



Water Resources West – Draft Regional Plan

Water Resources West Consultation

Date: 21 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 West (WRW) on its Draft Regional Plan.

Key CLA recommendations for WRW's final plan

3. Maintaining sufficient water supply for food production is essential to national food security.
4. Demand-side savings should derive from the public water supply rather than agricultural abstraction licences to avoid offshoring food production to more water-stressed areas.
5. There should be a requirement for WRW to quantify future agricultural water needs and deficits at a catchment scale as an urgent priority.
6. Reducing leakage by 50% by 2050 should be the minimum level of ambition from water companies.
7. WRW should retain Temporary Use Bans within its final plan as a way to reduce the burden on abstractors with more inflexible water needs during drought.
8. WRW needs to ensure that opening new groundwater and surface-water abstraction sites for the public water supply does not negatively affect river flows or existing abstraction licences.
9. The final plan should prioritise on-farm reservoirs as supply-side options which have multiple benefits.
10. Nature-based Solutions have huge potential to store water and manage river flows on farmland and moorland.

11. Water should only be transported from Wales to England (a) when Wales itself is in surplus; (b) if benefits of the transfer remain in Wales; and (c) once English water companies have invested in reducing leakage and pollution.
12. WRW should publish easily accessible data about its final plan to support businesses' investment decisions.

Response

Question 1: Are you satisfied with our demand management approach? (See Section 7.1)

13. The CLA is pleased to see the wide range of demand-side options assessed in the WRW draft plan.
14. The CLA supports the ambition to roll out widespread metering, including smart metering. However, it is important to ensure that smart meters are provided and installed free of charge, and that retrofits are subsidised. The CLA would like to see this support extended to private water supply systems. WRW 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.
15. Consumer education on reducing water usage is vital, and should be re-emphasised in the final plan.
16. To enable all businesses to plan for future water needs, the final plan should clarify what reductions in water consumption WRSE envisages from commercial water users which are non-household and non-industrial, such as businesses with shops or holiday accommodation.
17. The CLA supports the government's mandatory water labelling on white consumer goods, which will allow our members to make more sustainable investments in both their homes and businesses.
18. In terms of managing demand within agriculture, the draft plan states that "[a]griculture will need to find new ways of storing, sharing and using water to support farming activity". We respond to the storage aspect in Question 2 below. Abstraction licence review is likely to reduce the amount of water farmers and growers can abstract. The CLA cautions WRW that sharing water may therefore be less of an option than the draft plan proposes without significant investment in private water distribution networks and on-farm reservoirs.
19. The plan briefly notes that it would be perverse to push agricultural production to less sustainable locations by reducing abstraction licences. The CLA would like this point emphasised more strongly: maintaining sufficient water for food production is essential to national food security. There is a minimum viable volume of water to support certain crops, without which cropping patterns will change. The government's Food Strategy (2022) has a goal to increase horticultural production.

20. Consequently, the CLA feels that reductions in water demand should be borne first by the public water supply. Some users of the public water supply may be able to make substantial water savings. For instance, golf courses rely on the public water supply for irrigation and tend not to employ rainwater harvesting, on-site reservoirs, or grey water for irrigation. Implementing these measures would improve the leisure sector's resilience and reduce overall public water demand, freeing up water for food production.
21. The CLA would like to see the greatest possible ambition from water companies on leakage reductions to reduce water demand. Reducing leakage by 50% by 2050 is the minimum acceptable ambition level that the public should expect from water companies. Unrepaired leaks that flood roads and farmland are particularly egregious to our members.
22. The CLA also urges WRW to retain Temporary Use Bans (TUBs) within its final plan as a way to manage water demand and reduce the burden on abstractors with more inflexible water needs during droughts. To safeguard food security, the CLA would like to see TUBs applied to the public water supply ahead of Section 57 bans applied to spray irrigation during drought conditions.

Question 2: Do you think the supply options included in our preferred plan are good value, given that many of them target improvements to existing assets? (See Section 7.1)

23. The CLA supports the supply-side developments in the plan, including wastewater treatment works and raising the height of dams in the Derwent Valley. The CLA agrees that it is sensible and value for money to retain and modify existing assets rather than flood new land to construct new reservoirs where these are not needed. However, where new reservoirs in England are needed to improve the resilience of the public water supply, the CLA supports their construction, provided that the location of any new reservoirs takes into account high-grade agricultural land.
24. WRW needs to ensure that opening new groundwater and surface-water abstraction sites for the public water supply does not negatively affect river flows or existing abstraction licences, particularly agricultural licences. The CLA also believes that water recycling to recharge priority catchments could be a priority in the final plan, as could transferring water from river mouths to recharge aquifers and/or fill on-farm reservoirs.
25. At an individual business level, the CLA believes that WRW should give greater prominence to on-farm reservoirs. Water storage in on-farm reservoirs brings numerous benefits to businesses and the environment:
 - It allows water for summer irrigation to be abstracted during high flow periods, which means more water can remain in the environment during low-flow conditions.
 - Abstraction during high-flow conditions to fill farm reservoirs reduces river discharges, providing important flooding mitigation for downstream communities.

- It strengthens 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 during low flow to improve their ecological health.
26. Whilst we understand that supply-side options cannot be specified for individual abstractors in the way they can for water companies, the CLA believes that advocating for on-farm reservoirs as a supply-side solution would help raise the profile of this solution and the barriers facing its implementation. Current barriers include uncertainty over future abstraction licences; insufficient grant payment rates; and the lack of join-up between planning permission, abstraction licencing, and grant funding.
27. The CLA also believes that Nature-based Solutions should be considered as important supply-side interventions. WRW's draft plan recognises that peatland restoration alone cannot meet the size of the projected deficits within the necessary timescale. However, this does not mean that peat restoration is not worth including within the final plan for a more resilient water environment. Rewetting peat, blocking up drainage ditches, and regenerating woodland in the upland WRW area would encourage greater water infiltration, recharge groundwater, and attenuate surface flow to reduce the risk of flooding – in addition to climate, biodiversity and socioeconomic benefits. It is good to see that the draft plan includes wetland creation and restoration.
28. Other Nature-based Solutions that hold significant quantities of water include:
- restoring meanders on straightened rivers, which means they hold more water and flow more slowly, creating a mosaic of habitats;
 - leaky dams, which store more water in rivers and discharge water more slowly;
 - regenerative agriculture, which 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 bunds, which all slow overland flow and facilitate water infiltration into soils and groundwater;
 - well-managed swales and ditches, which can hold large quantities of water.
29. Overall, the CLA would encourage WRW to consider the synergistic benefits of Nature-based Solutions and Natural Flood Management implemented at a catchment scale, even those that may not appear good value for money on water supply alone. They may be able to offset carbon emitted through WRW's proposed infrastructure schemes.
30. Grey water is another source of water which WRW could consider in more depth in the final plan. The CLA believes that rainwater harvesting, storage, and the reuse of grey water should be mandatory within the building regulations in housing developments. Water

collected from Sustainable Drainage Systems could be used for irrigation on golf courses or fields if treated (e.g., through reedbeds).

Question 3: Are you satisfied with the range of catchment options we included as part of our environmental destination? (See Section 7.2)

31. The CLA is pleased to see that WRW is assessing environmental destination at an individual catchment scale rather than applying a blanket environmental destination. This will allow WRW to balance environmental protection with socioeconomic protection for local businesses and rural communities.
32. The CLA also supports analysing the contribution of Nature-based Solutions at a catchment level when planning environmental destinations.

Question 4: Are you satisfied that the strategic choices we have made in developing this plan were robustly informed by stakeholder and customer feedback? (See Section 6)

33. From the information made available in the plan, it is hard to assess whether the strategic choices contained within the plan have been robustly informed by all stakeholders' feedback. WRW must go beyond listening to the problems raised by agricultural and land-management stakeholders, to incorporate the solutions that these stakeholders, including the CLA, have suggested.
34. Furthermore, the CLA feels that strategic choices must proceed through catchment-level data on the water needs and future deficits projected for each sector, rather than solely stakeholder feedback. We are concerned that catchment-scale modelling of agriculture's future water needs in the WRW region has not yet been undertaken. Without this modelling, agricultural abstractors do not have the evidence to make investment decisions, and grant funding cannot be most effectively targeted to areas that will likely be over-abstracted in future.
35. The draft plan notes that "there is no clear funding route to achieve [an integrated assessment of the needs of non-public water supply sectors] at present", even though there are resource efficiencies to conducting this modelling within the regional water resources planning process. The CLA suggests that the OfWAT regulation prohibiting use of billpayers' revenue for research concerning the non-public water supply could be reinterpreted to fill this funding gap. Agricultural and moorland land management is pivotal in determining how water moves through the landscape and enters the public water supply, which means that water companies need to understand agriculture to effectively manage their water supplies. Hence, the CLA believes that OfWAT's regulation can be reinterpreted or redrawn to overcome the poor integration of agriculture within WRW's draft plan.

Question 5: What is your view on the pace of the delivery of our drought resilience and environmental improvements?

36. The CLA supports delivering greater drought resilience and environmental improvements. The UK heatwave in summer 2022, which would have been virtually impossible without climate change¹, and the ensuing drought underscore the urgency of adapting to climate change in the UK. In agriculture, waiting until 2039 to reach enhanced drought resilience may not be sufficient to secure food production.
37. The final plan could set different drought resilience goals for different sectors, with support made available earlier for agriculture so it can achieve an enhanced level of drought resilience sooner. WRW should advocate for on-farm reservoirs, rainwater harvesting, and Nature-based Solutions – alongside associated public and private funding – to improve the sector’s drought resilience.
38. If the current pathway to achieve enhanced drought resilience by 2039 is maintained without any additional funding for the agricultural sector to adapt, the CLA believes that reductions in abstraction should be borne to a greater extent by more drought-tolerant sectors before agricultural abstraction licences are reduced. Crops and livestock have minimum water requirements, and production patterns will change if these are breached. By providing sufficient water for agriculture, the region can avoid offshoring food production to more water-stressed areas and ensure that food remains affordable for the public.

Question 6: Do you think the transfers we selected in our plan have been sufficiently explained with regards to their risks and benefits? (See Section 7.3)

39. The draft plan clearly details benefits and risks from the transfer schemes. Our members accept the need to transfer water to the South East, provided that the WRW region is not disadvantaged. Using an existing canal makes sense for multiple reasons: minimal disruption to agricultural land, reduced carbon emissions, navigation benefits, and a shorter development period. The CLA would support using the existing Cotswolds Canals for the new Severn-Thames water transfer, even at greater cost, for the recreational and tourism benefits this would bring.
40. By transferring treated wastewater, the CLA’s concerns about cross-contamination of waters, transfer of pollution from the West to the South East, and management of invasive species appear to be addressed.

¹ <https://www.worldweatherattribution.org/without-human-caused-climate-change-temperatures-of-40c-in-the-uk-would-have-been-extremely-unlikely/>

41. One risk associated with the transfer schemes not fully explained is whether WRW will seek to avoid high-grade agricultural land when choosing the scheme's route. To preserve food security, the CLA would like to see the least high-grade agricultural land removed from production as possible. Disturbance to food production should be minimised. Any compulsory purchase agreements should take only the minimum necessary land out of production.
42. The CLA has members in both England and Wales. The history of Welsh water being exported to England is sensitive and political. Our members in Wales are clear that water should only be exported when Wales itself is in surplus; benefits of the transfer need to remain in Wales; and that English water companies should concentrate on investing in reducing leakage and pollution before they seek greater transport of Welsh water to England.
43. While the benefits of water transfers to the South East region are clear, how this scheme generates a surplus economic benefit for the West region is slightly unclear in the draft plan if water is being sold wholesale.
44. An open question remains about whether farmers and growers will be able to abstract water from the transfer schemes. The CLA believes this would be fair and justified.

Question 7: Do you have any views on how our plan can further develop to meet the needs of other abstracting sectors?

45. As discussed in response to Question 4, the final plan should quantify future agricultural water needs and deficits at a catchment scale. This is an urgent area for improvement, and we believe that WRW should be responsible for this modelling. By cross-referencing agricultural water need against priority catchments, WRW can assess where supply-side investment is most needed.
46. As mentioned in response to Question 2, the CLA urges WRW to recognise the multiple benefits of on-farm reservoir creation, other water storage in ditches, swales, soils, woodlands, and peat, as well as wider Nature-based Solutions. The final plan should support the agricultural sector by outlining these solutions and the challenges to their implementation.

Question 8: Do you have any other comments on ways to improve our plan?

47. 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.

48. The draft plan does not join up flooding and drought effectively. Natural flood management (NFM) reduces the flashiness of catchments and slows river flows, retaining water in the landscape for longer and aiding infiltration to groundwater. The final plan should consider investment in NFM – including regenerative agriculture, meander restoration, cover-cropping, woodland regeneration, leaky dams, and peatland restoration. NFM would create a healthier water environment and reduce the need to curtail current abstraction licences.

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