



National Policy Statement for Water Resources Defra Consultation

Date: 22nd December, 2017

The CLA has more than 30,000 members who between them own or manage about half the rural land in England and Wales. Most of our members are farmers and a significant number are involved in managing water resources in various ways, both at a business level on their properties and at a local level in coordination with other stakeholders.

Part 1: Development of the National Policy Statement

1. Do you have any views or further evidence that could inform the need for resilience in the water sector?

The need for water resilience is broader than the current focus on public water supply alone. Water resilience must take into account both agricultural and environmental resilience in relation to water resources.

While there is a demonstrable need to increase infrastructure for water resources to meet the expected gap in public drinking water demand, there should be concurrent action to facilitate greater water resilience for agricultural and rural businesses. Agricultural production is particularly susceptible to varying levels of both ground and surface water supply and these businesses suffer disproportionately from a lack of water resilience – both at a property holding scale, from an inability to store, transfer and manage water, and at a wider catchment scale, due to the confluence of actions of many stakeholders, including water authorities acting on behalf of the public water supply.

In terms of evidence, there are many cases which represent the need for a more holistic approach to water resilience which does not isolate the need for resilience of the public water supply without addressing the interdependencies with other water users.

For instance, crop rotations are practiced in arable agriculture, meaning that where crops are irrigated abstraction quantities can vary greatly from year-to-year depending on the position in the rotation. This means that water availability in one year out of many may be crucially important for the businesses' livelihood, while in other years water use may be nil.

Furthermore, the current gap in public water supply resilience has profound impacts on the ability to build resilience at an individual holding level. One member of ours who produces willow trees for cricket bats has been impacted because willow trees are susceptible to disease without the right water requirements. Because of a lack of water resilience due, seasonal dry weather and the quantity of abstraction has caused reductions in the water table below ground, which in turn affects the success of existing and newly planted trees (some of which will represent a decades-long investment).

We advocate for 'a need for water resilience' to take into account the impact that the water sector's practices have on agricultural practices. In line with this recognition we would also like to see greater action to address long-term water resilience both for and apart from the public water supply.

Part 2: Approach to the development of the National Policy Statement

2. Do you have any views or comments on these principles for developing the NPS?

We are in agreement with the principles set forth in the consultation document and have no objections.

3. Do you consider there to be any further principles for developing the NPS? Please explain your reasoning

No, as noted above we are in agreement with the principles guiding the approach to developing the NPS.

4. Do you agree with the main issues identified in the topic areas (Section 3.3 of AoS Scoping Report)? Specifically: Are there issues included in the proposed scope of the appraisal that you think should be removed? If so why? Are there relevant issues that have not been reflected in the proposed scope of the appraisal that you think should be included? If so, why?

We are not in a position to comment on this.

5. Does the AoS Scoping Report set out sufficient information to establish the context for the appraisal, both in terms of the scope of the baseline analysis presented, and the plans and programmes reviewed (AoS appendix B)? If not, which areas do you think have been missed from the baseline analysis and/or what additional plans or programmes should be included?

We are not in a position to comment on this.

6. Do the AoS objectives and guide questions (Section 4.3 of AoS scoping report) cover the breadth of issues appropriate for appraising the effects of the draft NPS? If not, which objectives should be amended and how? Or which guide questions should be amended and how? Are there other objectives or guide questions that you believe should be included?

We are not in a position to comment on this.

7. Do you have any comments on the discussion on potential reasonable alternatives to the NPS (Section 2.4 of the AoS scoping report)? Should any further alternative scenarios be considered? Please support your suggestion with your reasoning.

We are not in a position to comment on this.

8. Do you think that the proposed approach to assessing the NPS against the Habitats Regulations is appropriate? For example, you may consider if the approach described is proportionate and whether it would provide a suitable level of information about potential habitats impacts. If not, how do you think the intended approach should be amended, and why?

We are not in a position to comment on this.

9. Do you think that the HRA Methodology Report sets out sufficient information to establish the context for the Screening Report and later Appropriate Assessment? If not, which areas do you think have been missed and where is the information available from.

We are not in a position to comment on this.

Part 3: Review of nationally significant infrastructure projects definitions

10. Do you have evidence on the costs of potential supply schemes, especially those other than reservoirs, and potential time and cost savings from NSIP designation, to improve our economic analysis (see Annex B for more detail)?

We are not in a position to comment on this.

11. What are your views on the factors we have set out here for considering if schemes are nationally significant (see also Annex C)?

We are not in a position to comment on this.

12. Are there any further factors that we should take into account?

We are not in a position to comment on this.

13. Which of the two options is your preferred threshold for new nationally significant reservoir schemes? Please explain your reasoning, where possible using examples of previous reservoir schemes and schemes that are likely to be brought forward in future WRMPs.

We are not in a position to comment on this.

14. Which of the two options is your preferred threshold for new nationally significant water transfer schemes? Please explain your reasoning, where possible using examples of previous transfer schemes and schemes that are likely to be brought forward in WRMPs.

We are not in a position to comment on this.

15. Do you have any views on whether there would be benefit in including groups of smaller transfer schemes within the threshold? Please explain your reasoning.

We are not in a position to comment on this.

16. What do you see as the main benefits and risks of setting the same threshold for all infrastructure types? For example, do you see any reasons that the threshold for reservoirs and transfers should be / not be the same?

We are not in a position to comment on this.

17. What are your views on the inclusion of desalination schemes in the definition of nationally significant infrastructure? Please explain your reasoning, where possible providing examples of previous schemes or those that are likely to be brought forward in WRMPs.

We are not in a position to comment on this.

18. What should the threshold for desalination schemes be? Please explain your reasoning, where possible providing examples of previous schemes or those that are likely to be brought forward in WRMPs

We are not in a position to comment on this.

19. What are your views on whether effluent reuse schemes should be considered nationally significant? Please explain your reasoning, where possible providing examples of previous effluent reuse schemes or those likely to be brought forward in WRMPs.

We are not in a position to comment on this.

20. Do you have any further comments on what water resources infrastructure should or should not be considered nationally significant?

Recognising that the intended purpose of amending NSIP definition thresholds and the proposed NPS is to make it easier and quicker for more infrastructure projects to go forward, it is imperative that there are formal and comprehensive consultations carried out with landowners as early as possible in the development process, and ideally before sites are finally selected for installations. Infrastructure providers should demonstrate that they have tried to acquire the land through negotiation before being permitted to resort to compulsory purchase.

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