

To: West Country Water Resources Date: 28th February 2022
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West Country Water Resources Emerging Regional Plan Consultation Response

Introduction

West Country Water Resources (WCWR) is one of five regional water planning groups in England. The group provide strategic oversight and co-ordination of water resources across the river catchments of the South West of England. The water resources activity is dominated by water companies and public water supply (PWS). The geographical area covered is very diverse with regards to water resources and needs to support a variety of businesses including agricultural and farming sectors. Agriculture is important in this region with the livestock industry accounting for over £2bn and a very important dairy industry. Within the WCWR Emerging Plan, it states that “Agriculture was consistently highlighted as an essential sector that should be supported”.

Agriculture in the West

The NFU represents 55,000 members across England and Wales. In addition, the NFU have 20,000 NFU Countryside members with an interest in farming and rural life. Farming has a key role to play across a number of platforms within the WCRW Regional Plan, namely;

- water management (which includes a holistic approach to water resources, water quality and flood management)
- food security and
- providing environmental benefits and a range of ecosystem services

The NFU Integrated Water Management Strategy states that farmers have much to offer in the development of an integrated water management strategy. Farming plays a key role in protecting and enhancing our water environment along with providing substantial environmental benefits and ecosystem services.

A secure supply of water is essential for food security, supporting, horticultural, crop and livestock production. To meet the demand required for food production, farms rely on a combination of water from rainfall, abstracted sources and public water supplies. Irrigation demand is highly variable depending on seasonal peaks and weather conditions, whereas a constant supply is required for livestock production.

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The NFU asks that the WCWR Regional Plan looks to:

- provide a detailed understanding of the deficits that the agricultural sector faces across the South West
- provide a timeline for working with the agricultural sector to understand the options and how they support the short, medium and long term risks of water shortages
- provide assurance that regulation will work alongside the proposed options to secure water resources for a sustainable future for agriculture
- work at a sub regional / catchment level to fully understand the implications of water resources within those catchments
- to fully explore the financial implications (capital and operational costs) of the options available to the agricultural sector and to explore funding opportunities

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Questions to be answered as part of the response:**Supply and Demand Forecasts**

To understand what the future water needs are for the region we need to first forecast both the supply and demand for water.

a) We have calculated the impact of climate change on water availability in the region using two scenarios; For our central emissions scenario we have used RCP6.0 probabilistic climate projections, equating to an average UK temperature rise of 1.9°C from the pre-industrial baseline through to the 2070s. Under the RCP6.0 scenario global emissions peak in 2080, then decline.

Our higher emissions scenario is based on RCP8.5 regional climate model (RCM) projections. RCP8.5 is considered the worst-case emissions scenario, with emissions continuing to rise throughout the 21st century. RCMs show a greater impact on our region than the probabilistic projections resulting in an average temperature rise of 3.7°C by the 2070s. This high emissions scenario therefore represents the expected worse-case impact of climate change.

Do you think this is the correct approach?

5

b) **For the environment we have assumed we should meet current needs as we do not have detailed information on what future needs might be. Do you think this is the correct approach?**

8

c) **We have assumed the demand for water will be controlled due to both leakage reduction and households and businesses reducing their own use. This forecast assumes we meet government targets for both these areas. Do you think this is the correct approach?**

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d) **As the future is uncertain, we have undertaken a range of sensitivity tests to show how the needs could vary depending on how the future pans out. Do you consider our approach is appropriate?**

8

e) **Do you have any comments on how the future water needs have been assessed?**

The Emerging plan highlights that “we only have a rudimentary understanding of non-public water supply needs” (page 7) and whilst it is noted that the emerging strategic theme is to “improve understanding of non PWS needs and improve connectivity and storage to support them” it is difficult to see how assumptions can be made for the Agricultural sector based on this.

The NFU welcomes the provision of a Sector Plan for Agriculture (page 13, Figure 4) who will produce the plan and be responsible for it?

The NFU certainly welcomes the Sector Plan to “develop a response and strategy for non PWS needs. Build plans consistent with other legislative requirements”.

Environment

The plan sets out an aim to leave the environment in a better condition than we found it.

a) We have taken a phased approach, starting with those areas where there are known and evidenced problems and ending with those areas where there is less knowledge if there is an environmental issue. Do you think this is the correct approach?

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b) Do you have any comments relating to our aim and approach for leaving the environment in a better place than we found it?

Within the emerging plan, page 30 it states the next step is to review the environmental destination scenarios for other abstractors and to agree environmental destination for each catchment. The NFU would welcome the detail on these proposals with regards to the agricultural sector and timescales given the regional plan deadline.

Options

a) Our plan has focused on strategic needs and the main strategic options to provide more water in the region. Are there any strategic options you think we have missed?

Best Value Planning

Meeting water needs often requires a trade-off between different factors. To understand this we have produced a 'best value' framework to try and balance the trade-off between the environment, cost, and resilience to droughts

a) Do you think the themes we have selected (environment, cost and resilience) are the correct themes to assess?

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b) Do you have any comments on what best value means to you or how we should examine what is best value for the region?

Strategy and timing

We have used the forecasts of needs and the scenarios to develop a strategy for the region. This is split into a plan with three phases that allows the region to flex and adapt if the future changes.

c) Do you think a phased approach is right?

7

Flexibility and adaptability are required in order to allow the outcomes of the plan to be achieved within a potentially changing environment.

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d) Do you think we should do more, earlier, even if the trade-off is higher cost but less risk?
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e) The future position is sensitive to whether the demand for water reduces in line with Government targets. We haven't looked at increasing the cost of water during times of dry weather. Do you think this is something that we should consider going forward?
7

f) Do you have any comments on the proposed strategy for the region?

The questions above pertain, in the main to the provision of the plan for the environment. The response below specifically concerns the agricultural sector. The requirement for the agricultural sector to be fully included within the Regional Plan and the requirement for the sector to be fully engaged with.

On page 5, the Emerging Regional Plan highlights the outcomes required from the Regional Plan and the NFU would like to see added here, 'ensure water resources are managed effectively for food security'. The NFU are delighted to see, on page 70, the emerging plan stating the next step is to integrate with other plans and that includes, for agriculture, the NFU Integrated Water Management Plan.

Page 7 states that "strategic water resources schemes have been identified as needed and will require more detailed individual assessments". How are they able to be identified as a multi sector approach when the multi sector needs require improving?

Overall, the phased approach is welcomed by the NFU and it is hoped that adaptability and flexibility have been factored in to the review system at each of the phases. Page 67 within the medium term options, states "This phase should continue to increase non-public water supply connectivity and storage, to reduce climate change risk". The first step is to understand the water resources issue within the agricultural sector and then seek to understand the solutions available.

Page 12 where the emerging plan states it "should, engage widely with interested group", the NFU feel this ought to be changed to "must".

Page 36 reiterates the point that further work will be carried out within the agricultural sector to review its needs. The NFU would ask a timescale and detail of this work to be provided to ensure the provision of the information for the regional plan deadline. The emerging plan states "During focus groups customers consistently mentioned that agriculture water requirements should be supported and understanding the scale of the requirement will allow us to consider this within our draft regional plan". Page 36 "With the region having predominantly grassland-based livestock systems; in a drought situation alongside human need, animal welfare for livestock needs to be a key priority"

On page 36 the emerging plan states "for agriculture, we will estimate the extent of any shortfall in abstraction resulting in failure of supply during severe drought." What data will be used to estimate this shortfall? Is this correct?

Page 36 “As our estimates of the needs of other abstractors are still being developed, we haven’t included these within our supply demand balances shown above. They will be incorporated in our draft regional plan”. The NFU welcomes the opportunity for continued discussions to support the information. Page 61 states the proposed regional plan will “improve understanding of non-public water supply needs and improve connectivity and storage to support them – Implement actions to better understand non-public water demand (particularly agriculture and the food sector) and start a process to increase water availability to support it. Whilst we do not know all the future needs, climate change and environmental requirements are likely to increase pressure on sectors that may not have robust plans to meet future demand.” Through this process will an Agriculture Water Resources Sector Plan be produced. If so, how does this relate to the comment made on page 71, stating “Non-public water supply water users should look to:

- Identifying opportunities to operate water sources differently to increase resilience to drought whilst also reducing the impact on the environment at times of stress.
- Promote the regional plan to their sectors and encourage greater participation in water resources planning.
- Increase water resources planning activity in agriculture with support from water companies and regulators”. A clear understanding of expectations from the regional plan is required for the agricultural sector.

Linking to the point above, page 66 states “Historically non-public water supply supplies have been relatively robust. However, the impact of climate change and future environmental needs will make the availability of water less certain, particularly during severe drought” – is this correct? “This emerging plan therefore recommends a programme of work to create a plan to increase connectivity and storage availability for these water users. It is recommended this is focussed on agriculture to begin with and is likely to be very site specific in nature.” How does this fit in with the comments above regarding what the regional plan will provide for and what each sector should provide for?

Page 65 “for agriculture it could be to examine opportunity in Environmental Land Management (ELMs) to reduce sediment runoff”. How much of a problem is sediment run off within the region? And how much does it attribute to water quality? All options for the agricultural sector should be reviewed in context of the Water Resources Regional Plan.

It is essential that in developing any water resource plans there is accommodation made for food production. In the SW changes to climate and our weather mean that livestock and crops are at risk. There must be allowances for livestock in emergencies through drought weather and also during floods. Also there needs to be consideration for irrigation even on grassland areas.

Farmers will have different motivations for their businesses and how they manage their land. This might mean some will be involved in government schemes that can improve water resource sharing or they will work with water companies and other brokers in order to put in new measures.

As a final point. Farmers are in a unique position to be able to create additional water resources for the public. This can be through allowing their land to hold more water and therefore to increase base flows in rivers for abstraction or through adding in new reservoirs that can be used for water supply.

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