

**WORSHIPFUL COMPANY OF WATER CONSERVATORS
BRIEFING ON THE RESPONSE TO DEFRA CONSULTATION
ON THE LAND USE FRAMEWORK
MARCH 2025**

<https://consult.defra.gov.uk/land-use-framework/land-use-consultation/consultation/subpage.2025-01-21.3793375962/>

https://consult.defra.gov.uk/land-use-framework/land-use-consultation/supporting_documents/Land%20Use%20Consultation.pdf

https://consult.defra.gov.uk/land-use-framework/land-use-consultation/supporting_documents/LU_analytical%20annex.pdf

1 The Worshipful Company of Water Conservators ('WCWC') is a City of London Livery Company focussed on the long-term health of our water resources and the broader environment. Our members include senior professionals from water, environmental and related industries and regulators, along with others who share our concern for water and the environment. Our experience and knowledge ranges from the complexities of environmental sciences, through the application of engineering to deliver the goals identified by those sciences, and the subsequent management of the assets created. The WCWC's purpose is *promoting a diverse and sustainable environment*.

2. As part of that purpose, the WCWC has been responding to relevant consultations particularly on matters relating to water conservation. These are archived on its website.

<https://waterconservators.org/policies-and-practices/>

3 The WCWC is responding to the Consultation on the basis that land and water conservation must come together into the overarching conservation concepts of integrated natural resources management.

4 The WCWC supports the principles of the need for a sound Land Use Framework but suggests that a lot more work needs investing in these proposals. The consultation does not address the following fundamental failures in the current land market:

- excessive power of supermarkets in the food market that drive down market prices for farmers and low returns from farming which are lower than returns from using land for Solar PV with its Government promotion and subsidies.
- farming land for development having an excessive premium over its value from food production. This is partly due to LPAs' failure to implement CIL to cover the full costs of infrastructure requirements of developments – including supplying the water and sewage treatment for the additional new houses

Unless these market failures are addressed, Defra will not be able to realise its laudable aims of a sound land use framework that leads the market to deliver long term food security while delivering multiple benefits and supporting economic growth will not be realised

5 There is not enough alignment with the National Planning Policy Framework (NPPF). Nor enough recognition of the need to coordinate better with the high-profile issue of water management.

6 Water is crucial to any exploitation of land. Integration of land use allocation in a framework with other key matters such as climate change and water and in particular water use allocation is essential – as advocated in the Foundation for Water Research (FWR) publication on the future of water resources.

<https://fwr.org/publication/future-of-water-resources/>

There is no reference to the use of Catchment Plans as set out in the 2023 Defra Water Plan or of River Basin Plans. There needs to be a driving concept of Integrated Natural Resources Management bringing land and water together. The use of land for ‘nature- based solutions’ in water management, including that of floods, should be considered as a land use category.

7 The WCWC has been advocating an overarching National Water Strategy for some time and is considering if the example of the concept of Land Use Framework could be complemented by a Water Use Framework into which all the current water initiatives including River Basin Planning could be located .This will be included in the WCWC response to the call for evidence by the Defra Independent Water Commission .

<https://www.gov.uk/government/organisations/independent-water-commission>

8 The WCWC notes that Defra intends organising a series of workshops as part pf the Consultation. It urges the Minister to organise at least one on water specifically, and it stands ready to participate.