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**CONSULTATION ON ENVIRONMENTAL TARGETS, DEFRA**

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Questionnaire responses:

**Would you like your response to be confidential?**

No.

**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.’?**

Disagree. All 2042 targets should be 2030. This is also the view of the Thames Crossing Action Group.[[1]](#footnote-1) Similarly, the Wildlife and Countryside Link believes species loss will continue for lack of ambition to set earlier targets.[[2]](#footnote-2) Species loss will also continue until the Government favours brownfield site development only. We are in both Climate and ecological emergencies and this consultation does not show any urgency, in any of its sections.

A process of reducing land use for crops to feed animals must be initiated, with a gradual reduction year on year of domesticated animals. Green walls and roofs and enhanced species varieties in urban settlements are an area where local councils need powers and resources. Achieving targets will require restoration of Environment Agency funding to the 2010 level, initially. The Planning system must be adjusted to obtain sustainable retrofitting of the built environment, including as the major source of new homes. Surface car parks above 10 spaces should be used for apartments in an area where there is need for council homes, and for keyworker shared ownership schemes. Building above surface level would become a normal practice but car parking in the centre of urban areas contributing to congestion should be built over. All these measures are consistent with resisting species extinction, cutting air pollution and protecting wildlife-rich habitats, as are agroecology measures.

Additional measures:

Removals of invasive and destructive species

Big increase in peatland areas to pristine condition

Species addition as part of coastal and estuary defences should be developed.

Targets for marine species should be researched, created and maintained with reference to actual conditions.

**Do you agree or disagree with the level of ambition of a 10% increase proposed for the long-term species abundance target? What reasons can you provide for why the government should consider a different level of ambition.**

Disagree. 10% by 2030, to minimise risk of continuing losses making the target unobtainable. Reasoning: Species loss since 1945 has been catastrophic, and too many species have been noted as being at risk to some degree. The overall ecological emergency must be addressed with an assertive approach to resist species and habitat loss, including by rewilding as a strong emphasis throughout appropriate areas of Government policy, and in the powers and resources of local councils. The agroecology, forestry, eco-tourism, organic food production and urban regeneration potential of ambitious environmental targets should be obvious, including significant employment growth. Public health will benefit from better access to more green sites. Wetland and peatland enhancement are vital for species growth and for carbon storage.

**Do you agree of disagree with the ambition proposed for the long-term species extinction risk target to improve the England-level GB Red List Index? What reasons can you provide for why the Government should consider a different level of ambition?**

See previous answer

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

No, it is insufficient. Rewilding means returning grouse moors and ‘green deserts’ of ‘stately homes’ and the like to far better ecological contributions. Land Value Taxation can be used to discourage the mis-use of land and encourage forms of use of greater value to society and future generations. It should be 500,000 hectares as a target by 2030, with an extra 500,000 hectares by 2040, and by 2050.

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

Yes, but the areas of human settlement are not being considered for their potential contribution. These include: household gardens, species poor recreation grounds, areas at the fringes of allotments, schools, hospitals; green walls and green roofs; urban centre tree planting to help resist the ‘urban heat island’ effect; roadside verges, roundabouts and ‘sites of opportunity’ within housing estates, and industrial estates/science parks. The latter initiatives are vital for adapting to Climate Change, by creating more shade in urban areas and for contributions to water management during extreme weather events. They can also contribute to creating wildlife corridors to address the problem of fragments of disconnected environmental value.

**Do you agree or disagree with the level of ambition proposed for the Marine Protected Area Target? What reasons can you provide for why the Government should consider a different level of ambition?**

Disagree, aim should be by 2030 and for all waters under UK control, including those of Overseas Dependent Territories. Protection is essential to resist deep sea mining and over-fishing, and forms of tourist development that are wholly unsustainable. This will require better marine protection implementation/enforcement and strong engagement with wider international efforts to protect Oceans.

**Do you agree or disagree with the level of ambition proposed for an abandoned metal mines target? What reasons can you provide for why government should consider a different level of ambition?**

2030, no later. Usual lack of joined-up targets here: re-use/recycling of metals in the waste stream including those in computers/mobile phones/cars essential to cutting metal use and preventing further build-ups of such materials in our environment. There is a lack of recognition in this consultation of the need for a circular economy.

**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? 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.**

2030, latest. Agree that local catchment targets will reinforce national and note that this implied principle is not generally applied across the targets. In general, localisation of enforcement powers is essential with more powers allocated to both Environment Agency and local councils. Local Government needs an end to capping of Council Tax, more resources through a return to a Revenue Support Grant system – including restoration of funding levels - including EU resources to poorer regions. Land Value Taxation should eventually replace Council Tax as a better, and more progressive form of taxation.

**The target [for nutrient pollution from wastewater] needs to allow for 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?**

Not intellectually adequate. Private water companies need to have profit in order to give money supplied by the public to shareholders, which is then lost to necessary investment in the water industry. We should all be very sceptical about the level of priority to be given to this work, just as the water industry approach to water conservation, sewage re-use and water testing is poor overall. Renationalisation will be required to achieve best possible targets attainable by 2030.

**Do you agree or disagree with the level of ambition proposed for a water demand target? What reasons can you provide for why the government should consider a different level of ambition?**

2030, not 2037. This consultation proposes that the water industry privatised in 1989 suddenly develop water conservation measures it has radically neglected for over 30 years, presuming the public will accept additional costs to achieve what should have been done decades ago. Without radical changes to water use through big changes in planning legislation in buildings, reducing water demand will be very difficult; without reducing the numbers of domesticated animals in the food chain, reducing water demand will be very difficult; without actually addressing the Climate Emergency with year on year cuts of 10-14% in carbon dioxide emissions, extreme weather events – rainfall/droughts – will continue. Worse, Government enthusiasm for 1m homes by 2050 from Cambridge to Oxford and another 1m homes around the end of the Thames Estuary, in London, Essex and Kent, take no account of the rainfall and overall water supplies in these areas. Sustainable regeneration, including steps suggested above, requires that new and sustainably retrofitted homes be on brownfield site in areas of the country with the best rainfall regimes, and utilising sites with the best prospects for this remaining so in future decades. This section/question needs a rethink – and like the rest of the consultation – an overall restatement of the actual context in which environmental targets are to be set.

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

From 14.5% in England now to 17.5% by 2050 is truly pathetic. Habitats, rewilding, and the creation of a larger forestry industry involving biodiversity improvement and economically valuable tree species all require vastly more ambition than this. There should be targets for each council area specific to its character and the opportunities it presents.

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

Agree, but this should be made more specific. Permanent forest cover, recognising the need for lower cost rewilding and enhancement of biodiversity rather than a ‘plantation’ approach, should be an objective for annual increases in such area, with councils acting in partnership with statutory stakeholders, local and national NGOs and the community.

**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, but see previous answer.

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

Agree, but use of plastic in packaging should end no later than end of 2024, to radically reduce its impact on the waste stream and its volume in recycling. We should note that both farmers and artisan markets often sell fruit and vegetables to the public with no packaging whatsoever being taken away by the customer for a lot of such goods. Supermarkets can do the same, rapidly reducing the cost of packaging for themselves.

Concerning construction and mineral resource stream wastes, a more ambitious approach is needed to secure re-use of such materials. This could include re-use within construction in general, and in the creation of road and pavement surfaces that no longer rely on the use of fossil fuels. A target of 2030 should be set for full implementation of this approach, as part of circular economy initiatives.

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

Agree

**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?**

Yes, subject to this being supported by an end to capping council tax; restoration of the Revenue Support Grant and the value of all EU regional contributions; and the use of Land Value Taxation to replace Council Tax and Business taxation.

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

65% recycling in each local council area by 2030, not 2035, is desirable. But there is no target in this section for re-use or for how increases in re-use might be measured. In line with the concept of a circular economy, this needs attention without delay.

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

We are glad to see a reduction in England’s material footprint by 15%, 2001-2018. But this would have been greater if: single-use plastic had been abolished; fossil fuel use were being phased out against a 2030 objective; VAT on fast fashions had been applied to stop the creation of poor quality, short life clothing (and footwear); support for expansion of electric vehicles had been more successful; road traffic levels had been reduced, reducing the perceived need for vehicle replacement and the attrition of road surfaces requiring repair (now a 14 year backlog due to continued new trunk road building – which should cease in favour of pavement and road repair to higher standards.). So: this is agreed, but more ambition needs building into Government policy, and its financial support of local government in every area of environmental target achievement.

One unconsidered area concerning resource productivity. Electric vehicles are all heavier than their more polluting equivalents. Electric buses and electric HGVs will be markedly heavier. The implications for road damage and pavement damage are considerable. This requires:

Urgent review of extant research into how electric vehicles can be lighter, using less resources and creating less physical damage to infrastructure

New research on reducing electric vehicle weight

**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.**

Response to these questions compromised by insufficient information, and the failure to recognise opportunities to cut waste which are yet to be taken. See previous answer for examples of the real context. Second question excludes resource productivity from being a local government consideration: this is wrong. Government should set targets for decreasing material consumption and empower and resource local government to achieve this in each local council area.

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

Disagree. All London Boroughs exceed PM2.5 levels suggested by the WHO, and many areas will have the similar issues with this and other pollutants. As this is being typed, the author’s home is in breach of 3 WHO air pollution limits and it is no consolation that Oxford Town Hall and Oxfordshire County Council’s offices have the same problem.[[3]](#footnote-3)

We have to deal with the problem that electric vehicles will continue to add non-exhaust emissions, especially in areas of traffic congestion. These include tyre abrasion, road abrasion brake pad erosion and the problem that vehicles create wind that moves pollutants off road surfaces and potentially towards people, including vehicle occupants. Air pollution abatement requires:

Substantial extension of pedestrianised and pedestrian priority areas in those locations where World Health Organisation recommended air pollution limits are being exceeded.

An overall objective of reducing the vehicle fleet over time. A key tactic for achieving this is to support each local council promoting electric car and other vehicle hire rather than ownership, thereby reducing vehicle movements and numbers. Over time, existing Park and Ride sites and multi-storey car parks might (in whole or in part) be locations for the hire and storage of vehicles for hire.

Substantial increase in Active Travel funding to allow each local council area to have unbroken walking and cycling networks, as a contribution to health promotion, air quality, cutting greenhouse gas emissions and reducing the need for vehicle ownership and use.

**Do you agree with the level of ambition proposed for a population exposure reduction target?**

WHO targets should be followed as objectives, with radical reductions achieved by 2030 due particularly to phasing out fossil fuel use, in transportation and in space heating. The latter will require 100% grant aid for installing heat pumps in place of gas central heating; generous aid for installing solar PV and solar thermal, and making these a requirement for sustainable retrofitting of buildings, and for new buildings: this will require a planning application to be submitted for sustainable retrofitting so that refurbishment requirements are clear to the company doing the work, and also that it may engage with other contractors for aspects of it; use of ground source heat pumps in areas such as industrial estate/science parks.

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1. <https://www.thamescrossingactiongroup.com/environmental-targets-consultation-response/> [↑](#footnote-ref-1)
2. <https://www.wcl.org.uk/government-must-aim-higher-on-environment-targets.asp> [↑](#footnote-ref-2)
3. Established by postcode entry into this site: <https://addresspollution.org/> [↑](#footnote-ref-3)