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**From:** Garfield, Liv [REDACTED]

**Sent:** 10 May 2022 16:05

**To:** PS, Rebecca Pow [REDACTED]

**Cc:** Finkelstein, Tamara [REDACTED]; [REDACTED]@ofwat.gov.uk; [REDACTED]@environment-agency.gov.uk; [REDACTED]@naturalengland.org.uk; [REDACTED]@defra.gov.uk; [REDACTED]@defra.gov.uk

**Subject:** [Severn Trent support](#) for the recent environmental consultations

ST Classification: UNMARKED

Dear Rebecca,

I am writing to welcome the government's proposals to reduce storm overflow use, set tough new environmental targets and to better protect Sites of Special Scientific Interest and similar land. I also wish to welcome the government's policy paper on nutrient neutrality.

The headline summary of our response is: we welcome the government's direction of travel, it complements well the initiatives Severn Trent is already pursuing but, in some areas, we think there is scope for the government to be even more ambitious.

I cover each consultation and nutrient paper in the four sections below.

### **Consultation on the Government's Storm Overflow Discharge Reduction Plan**

We welcome the government's commitment to publishing a storm overflow road map in September this year and to the targets set out in the consultation.

The targets complement the approach ST is already taking with our [River Pledges](#) published last month. Amongst other things, we have committed to reducing our storm overflow use to an average of 20 times a year by 2025 and eliminating all harm any of our operations cause rivers (measured by the EA's Reasons for Not Achieving Good Status, or RNAGS) by 2030.

We consider the government's approach to be strong, but we also believe it could be strengthened further by:

1. Introducing a target for RNAGS reduction. Given ST has already committed to reducing RNAGS to zero by 2030, an industry-wide target to eliminate storm overflow and wastewater treatment works related RNAGS to zero by 2035 or 2040 seems reasonable.
2. Setting targets for other sectors to reduce their RNAGS targets too. The water industry accounts for around 20 percent of RNAGS; even if we were to eliminate all our RNAGS, most rivers would still not be at Good Status unless the other 80 percent are also addressed. We need all sectors doing their share of the heavy lifting.
3. Accelerating the target to reduce maximum storm overflow use to ten times a year from 2050 to 2040.
4. Increasing the target for reducing storm overflow spills in 'High Priority' areas from 75 percent by the end of 2035 to 90 percent.
5. Being as tough on the *causes* of storm overflow spills as on the spills themselves.
  - i. remove the automatic right for developers to connect surface water drains to the sewage network (thereby encouraging them to recycle surface water)
  - ii. banning plastic in wet wipes, a major cause of sewer blockages.
  - iii. encouraging highways authorities to gradually reduce the amount of rainwater they release into the sewer network.

We note that the Chartered Institute for Environmental Management has recently called for similar changes to drive improved environmental outcomes.

### **Environment Act targets consultation**

We welcome the range and intent of the Environment Act proposed targets and believe they represent an important step to a stronger environment. We particularly support the government's ambitious target to reduce phosphorus loadings from treated wastewater by 80 percent by 2037 (against a 2020 baseline).

The targets reflect the agenda that Severn Trent is already embarked upon. We are planting 1.3 million trees and working with around 9,000 farmers to enhance 5,000 hectares of agricultural

land, including offering grants of up to £30,000 a farmer to help them to move to regenerative farming practices, reducing nutrient pollution flowing into rivers. Our existing plans also commit us to reducing the amount of water we put into the network per person.

Whilst we welcome the progress being made, we believe the government's approach could be strengthened yet further with the following enhancements and clarifications:

1. The targets should recognise that how things are done is as important as what is done – e.g. planting trees is important, but it is also important to plant them in the right place to enhance biodiversity, reduce flooding and sequester carbon. One option would be to combine targets with clear principles for planting that should be adhered with.
2. The government should review what can be done to strengthen the tree planting supply chain, currently a major constraint on progress.
3. Consideration should be given to the benefits of requiring woodland management plans – e.g. how will new and *existing* woodlands be sustainably managed?
4. Whilst we support the government's target to reduce distribution input (DI) of water into the public network, we think the target underpinning this outcome could be made more effective by dividing it across the parties with the power to make the change, specifically:
  - water companies should be held to account over leakage on our pipes (we have the levers to reduce this measure, we have much less direct control over the one-third of leakage that occurs on private pipes).
  - businesses should be held accountable for how much water they use through their normal reporting processes (water companies have no direct means to control this variable).
  - Critically, direct abstraction by industry and agriculture should also be included – this accounts for around half of all water abstracted in England; all sectors need to play their part if we are going to make a meaningful difference.

We would also welcome the publication of the impact assessment and detailed evidence report on the water elements of the targets (we note that the corresponding documents are available for biodiversity, waste and woodland targets).

### **Defra Nature Recovery green paper consultation**

We very much support the government's determination to ensure that protective status remains fit for purpose.

We are seeking to support nature recovery through our work with farmers, our planting 1.3 million trees by 2030 and our work to improve peatland bogs.

Our recommendations in response to the consultation are:

1. Whilst the government is right to want to streamline designations (e.g. SACs, SPAs and SSSIs), for clarity there should be a 'no deterioration' clause in the

- proposed harmonisation – the levelling should be upwards, not down.
2. The government should seek to establish a standard for industrial and commercial properties which wish to optimise their green spaces for nature recovery.
  3. Financial compensation should still be considered if a change in standards (through harmonisation) places additional burdens on landowners/tenants.

### **Nutrient pollution: reduction the impact on protected sites**

We very much welcome the government's new approach to nutrient neutrality. We especially welcome the idea of creating nutrient trading markets as a way to achieve environmental goals in the most cost efficient way possible. The idea of encouraging water companies to be able to sell 'nutrient neutrality' packages to housing developers and others is particularly welcome. We are already talking with Ofwat and others about ideas in this area.

I have no doubt that the water sector can deliver an enhanced package of measures that will make meaningful improvements to the environment and keep long term bills low. I also have no doubt we can deliver a more ambitious programme with only a modest *short term* impact on bills. The key is to continue Ofwat's focus on improving efficiency (the sector today is already unrecognisably more efficient than we were just 10 years ago, never mind at the point of privatisation), ensure that financially vulnerable customers are properly protected (we are soon to announce a doubling of our programme that offers discounts of up to 90 percent) and the continuation of the Ofwat 'payment by results' ODI framework. It will also be important to ensure that the water sector is tasked with targets within its control, but that other sectors share the burden with targets under their control.

I hope these comments are helpful and constructive. We absolutely believe the government is going in the right direction, and would simply encourage an even more ambitious approach. We are committed to working flat out to make a success of the programme.

If helpful, we of course would be very happy to meet to discuss further.

With best wishes

Liv

**Liv Garfield (Pronouns: She/ Her)**  
**Chief Executive**

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