



Wildfowl & Wetlands Trust  
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**By online submission**

24 July 2014

Dear Ms Walley,

I hope my oral evidence to your Environmental Scorecard Inquiry was useful to the Committee's discussions. Thank you for inviting me to participate and for taking the time to hear and consider my comments.

You invited us to submit follow-up comments if we felt it would help your deliberations and I would like to take you up on that kind offer.

My organisation, the Wildfowl & Wetlands Trust (WWT), is a conservation charity that protects and creates wetlands to provide ecosystem service benefits for people and wildlife.

**Regulation, and Sustainable Drainage Systems (SuDS)**

During the oral evidence session, I mentioned SuDS in response to a question on water management, but I would also like to take this example to highlight their relevance to several other issues around environmental protection, including regulation. It is an example of a regulation that could deliver long-term net financial benefits and savings, but is being prevented by a separate Government agenda to avoid regulation for businesses.

A SuDS absorbs surface run-off onsite through features like green roofs, shales and permeable paving. This reduces peak flows into the drain system that can lead to flooding.

If designed in a "wildlife-friendly" way, SuDS create a number of benefits across the NAO/EAC environmental protection scorecard. They can reduce flooding and freshwater pollution (through filtering). They can increase biodiversity and wellbeing.

Voluntary uptake by the construction industry has been disappointing, despite efforts to encourage this - including a SuDS guidance document co-written by WWT (available online [here](#)). The Government therefore agreed with the Pitt Review's recommendation for regulation removing the automatic right to connect new buildings to the drain system. Provision was included in Schedule 3 of the Flood and Water Management Act 2010.

However, this has not been implemented, with Government citing that it may have an "adverse impact on development". This is despite a well-designed SuDS being as, or more, cost-effective to a developer as connecting to the drain system.

An indication of the onward cost to the public of not adopting SuDS is the £4.2bn London “super sewer” being built to handle peak run-off volumes caused by decades of non-permeable development in urban London.

## **Marine**

Caroline Nokes asked how Marine Conservation Zones might be protected, once identified. A major threat, to inshore areas especially, is pollution from rivers, exemplified by the famous satellite photograph of a plume of brown pollution in the Severn Estuary earlier this year as flooding washed top soil into the sea.

Similar to SuDS, techniques like Wetland Treatment Systems (WTSs) can capture diffuse pollution on farms and convert it into plant life. They can also slow down water running off fields into drainage channels and river system and into the sea (Natural England estimates that agriculture causes £234m in flooding costs alone). This creates benefits against the NAO/EAC environmental protection scorecard in terms of biodiversity, soil, flooding and coastal protection and both the freshwater and marine environments. When extended as buffer zones along river systems, these types of features can also provide corridors for species to move and adapt to climate change.

Not using features like WTSs can create cyclical costs. A senior figure in the water industry told me “The tax payer pays farmers to use tonnes of nitrate on their fields, which then run off into our rivers and the tax payer has to pay again for us to clean the pollution”.

We don't know yet whether CAP funding will be available for farmers to install features like WTSs from 2015. If not, I believe this would be a major opportunity missed. My impression is that long-term sustainability does not receive sufficient balance in the decision making process, with an undue focus on how the CAP can support the agriculture industry in the short to medium term. In addition, the continued use of public funds to support payments to farmers which do not deliver public goods, is a matter of concern. I contend this money could deliver greater benefit to more people if it were focussed into long-term sustainable solutions, such as WTSs.

It is also my impression that pollution affecting marine life receives essentially no consideration in CAP negotiations. In answer to Mrs Nokes' original question, a first step in reducing the cost of damage to our marine life would be to take that cost into account when allocating resources to managing our major sources of pollution, beginning with CAP payments.

## **Miscellaneous points**

In terms of solutions, I agree with my co-witnesses that the Natural Capital Committee is potentially a key factor in embedding environmental protection across the Government and public bodies. I support calls for its role to be placed on a firmer long-term footing.

Some form of cross-departmental environment office was also discussed briefly in the session. I'm not aware of previous discussions so cannot comment directly. But in general terms I presume this would either be an office that is shared across departments, which inputs at early stages of policy development; or an office that forms a conduit for scrutiny of environmental impacts at a late stage of policy development, similar to the Regulatory Policy Committee model. My initial inclination is that the former would be a more constructive and long-sighted approach, but that it should also have some sort of feedback loop around the Regulatory Policy Committee stage in order to give it some teeth.

Regarding water management, the Catchment Based Approach was not discussed in detail. I believe this is a very logical approach which inherently works with nature and I congratulate the Government on driving this forward. It is a good example of non-regulatory leverage: WWT is among the local community organisations contributing, we are providing training and materials for co-ordinators.

I hope the above comments are useful as part of your evidence gathering.

Finally, may I invite members of the Committee to visit the SuDS for Schools project in North London. This is a partnership between WWT, Thames Water and the Environment Agency. We have installed SuDS features at 10 schools in one river catchment. The project will demonstrate how SuDS can reduce pollution and peak flows in a flood-prone catchment, while at the same time giving schoolchildren a connection with nature, a more pleasant schooling environment and the opportunity for learning about nature and sustainability in a hands-on way outside of the classroom.

Yours sincerely,

A handwritten signature in black ink that reads "Martin Spray". The signature is written in a cursive style and is underlined with a single horizontal line.

Martin Spray CBE, Chief Executive