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Consultation on environmental targets

This response is submitted on behalf of ADEPT by David Dale, Policy Officer (contact details below). It is not confidential.

ADEPT is a professional membership association representing Place Directors from county, unitary and combined authorities across England, along with Local Enterprise Partnerships, sub-national transport boards and corporate partners drawn from key service sectors throughout England.

General comments

We welcome the opportunity to comment on the proposed targets, and we value our ongoing informal discussions with Defra officials on various matters relating to the local delivery of the ambitions of the 25 Year Environment Plan and the requirements of the Environment Act 2021. We strongly support the objectives of the Plan and we recognise the scale of the challenge to halt and then reverse the degradation of nature and the environment.

However, in responding to previous consultations – including those on environmental principles, waste and resources, Biodiversity Net Gain, Local Nature Recovery, and the recent Nature Green Paper – we have raised concerns about the level of the government's ambition, the lack of urgency over bringing forward initiatives, and the lack of coherence between policies coming out of different government departments.

We support the development of legally binding environmental targets as an important step in the delivery of the Plan and the implementation of the Act. The consultation document sets out clearly the issues addressed, the targets proposed, and the rationale for setting the targets at a particular level. However, some of our previous concerns are again prompted by the proposed targets: we have concerns about the level of ambition and lack of urgency shown in setting some targets and baselines in the future rather than immediately. These are indicated below in our answers to some of the specific questions.

Biodiversity on land

Proposed targets:

- Halt the decline in species abundance by 2030.
- increase species abundance by at least 10% by 2042, compared to 2030 levels.

- improve the England-level GB Red List Index for species extinction risk by 2042, compared to 2022 levels.
- create or restore in excess of 500,000 hectares of a range of wildlife-rich habitats outside protected sites by 2042, compared to 2022 levels.

6. *Do you agree or disagree that the proposed combination of biodiversity targets will be a good measure of changes in the health of our 'biodiversity'?*

Agree with the proposed targets but suggest that there should be additional ones (see 7 below).

7. *[If disagree] What additional indicators do you think may be necessary?*

Suggest that there should be targets for the condition of habitats, how well they are managed and maintained, in addition to the area restored/created. Also a target for improving the condition of protected sites.

8. *Do you agree or disagree with the level of ambition of a 10% increase proposed for the long-term species abundance target?*

Disagree.

9. *[If disagree] What reasons can you provide for why the government should consider a different level of ambition?*

The target is not sufficiently ambitious given that the proposed baseline date is 2030. If species abundance continues to decline until then this means that the situation in 2042 will be worse than it is now. At the very least the target should be a 10% improvement on the 2022 baseline.

10. *Do you agree or disagree with the ambition proposed for the long-term species extinction risk target to improve the England-level GB Red List Index?*

Disagree.

11. *[If disagree] What reasons can you provide for why the government should consider a different level of ambition?*

We need a clear and ambitious target for the protection and recovery of specific rare and threatened species, the proposed target is neither of these things.

12. *Do you agree or disagree with the level of ambition of 'in excess of 500,000 hectares' proposed for the long-term wider habitats target?*

Agree, but see comments at 6 above.

13. *[If disagree] What reasons can you provide for why the government should consider a different level of ambition?*

Not applicable.

14. *Do you agree or disagree that all wildlife-rich habitat types should count towards the target?*

Agree.

15. *[If disagree/Don't know] Are there any habitat types that you think should not count towards the target?*

Not applicable.

16. *What reasons can you provide for why these habitats should not count towards the target?*

Please provide reasons why these habitats should not count towards the target.

Not applicable.

Biodiversity in the sea

Proposed targets:

- 70% of the designated features in the Marine Protected Areas MPA network to be in favourable condition by 2042, with the remainder in recovering condition, and additional reporting on changes in individual feature condition.

17. *Do you agree or disagree with the level of ambition proposed for the Marine Protected Area target?*

Don't know. It is difficult to assess how ambitious this target is overall, however individual local authorities with MPAs will be able to give a view locally.

18. *[If disagree] What reasons can you provide for why the government should consider a different level of ambition?*

Not applicable.

Water quality

Proposed targets:

- Reduce the length of rivers and estuaries polluted by target substances (cadmium, nickel, lead, copper, zinc, arsenic) from abandoned mines by 50% by 2037.
- Reduce nitrogen, phosphorus and sediment contribution from agriculture in the water environment by at least 40% by 2037 against a 2018 baseline.
- Reduce phosphorus loadings from treated wastewater by 80% by 2037 (against a 2020 baseline).

19. *Do you agree or disagree with the level of ambition proposed for an abandoned metal mines target?*

Don't know.

20. *[If disagree] What reasons can you provide for why the government should consider a different level of ambition?*

Not applicable.

21. *In addition to the proposed national target, we would like to set out ambitions for reducing nutrient pollution from agriculture in individual catchments. Do you agree or disagree that this approach would strengthen the national target?*

Agree. Nutrient pollution is a major issue for many local authorities, not just in term of the environmental impacts but also constraining planning permissions for new homes. It is essential that there are ambitious targets for individual catchments as well as nationally. This catchments with high levels of pollution should have correspondingly higher targets for reducing pollution from agriculture. It is essential that local planning authorities should have the powers to consider the

overall impact of local agriculture on the water environment when determining individual planning applications for activities such as large-scale poultry farming and processing.

22. *[If disagree] Why don't you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target?*

Not applicable.

23. *[If agree] Why do you think ambitions for reducing nutrient pollution from agriculture in individual catchments will strengthen the national target? What factors should the government consider when setting these ambitions?*

See 21 above.

24. *The target needs to allow flexibility for water companies to use best available strategies to reduce phosphorus pollution, including the use of nature-based and catchment-based solutions. Do you agree or disagree that the proposed target provides this flexibility?*

Don't know. However, we are concerned that the target does not tackle the issue of sewage and stormwater discharges into watercourses, there should be specific targets to reduce this.

25. *[If disagree] What reasons can you provide for why the target doesn't give this flexibility?*

Not applicable.

26. *Do you agree or disagree with the level of ambition proposed for the nutrient targets?*

See 24 above.

27. *[If disagree] What reason can you provide for why government should consider a different level of ambition?*

Not applicable.

Water demand

Proposed target:

- Reduce the use of public water supply in England per head of population by 20% by 2037 against a 2019/20 baseline.

28. *Do you agree or disagree with the level of ambition proposed for a water demand target?*

Don't know. We agree that there should be a target for reducing demand in the system of public water supply to properties but it is difficult to know if 20% over 15 years is ambitious enough. We suggest that there should be an additional target that looks more widely at the overall extraction of water from the environment and the impact on nature and wildlife.

29. *[If disagree] What reasons can you provide for why the government should consider a different level of ambition?*

Not applicable.

Tree planting and woodland cover

Proposed target:

- Increase tree canopy and woodland cover from 14.5% to 17.5% of total land area in England by 2050.

30. Do you agree or disagree with the proposed metric for a tree and woodland cover target?

Broadly agree with the proposed metric for the area of new planting, but in accordance with the 'right trees in the right places' principle mentioned in the consultation document it is important that woodland expansion must align with local priorities and opportunities to be mapped and set out in Local Nature Recovery Strategies. There should be an additional target for the management and maintenance of existing trees and woodlands. The metric should reflect not just the quantity of woodland cover (total land area) but also its quality in terms of nature recovery, maintaining the character of protected landscapes and sites, and the protection and enhancement of the historic environment.

31. Do you agree or disagree that short rotation coppice and short rotation forestry plantations should be initially excluded from a woodland cover target?

Agree. These plantations do not provide the wider nature, environment and social benefits that are described in the consultation document.

32. Do you agree or disagree with the proposed inclusion of trees in woodlands, as well as trees in hedgerows, orchards, in fields, and in towns and cities?

Agree, the target should include non-woodland planting such as hedgerows, orchards, wood pasture, scrubs or parkland.

33. Do you agree or disagree with our proposed level of ambition for a tree and woodland cover target?

Agree, but see the comments below (34). The proposed canopy cover target by 2050 is supported as this is in line with the recommendations from the Climate Change Committee. However, this should be backed by annual targets to provide certainty to the sector i.e. in terms of number of trees nurseries need to produce.

As noted above, the target should not just be about quantity of trees planted but also the reflect the quality of woodland to ensure they deliver the full range of environmental and social benefits i.e nature recovery, carbon sequestration, landscape and beauty, access and public health benefits and reduced flood risk. Focussing just on the number of trees planted or the land area covered is too simplistic.

34. What reasons can you provide for why the government should consider a different level of ambition?

There should also be a target on the management and condition of existing woodland. Much of England's existing woodland is undermanaged and in poor condition: only 20% of broadleaf woodland is managed to UK Forestry Standard. Government objectives on net zero, nature recovery and biodiversity depend on existing woodland being much better managed and brought back into management. In line with the recommendation from the Climate Change Committee the target should be for 80% of existing broadleaf woodland being managed to UKFS standards.

It is also essential that newly planted woodland is adequately managed in the long term. At the moment maintenance grants do not provide this level of certainty with the risk that lots of trees are planted that then fall out of management or are undermanaged after 10 years.

The level of ambition set in the targets must be backed by appropriate long-term funding, skills and capacity for both woodland creation and the management and maintenance of existing woodland. Government should review the resourcing of the England Woodland Creation Offer and the various environmental land management schemes to ensure that they are sufficient to support the achievement of the targets.

Resource efficiency and waste.

Proposed target:

- Reduce residual waste (excluding major mineral wastes) kg per capita by 50% by 2042 from 2019 levels. It is proposed that this will be measured as a reduction from the 2019 level, which is estimated to be approximately 560 kg per capita.

35. Do you agree or disagree with the proposed scope of the residual waste target being 'all residual waste excluding major mineral wastes'?

Broadly agree (but see 36 below). A residual waste reduction target will help to drive waste up to all other levels of the waste hierarchy, rather than a singular focus on recycling, and alongside appropriate policy it should help support waste prevention and moving to a Circular Economy. Agree the scope should target all residual waste but also recommend that Government considers collecting the data by category to provide granularity (e.g. household waste; industry sector etc.) so the impacts of specific policy measures might be better understood and also any industry-specific risks around unintended off-shoring of production or exporting of waste can be better addressed.

36. [If disagree] What reasons can you provide for why the government should consider a different target scope?

ADEPT is concerned that the proposed exclusion of major mineral wastes will result in a lack of focus on waste (and emissions) reduction in the construction and demolition sector. For that reason ADEPT favours the target also applying to major mineral waste, but if this massive proportion of the overall waste stream is to be excluded from the waste reduction target then it needs to be appropriately addressed in some other way.

37. Do you agree or disagree that our proposed method of measuring the target metric is appropriate?

Agree. Note Government will need to provide some clarity on how waste that is sent to MBT processes will be considered.

38. [If disagree] What reasons or potential unintended consequences can you provide or foresee for why the government should consider a different method?

Not applicable.

39. Do you agree or disagree that local authorities should have a legal requirement to report this waste data, similar to the previous legal requirement they had until 2020?

Agree, subject to (a) resourcing – the full costs to local authorities of any new data collection and reporting requirements being provided for under the ‘new burdens’ doctrine and (b) reporting requirements will need to be imposed across the entire waste system, not simply on local authorities – mandatory digital waste tracking will be essential to securing reliable data.

40. Do you agree or disagree with the level of ambition proposed for a waste reduction target?

Agree. The proposed baseline of 2019 is recent past, so using this will show the impact of new Government policy measures. A 50% residual waste reduction target per capita shows an appropriate level of ambition (i.e. it won't be easy and will require Government to drive change through policy). However, Government needs to recognise that this still falls a long way short of its Circular Economy ambition and will still mean residual waste could be a big contributor to the UK's carbon emissions. We believe Government also needs to set challenging interim targets and create a review mechanism which allows it to increase the ambition of its reduction target if circumstances permit. An interim target in 2026/27 ought to capture the impacts of the main policies in the Environment Act (i.e. Extended Producer Responsibility and Consistency). Another area which Government will need to address is how to effectively achieve residual waste reduction in flats and Houses in Multiple Occupation: housing growth targets will require a significant increase in these types of accommodation, which have shared and limited ‘binrastructure’ and have traditionally been less amenable to policy interventions.

41. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Not applicable.

42. Do you agree or disagree with our proposed metric for considering resource productivity?

Agree – it is essential that a metric for measuring resource productivity is introduced and the basis proposed sounds appropriate. In order to have impact, milestone targets will need to be set to encourage progress in increasing our resource productivity. Furthermore, Government will need to produce and monitor the sector-specific data that feeds into the overall economy-wide indicator, in order to better understand where improvements in resource productivity are being achieved and where further policy interventions are required to drive improvement.

43. [If disagree] What reasons, or potential unintended consequences can you provide for why the government should consider a different metric and what data exists to enable reporting for this alternate metric?

Not applicable.

44. Of the possible policy interventions described, which do you think will be most effective to meet a resource productivity target? Please specify whether these policies would be most effective if implemented nationally or regionally, and whether measures should be product or sector-specific.

Increased resource efficiency is likely to require the full range of policy interventions listed, with different approaches working in different sectors of the economy. We note that the Government's Resources and Waste Strategy (2018) and more recent Net Zero Strategy (2021) are not wholly aligned. We believe that a Government carbon target for waste underpinned by a common carbon accounting framework for waste would help to ensure that national waste policy and the actions of the waste sector contribute to the fullest extent to Government's ambitions for emissions reduction.

Air quality

Proposed targets:

- Annual Mean Concentration Target ('concentration target') – a target of 10 micrograms per cubic metre ($\mu\text{g m}^{-3}$) to be met across England by 2040.
- Population Exposure Reduction Target ('exposure reduction target') – a 35% reduction in population exposure by 2040 (compared to a base year of 2018).

45. Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target?

Don't know.

46. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Not applicable.

47. Do you agree or disagree with the level of ambition proposed for a population exposure reduction target?

Don't know.

48. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Not applicable.

Consultation tool

49. Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it.

Not applicable.

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