Consultation Response

West Country Water Resources – Draft Regional Plan

West Country Water Resources Consultation

Date: 24 April 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 West Country Water Resources (WCRW) on its Draft Regional Plan.

CLA recommendations for WCRW's final plan:

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

3. The CLA is concerned that WCWR's draft plan states that it "only ha[s] a broad understanding of non-public water supply needs". We believe WCWR should urgently conduct detailed modelling of future agricultural water needs and deficits at a catchment scale. WCWR 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.

4. 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;

- and help government and other funders to target grant funding to the most water-stressed catchments.

5. The CLA believes it is most resource-efficient for WCWR to conduct this modelling, ready for incorporation in the final plan. We are aware that an Ofwat regulation, stipulating that billpayer revenue cannot fund non-public water supply research, has precluded Water Resources Regional Groups 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 WCWR's draft plan.

6. In general, we believe that demand-side savings should derive from the public water supply rather than agricultural abstraction licences. This will help avoid offshoring food production to more water-stressed areas.

Reducing leakage by 50% by 2050 should be the minimum level of ambition from water companies.

7. The CLA firmly believes investments to reduce leakage should be as ambitious as possible, especially given that water infrastructure has seen underinvestment in recent years.

The CLA is concerned that WCWR's currently proposed supply-side options do not meet the expected deficit under the more severe population growth and climate change scenarios, and we urge WCWR to develop other proposals.

8. The CLA recognises that a wide envelope of future water use scenarios exist, with large uncertainty surrounding trends in working-from-home, and that sparsely populated geographical areas in the West Country make it difficult to develop regional water resources. However, we would urge WCWR to consider developing new supply-side options in order to avoid placing additional stress on water for food production and to provide more water for conservation in future. This is particularly relevant given WCWR's finding from its focus groups that household consumers are sceptical about per capita

reductions. Developing new water supplies will become more important the larger the magnitude of the abstraction reduction from the Avon.

9. For example, multiple quarries at the end of their lives in the Mendips could be investigated for suitability as reservoirs, rather than a single one. These would have tourism, recreational and biodiversity benefits, and be highly land-efficient as reservoirs.

10. Smaller-scale infrastructure can come online more quickly, and should feature within the plan. Options include:

    - Smaller water recycling projects, which can recharge rivers and groundwater higher up their courses using water from river mouths, following the model of the Felixstowe Hydrocycle scheme in Suffolk.

    - Rainwater harvesting and grey water reuse in housing estates, roads, and other urban areas, using 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.

Temporary Use Bans (TUBs) should be retained as an option within the final plan to provide more flexibility during drought.

11. 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 any bans or caps on water use are applied to the agricultural sector during droughts. The CLA urges WCWR to retain TUBs within its arsenal of demand-side measures in the final plan.

12. 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.

13. The CLA is pleased to see that WCWR acknowledges the importance of water for livestock welfare during drought situations, and that customers wish to see agricultural production continue. We would encourage WCWR 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.

The CLA is concerned that WCWR's draft plan exhibits low familiarity with solutions for agricultural water resources. We recommend that WCWR consider a much wider range of options for agriculture, particularly on-farm reservoirs and nature-based solutions.

14. The main policy solution which WCWR highlights for agriculture is "to examine opportunity in Environmental Land Management (ELMs) to reduce sediment runoff". Although sedimented rivers do reduce discharge capacity, indicate high surface runoff, and should be minimised for many reasons including soil water retention, the larger challenge on water is to develop new agricultural water supplies.

15. On-farm reservoirs are one of the most important supply-side options for food production. Climate change will make on-farm reservoirs a higher priority for many different farm types, including dairy and high-value horticultural crops. On-farm reservoirs provide numerous 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.

16. 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. 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.

17. The CLA believes that if WCWR 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.

18. Farmland is also able to host numerous Nature-based Solutions to hold water on the land and encourage greater infiltration to groundwater. Nature-based solutions are crucial to CLA members, and WCWR's final plan should promote them; for example:

    - restoring meanders on straightened rivers, meaning they hold more water and flow more slowly;

- leaky dams, which store more water in rivers and discharge water more slowly;
- regenerative agriculture techniques, such as cover cropping, no-plough agriculture and agroforestry, which improve soil health and allow a greater volume of water to infiltrate into soil and be stored in its structure;
- well-managed swales and ditches, which can store large quantities of water;

We support WCWR's decision to make desalinisation an option of last resort (except in the Isles of Scilly).

19. The CLA believes that desalinisation must only be undertaken when plentiful renewable energy is available. Careful cost-benefit analysis is required to minimise the contribution of expensive desalinisation plants to climate change. We agree that the concentrated saline output from desalinisation needs careful disposal to minimise ecological harm. Desalinisation plants must not interference with ecologically sensitive coastal habitats, flood defences, and/or carbon sequestration.

20. In preference, the CLA supports water recycling to recharge river headwaters. We welcome the water recycling plant proposed at Poole, and believe this type of technology could be extended at a variety of scales. Abstraction from the river mouth can also be used to recharge aquifers and groundwater, as demonstrated by the Felixstowe Hydrocycle scheme in Suffolk.

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

21. The CLA recognises that new reservoirs and other infrastructure for the public water supply are needed to provide water security. Research effort has gone into deciding their siting, and the CLA is encouraged that existing assets like quarries are being explored before flooding farmland. Future schemes should seek to minimise flooding higher-grade agricultural land wherever possible. Only the land directly necessary to the reservoir's construction and function should be subject to compulsory purchase orders.

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

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

23. The CLA strongly supports the ambition to reduce unnecessary water consumption and to make the public more cognisant 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 instance, the issue and installation of smart water meters should be free, and more water-efficient fixtures and fittings should be subsidised by water companies. Education about the need for reductions in public water consumption should also be a higher priority in the final plan.

24. The CLA would like to see schemes and funding to help install more water-efficient fixtures extended to the private water supply. WCWR 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, especially during drought.

25. Furthermore, the final plan should clarify what reductions in water consumption WCWR desires from commercial water users which are non-household and non-industrial, such as businesses with shops or holiday accommodation – the latter a significant water use in the West Country. WCWR should note that farm shops, property lets, and cafes cannot legally stop or limit visitor water usage.

26. It makes sense that regulations for new buildings reflect water efficiency, and the CLA supports their prompt rollout. Building regulations for new developments should include mandatory rainwater harvesting, storage and re-use of grey water.

27. We welcome the government's water labelling on white goods, which will help households and businesses to make water-efficient investment decisions.

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

28. The draft plan does not join up flooding and drought effectively, although we are pleased to note that WCWR advocates separating sewage from surface runoff in the wastewater system. The CLA would like to see greater recognition of how Nature-based Solutions for drought also contribute to flood mitigation, by reducing the flashiness of catchments and slowing river flow, thereby retaining water in the landscape for longer and aiding infiltration to groundwater. WCWR'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 interventions.

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

29. 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. WCWR should plan for reduced water usage from golf when deciding supply-side public water infrastructure.

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

30. Finally, 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.

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