

The Right Honourable Rishi Sunak MP  
10 Downing Street  
London SW1A 2AA

*By email*

24 July 2023

Dear Prime Minister,

As a group of environmental NGOs, we are writing to express our deep concern about media reports that you are considering lifting restrictions on polluting new developments without mitigation which impacts Special Areas of Conservation and Special Protection Areas where nutrient levels are already causing significant damage to water quality and wildlife.

Such a move would go against your government's firm commitment to maintain or enhance environmental protections following EU Exit. It would also undermine a nascent and important market in ecosystem services and green finance, a framework which underpins the delivery of much of the Government's Environment Act, as well as the Environmental Improvement Plan and Plan for Water. The public is also increasingly aware that nutrient pollution is the sewage scandal in slow motion and poses the biggest single threat to achieving healthy waterways across the country.

Over the past few years, we have collectively learnt a huge amount about the techniques for tackling nutrient pollution and an enormous amount of work has been done by regulators, NGOs, private contractors and local authorities to develop collaborative projects and partnerships that can not only unlock housing developments, but also reduce the endemic levels of nutrient pollution in our rivers. Revoking the regulations would mean that all this work would be wasted, and your government's legacy would be to leave the water environment in a worse – rather than a better – state for the next generation.

We understand the need to provide homes for a growing population. However, the solution to this should be to put in place measures to reduce pollution, rather than to change the regulations. The speed of mitigation could be increased if the government were to allow catchment nutrient balancing bringing all parties responsible for nutrient pollution into building solutions together, rather than treating them all separately.

Current measures, particularly the provisions of the Levelling Up and Regeneration Bill, have perverse outcomes, driving water companies to concentrate efforts on the largest nutrient inputs from sewers, which tend to be near the river mouth and therefore only of benefit to a short stretch of river. If companies could spend their investment on nature-based solutions (like treatment wetlands) in the upper end of catchments, often in partnership with farmers, there would be potential for an improved outcome for the environment at far lower cost and in a shorter time frame. There would also be many other co-benefits to this type of intervention for wildlife, flood prevention, management of water resources, net zero, and access to nature.

As a movement, we are keen that environmental, economic and social policies are mutually reinforcing, rather than rivals. Getting on top of the issues caused by nutrients is an essential

precursor to long term sustainable development and therefore an opportunity as well as a short-term risk. We would therefore be keen to work with your officials to explore ways of speeding up delivery without creating unacceptable environmental consequences.

We should not have to choose between growing food, having houses to live in with clean water to drink and a recovering natural world. It is perfectly possible for us to have all of these things, as other countries such as Denmark have demonstrated. It requires a collaborative effort by all parties, with funding being spent where it will have the most benefit. It also requires strong and ambitious leadership from the top to give everyone the confidence to work together for a common objective.

We urge you to pull back from any consideration of removing these very important regulations and instead set out an inspiring ambitious programme of rapid action to address the sources of pollution and contribute to many other public policy objectives at the same time. We stand ready to work with your government to make this approach a reality.

Yours sincerely,

Richard Benwell, CEO, Wildlife and Countryside Link  
Mark Lloyd, CEO, The Rivers Trust  
Beccy Speight, CEO, RSPB  
Nick Measham, CEO, WildFish  
Rose O'Neill, CEO, Campaign for National Parks  
Chris Butler-Stroud, CEO, Whale and Dolphin Conservation  
Kit Stoner, CEO, Bat Conservation Trust  
Matt Larsen-Daw, CEO, The Mammal Society  
Joan Edwards, Director of Policy and Public Affairs, The Wildlife Trusts  
Harry Bowell, Director of Land and Nature, National Trust  
Ruth Tingay, Co-Director, Wild Justice  
Jenny Hawley, Policy Manager, Plantlife  
Marcus McAuley, Policy Director, Institute of Fisheries Management  
Kevin Cumming, Director, Rewilding Britain  
Steve Head, Founder Patron, Wildlife Gardening Forum  
James Robinson, Director of Conservation, WWT  
Mark Owen, Head of Fisheries, Angling Trust  
Darren York, Chief Executive, The Conservation Volunteers  
Daniela Russi, Senior Policy Manager, British Ecological Society  
Paul de Zylva, Senior Analyst, Friends of the Earth  
Abi Bunker, Director of Conservation and External Affairs, The Woodland Trust  
Doug Parr, Policy Director, Greenpeace

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CC:

The Rt Hon Thérèse Coffey MP, Secretary of State for Environment, Food and Rural Affairs  
The Rt Hon Michael Gove MP, Secretary of State for Levelling Up, Housing and Communities  
Tony Juniper, Chair, Natural England  
Alan Lovell, Chair, Environment Agency