Consultation Response

Water Resources North - Draft Regional Water Resources Plan for the North of England

Water Resources North Consultation

Date: 23 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. The CLA supports the objectives of the regional planning process to ensure sustainable and resilient water resources to 2050 and beyond.

2. The CLA welcomes the opportunity to respond to the consultation published by Water Resources North (WReN) on its draft Regional Water Resources Plan for the North of England.

Response

3. The CLA would like to see WReN's draft plan improved in the following ways.

WReN should quantify future agricultural water needs and deficits at a catchment scale as a priority.

4. The CLA is concerned that WReN's draft plan lacks detailed modelling of future agricultural water needs and deficits at a catchment scale. WReN should invest in research to determine how much more water will be needed by 2050 in individual catchments to (i) maintain current agricultural and horticultural production and (ii) to increase horticultural production in line with the government's Food Strategy (2022) goals.

5. Catchment-scale modelling of agricultural and horticultural demand would have numerous benefits within the WReN planning process. It 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 into farm reservoirs;
- 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.

6. Adequate funding needs to be secured so that WReN can undertake this modelling and incorporate it into its final plan. Modelling work has not yet been undertaken because of "various challenges such as data availability and a lack of funding". The CLA is aware that OfWAT ring-fences the spending of billpayer revenue, preventing water companies involved in WReN from modelling these deficits.

7. However, land management is pivotal in determining how water moves through catchments to rivers and groundwater, and the overall availability of water for the public water supply. This means that understanding agriculture is fundamental to water companies effectively managing their water supplies. Consequently, the CLA believes there are grounds to permit funding from water companies to be used for modelling agricultural water needs, alongside other sources. The most resource-effective route for modelling agricultural water need is through the regional water resource planning process.

Non-public water supply solutions must be included within the plan.

8. The CLA recognises that regional plans are not implementation documents, but has concerns that "there are no non-PWS [non-public water supply] solutions identified for this iteration of our regional plan", and that identifying them is considered "impractical". Consequently, the CLA judges that the current plan is not multisectoral, as envisaged by the Environment Agency's National Framework for Water Resources.

9. Solutions to improve water security in agriculture and horticulture exist. The CLA believes that WReN should prioritise on-farm water storage. With the right support, on-farm water storage could become significantly more widespread and help ensure that sufficient water for food production is available to maintain national food security.

10. For example, on-farm reservoirs have multiple 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, their construction is impeded by (a) the lack of alignment between planning permission, abstraction licencing, and grant funding; (b) the uncertainties surrounding future abstraction licence reform, 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 WReN 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.

14. The final plan should also recognise other on-farm water storage schemes beyond reservoirs, including water stored in:

- well-managed ditches and swales;
- wooded areas and woodland soils;
- farmland soils, achieved via regenerative agriculture techniques like cover cropping and no-till cultivation, which improve soil health, allowing a greater volume of water to infiltrate into soil and be stored in its structure.

Water companies should be more ambitious with respect to leakage reductions.

15. The draft plan notes that reducing leakage is top priority for customers. It is also a priority for CLA members. The CLA believes that that investments by water companies to reduce leakage should be as ambitious as possible, especially given that water infrastructure has seen underinvestment in recent years. The 50% leakage reduction target should be viewed as the minimum level of ambition.

The plan should recognise the value of Nature-based Solutions and include them within the final plan.

16. The CLA urges WReN to recognise the synergistic benefits of Nature-based Solutions for water security, flood mitigation, climate mitigation and adaptation, biodiversity, and socioeconomic wellbeing within its final plan.

17. The WReN region includes large areas of uplands. From the 1960s until the mid-1980s, ditches known as grips were dug in heath and blanket bogs in the northern uplands to drain them. Blocking grips raises the water level and encourages the re-establishment of sphagnum moss, a keystone species in peatlands which increases water retention. Restoring more natural hydrology in the uplands would allow water to infiltrate more slowly, recharge groundwater, and reduce the dangers posed by flooding and silted streams.

18. It is disappointing that the current plan does not incorporate Nature-based Solutions like restoring peat as supply-side strategies. Whilst it may be hard to quantify the benefits of Nature-based Solutions in terms of water supply, the CLA does not believe this is a reason to exclude Nature-based Solutions from the plan.

19. Beyond peatland restoration, other Nature-based Solutions for WReN to consider 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 facilitates greater storage of water in soils and slows overland flow;
    - woodland planting and natural regeneration, to slow overland flow and increase infiltration;
    - well-managed swales and ditches, which can hold large quantities of water.

20. These Nature-based Solutions dovetail with Natural Flood Management (NFM), which reduces the flashiness of catchments and slows river flows. WReN should consider flooding and drought more holistically in its plan. Solutions using nature can address both and deserve greater recognition.

21. Nature-based Solutions offer substantial opportunities to sequester carbon. The CLA supports WReN's aim for its plan to be carbon neutral in order to meet the national 2050 net zero target. Therefore, WReN should consider how Nature-based Solutions for water security can also offset the carbon emitted during the construction of new public water supply infrastructure, and invest accordingly.

WReN should retain Temporary Use Bans (TUBs) within its final plan as a way to reduce the burden on abstractors with more inflexible water needs during drought.

22. The CLA regards TUBs as a valuable option that the public water supply can implement to ease the pressure on other abstractors with less flexibility in their water needs during drought situations. Crops have relatively small water needs overall, but if these are not met, production becomes no longer possible and will move elsewhere. 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.

23. More generally, the CLA is clear that demand-side reductions should be borne by the public water supply not the agricultural sector, a sector in which even small reductions in abstraction licences could change production patterns in ways detrimental to national food security.

WReN should ensure that new groundwater and surface-water abstraction sites for the public water supply do not negatively affect river flows or existing abstraction licences.

24. The CLA notes that WReN expects to meet a large fraction of future water deficits by exploiting new groundwater supplies. Careful, scientific cost-benefit analysis should be undertaken for each new groundwater and surface-water site to ensure existing abstraction licences owned by farms and other businesses downstream are not affected.

Demand-side reductions need to be accessible to all households, particularly in rural areas on private water networks.

25. To reach the ambition on individual water consumption of 110 litres per person per day, there needs to be support for retrofitting homes and buildings in WReN's final plan, such as grant funding for water-efficient fixtures and fittings, and free issue and installation of smart meters. Grants or subsidies for retrofitting and metering should also extend to private water supplies.

26. WReN should note that that private water suppliers have a legal duty to provide continuity of supply, but have no means to compel demand-side water reductions. Reducing abstraction licences for private water supplies may be counter to landowners' duty to provide households with a right to a supply of water.

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

27. 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.

Other points the CLA wishes to raise:

28. **Reservoirs:** Water companies in WReN could consider dredging reservoirs to increase their capacity, and maintaining them better. Whilst the CLA does not want to see land unnecessarily flooded, reservoirs can contribute to flood mitigation and hydropower as well as water supply. The construction of new reservoirs in the North East could be further explored.

29. **Landowner engagement:** It is pivotal that genuine local engagement, especially with landowners, takes place for any infrastructure projects that may impact land. Agricultural land should be disturbed for the minimum duration possible whilst installing or upgrading infrastructure.

30. **Grey water recycling:** Building regulations for new developments should mandate grey water recycling and re-use.

For further information please contact:

Matthew Doran
Land Use Policy Adviser – Climate and Natural Resources
CLA, 16 Belgrave Square
London SW1X 8PQ

Tel: 07525 196833
Email: matthew.doran@cla.org.uk
www.cla.org.uk
