

30 July 2021

Dear Sir/Madam,

Re: Horticultural Trades Association submission to South East Water Dry Weather Plan consultation

Thank you for the opportunity to contribute to this consultation. The Horticultural Trades Association (HTA) represents the UK garden industry, including garden centres, DIY stores, commercial plant growers, domestic landscapers and manufacturers. The ornamental horticulture industry is worth £24bn to UK GDP, with over 560,000 jobs supported in the UK.

In our response we note that the pressures of population and economic growth, and climate change are set to put pressure on water supplies in the coming years. It's vitally important that we act now to ensure adequate access to water supplies for the country. Our industry is ready to play a part in this and has begun work towards reducing mains water use through the HTA's Sustainability Roadmap (hta.org.uk/sustainability). As part of our Roadmap, we set out our goals for the industry on water use. These are:

- an aggregate **40% increase** in the proportion of water that comes from non-mains and re-used water sources such as rainwater or runoff capture among growers and retailers.
- an aggregate **25% increase** in the proportion of HTA members using water efficiency measures such as reservoirs and automated irrigation systems.

With these points in mind, we would make three key points in response to the consultation:

1. That the devastating impact of a ban on 'watering outdoor plants on commercial premises' on our members be recognised in the plan, and that an exemption for horticultural businesses be introduced in non-essential use bans.
2. That the temporary provision for 'watering newly bought plants for the first 28 days after the ban is introduced' be nuanced so that irrigation of plants and trees being introduced to green infrastructure projects can continue, and that longer term environmental benefit is not lost.
3. That South East Water (and other water companies) work with us to accelerate the introduction of measures and best practice that will reduce our members' reliance on mains water. This includes support for water capture infrastructure projects, such as more self-sufficient water systems like reservoirs and efficient irrigation systems.

We and our members already take water efficiency measures, including selling drought resistant plants, but we stand ready to support greater domestic water efficiency through disseminating information to gardeners on responsible watering in their gardens.

Thank you once again for the opportunity to respond, and we hope to work with South East Water and other water companies as a responsible partner in ensuring water resilience for the UK in the coming years.

Yours faithfully,



James Clark
Director of Policy and Communications

HTA Response to South East Water's Dry Weather plan

Background

The Horticultural Trades Association (HTA) represents the UK garden industry, including garden centres, DIY stores, commercial plant growers, domestic landscapers and manufacturers. In our response we note that the pressures of population and economic growth, and climate change are set to put pressure on water supplies in the coming years.

In 2017, research from Oxford Economics demonstrated that the ornamental horticulture and landscaping industry supported contributions of £24.2 billion to the UK's GDP and 560,000 jobs – around 1% of the UK's workforce.

It's vitally important that we act now to ensure adequate access to water supplies for the country. Our industry is ready to play a part in this, and has begun work towards reducing mains water use through the HTA's Sustainability Roadmap (hta.org.uk/sustainability). As part of our Roadmap, we set out our goals for the industry on water use. These are:

- an aggregate 40% increase in the proportion of water that comes from non-mains and re-used water sources such as rainwater or runoff capture among growers and retailers.
- an aggregate 25% increase in the proportion of HTA members using water efficiency measures such as reservoirs and automated irrigation systems.

Many members already sell and promote drought-resistant plants and have communication plans in place to consumers to improve water efficiency. However, we want to work with water companies in improving these communications.

The industry underpins many of the goals of the Government's 25-Year Environment Plan, including heightened levels of biodiversity and carbon sequestration, and since the first covid lockdown easing there are now 3 million new gardeners, making 30 million gardeners in the UK in total, relying on horticultural businesses.

The horticulture industry also supplies the green infrastructure that will increasingly present nature-based solutions to the effects of climate change, for instance in urban tree planting and greening projects and sustainable urban drainage systems. This is just one way that horticulture underpins the Government's 25-year Environment Plan.

The ornamental horticulture industry and water use

Water Resources South East, of which South East Water is part, has high concentrations of horticulture businesses in its catchment, particularly over 40 commercial plant and tree growers and 245 garden centres; this means that significant employment in the area is provided by horticulture.

Specifically within South East Water's supply, there are 10 grower businesses who have a collective annual turnover of over £16 million. There are also many garden retailers who would sit under the same catchment; however, we understand that there would be exemptions on the ban for plants that are for sale.

These grower businesses supply plants to garden retailers and domestic and amenity landscapers, both locally and across the country. If plants grown in the southeast were to fail due to a lack of water, the consequences would be felt nationwide and the whole ornamental horticulture industry would be at risk.

In research presented at the 2021 Waterwise conference, HTA showed that UK garden centres and ornamentals growers accounted for around 20 million cubic metres of water per year compared with a total 5.3 billion cubic metres abstracted for public water supply. The business survey which informed the research found that the impact were mains and/or abstracted water were not available during peak operating periods would affect the survival of the business for 50% of commercial growers and 45% of garden centres; for almost all the others the scenario would have a 'serious negative impact'.

Our industry also plays a vital role in the design, planting and maintenance of green infrastructure. Examples of projects include the Government's Tree Action Plan commitment to planting 30,000 ha of trees per year, and the Queen's Green Canopy, a project to encourage people to plant trees for the Queen's Platinum Jubilee. UK production nurseries are key to meeting these targets. These projects are often years in the planning; however, these timeframes are small compared with the years and decades of environmental benefit they provide in terms of reducing urban heat island effects, shading benefits, and reducing the impact of heavy rains and flash flooding on urban drainage systems. However, in order for these planting schemes to succeed it is vital that plants be irrigated as they root in to their situations.

Our response to points in the proposed drought plan

In broad terms we welcome and support the principles of the plan. As noted, continuity of water supply plays a vital role to the employment and economic contribution our industry makes in the South East Water area, and nationwide. Our industry has innovated solutions for domestic gardeners to reduce their reliance on mains water and hosepipes for watering in the form of water butts and drip irrigation systems, and stands ready to help educate consumers around responsible water use in gardening.

We note that under non-essential use bans a there is a provision to ban 'watering outdoor plants on commercial premises'. The wording of this is ambiguous in the context of our industry and could be interpreted as a ban on irrigating commercial crops which would lead

to huge commercial losses; essentially horticultural businesses would be treated in the same way as pubs looking to water a hanging basket. Such a ban would risk inflicting huge and lasting damage on our industry. The loss of what amounts to a cash crop would push a huge proportion of our member businesses into insolvency and would reduce the UK's capacity to produce plants and trees needed for tree planting and urban greening goals envisaged in Defra's 25 Year Environment Plan. We would ask that an exemption be built into the plan for horticultural businesses, recognising the disproportionately serious impact water restrictions would have on our sector, especially in peak production periods.

We also note that under non-essential use bans the plan provides for 'watering in newly bought plants for the first 28 days after the ban is introduced'. In the coming green infrastructure projects such as tree planting and urban greening work have huge potential to provide nature-based solutions to the effects of climate change. The benefits on human health are also significant; according to the Office for National Statistics air pollution by UK vegetation averted 1,900 deaths per year in 2015 alone, and in 2018, saved over £1.2 billion in avoided healthcare costs

These ecosystem services pay back over many years and decades. However, a critical point in their implementation is in the period after planting when these trees and plants need to take root and establish themselves. Without adequate irrigation (which can be managed in a responsible way), these plants and trees will die, and the projects fail. We note that you propose an exemption to non-essential use bans for 'water-using activities which protect human health and safety'. We suggest that this be extended to activities which protect or benefit the environment and the UK's natural capital, and that exemptions based on a case-by-case review of the irrigation needs of green infrastructure projects be provided for in the plan.

Future opportunities for collaboration

As noted in our covering letter, our industry is already working towards greater water resilience and on reducing its reliance on mains water; we recognise the vital national interest in conserving the nation's water supplies. Our Sustainability Roadmap includes a target for an aggregate 40% increase in the proportion of water that comes from non-mains and re-used water sources such as rainwater or runoff capture among growers and retailers. In the research presented at Waterwise's 2021 conference, we reported that 32% of commercial growers and 50% of garden centres do not currently use rainwater harvesting systems but would like to; almost all the others are already using such systems. We believe there are solutions for businesses to rely less on mains water in this way, and feel it is a mutual interest of water companies. We therefore welcome engagement with water companies to achieve this goal.

We are working to raise awareness and share best practice and guidance between our member businesses and would like a dialogue with water companies on how this can be accelerated. Similarly, we would like to ensure that our members are able to promptly identify, and access regional or national funds or incentives designed to accelerate investment in water resilience measures and in infrastructure which utilises water in the most efficient way – such as reservoirs on site for growers and retailers and the latest water

saving technology. In many cases this will not be a case of new funds or incentives specifically for horticulture businesses, but merely of ensuring that horticulture businesses are aware of and are included in eligibility criteria for such support. This would ensure that the horticulture industry can continue to provide so many environmental, and health and well-being benefits in the most sustainable way. We would welcome collaboration with South East Water and other bodies to this end.

Lastly, better data and information on our industry's water use and needs are vitally important to achieving greater water resilience in horticulture. We would like to collaborate with the water industry in developing better data in the industry's national and regional water needs and the related economic dependencies on water supplies. This will enable us to identify and prioritise areas in which there are particular areas of commercial or environmental impact relating to water use in horticulture, and for us to work together to play a part in preventing future difficulties rather than reacting when problems occur.

In summary, we feel that it is in both the horticulture industry's and water sector's interest to ensure that essential products such as plants and trees, and the many benefits they provide to society and the economy, and most importantly to the environment, are not threatened by a lack of water.

We welcome future engagement with the water sector and look forward to collaborating together.