



Water Resources South East - Draft Regional Plan for South East England

Water Resources South East Consultation

Date: 20 February 2023

Introduction

1. The Country Land and Business Association (CLA) is the membership organisation for owners of land, property and businesses in rural England and Wales. Our 27,000 members own or manage around half the rural land in England and Wales and more than 250 different types of businesses. They have a long-term interest in rural communities and the environment in which they live. Their businesses are often at the foundation of the local economy by providing homes, jobs, employment space and services to local communities.
2. The CLA welcomes the opportunity to respond to the consultation published by Water Resources South East (WRSE) on its draft Regional Water Resources Plan

Response

3. The CLA welcomes the objectives of the regional planning process to ensure sustainable and resilient water resources to 2050 and beyond.
4. The CLA is pleased that WRSE has addressed the full scale of potential water deficits in the plan under multiple population growth scenarios. It is positive that the 'regional pathway' chosen as default is very similar to the pathway with the highest extra water demand (2.7 billion vs. 2.8 billion litres of water per day); this approach will provide much-needed resilience. The CLA supports the adaptive planning process through which the plan will evolve. The amount of water to be returned to the environment – accounting for 54% of the expected deficit – is ambitious, but the CLA supports the drive for improved river, wetland and groundwater health, where consistent with food security.
5. The CLA would like to see WRSE's draft plan improved in the following ways.

WRSE should model and quantify future agricultural water needs at a catchment scale.

6. The CLA is concerned that the final plans lack detailed modelling of future agricultural water needs and deficits at a catchment scale. WRSE should determine how much more water will be needed by 2050 in individual catchments (i) to maintain current agricultural and horticultural production, and (ii) to increase horticultural production in line with the government's Food Strategy (2022) aims.

7. Catchment-scale modelling of agricultural demand and deficit would:
- provide the evidence base for agricultural abstractors to make investment decisions in on-farm water storage schemes, like reservoirs;
 - provide an evidence base to coordinate collaborative infrastructure projects, such as pumping water inland from river mouths to fill farm reservoirs and recharge groundwater;
 - highlight future abstraction conflicts, to enable time for investment in on-farm water storage;
 - help government and other funders to target grant funding to the most water-stressed catchments.
8. The CLA is dissatisfied that this modelling work has not yet been undertaken, or at least not shared within the draft plan. The CLA believes it is most resource-efficient for WRSE to conduct this modelling, ready for incorporation in the final plan.
9. We are aware that an OfWAT regulation, stipulating that billpayer revenue cannot fund non-public water supply research, has precluded WRSE from modelling agricultural water needs. The CLA believes that this regulation should be reinterpreted to recognise the importance of land management in determining how water moves through catchments to become available for the public water supply. Understanding future agricultural water needs is fundamental to water companies effectively managing their own water supplies. As a precedent, some water companies, such as Anglian Water, already use billpayers' money to fund best-practice farm management, such as cover cropping. Hence, the CLA suggests that grounds exist for reinterpreting or redrawing OfWAT's ring-fencing to overcome the poor integration of agriculture within WRSE's draft plan.

The final plan should advocate for on-farm water storage schemes, particularly on-farm reservoirs, as crucial supply-side solutions.

10. On-farm reservoirs provide the following benefits:
- They allow water for summer irrigation to be abstracted during high flow periods, which means that more water can remain in the environment during low-flow conditions.
 - Abstraction during high-flow conditions to fill reservoirs reduces river discharges, providing important flooding mitigation for downstream communities.

- They strengthen national food security by ensuring farmers have enough water for summer crop irrigation and watering livestock.
 - Water stored in on-farm reservoirs can be discharged into watercourses like chalk streams during low flow to improve their ecological health.
11. Currently, on-farm reservoir construction is impeded by (a) the lack of alignment between planning permission, abstraction licencing, and grant funding, leading to delays and cost increases; (b) lack of certainty on future abstraction licence volumes, particularly with the incoming Environmental Permitting Regime; and (c) an insufficient grant funding rate to make on-farm reservoirs viable investments.
 12. The CLA has identified solutions to these problems, including increasing government grant funding for reservoir construction to 60%; fast-tracked planning and abstraction licence approval for grant applicants; and reformulating abstraction licencing in terms of high flow not seasonality.
 13. The CLA believes that if WRSE properly acknowledged the value of on-farm reservoirs as supply-side infrastructure, and included them in cost-benefit analysis, this would make an important contribution to addressing barriers to their construction.

Water companies should be more ambitious on reducing leakage.

14. The CLA firmly believes that the 50% leakage reduction target for water companies should be the minimum level of ambition. Investments to reduce leakage should be as ambitious as possible, especially given that water infrastructure has seen underinvestment in recent years. Water companies should also invest to reduce pollution, which would reduce the need for farmers to turn to other, less-polluted water supplies (e.g., mains water).

Temporary Use Bans (TUBs) should be retained within the final plan.

15. The CLA is reassured that WRSE's draft plan retains TUBs, unlike other Water Resources Group's draft plans. TUBs are a valuable option that the public water supply can implement to ease the pressure on abstractors with less flexibility in their water needs during drought situations. TUBs can protect aquatic species with a minimum water requirement for reproduction and crop plants which have minimum water needs for survival. The CLA believes that TUBs should be applied to domestic consumers before Section 57 bans on spray irrigation are applied to the agricultural sector during droughts. The CLA urges WRSE to retain TUBs within its arsenal of demand-side measures in the final plan.
16. Relatedly, researching the best way to communicate with customers about drought and reducing water consumption should also be a priority acknowledged in the final plan.

17. The CLA is pleased that WRSE acknowledges that “water security is integral to food and energy production, as well as crucial industries – involving businesses of all sizes”. We would encourage WRSE to view water for food production as an essential use of water, even though the Water Resources Act (1991) does not view water for agriculture in this light.

Nature-based Solutions should be given greater prominence within the plan.

18. The CLA was encouraged to see that WRSE identified over 200 options for Nature-based Solutions in individual catchments in the emerging draft plan. However, we are concerned that applying regulatory guidance has cut this number to just two schemes in the draft plan. The CLA urges WRSE to recognise the synergistic benefits of Nature-based Solutions for climate mitigation, biodiversity, and socioeconomic wellbeing within a best-value plan.
19. Nature-based Solutions are key to CLA members. As the draft plan states, they “may deliver better outcomes for our rivers at a more efficient cost and deliver wider environmental benefits such as improving water quality and reducing flood risk.” For instance:
- restoring meanders on straightened rivers means they hold more water and flow more slowly, creating a mosaic of habitats;
 - leaky dams store more water in rivers and discharge water more slowly;
 - regenerative agriculture improves soil health, allowing a greater volume of water to infiltrate into soil and be stored in its structure;
 - cover cropping, no-plough agriculture, wooded areas, and swales all slow overland flow and facilitate water infiltration into soils and groundwater;
 - well-managed swales and ditches can store large quantities of water;
 - water from Nature-based Solutions can be used to recharge aquifers locally, with benefits to groundwater abstractors and local river flows.
20. Appropriate investment in Nature-based Solutions within the water environment would also be a way for water companies to offset some of the irreducible carbon emissions from the plan’s proposed infrastructure.
21. The CLA suggests that WRSE reinstates many of the proposed Nature-based Solutions, even if the amount of water they individually supply is small or cannot be accurately constrained.

22. The draft plan acknowledges the potential for the government's Environmental Land Management schemes to deliver greater water security. However, the CLA cautions WRSE that public money may be spread too sparsely to achieve the outcomes WRSE envisages. Additional options within Environmental Land Management, such as a new Countryside Stewardship option for meander restoration, may be required. If water companies support the Nature-based Solutions approach and see its benefits for their water security and wider sustainability goals, the CLA believes that they should privately fund similar Environmental Land Management schemes.

Smaller-scale infrastructure that can come online more quickly should feature within the plan.

23. The CLA believes that the draft plan misses an opportunity to prioritise more agile, smaller-scale infrastructure which can become operational far more quickly than big infrastructure schemes. These modular schemes could be repeated at relatively low cost in different catchments. Such schemes include:
- pumps and pipelines to abstract water at river mouths and either store it in on-farm reservoirs upstream or use it to recharge aquifers, following the model of the Felixstowe Hydrocycle scheme;
 - rainwater harvesting and grey water reuse in urban areas, with water from Sustainable Drainage Systems filtered through reedbeds and other nature-based treatments before reuse;
 - private water distribution networks between landholdings so that the currently licenced abstraction volume can be deployed more effectively on farms;
 - maintaining and investing in weirs to control flows and hold water in the environment for longer.

Demand-side reductions need to be accessible for households, particularly in rural areas.

24. The CLA strongly supports the ambition to reduce unnecessary water consumption and to make the public more cognizant of their water use. However, to meet the ambition of 110 l/p/d individual water consumption, households will need financial and technical support for smart metering and retrofitting buildings. For example, the issue and installation of smart water meters should be free, and more water-efficient fixtures and fittings should be subsidised by water companies. The CLA would like to see such schemes also extended to the private water supply. WRSE should note that private water suppliers have a legal duty to provide continuity of supply, which may affect their ability to compel demand-side water reductions.

25. Education about the need for reductions in public water consumption should also be a higher priority in the final plan.
26. To enable all businesses to plan for future water needs, the final plan should also clarify what reductions in water consumption WRSE would like from commercial water users which are non-household and non-industrial, such as businesses with shops or holiday accommodation.
27. It makes sense that regulations for new buildings reflect water efficiency. The CLA supports an earlier date for these regulations. Building regulations for new developments should include mandatory rainwater harvesting, storage and re-use of grey water.
28. We also welcome the government's water labelling on white goods, which will help households and businesses to plan.

The use of desalination plants needs careful cost-benefit analysis, and other options should be prioritised.

29. Given the energy requirements for desalination, the CLA believes that desalination must only be undertaken when plentiful renewable energy is available. Careful cost-benefit analysis is required to minimise the contribution of expensive desalination plants to climate change. The concentrated saline output from desalination needs careful disposal to minimise ecological harm. Desalination plants must not interfere with ecologically sensitive coastal habitats, flood defences, and/or carbon sequestration.
30. The CLA would like to see desalination used as an option of last resort. In preference, the CLA supports water recycling to recharge river headwaters. We welcome the six new water recycling plants proposed, and believe this type of technology could be extended. Abstraction at the river mouth can also be used to recharge aquifers and groundwater, as demonstrated by the Felixstowe Hydrocycle scheme.

Construction of new infrastructure should minimise disruption to high-grade agricultural land; compulsory purchase orders should be minimised.

31. The CLA recognises that new reservoirs and other infrastructure for the public water supply are needed to provide water security. Substantial research effort has gone into deciding their siting. Nonetheless, the CLA would like to emphasise the importance of high-grade agricultural land to national food security. Flooding high-grade agricultural land should be minimised wherever possible. Only the land directly necessary to the reservoir's construction and function should be subject to compulsory purchase orders.

32. The CLA urges WRSE to plan for as minimal disruption as possible in the construction of new water transfers, and to include genuine local engagement with landowners.

The CLA supports the use of existing canals for water transfers, including using the Cotswold Canals for the Severn-Thames transfer, even at higher cost.

33. The CLA welcomes the repurposing of the Grand Union Canal to carry treated wastewater. Using an existing canal makes sense for multiple reasons: minimal disruption to agricultural land, reduced carbon emissions, navigation benefits, and a shorter development period. Even at greater cost, the option of repurposing the Cotswold Canals should be further explored, with the recreational and tourism benefits of this option factored into cost-benefit analysis.
34. Relatedly, as an organisation with membership in both England and Wales, the CLA emphasises that Wales must not be disadvantaged by exporting water to meet demand in South East England.

The final plan should devote more attention to flooding and Natural Flood Management (NFM).

35. The draft plan does not join up flooding and drought effectively. NFM reduces the flashiness of catchments and slows river flow, retaining water in the landscape for longer and aiding infiltration to groundwater. WRSE's final plan should consider how to invest in NFMs; options include regenerative agriculture, meander restoration, cover-cropping, woodland regeneration, and leaky dams, amongst others. NFM would create a healthier water environment and reduce the need to curtail current abstraction licences when employed alongside other Nature-based Solutions.

The final plan and associated website should make data easily accessible to land managers to guide investment decisions.

36. It is hard for individual farmers and other rural abstractors to make sense of what the plan means for them in its current format. The CLA would like to see the final plan and associated website highlight where land managers can access data and information to make investment decisions. This data should be digestible, relevant, and empower rural businesses to participate within the plan's goals.

Golf courses can make significant water savings, helping to reduce the total regional water deficit.

37. Golf courses rely heavily on the public water supply to maintain their grounds, largely for aesthetic reasons. Golf courses do not need high-quality drinking water for irrigating grass. Few golf courses have invested in on-site reservoirs, rainwater harvesting, or collection and irrigation with grey water. The CLA believes that it is incumbent on golf courses to invest in more sustainable water sources. WRSE should plan for reduced water usage from golf when deciding supply-side public water infrastructure.

The final plan should consider novel future water uses, including water to prevent wildfires, rewet peatland, and increase horticultural production.

38. Finally, WRSE should bear in mind novel water demands linked to climate change that need factoring into its projections of water demands at 2050. These include water to:
- avoid and control future wildfires – a risk from climate change highlighted in the South East by 2022’s record-breaking heat;
 - increase water table height on lowland peatlands to reduce carbon emissions;
 - increase horticultural production, in line with the government’s Food Strategy goal for greater horticultural self-sufficiency.

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