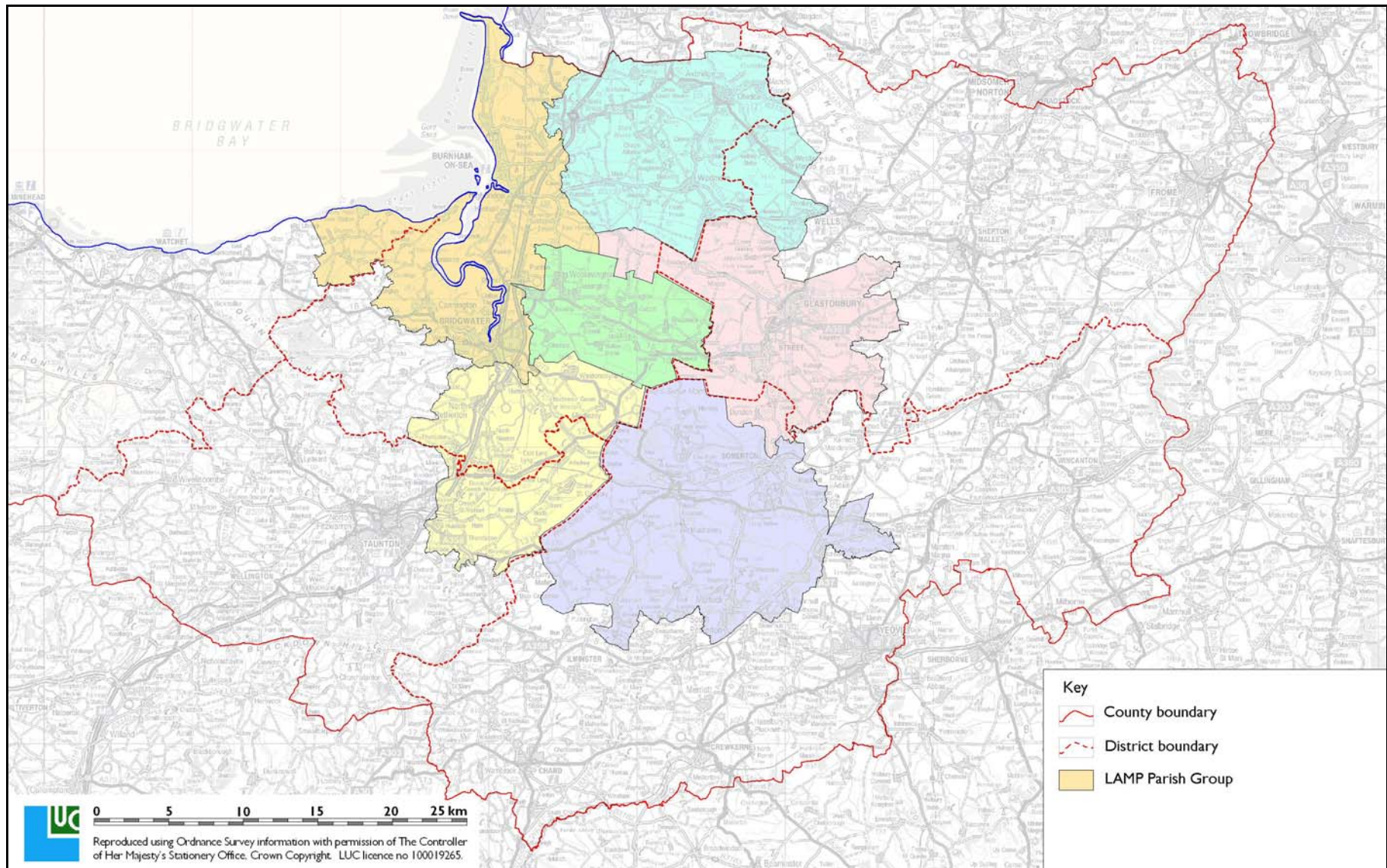
## 2. CONTEXT

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### INTRODUCTION

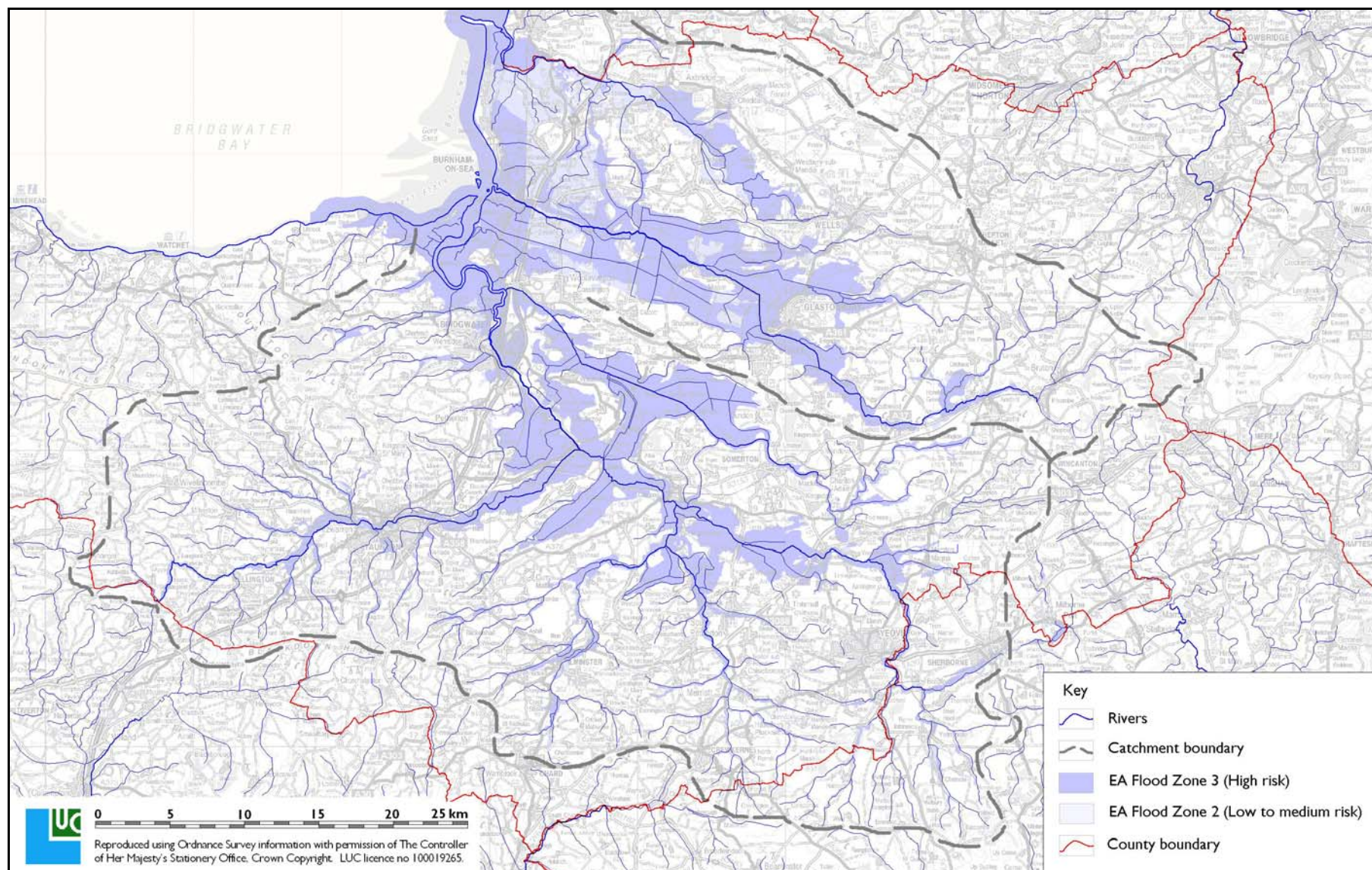
- 2.1. Before describing the nature of the two organisations it is helpful to provide a brief overview of the area of study. This consists in its broadest terms of the entire catchments of the River Brue and River Parrett which together make up most of Somerset (see **Figure 2.1**). Within this broad area attention is focussed on the low lying core which is prone to frequent flooding (see **Figure 2.2**). The core area is often referred to locally as the Somerset Levels, although it is actually made up of two distinct land types; the Levels which constitute a low bank of sands and silt running parallel to the coast, and the inland Moors which are linked to the sea by rivers confined within raised embankments.
- 2.2. The Levels and Moors are divided into a northern (Brue) and southern (Parrett) zone by the low lying Polden Hills.
- 2.3. Most of the Levels lie at or below sea level, and were it not for constant human intervention (through drainage works and canalisation of the rivers since medieval times) these areas would experience frequent saline and freshwater inundation. Flooding in the northern zone is restricted by the existence of a tidal sluice, but the Parrett is unconstrained. This river and its tributaries often overflow after prolonged periods of heavy rain, and the scale of flooding is increased with high tides.
- 2.4. The long history of land and water management has resulted in extensive wetlands (predominantly of seasonally flooded meadows and pastures) which are of high nature conservation value in spite of their artificial nature (see **Figure 2.3**), and a pattern of livestock grazing which responds to the carefully managed water regime with raised water levels and splash flooding in early summer and pumping in winter to reduce the impact of flooding. Conflicts have arisen in the past between landowners, farmers and the conservation bodies over the precise requirements for water management, and many of the Sites of Special Scientific Interest (SSSI) remain in an unfavourable condition. In recent years, however, amalgamation of the local drainage boards and the availability of higher grant levels, amongst other things, has brought about more effective management.
- 2.5. The Levels and Moors have been inhabited since prehistoric times, giving rise to extensive archaeological remains in the form of wooden tracks and lakeside dwellings. Historical legends, such as those of King Arthur associated with Glastonbury, and real events such as the dissolution of the monasteries, add interest to the local culture. Today most inhabitants live in villages on low mounds or ridges of higher ground around the perimeter of the Levels. There are, however some 2-3000 people who live below the level of the river systems and who are particularly vulnerable to flooding.

**Figure 2.1. Administrative boundaries, showing the LAMP Parish Groups**



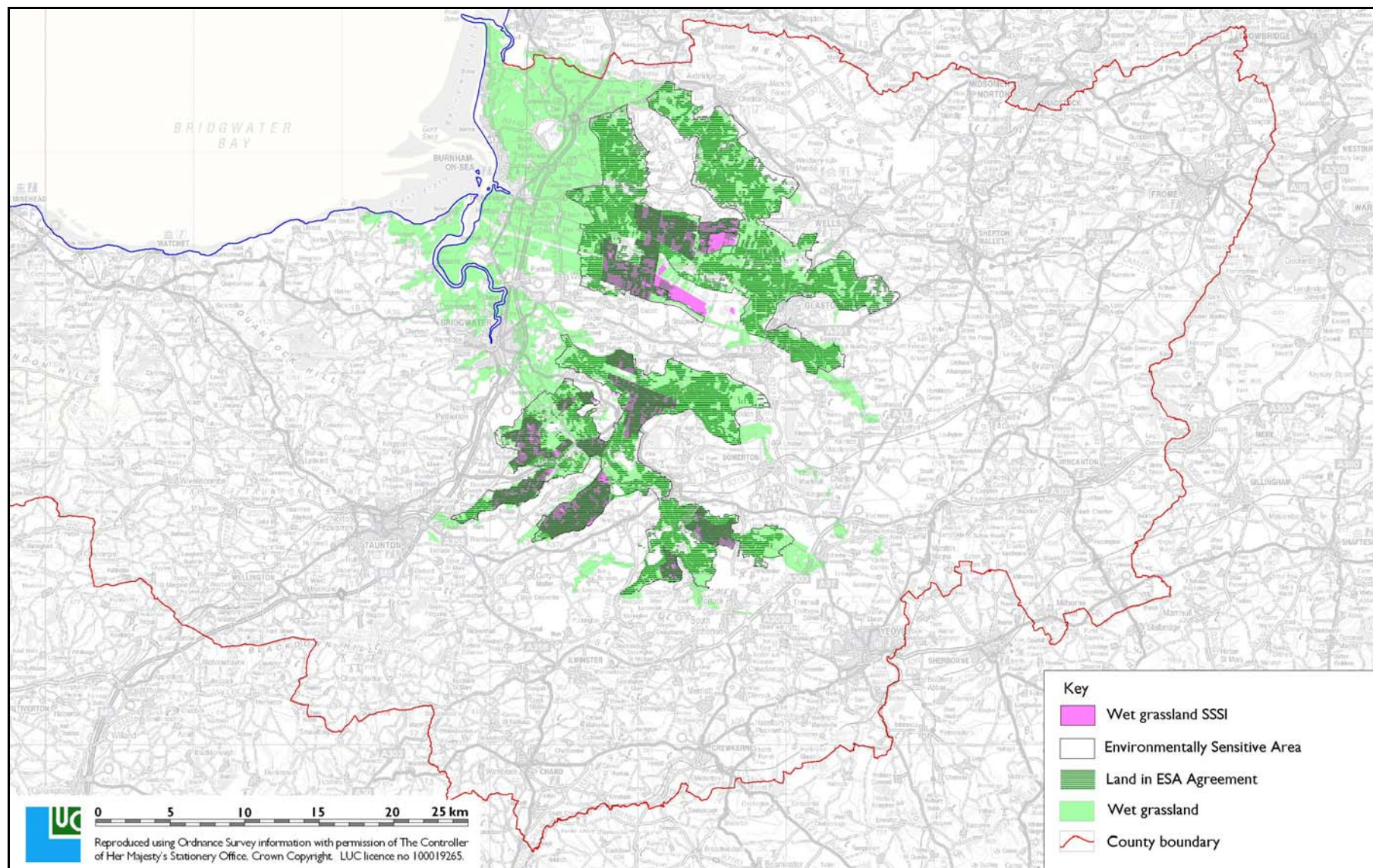


**Figure 2.2. Hydrology**





**Figure 2.3. Environmental designations**





## ORIGINS AND ASPIRATIONS OF LAMP

- 2.6. LAMP has a long pedigree which can be traced back at least as far as the controversy surrounding the designation of the Sites of Special Scientific Interest on the Levels in the early 1980s. Concern about the antipathy of local residents and landowners towards the objectives of public bodies, and the failure of these public bodies to engage with local people, led to the 1984 Somerset Levels and Moors Strategy and Framework. This established the Countryside Forum<sup>1</sup> as an innovative approach to co-ordinating agency activities and consulting with local interests.
- 2.7. The Levels and Moors Project, staffed by a project officer and funded by the County Council (and, until 1997, the Countryside Commission), was set up to support the Countryside Forum and to deliver a programme of work agreed by the Group Manager of Countryside Services in the County Council. To avoid confusion in the rest of this paper, the Levels and Moors Project is referred to in full, whereas the Levels and Moors Partnership is referred to as LAMP.
- 2.8. By 1993, when a group of rural planning professionals from the United States and Canada (under the North America/United Kingdom Countryside Stewardship Exchange or CSE) were invited to Somerset to look at the way the Levels and Moors were being managed, the effectiveness of the Countryside Forum was being questioned. The CSE team commented in their report that the Forum has *“a lack of a well-defined and consensual programme and goals”*. The team recommended that it was *“extremely important that the Levels and Moors have a single organisation to bring together the various citizens, governmental and non-governmental interest and to play a major role in policy development, co-ordination and implementation”*.
- 2.9. Following a consultation paper drawn up by the County Council<sup>2</sup>, LAMP was established in 1995. LAMP covers an area of 99,850 ha (29% of Somerset) and includes over 86 parishes plus Bridgwater town, as shown in Figure 2.1. In April 2001 the area had a population of 160,898 (32% of Somerset’s population).
- 2.10. LAMP has a four tiered structure. The six parish groups each elect their Parish Representatives, who must be a Parish Councillor, and all the parishes meet annually as the Parishes Council Forum which elects its own Chairman. At the core of LAMP is the Partnership Steering Group which consists of the six Parish Representatives, four District Council members and two County Council members. The Steering Group meets six times a year. The full Partnership consists of 18 voting members (representatives of local authorities, communities and statutory bodies) and a wider group of non-voting members (representatives of advisory and interest groups). The Partnership meets twice a year, and its meetings are open to the public. The Steering Group and Partnership is chaired by an independent person who is appointed annually by the Steering Group. The final tier of LAMP consists of two more

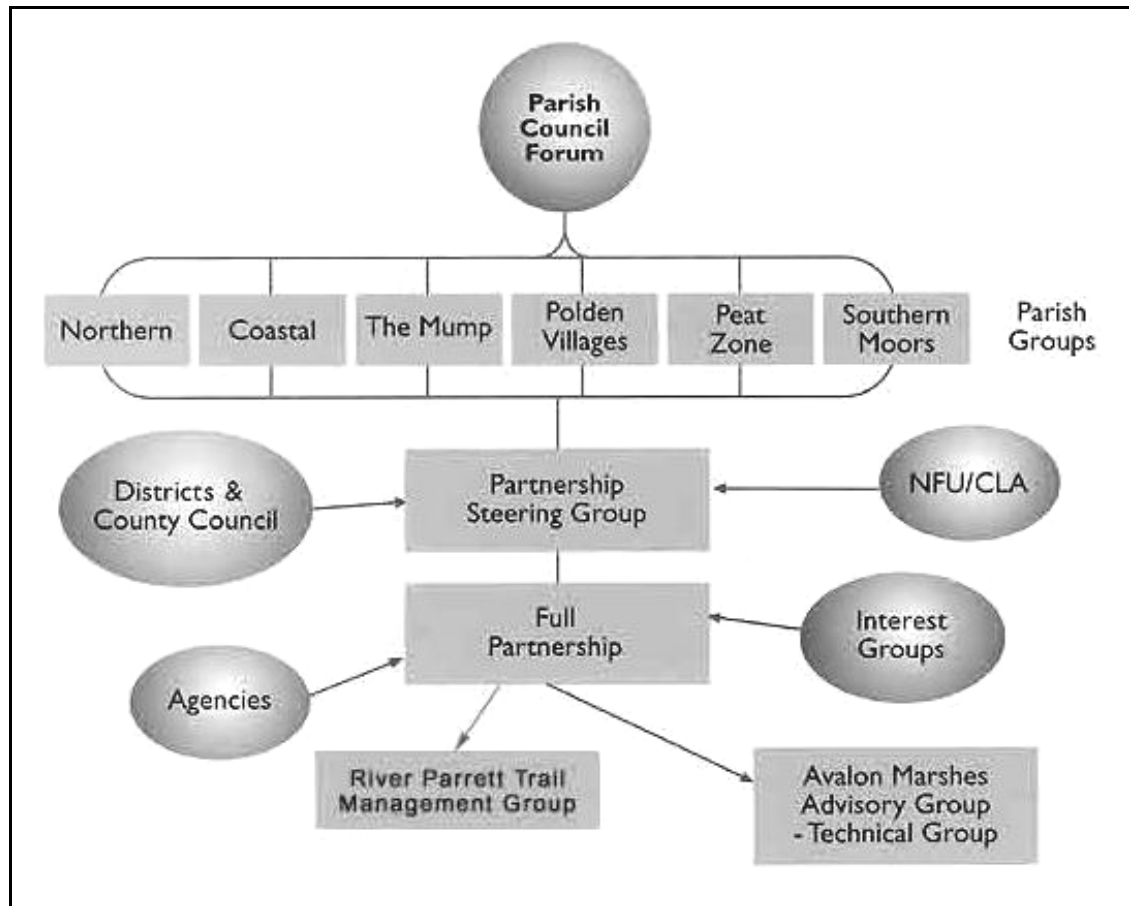
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<sup>1</sup> The Countryside Forum was chaired by Somerset County Council and consisted of MAFF, the Nature Conservancy Council, National Rivers Authority, Countryside Commission and NGOs including the National Farmers’ Union, Country Landowners Association and Somerset Wildlife Trusts. Meetings, which were not open to the public, were held twice a year.

<sup>2</sup> SCC, 1994. *The Somerset Levels and Moors – The Future: A review of needs, consultation, and management structures and proposals for a Joint Committee.*

technical groups established to advise on particular programmes of work conducted by the County Council and its partners under the Levels and Moors Project<sup>3</sup>. This structure is shown in **Figure 2.4**.

**Figure 2.4. The Structure of LAMP**



Source: [www.somersetlevels.com](http://www.somersetlevels.com)

- 2.11. LAMP is serviced by the Levels and Moors Project staff who are based in their own office at Moorlynch.
- 2.12. The draft constitution and operation of LAMP<sup>4</sup> states that its aim is “to promote the wise management of the Levels and Moors, and the understanding, enjoyment and celebration of this unique working landscape by local people and visitors”. The draft constitution also states that “LAMP has a rural focus and aims to assist all parishes, businesses and land managers with:
  - the recognition of the Levels and Moors as a distinct ‘Cultural Landscape’
  - the wise management of land, water and environmental assets within the ‘Cultural Landscape’ of the Levels and Moors
  - getting the maximum benefits from public funding for farming, conservation and heritage work – encouraging co-ordination under a common vision

<sup>3</sup> These projects are the River Parrett Trail and the Avalon Marshes project.

<sup>4</sup> This paper exists as a first draft dated 16 July 2003 put together by the Levels and Moors Project officer.

- *promoting 'Levels and Moors' products and services through local branding and marketing initiatives*
  - *supporting local communities and businesses in their efforts to develop 'green tourism' initiatives which bring new income to rural areas and protect environmental assets valued locally*
  - *enabling local communities to influence policies and decisions which affect their well-being, local economy and environment".*
- 2.13. It is significant that these aims do not encompass issues such as flood defence or the management of land to achieve environmental objectives. Nor does the draft constitution see LAMP having a role *"to bring together the various citizens, governmental and non-governmental interest and to play a major role in policy development, co-ordination and implementation"* as envisaged by the CSE team in 1994. Rather it focussed on the socio-economic development of the Levels and Moors and seeks to provide a democratic force to influence the policies and actions of other bodies.

## **ORIGINS AND ASPIRATIONS OF PCP**

- 2.14. The River Parrett is 59 km long. Its main tributaries include the rivers Tone, Isle, Carey and Yeo. The Parrett catchment is the largest river-system in Somerset covering half the county (1690 sq km).
- 2.15. The summer floods of 1997, which left large areas of the moors flooded for many weeks, and the severe flooding of 1999/2000 which threatened to inundate Taunton and Bridgwater, were a catalyst for an analytical approach to the hydrology and land management of the Parrett catchment. At a conference in November 2000 the Minister for Environment, Elliot Morley, laid down a challenge to the agencies, authorities and landowners in Somerset to demonstrate that by working together they could find long term solutions to the flood defence problems of the Parrett Catchment.
- 2.16. This led to the formation of the Parrett Catchment Project in 2000. The project was essentially a pilot with two linked overall objectives:
1. To develop and demonstrate to other catchments facing similar issues integrated models of water management across the whole catchment, taking account of rates of water run-off from land, water storage in soils, ponds and rivers and the release of water out into the sea.
  2. To demonstrate how landowners and communities outside the area at most risk of flooding can work together to improve water management (and, in doing so, to provide wider environmental and social benefits).
- 2.17. The PCP is a partnership of 27 organisations whose interests, activities and agendas span every aspect of life in the catchment. The PCP's management group consists of representatives from the ten core organisations, which contribute to the project.
- 2.18. In 2002, after intensive research into funding programmes and projects, PCP elected to join three Dutch water boards and one German water board under a European project called the 'Joint Approach for Managing Flooding' (JAF). JAF is funded by the European Regional Development Fund through the Interreg IIIb Community Initiative.

- 2.19. The PCP was granted £650,000 for prescribed work over a three-year period. This sum has been 50% match-funded by the Environment Agency and the other funding partners. Somerset County Council became the signatory to JAF on behalf of the PCP.
- 2.20. PCP's action plan identifies 12 components under three headings that the project seeks to address. These are shown in **Figure 2.5**.

**Figure 2.5. The Twelve Components of the Parrett Catchment Project**

<b>Rural</b>	<ol style="list-style-type: none"> <li>1. Changes to agricultural land management</li> <li>2. Creating temporary flood storage areas on farmland</li> <li>3. Creating new wetland habitats</li> <li>4. Woodland Development</li> </ol>
<b>Water</b>	<ol style="list-style-type: none"> <li>5. Dredging and maintaining river channels</li> <li>6. Raising riverbanks</li> <li>7. Upgrading pumping stations</li> <li>8. Spreading floodwater across the moors</li> <li>9. Building a tidal sluice or barrier downstream of Bridgwater</li> <li>10. Upgrading channels to enhance gravity drainage</li> </ol>
<b>Urban</b>	<ol style="list-style-type: none"> <li>11. Controlling runoff from development</li> <li>12. Restricting new development on the floodplain</li> </ol>

- 2.21. PCP's website<sup>5</sup> also describes its work under headings of:

**Research and discussion** – to develop new and innovative technical solutions to reduce flooding and achieve environmental and social benefits.

**Lobbying** - to lobby appropriate authorities to ensure that their policies and rules facilitate, rather than constrain, PCP's work. PCP's lobbying groups include a Sustainable Drainage Systems (SuDS) group, a Woodland Development Group, a Monitoring Group and a JAF Local Coordination Group.

**Demonstration projects** – particularly the Farming Water project which aims to test and demonstrate techniques that could help to reduce prolonged and deep flooding.

**Facilitating communication and raising awareness** - to achieve efficient communication between stakeholders, interest groups and the general public through awareness-raising events, public and stakeholder participatory forums and publications.

<sup>5</sup> [www.somerset.gov.uk/somerset/ete/pcp](http://www.somerset.gov.uk/somerset/ete/pcp)

### 3. REVIEW OF STRENGTHS AND WEAKNESSES OF LAMP AND PCP

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#### INTRODUCTION

- 3.1. This section examines the track record of PCP and LAMP in terms of their tangible outputs as well as the outcomes reported by consultees. However, both of these partnerships exist because of other organisations' interests and agendas, and the successes and failures of the two bodies can only be seen in a true light if the attitudes and reactions of the major agencies are also taken into account.

#### THE PERFORMANCE OF LAMP

- 3.2. This section summarises the relative strengths and weaknesses of LAMP, grouped under the headings of:
- Goals and objectives
  - Democratic representation
  - External influence
  - Organisation and management
- 3.3. It is followed by a commentary on these strengths and weaknesses, drawing out key conclusions.

#### Goals And Objectives (Role And Purpose)

Strengths	Weaknesses
<ul style="list-style-type: none"><li>• <b>LAMP has always been visionary</b> in its approach (setting out aspirations for the Levels and Moors)</li><li>• <b>LAMP has achieved its objectives in terms of engaging the local communities</b></li></ul>	<ul style="list-style-type: none"><li>• The organisation has sometimes <b>taken on more than it can deliver</b>, leading to raised expectations which are then disappointed</li><li>• LAMP has sometimes pursued <b>too wide a range of goals</b> with the risk of appearing to lack focus and direction</li><li>• The organisation has sometimes been <b>overambitious</b> in terms of its own capacity to deliver projects</li></ul>

## Democratic Representation

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>• <b>Parish member elections work well</b> ( ahead of the movement to include Parish representatives in AONBs and National Parks)</li> <li>• There is <b>no obvious duplication of effort between LAMP Parish reps' and District councillors'</b> roles and responsibilities</li> <li>• <b>A good network exists</b> – working best at the informal level</li> <li>• <b>Strong support for local socio-economic and cultural initiatives</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Lack of strategic focus</b> means that members do not always speak with one voice</li> <li>• <b>Lack of corporate responsibility</b> – Members of LAMP may advocate one view internally but express quite different opinions at other fora</li> <li>• <b>Influence is limited in terms of strategic planning</b>, because this is not an area in which the officers have sought to lead the organisation</li> </ul>

## External Influence

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>• Existence of LAMP has proved advantageous in terms of <b>attracting funding</b> into the area. (Its status as a community-based and voluntary organisation is helpful in generating new projects)</li> <li>• Through <b>twinning arrangements</b> with similar initiatives in France and <b>involvement in EC programmes</b>, LAMP has gained a level of international recognition</li> </ul>	<ul style="list-style-type: none"> <li>• LAMP is sometimes seen by national bodies as <b>representing factional interests rather than the common good</b></li> <li>• LAMP is often viewed as being <b>parochial and unable to focus on the big picture</b> – preferring to work on local rather than sub-regional or even regional and national issues</li> </ul>

## Organisation and Management

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>• Has always relied on <b>capacity of lead officer</b> and <b>voluntary efforts</b> of steering group members</li> <li>• Actively <b>engages communities</b> in local initiatives</li> <li>• Has a <b>local project base</b> within the heart of the Levels and Moors</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Has over-stretched itself at times</b></li> <li>• <b>Has not always enjoyed the full support of the County Council and other funding partners</b>, even though it is largely financed by the County Council</li> </ul>

### **Commentary by the reviewers**

- 3.4. LAMP's outputs can be broadly divided into those involved in developing an inclusive partnership of interests, including local representation, and the management of programmes of work, whether these were initiated by LAMP or undertaken on behalf of other bodies.

### ***Partnership and representation***

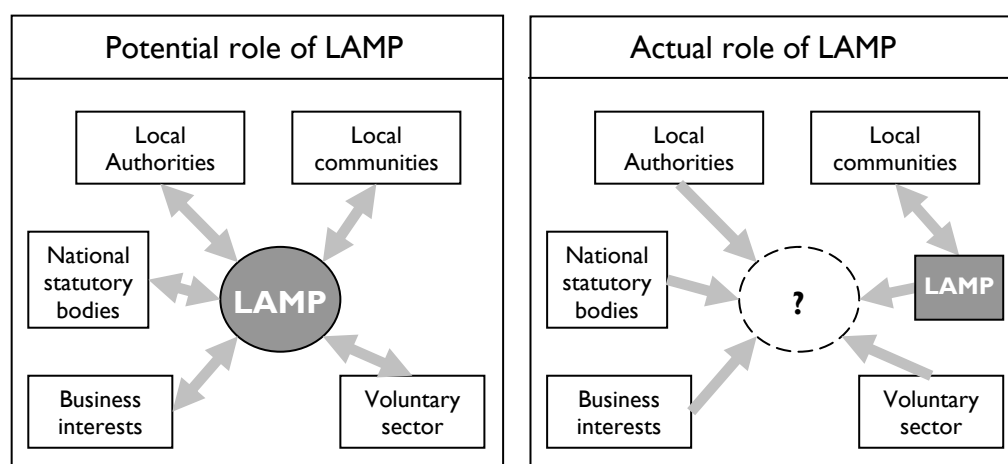
- 3.5. Given the history of a lack of engagement between local people and the national agencies on the Levels and Moors, there has been a clear challenge for LAMP to provide a conduit for inclusive and engaged debate and agreement over policy development and delivery. As one consultee put it *"LAMP's existence is evidence of the historic failure of the other layers of local government to adequately come to terms with the area's needs"*. There are a number of different relationships that must be developed successfully for LAMP to fill this gap. This leads us to conclude that local communities should accept the role of LAMP as a co-ordinating body, and the elected parish representatives must give their active commitment to liaise with their parish councils. There is evidence that LAMP has been working towards this objective, and there is now an acceptance that LAMP forms a valuable role in representing the distinctive interests of the third of Somerset's population living in the area straddling the four districts. As noted further below, any concerns that LAMP parish representatives might duplicate or frustrate the work of Council or District Councillors appears not to have been realised.
- 3.6. In our view it is clear that the local authorities and national agencies should accept that the Levels and Moors are a distinct area with special needs and deserving a co-ordinated approach to policy delivery. These authorities and agencies must have the flexibility at the local level to adapt their programmes of work to provide this integrated approach, taking account not only of the programme objectives of other authorities and agencies but also of the objectives developed by the local community.
- 3.7. Local community representatives and LAMP staff comment that this has not occurred, particularly in relation to the national agencies, with the result that LAMP has been perceived as representing local interests against, or in spite of, the objectives of these national agencies. This tension between LAMP and the agencies is referred to again below.
- 3.8. There appear to be several reasons for this lack of recognition of the authority of LAMP by agencies and authorities.
- Firstly, without a formal designation or other statutory recognition, there has been no mechanism for these bodies to 'do different' in the Levels and Moors. The issue of special recognition is covered further below.
  - Secondly, several consultees commented that the agencies, particularly the Environment Agency and English Nature, lack a strong institutional approach to engagement and consultation with local communities in their own policy development and delivery.

- Thirdly, although the local authorities have certainly shown a strong recognition and commitment towards the special needs of the Levels and Moors, the same cannot always be said for the concept of LAMP itself. Although, the County Council has hosted and provided the majority of LAMP's funding, it is surprising that the Council has allowed LAMP to operate under its aegis without formally confirming its constitution or the Memorandum of Understanding with its other funding local authorities. This has meant that senior SCC and District Council staff have sometimes been unsure of the long term strategic commitment of their authorities towards LAMP. This failure suggests a lack of 'connectedness', and perhaps even a lack of commitment, from successive political administrations towards the objectives of LAMP itself. This may be partly because of concern that LAMP's separate democratic structure in some senses competes with the democratic structure of the Councils (although in reality LAMP parish representatives have often been District councillors and in this respect this study has found no evidence of tensions between the different roles).
- 3.9. It is understandable that the local authorities, particularly LAMP's chief sponsor, the County Council, should be wary about adopting ongoing responsibilities that go beyond their statutory duties, particularly involving a disparate partnership of other interests. However, consultees to this study pointed out that Somerset's local authorities have previously accepted the role of 'honest broker' in bringing together the local communities and national agencies on the Levels and Moors. They also suggest that none of the other organisations have either the trust of all parties or the statutory powers of 'general well-being' that allow them to intervene in this way.
  - 3.10. Another important conclusion is that LAMP, or any equivalent organisation, should demonstrate, through the operation of its Steering Group, full Partnership and the Parish Forum, an awareness of regional and national policy objectives. This is the corollary to the lack of recognition of the special needs of the Levels and Moors by the national agencies. As noted in Chapter 2, LAMP arose to address the mistrust of the local communities towards national agencies. It is therefore important that LAMP is able to address this by helping to communicate to local communities the way in which national and regional policy programmes impact on the area. It is significant that this purpose is not evident in the draft constitution and operation of LAMP (16 July 2003 version), nor does it appear to have been given much emphasis in the work of LAMP.
  - 3.11. The Levels and Moors Project officer acknowledged that insufficient time has been allocated to briefing the parish representatives through a formal induction and updating programme. Instead, there is stronger weight given to helping local communities to influence other organisation's policies. This has given rise to the perception by other bodies that LAMP acts as a pressure group for local community interests rather than as a forum to bring agencies together with local interests. As one consultee put it "*LAMP has gone native*".
  - 3.12. **Conclusion: LAMP has not succeeded as a partnership in the sense it was intended. While it has strengthened the sense of identity and community amongst the parishes, it has failed to connect sufficiently with the wider agencies and authorities. The failure of LAMP to occupy the central**



ground between the disparate interests in the Levels and Moors is illustrated in Figure 3.1. Nevertheless, there is strong support for LAMP's role in providing a democratic framework and logistical support to representation of local community interests in a way that has not been achieved adequately by the formal tiers of local government.

**Figure 3.1. The role of LAMP in policy development and co-ordination**



### ***Development of programmes of work***

- 3.13. Through the resources made available to the Levels and Moors Project by the County Council, LAMP has been able to develop its own initiatives and projects and to take responsibility for running projects on behalf of other bodies. A formal evaluation of these activities is outside the scope of this study, but initial comment can be made based on the views received from consultees.
- 3.14. LAMP has stimulated and supported community-based initiatives through the **employment of parish assistants** (who have provided officer support to the elected parish representatives) and by offering small **capital grants** to community groups.
- 3.15. The **Avalon Moors Project** was one of the earliest initiatives of the Levels and Moors Project, but activity has diminished significantly in recent years. It has been steered under its own Avalon Moors Advisory Group which, since LAMP was established, has answered to the LAMP Steering Group. It is recognised as having been a success.
- 3.16. A programme of work to **improve the droves** (the raised trackways across the moors used communally by graziers to provide access for their stock) took place during the late 1990s but is now understood to be complete. This work was deemed a success.
- 3.17. Since 2001 LAMP has received grant aid from the Local Heritage Initiative<sup>6</sup> to develop and run three projects celebrating distinctive land-based industries. These are the **Somerset Peat Heritage Project, Celebrating Somerset's Willow Industry**

<sup>6</sup> This used money from the Heritage Lottery Fund, managed by the Countryside Agency.

**Project** and **Somerset Apple Villages Project**, each of which ran for about two years. They sought to record and celebrate the heritage of these distinctive land uses and how they have affected the lives of local people. Outputs have included booklets, interpretation panels, mobile displays which have toured local villages, open days and workshops. The information collected is archived at the Somerset Rural Life Museum in Glastonbury.

- 3.18. A complementary theme has been the promotion of **sustainable tourism** which has been delivered by a member of staff in the Levels and Moors Project working with the tourist information centres and through distinct projects.
- 3.19. LAMP has hosted a number of projects for which it has acted as the managing agent on behalf of other partner bodies. These include the **River Parrett Trail** project (funded by Somerset and Dorset County Councils and the four Districts that the trail passes through), which has involved the management and promotion of the River Parrett Trail and its accompanying arts features, and the **Pedal the Levels** project, based around the long distance cycle routes. Since each of these projects have been steered by their own group of funders rather than under the aegis of the LAMP Steering Group, it might be considered that these projects have been hosted by the Levels and Moors Project (in the form of office accommodation and staff management) rather than by LAMP, as a representative body. However, it is significant that the Memorandum of Understanding between the local authorities funding the River Parrett Trail project names the host as LAMP not the Levels and Moors Project. This may reflect a confusion between the different roles of the Levels and Moors Project and LAMP.
- 3.20. LAMP has worked to support projects being led by a variety of other partners, such as Somerset Food Links to establish the Somerset Producers Club, local authorities over Rights of Way Improvement Plans and the creation of permissive routes, and with District Councils and equestrian businesses to support the Horses and Tourism in Somerset (HATS) project. Again this element of LAMP's work, using the resources of the Level and Moors Project, has been deemed successful.
- 3.21. The pursuit of '**special recognition**' for the Levels and Moors has been a major theme of work for LAMP and the Levels and Moors Project in recent years. Following the decision by the Country Agency at a national level not to create any new Areas of Outstanding Natural Beauty, the LAMP Steering Group has spent several years considering the suitability of different formal and less formal designations. Based on consultants' recommendations in March 1999<sup>7</sup>, the Steering Group decided to pursue the Unesco designation of 'Man and Biosphere Reserve' but this has found little favour with the agencies and authorities. The agencies claim that they were not kept informed by LAMP of its work in relation to the Man and Biosphere Reserve status, and were unable to raise their concerns about the suitability of this designation until faced with a *fait accompli* by the LAMP Steering Group. This lack of liaison and consultation is disputed by the Steering Group who point to the lack of engagement by the agencies and authorities in their work. The inability to reach agreement about the most appropriate designation (or indeed the need for a special designation) is now regarded by many consultees to this review as

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<sup>7</sup> Land Use Consultants, 1999. *The Somerset Levels and Moors: Study of recognition options*.

a significant failing of LAMP, although there is disagreement about where the blame lays.

- 3.22. Ironically recent developments such as the multi-agency project to pursue favourable status of the SSSIs on the Levels and Moors and the implementation of the Somerset Leader + Programme have increased the profile of the Levels and Moors and reduced the need for special recognition.
- 3.23. **Conclusions: LAMP has used the Levels and Moors Project to undertake a range of activities under its own direction, often successfully using funding from external sources, and has hosted project on behalf of others. It appears that there has been confusion between the role of the Levels and Moors Project, whose staff are managed by Somerset County Council, and LAMP, which as a partnership provides the strategic guidance to much (but not all) of the Project's work.**
- 3.24. **While most of this work has been judged a success, the unsuccessful pursuit (to date) of special recognition status has been a major distraction to LAMP's other recent work. It remains to be seen whether the need to demonstrate, and gain commitment from statutory authorities for, the distinctive needs of the Levels and Moors requires the adoption of a formal 'off the peg' designation, or whether this outcome can be achieved through mutual agreement.**

## THE PERFORMANCE OF PCP

- 3.25. This section follows the same format as that for LAMP, summarising PCP's strengths and weaknesses under headings of
  - Goals and objectives
  - Stakeholder involvement and partnership working
  - Strategy development
  - Policy delivery
  - Project management
- 3.26. This is followed by a commentary leading to conclusions.

### Goals And Objectives (Role And Purpose)

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>PCP vision and Action Strategy, developed with <b>extensive stakeholder involvement</b>, takes long term and <b>integrated approach</b> to catchment management planning</li> </ul>	<ul style="list-style-type: none"> <li>No clear exit strategy developed</li> </ul>

## Stakeholder involvement and partnership working

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>• <b>Partnership working</b> has gained widespread support for work, especially from landowners, that might not have been supported if undertaken by a single agency</li> <li>• District Council members (Anne Fraser, Patrick Palmer and David House) on the stakeholder group have ensured <b>strong representation of community interests</b>.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>'Hard to reach' landowners</b> still difficult to engage with because they are less involved with stakeholder groups (e.g. FWAG, NFU, CLA)</li> <li>• Possible criticism that <b>PCP has not sought to lead opinion</b> (has sought to retain support of the majority). PCP is not keen to become an advocate e.g. for special status of Levels and Moors</li> <li>• <b>Sporadic attendance of some partners</b> suggests less engaged involvement in programme delivery</li> </ul>

## Strategy development

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>• <b>PCP's documented vision and framework</b> of 12 components have changed the nature of the debate about flood risk management in Somerset</li> <li>• <b>PCP's approach is potentially available to other catchments</b> and for rolling out WFD</li> <li>• PCP claims to have <b>influenced regional / national policy development</b>, e.g. inclusion of flood risk reduction as secondary objective of HLS</li> </ul>	<ul style="list-style-type: none"> <li>• Partnership became <b>less involved in strategic work</b> once staff became focussed on delivering the JAF funded work</li> <li>• <b>Issue of the Parrett Sluice</b> has been allowed to become divisive between the partners</li> </ul>

## Policy delivery

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>• Demonstrated that farmers in upper catchment can be influenced to adopt <b>positive land management</b> to reduce flooding in lower catchment</li> <li>• <b>Resources of Environment Agency used effectively</b> to deliver key components of project (for instance river dredging and maintenance of flood defence structures)</li> <li>• Relatively <b>narrow focus</b> of project (water management and environmental benefit of this) has allowed more progress than if broader front had been opened.</li> <li>• Annual River Festivals and other public facing activities deemed a <b>success in raising public awareness</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>No technical evaluation of impacts</b> of activity on flooding (yet). Requires complex modelling for impacts to be proved</li> <li>• <b>Lack of funding</b> available for work with farmers from Countryside Stewardship despite several applications put forward. Expected to change under ES.</li> <li>• Project has <b>not addressed fundamental water management issues</b> in the lower catchment (i.e. who gets the floodwater)</li> <li>• Focus on delivery has <b>diverted attention from strategic thinking</b></li> </ul>

## Project management

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>• <b>Effective management</b> of EU Interreg IIIb project, matching PCP partners funding</li> <li>• <b>Slimline project management</b> compared to EA's complex management structures</li> <li>• <b>Effective use of FWAG</b>, under service level agreement, to deliver key project outputs</li> </ul>	<ul style="list-style-type: none"> <li>• <b>A slow start</b> which delayed implementation (due to engagement of a diverse partnership and development of expertise by SCC secretariat in managing complex engineering projects)</li> <li>• <b>Ineffective use of some resources</b>, particularly in relation to development of plans for flood storage ponds</li> </ul>

### **Commentary by the reviewers**

- 3.27. This section adopts a similar structure to that used for the commentary on LAMP, distinguishing between PCP's work to build an inclusive partnership for strategy development and the implementation of its programmes of work. Since the ending of the JAF funding in March 2006 is a key issue for this study, the 'conclusions' paragraphs in this section consider how the withdrawal of this source of funding will impact on the project's achievements.

### **Partnership working**

- 3.28. From the outset PCP has sought to be innovative in taking a whole catchment approach to solving flood and water management issues in the lower catchment. While the project relied on developing technically sound solutions (i.e. an evidence based understanding of water flows and storage), its success has always depended on the extent to which it is able to engage the interested parties who need to fund and implement the agreed programmes of work.
- 3.29. Four distinct interests can be distinguished in the partnership. These are:
- the public authorities (national agencies and local authorities) responsible for funding the project and/or for supporting and taking on board policy recommendations developed by PCP;
  - the land managers and others in the upper catchment who need to adopt many of the measures developed by the project for it to be successful;
  - the land managers, IDB's and communities in the lower catchment most at risk from flooding who, it was hoped, will be beneficiaries of PCP's work; and
  - the wider business community, user groups and voluntary environmental bodies whose support and advice would demonstrate that wider environmental, social and economic benefits were being achieved.
- 3.30. It is significant that, although PCP has developed a detailed vision and action plan, no formal constitution or terms of reference have been drawn up for the partnership itself. Nor has the Memorandum of Understanding between the funding bodies been formally signed by all of them. This may not be necessary for the successful operation of the project (in one sense it is admirable that the project has focussed on its intended outcomes rather than its internal structures). It is likely that a change in key project personnel during the project is responsible for the MOU not being signed off.
- 3.31. Despite this misgiving over the formal arrangements underpinning the partnership, it would appear that the partnership has generally worked well. A key success has been gaining the confidence of land managers in the upper catchment, exemplified by the chairing of the partnership by the NFU's Regional Director and by the success of the advisory work undertaken by FWAG (considered further below).

- 3.32. A notable hitch in the partnership this year has been the withdrawal by English Nature from partnership meetings (but not its funding). This reflects English Nature's concern over the role of the partnership as an advocate of a tidal sluice across the Parrett. Nevertheless, English Nature remains strongly in support of PCP's overall objectives. Should the project continue beyond the end of the JAF funding in March 2006, it will be important that this situation is resolved and that English Nature is able to rejoin partnership meetings.
- 3.33. Several consultees suggested that PCP had not been successful in maintaining the confidence of land owners in the lower catchment, particularly those in the areas most frequently threatened with flooding such as Curry and North Moors. It might be argued that by seeking long term catchment-wide solutions to flooding, the project had reduced the focus on the need for more immediate resolution of issues such as where water is stored when flooding occurs and the impact this has on farming and on roads. The relatively dry winters experienced in the last two years have probably reduced the imperative for these issues to be addressed.
- 3.34. The change in focus of the partnership's work brought about by the receipt of JAF funding was commented on by several people. Whereas the initial period of the project was involved in developing an overall strategy and priorities for action by partners, the work of the partnership became increasingly dominated by PCP's own delivery of the JAF programme. Some of the partners, particularly those such as the community interests and some NGOs who were not involved in this delivery regretted this change, commenting that it is important that the partnership is able to return to its more strategic approach as the JAF funding comes to an end.
- 3.35. **Conclusions: The project has been largely successful in bringing together a partnership of previously disparate interests to focus on the issue of water management and flood alleviation across the whole catchment, although there is ongoing evidence of tensions between the expectations on the project from land owners, particularly those in the areas most at risk from flooding, and statutory bodies. Several partners regretted the change of emphasis in the partnership's work from developing and advocating a strategic overview of priorities to the delivery, of the JAF funded programme, and want to see this coupled with a return to the earlier strategic work, as evidenced by PCP's Vision and twelve component themes.**
- 3.36. **Looking to the future, it is likely that the partnership can continue to be serviced without the need for JAF funding (assuming one of the partners is willing to cover the costs of the secretariat) and that the partnership could continue to develop and advocate the strategic approach to flood alleviation. However there is a danger that without the focus of activity that, in the last three years, has been provided by the project's grant aided programmes, the project would become less relevant to many of the partners, particularly the landowners who want to see evidence of action on the ground. This suggests that the PCP partnership would be unlikely to survive in its current form without a new focus being found to bring partners together. This focus could either be provided by a single source**

**of funding to underpin the programme of work, or by high level commitments being given by all the relevant statutory authorities that the PCP's objectives will be pursued through their own programmes.**

***Project delivery – technical solutions***

- 3.37. Just as PCP has aimed to be innovative in terms of its catchment wide partnership approach, so it has sought to pioneer new practical approaches to reducing flood water flows.
- 3.38. Of the twelve components for action originally developed as part of the PCP action plan (see Figure 2.5), it is significant that the project has been most closely involved in implementing the four components under the 'Rural' heading (particularly through the 'Farming Water' programme discussed later in this section). The six components identified under the 'Water' heading have been largely undertaken by the Environment Agency through their programmes of river dredging and maintenance of flood defence structures. The Environment Agency's contribution towards achieving the objectives set by PCP would therefore appear to be considerable (although empirical proof of the effectiveness of this work must await a formal technical evaluation). The final two components of PCP's action plan, under the 'Urban' heading, have been delivered by PCP principally through awareness raising, considered further below.
- 3.39. The area of the PCP's own work that consultees considered to have been most successful has been the advisory work contracted to FWAG to encourage land managers to adopt practical soil and crop and habitat husbandry measures that reduce peak flood flows while also maximising environmental benefits. A total of XX farmers have been visited, managing a total area of XX ha. (info sought from FWAG)
- 3.40. A technical assessment, requiring complex modelling, is necessary before the actual impact of this farm advisory work on reducing flooding can be assessed. Nevertheless, the project appears to have succeeded in demonstrating that farmers in the upper parts of a catchment can be encouraged to adopt practices that will have wider benefits to the catchment as a whole, as well as to their local environment. A key lesson has been that farmers will only adopt new practices if they are convinced that the issue is relevant to them and their activity will make an overall difference. At a national level, while PCP's farm advisory work has been acknowledged by Defra as a positive contribution to policy development and delivery mechanisms, it has not provided sufficiently robust evidence that such approaches are cost effective in reducing flooding.
- 3.41. A constraint on the effectiveness of PCP's work with farmers has been a lack of grant funding for project work, particularly for developing the ambitious sub-catchment scale trial of changing land use that was initially planned and for establishing 'wet woodlands'. The project put together applications for Countryside Stewardship Scheme funding, but these were not approved because the benefits would not have matched the objectives of the scheme. The Rural Development Service have commented that the broader objectives of the Higher Level Stewardship Scheme, which include resource protection and flood alleviation (the latter as a secondary



objective), should mean that work of this nature could be potentially eligible under the new scheme.

- 3.42. Consultees to this review considered that the other key part of the 'Farming Water' programme, that of creating of flood storage ponds, has been less successful. This is partly because, in order to make a significant impact on reducing peak flows of flood water, the project would need to build many hundreds of small farm ponds, or create a few much larger storage areas. This was clearly never the intention of the project, which sought to demonstrate the potential through a small number of pilots. Nevertheless, so far the project has been successful in creating only one small flood storage area and progress on other works has been slow. Consultees suggested that better continuity of project management (i.e. a single contact point who is closely involved throughout) and more consistent communication with landowners and other partners would have improved the situation.
- 3.43. The initial priority in the project to developing the partnership and agreeing the vision and action plan, perhaps coupled with an underestimate of the time needed to develop even small engineering projects, meant that progress with this area of work has been slow. The County Council secretariat in their Environment Department lacked experience of managing engineering projects, and an engineer with a long experience of the area was taken on by the project to do this. While PCP has not been encumbered by the complex administrative procedures considered necessary by the Environment Agency<sup>8</sup>, consultees still felt that the engineering projects have not been conducted efficiently.
- 3.44. **Conclusions: Practical work to test out engineering and land management solutions to flooding issues has formed a major part of PCP's activities, with the Environment Agency's ongoing work and PCP's own Farming Water programme being the major elements of this. In the absence of technical evaluations of the effectiveness of this work, it is difficult to conclude on the success of this part of the project. However, there is a strong consensus that the farm advisory work undertaken by FWAG has been successful and that the works conducted by the Environment Agency are a significant improvement on previous practice. The piloting of farm storage ponds has been less effective.**
- 3.45. **While the completion of JAF funding should make no difference to the Environment Agency's work, it will bring the current contract with FWAG to an end. If this work is to continue it will be necessary for new funding to be found, possibly from more than one partner. It is also possible that funding from Defra or Natural England (if it were obtained) would require a change in objectives, such as a focus on improving water quality rather than reducing quantity.**

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<sup>8</sup> Although the regulatory requirements of the Reservoirs and Water Acts (in relation to design specifications for dams and the need for abstraction licences respectively) have had to be followed and have been a constraint.

### ***Project delivery – raising awareness***

- 3.46. As noted above, several of the project's component themes have involved raising awareness of best practice or, where this is not known, of stimulating informed debate about flood alleviation practices amongst land managers, planners and developers and the public generally. Key activities have been the river festivals held in Langport, Taunton and Bridgwater, the 'Big Sponge' campaign to encourage the public to adopt small-scale flood storage practices, the production of a leaflet for developers on Sustainable Drainage Systems (SUDS), work with schools including the school ponds grant scheme and holding an annual 'PCP in Practice' event.
- 3.47. It will be very difficult for the project or any independent evaluation to assess the practical impacts of this work. Many of the changes in practice sought by the project (such as the use of water butts or creation of garden ponds by the public) have been widely dispersed and small scale. Nevertheless, consultees to this review commented that the project had frequently had a high public profile and felt that the project had been successful in raising its objectives in the the public consciousness.
- 3.48. **Conclusions: With the proviso that firm evidence of the impact of the project's awareness raising work on flood risks has yet to be generated, there is a strong consensus that the awareness raising aspects of PCP's work have been successful. The cost of running high profile events such as the River Festival and catchment roadshows is considerable and would require a replacement to the JAF funding if they are to continue. However, influencing the programmes of partner organisations and raising public interest through press releases and small media events are probably achievable using the more modest costs that might be forthcoming from partner organisations.**
- 3.49. **A final overall conclusion on the future of PCP is pertinent. It is important to distinguish between the continuation of the partnership as an entity and the furtherance of its objectives and outputs. Although, as stated above, the partnership has been successful, there appears to be no overwhelming appetite from stakeholders that the partnership should be continued for its own sake. Instead, the primary objective should be that the concepts pioneered by the project – that of an inclusive and integrated approach to catchment management – should be continued and that funding should be found to maintain the more successful programmes of work. Whatever future is created for PCP's work will therefore require a continuation of the joint working of the relevant statutory authorities with the full involvement of business and community interests, but not necessarily the rolling on of the PCP under a single funding programme.**

## 4. CHALLENGES FOR THE FUTURE

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### INTRODUCTION

- 4.1. The launch of the Parrett Catchment Project followed an initial appraisal of the strategic options for the management of the southern part of the Levels and Moors over a fifty year time horizon. The resulting strategy focuses on the short to medium term, with plans to strengthen river banks and flood defences, reduce the risk of saline flooding by building a sluice, reducing river runoff through more effective water retention measures in the upper catchment areas and minimising the adverse effects of unavoidable flooding by distributing water more equitably over the floodplain.
- 4.2. In parallel with improved water management for flood control purposes, PCP has also been assisting with more effective water and land management to deliver biodiversity objectives for the key conservation areas.
- 4.3. Less concern has existed over the impact of flooding in the northern part of the Levels and Moors, because the combination of excessive runoff from the upper catchment combined with high tides has less impact on the capacity of the river system to store flood water within its banks.
- 4.4. However, projections about the scale of climate change which could occur over the next 50-100 years have been revised quite significantly over the last five years, and this makes it expedient for all interested parties to revisit some of the initial assumptions and to debate the policy measures that should be followed in the years ahead.

### CLIMATE CHANGE

- 4.5. Evidence of climate change is becoming more apparent with every year that passes. The UK Climate Impacts Programme published four scenarios in 2002, of which the most extreme predicted a summer temperature increase of 5°C in the South West by 2080 coupled with up to 50% less summer rainfall and up to 25% more winter rainfall. The prediction suggests up to twice as many winter depressions affecting the region by the 2050s, and sea level rise of between 30 and 50 cm by 2100.
- 4.6. The Secretary of State, Margaret Beckett, noted when attending the Defra South West Regional Climate Change Conference (31 January 2005), that the region could expect to see *“an increased risk of both river and urban flooding with winters wetter by 5-15% by the 2050’s”*<sup>9</sup>
- 4.7. Such climatic changes will prompt many other responses in both the natural environment and in social and economic conditions. Maintenance of maritime and temperate habitats and species that are at or near their southern limits will become increasingly difficult, and the current targets for nature conservation in the Somerset wetlands may need radical revision. Traditional livestock grazing could be affected by

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<sup>9</sup> Source: ‘Warming to the idea – Meeting the challenge of climate change in the South West’, South West Climate Change Impacts Partnership

drought and increased heat stress. Approaches towards building design would need modification to combat extremes of temperature<sup>10</sup>.

- 4.8. Not all of the changes would be adverse. In some areas (principally the upper catchment of the Brue and Parrett) increased crop yields would follow with new varieties of maize and sunflower, and tourism should expand with the extended summer season.
- 4.9. All of these factors need to be considered in the round, however, and incorporated in the policies, plans and strategies of the different agencies and arms of government.

## **FLOOD MANAGEMENT**

- 4.10. Of all the issues to be considered, the prospect of significantly higher rates of runoff in winter, and sea level rise by potentially 30 centimetres in 50-80 years with increased risks of annual flooding, will need very careful attention. For those people living in the flood risk zones of the Levels and Moors their desire to be protected from such disaster is self evident, but if conditions do continue to worsen in the manner predicted the time may ultimately arrive when the traditional approaches of reducing flood risk by building sluices, raising river banks and spreading floodwater across open moorland has to be questioned. This is not to suggest that technical solutions could not be found, but that the costs could far exceed the benefits. There would be the strongest incentives to continue to protect the main urban areas and infrastructure including road and rail communications, but safeguarding outlying and sparsely populated rural areas would be harder to justify.
- 4.11. Abandoning, or modifying, parts of the inland flood defences would result in semi-permanent flooding of some areas below sea level and the creation of freshwater or brackish lagoons. New vegetation and wildlife habitats would evolve in such areas over time, and new economic uses could be developed to compensate for the loss of agricultural land.
- 4.12. This scenario has been presented not with the intention of provoking controversy, but with the aim of illustrating the strategic nature of the decisions that will need to be taken within the next generation. It will be argued later in this report that it is vital that the right forum and organisations exist to allow those debates to happen constructively.

## **COMMUNITY COHESION**

- 4.13. The third challenge identified in this report is the need to maintain the cohesion of the communities that make up the Levels and Moors. This will not be as easy to achieve as one might think. Traditionally, the villages of the Levels and Moors were almost totally dependent on local economic activities including cattle farming, cider making, fishing, leather production, osier growing and peat cutting. As a result they were self contained, inward looking and, to the outside world, insular and parochial in their outlook. Today, the social and economic mix is increasingly diverse. Many people travel to work in neighbouring urban centres and some, but by no means all,

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<sup>10</sup> Source: Dr Richard Betts, Hadley Centre for Climate Prediction and Research, Met office, Exeter April 2005

of the traditional industries are in decline. The changing demography and socio-economic character of the communities does not necessarily mean a weakening of people's perceptions of the special character of the place. Indeed, new residents may be more articulate and concerned to preserve what they regard as the special qualities of their environment and community than longer term residents. However, there tends to be an increasingly wide diversity of views. This makes it increasingly difficult for community representatives to express the views of the community as a whole. However, given the other strategic challenges discussed above, there is a clear need to support and develop those channels of communication which work most effectively.

## **TAKING ACTION TO MEET THE CHALLENGES**

- 4.14. The existence of LAMP and the PCP are evidence of the foresight and vision that has been shown in the past in coming up with new ways of tackling challenges and opportunities within the Levels and Moors. However, there is a real concern amongst many of those who have been interviewed that the bigger picture often gets lost in the minutia of day to day activities of both organisations. The Parrett Catchment Partnership has, for example, expended a great deal of effort in building small scale engineering structures to hold back a limited amount of flood water while failing to resolve the key issue of apportioning the much larger floods downstream. At the same time LAMP has pursued local cultural and tourism projects which many would argue should not be the main focus of its existence.
- 4.15. Having said this, similar criticisms can be levied at the national agencies and at local government, which many would say have failed to clarify their agendas and prioritise actions that need to be taken at a strategic level across the area.
- 4.16. The review team believes that there are compelling reasons for treating the Levels and Moors as an important and distinctive area which should be given effective recognition by the County Council and national agencies through their own policies and work programmes. The reviewers also consider that there is a need for greater dialogue and engagement between the national agencies, the County Council, District Councils and the local communities in planning the area's long term future in a coordinated manner.



## 5. POLICY DRIVERS

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### INTRODUCTION

- 5.1. Chapter 4 outlined a number of the challenges which face the Levels and Moors over the next 50 years. This section summarises some of the key elements of national policy that will help to shape the response and provide the mechanisms for dealing with land and water management at a practical level.

### FAVOURABLE CONDITION

- 5.2. The international significance of the 914 ha of wet grassland that is designated as the Somerset Levels and Moors Special Protection Area (plus a further 836 ha of Sites of Special Scientific Interest not designated as SPA) will continue to be a key driver of water level management in these areas, influencing wider land drainage and flood protection activity.
- 5.3. The Government's Public Service Agreement (PSA) target with Defra (which English Nature is responsible for implementing) sets the challenging target of bringing 95% of SSSIs into recovering or favourable biological condition by 2010. The rigorous way in which nature conservation objectives are set for each unit of each SSSI, and the way in which the condition is assessed against these objectives provides a robust structure for action.
- 5.4. Latest data<sup>11</sup> (July 2005) based on assessments made in the last three years show that 58% of the SSSI area in the Levels and Moors are in unfavourable condition with no change, 10% is in unfavourable but recovering condition and 32% are in favourable condition. This shows that, in common with most SSSIs in England, those in the Levels and Moors are a long way from reaching the Government's PSA target. There are a variety of reasons for the unfavourable condition, shown in **Table 5.1**. Inappropriate land drainage and agricultural management account for the majority of land in unfavourable condition.

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<sup>11</sup> [www.english-nature.org.uk/special/sssi/reportIndex.cfm](http://www.english-nature.org.uk/special/sssi/reportIndex.cfm), based on analysis of data for the Catcott Edington And Chilton Moors, Curry And Hay Moors, King's Sedgemoor, Langmead And Weston Level, Moorlinch, North Moor, Shapwick Heath, Southlake Moor, Street Heath, Tealham and Tadham Moors, West Moor, West Sedgemoor, Westhay Heath, Westhay Moor and Wet Moor SSSIs.

**Table 5.1. Reasons for unfavourable status of Levels and Moors SSSIs**

Reasons for unfavourable status	% of all SSSI land	Reasons for unfavourable status	% of all SSSI land
Drainage	42.3%	Inappropriate cutting/mowing	1.0%
Fertiliser use	31.0%	Vehicles - other	0.8%
Water pollution - agriculture/run off	17.2%	Pesticide/herbicide use	0.6%
Agriculture - other	8.7%	Water pollution - discharge	0.4%
Inappropriate water levels	4.5%	Public access/disturbance	0.4%
Inappropriate CSS/ESA prescription	4.4%	Vehicles - illicit	0.3%
Peat extraction	3.0%	Inappropriate weed control	0.2%
Undergrazing	2.1%	Overgrazing	0.1%
Inappropriate ditch management	1.2%		

Source: [www.english-nature.org.uk/special/sssi/reportIndex.cfm](http://www.english-nature.org.uk/special/sssi/reportIndex.cfm). Note: totals exceed 100% because more than one reason may be given for unfavourable status on each SSSI unit.

- 5.5. The achievement of favourable status is a key driver of policy for several other bodies, including the Rural Development Agency over the allocation of agri-environment agreements (the Somerset Levels and Moors ESA and, from 2005, Environmental Stewardship), the Environment Agency over their maintenance of flood defence structures and the Internal Drainage Boards who are responsible for drawing up and implementing water level management plans. The coming together of these bodies with English Nature at the end of 2004 to create a multi-agency partnership to achieve favourable status, and the decision by Defra to offer 100% capital funding for water level management structures, indicates a new urgency and priority being given to this issue which has been widely welcomed.
- 5.6. Several consultees to this study have recognised that in the medium to long term climate change will pose a major challenge to the conservation of the SSSIs. The conservation objectives for all of the SSSIs are currently to maintain the sites as lowland neutral wet grassland with splash flooding during the summer period. However, the threat of prolonged periods of deeper summer flooding and of periodic saline inundation will probably make these objectives untenable. Looking beyond the current PSA target date of 2010, there will be a need for public debate about the nature conservation objectives that should be pursued on the Levels and Moors. This will require consideration of land that is currently outside the SSSIs. Indeed it is possible that the SSSI designations themselves will need to be reconsidered if the nature of the land changes significantly as a result of increased flooding (and other climate induced changes such as rising temperatures).
- 5.7. **Conclusions: The pursuit of favourable nature conservation status for the SSSIs on the Levels and Moors currently provides a clear and welcome policy framework for these areas. Although, like most SSSIs in England, they are currently a long way from reaching their target condition, good progress is now being made. However, in the medium to long term, rising sea levels and climate change will require a substantial re-evaluation of the conservation objectives of the SSSIs and the wider area of environmentally valuable wet grassland. This will require a period of public debate involving all stakeholders.**



## NATURAL ENGLAND

- 5.8. The creation of the new integrating agency, Natural England, which will combine the work of English Nature, the Rural Development Service and the landscape, access and recreation branches of the Countryside Agency, is due to take place in October 2006 (recently brought forward from January 2007). This should ensure a simpler and more co-ordinated approach to delivering protection and conservation of the areas biodiversity and landscape.
- 5.9. Of the three agencies forming Natural England, English Nature and the Rural Development Service have been active in the two core areas of SSSIs and the Environmentally Sensitive Area, respectively. The Countryside Agency, while taking a close interest in the potential for special recognition of the area, has maintained a more arms-length relationship, preferring to part-fund the Levels and Moors Project until 1997 and more recently helping to fund research into special recognition.
- 5.10. Although it is likely that Natural England will give increased priority to communicating its objectives to local communities, it remains to be seen how much it will be actively involved in policy development and delivery outside the core areas of SSSIs and land in the ESA and Higher Level Stewardship scheme<sup>12</sup>. It should be noted that the South West Rural Development Agency will be taking over responsibility for the socio-economic measures of the Rural Development Plan from the Rural Development Service in January 2007, when the new Rural Development Plan is due to come into force.
- 5.11. **Conclusions: The creation of Natural England should enable more integrated policy delivery in the Levels and Moors. However, it remains to be seen how far Natural England will wish to influence policy outside its core areas of responsibility, which will be the SSSIs and areas in the higher level agri-environment schemes.**

## WATER FRAMEWORK DIRECTIVE

- 5.12. The EC Water Framework Directive is the most significant piece of European water legislation for over 20 years. It places obligations on EU Member States to report on, and where necessary improve, the condition of water quality in defined 'River Basin Districts'. In the UK the Environment Agency is charged with developing and reporting on River Basin Management Plans that will guide a programme of Measures undertaken by a variety of agencies to correct situations where surface or ground waters are not in good condition. These measures will include existing statutory controls as well as supplementary measures, most of which are probably already in place (such as the rural development schemes) but some which will need to be developed.
- 5.13. The Parrett and Brue catchments fall within the South West River Basin District (which includes all of Cornwall, Devon and Dorset, most of Somerset and parts of

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<sup>12</sup> While Natural England will be involved in running Entry Level Stewardship over a much wider area, the relatively untargeted and generic nature of this scheme makes it unlikely that it will require detailed strategic work at the scale of the Levels and Moors.

Wiltshire and Hampshire). Significantly, the Axe catchment falls into the Severn River Basin District (which extends into Shropshire and Warwickshire).

- 5.14. The timescale for the development of these Plans and measures is a relatively long one (the first round of reporting on River Basin status must be completed by 2005). However, the Directive will ensure that planning at a catchment scale will increasingly be the way in which Defra addresses water quality and management issues, and it is likely to influence the direction of other policies such as the Rural Development Programme and environmental management conditions ('cross compliance') applied to farmers receiving the CAP Single Payment.
- 5.15. The catchment focus of the PCP and its successful piloting of voluntary land management activities suggests that the Levels and Moors could provide useful lessons for the Environment Agency to draw on nationally (particularly in other large agricultural catchments facing significant flooding issues such as the River Ouse in Yorkshire and the Medway in Kent).
- 5.16. A critical issue for the Environment Agency is that the Directive requires significant levels of public consultation over the development of the Plans, something that the Agency has relatively little experience of at the level of local communities. The Agency is committed to working with existing community networks, rather than seeking to establish new networks or groupings, as shown in the quote below from its Framework for Stakeholder Engagement, which is part of its Strategy for River Basin Planning, Water for life and livelihoods.

*"Local engagement will also contribute to planning at the catchment level, focussing particularly on areas where there is a serious risk that the objectives of the WFD will not be met or where there is already conflict. In these cases, we want local communities to discuss problems and their potential solutions. We are developing experience of involving communities in looking at local river management problems, through research projects in different parts of England and Wales. Engagement will be issue-led and proportionate to the scale of the problems. It is envisaged the information generated, including proposals for appropriate measures, will be fed upwards into the Catchment Framework or RBMP as appropriate.*

*We do not intend to create new formal arrangements at this level. The emphasis will be on working with existing stakeholder networks. This is likely to strengthen these networks and enhance their capacity for action. However we are concerned that where networks do not exist or are in conflict, and there is a risk that all stakeholder interests may not be taken into consideration, alternative mechanisms for participation should be provided. This is especially important to ensure equity of representation for sectors with legitimate interests who have not been involved in the past".*

- 5.17. Although the public consultation aspect of PCP has not been particularly well-developed, the community structure of LAMP could provide opportunities for the Agency to use in the Levels and Moors. The LAMP model of electing parish representatives is partially mirrored by the arrangements for electing parish members of National Park Authorities and the two AONBs that have adopted Conservation Boards (the Cotswolds and Chilterns). It could therefore provide a model for other large catchments spanning a number of regions and local authority boundaries.
- 5.18. **Conclusions: The integrated catchment management planning required by the EC Water Framework Directive will be increasingly central to the**

work of the Environment Agency and will influence the work of other agencies. The experience gained so far in the Parrett Catchment should prove useful to the Agency nationally. The Agency is committed to new levels of engagement with local communities, and will seek to work with existing community networks rather than establish new consultation structures.

## **GOVERNMENT STRATEGY FOR FLOOD AND COASTAL EROSION RISK MANAGEMENT IN ENGLAND**

- 5.19. In its recent response<sup>13</sup> to the autumn 2004 consultation “Making space for Water”, the Government has given a commitment to develop, over a 20 year period a new holistic strategy to managing flooding and coastal erosion in England. Much of this will be achieved by adopting the whole catchment approach required by the Water Framework Directive, and the involvement of stakeholders will also be central to the develop of integrated policies and programmes of work.
- 5.20. Significantly, the Government states that it will “*work towards giving the Environment Agency an overarching strategic overview across all flooding and coastal erosion risks*”. This is likely to involve the Agency adopting a more active role in land use planning which will be addressed as part of the forthcoming review of Planning Policy Note (PPG) 25 (‘Development and Flood Risk’).
- 5.21. **Conclusions: The development of the Government’s new strategy for flood and coastal erosion risk management in England will provide the Environment Agency with a wider role, particularly in relation to land use planning.**

## **REFORM OF THE CAP AND RURAL DEVELOPMENT PROGRAMMES**

- 5.22. The way that land is managed for agriculture will continue to be important in Somerset and has a bearing on this study.
- 5.23. The replacement of the range of production-related agricultural subsidy schemes with the ‘decoupled’ Single Payment Scheme will undoubtedly have a significant impact on agricultural land use in the study area. The incentive for farmers to grow crops or keep stock on land that is agriculturally marginal is now much less than it was, with the exception of farmers in agri-environment agreements who have agreed to manage land for environmental purposes.
- 5.24. Farming organisations are predicting a significant decline in the number of livestock, particularly breeding beef herds, in the next few years as farmers adjust to the new subsidy regime. Environmental organisations have expressed concern that it may become more difficult to find suitable graziers to manage grassland sites of high environmental value.

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<sup>13</sup> Defra, 2005. *Making space for water: Taking forward a new Government strategy for flood and coastal erosion risk management in England*. March 2005

- 5.25. Without the stabilising influence of price support and export subsidies, farm incomes will be more reliant on market prices. With increasingly globalised agricultural commodity markets there is likely to be greater fluctuation in the prices paid to farmers, which could see significant annual changes in the areas of crops grown and livestock kept.
- 5.26. The introduction of the Environmental Stewardship (ES) scheme in 2005, which has both an entry level tier available to all farmers and a higher level tier which will be competitively funded, will increase the incentives available to farmers to manage land with the environment in mind. It is likely that land in the study area will be targeted to receive the higher level management prescriptions in the same way as it has under the ESA scheme. Furthermore, the broader objectives of the Higher Level Scheme (which include resource protection as a key objective and flood alleviation as a secondary objective, neither of which were present in the ESA scheme) will enable the Levels and Moor's water management issues addressed in a more flexible way than previously. However, it remains to be seen whether the budget for the scheme will lead to an increase in the area managed to high environmental standards.
- 5.27. **Conclusions: The decoupling of EU agricultural support is likely to lead to agricultural withdrawal from some economically marginal land and to greater volatility in land use, although this may be countered by the introduction of the Environmental Stewardship scheme.**

## **6. WAYS FORWARD**

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### **INTRODUCTION**

- 6.1. Having set the context, considered the current performance of LAMP and PCP and examined the challenges and drivers influencing the future, it is appropriate to draw some conclusions about the future needs of the area of the Levels and Moors and to set out some principles that should guide what sort of organisational structure is maintained for the future. These issues are addressed in the first section below. Having concluded that there is a need both for a continuing organisation, but also for substantial change in existing arrangements two options are considered. Finally, the potential financial and management implications of these options are considered.

### **CREATING A SHARED UNDERSTANDING OF THE CHALLENGES AND OPTIONS FACING THE LEVELS AND MOORS**

- 6.2. After assessing the challenges for the future and drivers for change, the reviewers are left in no doubt that planning for future land use and land and water management in the core area of the Levels and Moors does need to be treated as a special case and must engage all government and local authority bodies and the local communities. In particular, there is a need for existing organisations (or any new organisations that may be established) to recognise:
- The significance and importance of the area constituting the Levels and Moors due to its:
    - hydrological regime, and
    - high environmental value,To which might be added its distinctive socio-economic and cultural character.
  - The long-term strategic concerns over water management in the face of climate change and the increased risks of frequent flooding given higher winter rainfall and rising sea level.
  - The need for local government and national government agencies to maintain effective communications with each other and with the landowners and communities within the Levels and Moors.
  - The need for local communities and those people living directly within the potential flood areas to be engaged in long-term strategic planning for the area.
- 6.3. Faced with threats of higher rainfall and increased flooding over the next fifty years there is still time to establish realistic plans for the future (as have been partially explored for the Parrett Catchment), but the efforts made to date to clarify the strategic options for all the areas of risk have been inadequate. As a result, debate

has become ‘stuck’ on a few high profile issues and the important first principles upon which other policies should be founded have remained obscure.

- 6.4. The national agencies are, of course, alive to these issues and are constantly evolving their own thinking and actions. Evaluations of flood risks and major programmes for flood defence have been put in place and further works are ongoing or planned. However, these initiatives are not always presented in a form that is intelligible to the public. Although efforts have been made to develop a dialogue between government and the communities living in and around the Levels and Moors there is perceived to be a lack of strategic direction on the part of government agencies and local government.
- 6.5. Amongst the local communities, and the organisations representing them there has also been a lack of focus and unwillingness to address some painful truths. The self-interest of individuals has often coloured the nature of exchanges with national agency officials and made the work of these officers more difficult.
- 6.6. What is now required is a more transparent, inclusive, objective and pragmatic debate, based on the best available evidence, on the future of the Levels and Moors. This will require better understanding by all parties of the potential scenarios for flood defence, water and land management and the associated economic, environmental and social activities on the Levels and Moors.

It is therefore **recommended** that:

***Recommendation 1***

**In order to focus debate on the fundamental challenges that are emerging from the anticipated rise in sea level and increased winter rainfall, the bodies which commissioned this study should prepare and circulate an options appraisal which outlines different land use scenarios and quantifies the likely economic, social and environmental consequences arising from them.**

- 6.7. We recognise that this will be a difficult task and that a comprehensive appraisal would be time consuming and expensive. It must be accepted that the appraisal will reflect the available evidence and should be regarded as an aid to stimulating discussion rather than an end in itself.
- 6.8. The Environment Agency already holds significant information on potential scenarios and we recommend that the Agency should take the lead on this part of the appraisal. The Agency’s contribution should assess the technical feasibility of the chosen scenarios and make clear the costs of building flood defences and other engineering works to achieve them. It should also examine the consequences of doing nothing or of taking alternative action to allow controlled flooding on an increased scale.
- 6.9. The assessment of the wider economic, social and environmental impacts that would arise from each of the scenarios should be led by Somerset County Council, with technical support from the district councils and relevant national agencies.

- 6.10. The local communities should be involved in the preparation of the discussion document, and should be fully consulted on the options. It will be important that the paper is written in a clear and non-technical manner suitable for a wide audience.
- 6.11. A timetable should be set for the study with a definite commitment by all the lead agencies and local government to agree on an official strategy and programme of actions by a fixed date.
- 6.12. This work should cover the core areas of the Brue and the Parrett Catchments, including the whole of the Levels and Moors and the coastal belt.

## **INTEGRATED STRATEGY DEVELOPMENT FOR THE LEVELS AND MOORS**

- 6.13. Against the background of the options appraisal suggested in Recommendation 1, all official bodies should identify the actions they would need to take to deliver their responsibilities and duties. This includes water and land management, nature conservation and biodiversity enhancement, all aspects of spatial planning and infrastructure management. This leads us to **recommend** that:

### **Recommendation 2**

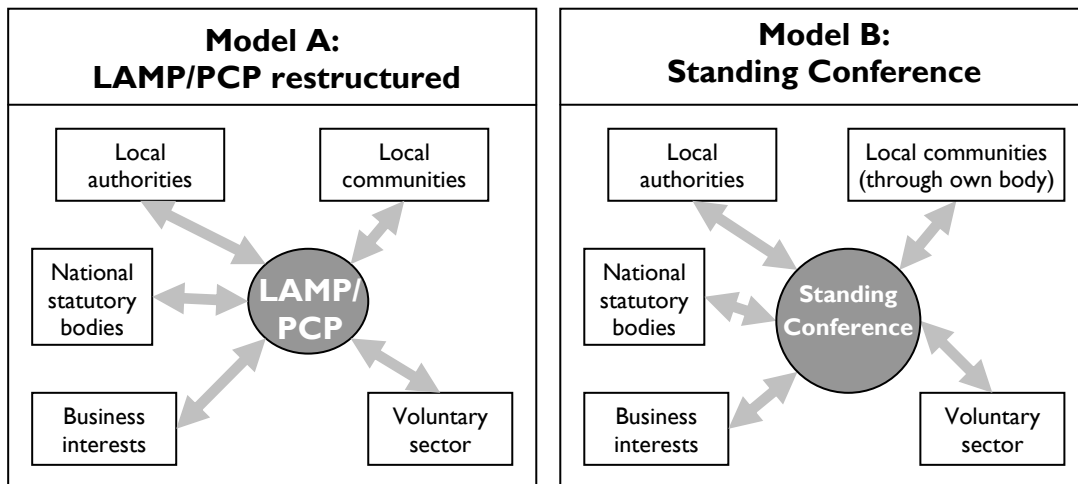
**Government Agencies and local authorities (County Council, relevant district councils and parishes) should agree to develop integrated policies for strategic land and water management for the Levels and Moors, including transport, infrastructure and economic development. These policies must take account of, and be informed by, the views of local communities**

- 6.14. If this recommendation is accepted it would provide the area of the Levels and Moors with *de facto* endorsement of its special status without the need to pursue some form of national recognition (potentially making the formal adoption of an 'external' designation unnecessary). Co-ordination of agency policies and funds could deliver most if not all of the support which LAMP has campaigned for over the years. Formal endorsement of the need for a long term strategy for the Levels and Moors would in our view provide the level of recognition necessary to attract European and Lottery funding.
- 6.15. The principal difficulty that has existed for more than twenty years in developing integrated policies for the Levels and Moors lies in the fact that there are a multiplicity of issues, agencies and local authorities who need to be engaged. Mechanisms exist under the new planning system for coordinated joint action between local authorities through joint Area Action Plans, and the new Water Framework Directive will require integrated catchment planning. The formation of Natural England should also help to focus attention on the links between nature conservation, landscape and recreation. But the need for '*a single organisation to bring together the various citizens, governmental and non-governmental interest and to play a major role in policy development, co-ordination and implementation*' remains as valid today

as it did when articulated in 1993. The question is what form should that organisation take?

- 6.16. There are, in our view, two basic models that should be considered. The first would involve restructuring LAMP or possibly PCP (**Model A**) to deliver the role outlined in Figure 3.1. The second would involve establishing a new strategic partnership, which we have termed a Standing Conference, for the Levels and Moors (**Model B**) on the lines that originally operated before LAMP was created, but retaining the benefits of the community engagement provided through LAMP. **Figure 6.1**, which refers back to Figure 3.1, illustrates these two options.

**Figure 6.1 Alternative organisational models**



### **Commentary on Model A – Restructured LAMP**

- 6.17. In our view, having studied the constitution of LAMP and objectives of PCP, as they are currently composed, we consider that Model A has significant flaws. The fundamental issue with LAMP is that it is seeking both to provide an influential voice for the local communities (largely successfully) and is also trying to meet everyone's aspirations by including the community representatives, agencies, local government, and a large number of interested parties (NFU, CLA, Wildlife Trusts etc) **within** the organisation itself (which it has not succeeded in doing). In addition, the organisation has no statutory status and any decisions it might reach could not be imposed on others.
- 6.18. PCP also has a partnership structure and could conceivably also take on this co-ordination role. However, there appears to be no appetite from members of the PCP to take on this much enhanced and more 'political' role. Since taking on the JAF funding it has come to be seen as a 'delivery organisation' rather than one that is concerned with strategic priorities. The geographical focus of PCP (covering the whole of the Parrett catchment but none of the 'core' low-lying area in the Brue catchment) also makes it unsuitable. We therefore conclude that this option has limited appeal.



## **Commentary on Model B – Standing Conference**

- 6.19. The model of a standing conference has been tried before. It was, in fact, the arrangement that predated formation of LAMP. However the original model failed precisely because it made no provision for sounding out and considering the views of the local communities that make up the Levels and Moors. It also failed to set an agenda and develop a long term strategy. We would argue that a Standing Conference, vested with authority from all agencies and local government and supported by a modified form of LAMP (which was restricted to representing the views of the local community of the Levels) could provide direction, guidance and feedback on all areas of policy development at a sufficiently senior level to achieve results. We therefore **recommend** that, in order to most effectively and transparently implement Recommendation 2:

### **Recommendation 3**

**A Standing Conference should be established for the Somerset Levels and Moors to coordinate the strategic development and adoption of integrated policies for the area.**

- 6.20. We emphasise that the primary role of the Standing Conference should not be the development of new policies (although it may choose to influence the policy development of its constituent bodies). Nor should it be involved in delivering programmes of work (although it may wish to call its constituent bodies to account on their implementation activities). Instead its priority should be in developing the strategic frameworks that are necessary to translate policies into action on the ground in an integrated manner.
- 6.21. We propose an outline structure of the role and membership of the Standing Conference for discussion in **Figure 6.2**.

**Figure 6.2. Outline structure of the Standing Conference for the Somerset Levels**

<b>Role:</b>		
The Standing Conference should meet twice a year to consider the development of major policies and proposals affecting the Levels and Moors. The Conference will pass recommendations on such policies and proposals which, while not legally binding, will have major influence, being the informed view of all the participants.		
<b>Membership:</b>		
The following structure should be considered for membership of the Standing Conference:		
<b>Post / supporting body</b>	<b>Voting members</b>	<b>Officers</b>
Independent Chairperson	1	
Vice Chair (appointed by members)	1	
Executive Officer		1
County Council	1	1
District Councils (1 each)	4	4
Environment Agency	1	1
Natural England	1	1
Defra	1	
Regional Development Agency	1	1
Regional Assembly	1	1
Government Office (SW)	1	
Somerset Levels Community Forum (Chair/VC)	2	1
Business Interests	2	
Conservation Interests	2	
<b>Total</b>	<b>19</b>	<b>11</b>
<b>Executive Board:</b>		
The Standing Conference should appoint an Executive Board to meet more frequently (at 2-3 month intervals) to consider progress and give advice on policies, plans and proposals that require an input more frequently than the 6 monthly meetings of the Standing Committee and to agree priorities for the Committee's attention.		
The Executive Board should comprise one member from each of the following bodies:		
Chair/Vice chair	County Council	District Councils
Somerset Levels Community Forum	Business interests	National agencies
		Conservation interests
This provides a total of 7 members supported by Executive Officer.		

## THE CONTINUING NEED FOR A BODY TO REPRESENT COMMUNITIES ON THE LEVELS AND MOORS

- 6.22. If the recommendations above for a Standing Conference are accepted then the next question that arises is what type of organisation is required to provide an effective means of maintaining a dialogue with, and assessing the consensus of, community interests?
- 6.23. Our interviews suggest wide support for the role of the LAMP parish representatives and steering group, and the way in which PCP has stimulated discussion at community level but also criticism about the effectiveness of both organisations in delivering other parts of their remit. We therefore conclude that **there is a strong need for a community voice which represents the Levels and Moors** and that the existing organisations offer something that cannot be provided through the diverse structure of local government (although consultation with the four district councils is also vital in terms of establishing the democratic view on new strategies and development proposals).
- 6.24. At the same time we consider that **the existence of two bodies with very similar aims and objectives is likely to create confusion in terms of public recognition and is not desirable in the long term**. The Parrett Catchment project was set up as a pilot initiative and it has already delivered many of its short term objectives. However its longer term role in improving water management applies with equal relevance to the catchments of the river Brue and river Axe which flow through the northern part of the Levels and Moors. **It would therefore seem sensible to amalgamate the existing organisations into a single body representing the interests of communities on the Levels and Moors**. We therefore recommend that

### Recommendation 4

**A single organisation should exist to represent the interests of communities in the Levels and Moors, represented by the six groups of parishes defined in Figure 2.1. This body is referred to as the Somerset Levels Community Forum to distinguish it from the existing LAMP.**

- 6.25. The question arises as to whether or not the community forum should also cover the interests and activities of communities lying in the upper parts of the catchments? We think that land management and development in the upper catchments are very important considerations in terms of lessening the impacts of climate change on flooding in the Levels and Moors. However, the issues involved are much more diverse and lack the same intensity which necessitates an effective organisation to represent the community voice in the flood zone. **We therefore conclude that the need to consult parishes and other bodies in the upper catchments should form part of individual campaigns as required and that the Somerset Levels Community Forum should not be enlarged beyond the six groups of parishes.**
- 6.26. The next question that needs to be addressed is what form the Somerset Levels Community Forum should take? In considering the answer, we think it is essential to

separate out the existing functions of LAMP in responding to official consultations from its role as a promoter and enabler of local initiatives. We **recommend** that:

**Recommendation 5**

**The Somerset Levels Community Forum should be given official recognition, as a consultee on all plans affecting the area, by national agencies and local government.**

6.27. We further **recommend** that:

**Recommendation 6**

**The Somerset Levels Community Forum should focus its attention on responding to the strategic issues affecting the area, and should not be directly engaged in project management of rural regeneration initiatives.**

### **Membership of the Somerset Levels Community Forum**

- 6.28. We consider that there would be major benefits in modelling the Somerset Levels Community Forum on the existing strengths of LAMP. The SLCF would effectively replace the Levels and Moors Parish Council Forum which comprises all 90 parishes. The Forum would continue to oversee the process by which one individual parish councillor from each of the six parish groups would be appointed to represent their interests on an **Executive Committee**. The executive committee would also include a nominated member from each of the four district councils, two county council members and one representative of the Community Council for Somerset / Somerset Association of Local Councils. A Chair and Vice-chair would be elected by the executive committee. The Chair should be one of the six serving parish councillors while the Vice chair could be drawn from any member of the executive. The executive committee would meet at regular intervals (say 6 times a year) and would respond to all consultations on policies, plans and programmes being presented to the Standing Conference. The views of the committee would be represented at the Standing Conference by the Chair and Vice Chair. The Executive Committee and the annual meeting of the SLCF would need to be supported with secretarial services and it is recommended that an officer of Somerset County Council should fulfil this role on a part-time basis.
- 6.29. The major change to the existing structure of LAMP would lie in the focus of the committee on the interests of the local communities. There would be no observers or non-voting members, and the concerns of the voluntary sector, conservation bodies and businesses would need to be directed to the executive committee members or represented directly to the standing conference.

## CONTINUATION OF PROJECT WORK WITHIN THE LEVELS AND MOORS

- 6.30. If Recommendations 1-3 are adopted and the standing conference is established the status of the Levels and Moors will be significantly enhanced. This will generate an increased need for practical projects to promote its economic, social, cultural and environmental well-being. It will be important that the momentum that has been generated by many of the recent projects is not lost in any change to the organisational structures.
- 6.31. We consider that the existing arrangements for handling projects under the control of LAMP, using the resources of the County Council's Levels and Moors Project, have worked successfully when there has been strong direction and management but there have been periods when the County Council as ultimate employer has been too remote and disengaged, resulting in breakdowns in communication.
- 6.32. Similarly, we consider that PCP has proved effective at managing most elements of the JAF project but note that there is relatively little appetite from consultees for PCP to apply for a second tranche of funding along the same lines as JAF.
- 6.33. We are certain that the new SLCF should have an active role in determining what types of project are undertaken and in monitoring progress on behalf of the communities but, in keeping with the aim of focusing its attention on delivering an effective community voice on strategic issues, we think that the arrangements for managing and delivering projects should be reconsidered by the funding partners. We therefore **recommend** that:

### **Recommendation 7**

**Arrangements for promoting rural regeneration and development projects in the Levels and Moors should be re-examined by Somerset County Council, the four District Councils and national agencies, in consultation with the steering groups of LAMP and PCP to determine the most effective way of taking forward this area of work.**

- 6.34. The options for promoting and managing rural regeneration activities would include:
- a) Establishing a permanent unit within the rural services division of Somerset County Council by reinvigorating the Levels and Moors Project, and/or
  - b) Coordinating these activities through the District Councils or national agencies, and/or
  - c) Setting up an operating company at arms length from the Somerset Levels Community Forum (which would determine priorities for action but not engage directly in project management).
- 6.35. In terms of allocating new responsibilities for hosting the existing successful programmes that consultees felt should be continued, we suggest potential options in **Figure 6.3** as the basis for discussion. Any or all of these projects could also be

hosted by a new operating company (option c, above), receiving funding under service level agreements from local authorities, the national agencies and external sources such as EU programmes.

**Figure 6.3. Potential hosts for existing LAMP and PCP projects**

Project		Potential lead host
LAMP	Avalon Marshes Project	Somerset County Council
	Parish projects	Respective District Councils
	Sustainable tourism work	Respective District Councils
	River Parrett Trail	South Somerset District Council
PCP	Farm advisory visits (FWAG)	Rural Development Service or Environment Agency
	River Festivals	Somerset County Council
	Big Sponge Project	Environment Agency

- 6.36. While ‘repatriating’ the management of project work to the authorities and agencies in this way would reduce the potential for duplication of activity with these bodies, there is the disadvantage that joint funding of projects between these bodies, or acquiring funding from external sources such as the Heritage Lottery Fund or EU Structural Fund Programmes, might be more difficult. On the other hand, a separate operating company might find it easier to operate service level agreements with a variety of funders and to acquire funding from external sources but would be burdened with establishment and administration costs. There is clearly considerably more debate to be had on these options.

## MANAGEMENT, FINANCIAL AND STAFFING IMPLICATIONS

### Setting up the Standing Conference

- 6.37. A Standing Conference for the Somerset Levels would require managerial and secretarial support which should be delivered by a body used to handling high level discussions and decision-making. We suggest that this service might best be performed by Somerset County Council’s Chief Executive’s office. In addition to organising the venue, agendas and meeting papers, the management team would be responsible for supporting the Independent Chairperson. It is therefore **recommended** that:

#### **Recommendation 8:**

Somerset County Council should consider nominating a senior officer to act as the Executive Officer to the Standing Conference.

- 6.38. The Executive Officer should have strong administrative skills but should also be knowledgeable about the range of planning, land and water-management issues likely to come before the Standing Conference. There would have a variable workload, building up to the twice yearly meetings, and more frequent sessions of the Executive Board. This task could consume 10-20% of the officer's time.
- 6.39. Other bodies would need to absorb their own costs (which would be limited to attendance at meetings and presentation of their own policies, plans and programmes for scrutiny by the SC). They might also be expected to contribute towards the operating costs in terms of venue, management and secretarial services.

### **Supporting the Somerset Levels Community Forum**

- 6.40. Formation of the SLCF should be relatively straight-forward since it would build directly on the arrangement for electing the representatives of the six parish groups and would mirror the structure of LAMP's steering group. Secretarial and officer support would be required to run the elections, arrange the annual meeting of the Forum and service the executive committee. It is considered that these functions could be provided by a member of staff appointed by the County Council to act as the Community Forum Officer. The post would demand excellent communication skills and interest and enthusiasm in the wide range of community issues relevant to the Levels and Moors. It should not, however, be linked with the equivalent post for the Standing Conference because the Community Forum Officer would be expected to play an advocacy role on behalf of the Forum and would not therefore be impartial and independent. It is **recommended** that:

#### **Recommendation 9**

Somerset County Council should appoint a Community Forum Officer to assist the SLCF executive committee and to represent the Forum in all relevant meetings and discussions about emerging policies, plans and programmes

- 6.41. The post of Community Forum Officer might be regarded as part-time initially, but could easily expand into a full time requirement if the need arose to coordinate consultations at parish level about major initiatives affecting the Levels and Moors.

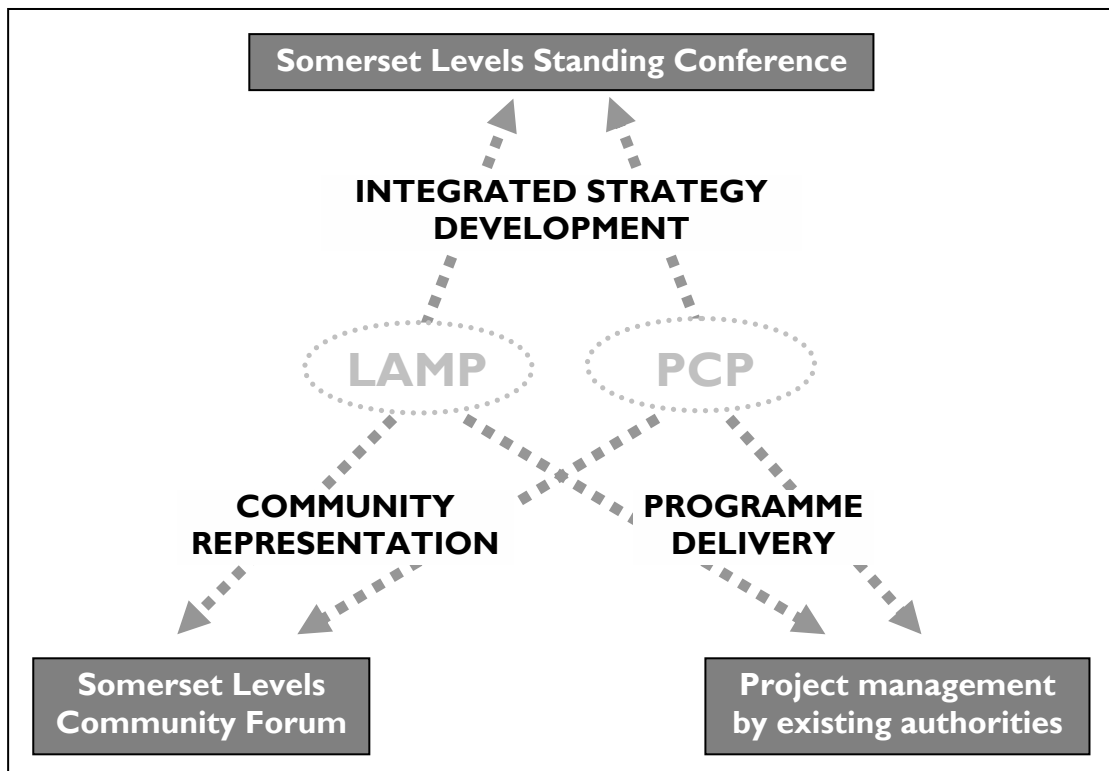
### **Undertaking the project work currently overseen by LAMP and PCP**

- 6.42. As noted under Recommendation 7 there would be a need to reorganise the way in which current project work is undertaken, and this would have implications for the existing staff of LAMP and PCP, both in terms of the nature of the tasks to be undertaken and office locations. As stated above, we are certain that the existing level of activity should continue and be expanded as appropriate so there should be no net reduction in the level of service offered. However, a more detailed examination of the way in which project work is handled, and the staffing issues associated with this, should await the broader decisions on how projects are hosted (paragraphs 6.34 to 6.36).

## IN SUMMARY ...

- 6.43. The overall conclusion of this review is that, while LAMP and PCP have achieved much, their weaknesses stem from a blurring of the different roles that each have pursued of integrated strategy development, advocacy of particular views and delivery of programmes of work. Each of these functions is essential to the future of the Levels and Moors but there must be greater clarity about the boundaries between each of them. If this is done, there should be fewer distractions and a greater focus from all parties on addressing the critical challenges that face the Levels and Moors over the next 50 years.
- 6.44. The recommendations of this review are therefore founded on the premise that a new organisational structure is required that separates out these functions but builds on the achievements and experience that have been developed by LAMP and PCP. These changes to the functional responsibilities currently held by LAMP and PCP are shown diagrammatically in **Figure 6.4**.

**Figure 6.4. Proposed changes to functional responsibilities of LAMP and PCP**



- 6.45. If the functions of LAMP and PCP are successfully transferred in this way, the reviewers believe the objectives of these organisations will be more effectively met through the new organisational structure, at which time LAMP and PCP can therefore be wound up.



## APPENDIX I. LIST OF CONSULTEES TO THIS STUDY

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- 6.46. The authors are grateful for the information and opinions generously provided by the following people as part of this review.

Adrian Jowitt, Rural Development Service

Andy King, English Nature

Cllr. Anne Fraser, Sedgemoor District Council

Anthony Gibson, Chair of PCP

Barry Phillips, REFS

Ben Thorne, Somerset Farming and Wildlife Advisory Group

Cllr. David House, Taunton Deane District Council

Humphrey Temperley, Regional Flood Defence Committee

James Phillips, Rural Development Service

Jerome Hayes, LAMP

Julie Cooper, Sedgemoor District Council

Mark Robins, Royal Society for the Protection of Birds

Nick Gupta, Environment Agency

Peter Maltby, Parrett Consortium of Internal Drainage Boards

Richard Bradford, Levels and Moors Project officer

Richard Clark, Chair of LAMP

Roger Martin, Somerset Wildlife Trust

Sarah Diacono, Somerset County Council

Tim Walford, Country Land and Business Association

Tony Owen, Environment Agency