



BY EMAIL

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Dear Sir/Madam,

**Severn Trent Water – Making the right choices, the future of your water and waste services 2015 – 2020.**

**Background to comments.**

**Cotswolds Area of Outstanding Natural Beauty (AONB)**

The Cotswolds Area of Outstanding Natural Beauty (AONB) was designated in 1966 and extended in 1990, under the National Parks and Access to the Countryside Act 1949. The primary purpose of AONB designation is to conserve and enhance the natural beauty of the area.

AONBs are also recognised and valued at the international level. The World Conservation Union (IUCN) considers AONBs to be of international importance as Category V Protected Landscapes and are therefore listed on the World Database of Protected Areas compiled by the United Nations Environment Programme's World Conservation Monitoring Centre

The Severn Trent area coincides with the western edge of the Cotswolds, essentially the scarp which includes the Frome and Isbourne rivers, and with the northern end of the AONB where the Cotswold streams drain northwards into the Warwickshire Avon.

**Cotswolds Conservation Board**

The Cotswolds Conservation Board was established by Parliamentary Order under part iv of the Countryside and Rights of Way Act 2000. The purposes of the Board are :

- To conserve and enhance the natural beauty of the Cotswolds AONB
- To increase the understanding and enjoyment of the special qualities of the AONB, ensuring these are compatible with its conservation and enhancement.

In carrying out its twin purposes, the Board shall seek to foster the economic and social well-being of its local communities.

The CROW Act 2000 underlined the importance of AONBs and introduced specific requirements for local authorities and public bodies, including water companies, in looking after these special areas. Section 85 of the Countryside and Rights of Way Act 2000, places a duty

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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on public bodies to have regard to the purposes of AONB designation when carrying out their functions in relation to, or so as to affect, land.

The Board is responsible for producing the statutory management plan for the Cotswolds AONB as required by section 89 of the CROW Act and in doing so, involves a wide range of agencies, authorities, organisations and individuals with an interest in the Cotswolds through participatory events, surveys and consultation. The 2008 – 13 plan was subject to a Strategic Environmental Assessment and Appropriate Assessment and has wide support, including endorsement from 13 local authorities. The Management Plan for the Cotswolds is currently under review and a revised plan will be out for consultation from April this year.

### **Response to consultation**

Bearing in mind the purposes of AONB designation and those of the Board, our comments are limited to the sections of the consultation dealing with water availability, impacts on the environment and climate change and healthy and sustainable rivers.

#### **1. Making sure we have enough water to supply customers.**

Both compliance with the Water Framework Directive and the predicted impacts of climate change (page 48) clearly indicate that less raw water will be available in the future, particularly during the summer period. Consequently reducing leakage and increasing water efficiency will become increasingly important and should be given equal priority. The predicted impacts of climate will inevitably lead to a change of services offered by Severn Trent, including more regular hosepipe bans. The consultation suggests this could lead to lower bills, but it could also lead to further investment.

Severn Trent should work with customers, developers and local authorities to build in water efficiency in all new development, not just homes. There is also a strong case for further promoting and assisting with retrofit measures to use water more efficiently, including rainwater capture and grey water recycling.

#### **4. Reducing our effect on the climate.**

The work currently being undertaken to generate 20% of the electricity used by Severn Trent, improving processes and equipment and taking the carbon footprint into account of new projects is very much supported and makes good business sense.

Severn Trent should not increase its carbon footprint, but aim to reduce it. Further investment in improving energy efficiency is supported as is further investment in renewable energy. Other forms of renewable energy should be considered such as photovoltaics, and micro-hydro. Buildings could be heated by ground source heat and woodfuel. Whilst this involves investment, payback times are shortening due to the rising cost of energy.

#### **5. Adapting to climate change.**

Preparing for the impacts of climate change makes good long-term business sense and contributes to securing a supply of water to customers. Severn Trent should establish a short to

medium term programme from 2015 to adapt to climate change and include the suggestions, 1 to 5, listed on page 50.

#### **6. Ensuring healthy and sustainable rivers.**

Tackling diffuse pollution, albeit with less certain outcomes, should be a priority. There are currently 50 Catchment Sensitive Farming Projects across England, most, if not all, funded by Defra. One of the major beneficiaries of these projects is the water industry and its customers. Research is showing that preventing diffuse pollution is more cost effective than traditional water treatment.

Likewise, better sewage treatment leading to reduced phosphates etc being put back into rivers not only benefits the water environment, but also benefits extraction and water treatment for drinking water supply further downstream.

Consequently, the Board encourages Severn Trent to engage in and support catchment management schemes, both existing schemes and be involved in developing new projects. The Board would also be interested in becoming involved where catchment management is being considered within the Cotswolds.

And, where appropriate to improve sewage treatment. The issue with this is that under the WFD all inland and coastal waters must aim to reach good chemical and ecological status in inland and coastal waters by 2015, too late for the plan period being consulted on.

#### **9. Being good neighbours**

The consultation document covers noise, flies, odours etc but not light pollution. Severn Trent should endeavour to reduce light pollution from its treatment works and other properties. For example, the lighting at the Strensham treatment works is very intrusive from the Cotswolds AONB.

If you have any questions or would like to discuss any of the above responses, please do not hesitate to contact me.

Yours faithfully



Mark Connelly  
Land Management Officer