

[Reservoir flood plans: Impact assessment \(17 December 2009\)](#) [1]

Written by [Tim Ambler](#) [2] | Thursday 1 April 2010



Daft Regulation of the Month

England and Wales have about 2,000 reservoirs. With more volatile weather increasing the risk of failure, the government is concerned that some may fail and contingency plans are required in such events. So far so good. DEFRA has decided that each reservoir ?undertaker? should have a flood maps so they know where the water will go. This is fine King Cnut stuff because these maps will do nothing to stop the waters overflowing.

This new regulation allows DEFRA to require reservoir undertakers to draw up flood plans, including maps. The Water Act 2003 which amended the Reservoirs Act 1975, already authorises the Secretary of State to direct reservoir undertakers [each] to draw up these plans but it was all, apparently, a bit voluntary so most of them have not got around to it. With only 100 major reservoirs (greater than 25,000 cubic metres), you might have thought a few phone calls to CEOs would do the trick not to mention visits from OFWAT, and the Health and Safety Executive.

The £37M costs need to be less than the benefits so DEFRA reckon the regulation will save 90 lives at £1.4M each (£131M) or 27 lives later in the same Impact Assessment (presumably because it only needs 27 lives to balance the costs. No lives have been lost due to reservoirs overflowing since the original rules were put in place in the 1930s but we should not let the facts spoil the case.

The benefits analysis is beyond parody: ?Occupancy is assumed to be 20% at night and 80% during the day. So with a 50% probability of failure occurring either during night or day the average occupancy would be 50%?. No attempt is made to link that arithmetic to the 90 (or 27) deaths DEFRA expects to save nor does the Impact Assessment show how, in the event, such plans would save even a single person. It will comfort the mourners to know that at least we had the flood plain maps.

Tim Ambler is a Fellow of the ASI and Honorary Senior Research Fellow of the London Business School.

This blog is part of the ongoing series: Daft regulation of the month. The first port of call for any government that is really committed to cutting useless red tape. Click [here](#)[3]to find out more.

[blog comments powered by Disqus](#) [5]

Source URL: <http://www.adamsmith.org/blog/regulation-and-industry/reservoir-flood-plans-impact-assessment-17-december-2009>

Links:

[1] <http://www.adamsmith.org/blog/regulation-and-industry/reservoir-flood-plans-impact-assessment-17-december-2009>

[2] <http://www.adamsmith.org/taxonomy/term/5859>

[3] <http://www.adamsmith.org/../../../../blog/regulation-and-industry/daft-regulation-of-the-month>

[4] http://disqus.com/?ref_noscript

[5] <http://disqus.com>