



Environment Act 2021: environmental targets

We submitted the following response to the Government's consultation on their plans to introduce new environmental targets under the Environment Act 2021.

The consultation sets out their proposals and targets for:

- biodiversity on land and in the sea
- water quality and availability
- resource efficiency and waste reduction
- air quality

UK100 Consultation response

Part 3: What is included in the proposed initial suite of targets

Target proposals for biodiversity on land

• 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/Disagree/Don't know] • [If disagree] What additional indicators do you think may be necessary?

The proposed criteria to achieve the 30 by 30 commitment and it is encouraging to see the targets extending out to 2042, but the proposed level for species abundance seems low. There is a need for further detail to be able to comment fully. For example more detail is needed on the roles and responsibilities for management, how the appropriate outcomes would be determined, how they would be measured and monitored and by whom are all outstanding questions with no clear direction laid out. Clarity is needed on what 'improvement' looks like in terms of biodiversity and how this will be measured.

Do you agree or disagree with the level of ambition of a 10% increase proposed for the long-term species abundance target? [Agree/Disagree/Don't Know]

See above

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

- Do you agree or disagree that all wildlife-rich habitat types should count towards the target? [Agree/Disagree/Don't know]

- [If disagree/Don't know]

- Are there any habitat types that you think should not count towards the target? [[peatland], [grassland], [heathland], [scrub], [native woodland], [hedgerows], [traditional orchards], [arable field margins], [estuarine and coastal water habitats], [wetlands], [rivers / streams], [lakes / ponds], [other habitat types that you think should not count towards the target]]

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

Nature restoration is needed across the board, all habitats should be protected and preserved so they should be included in the target.

Local authorities need to increase peat, wetland and grassland restoration, woodland planting and management, and urban trees on Council-owned land, and encourage it on parish council and other public sector land.

Nutrient Pollution

- 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/Disagree/Don't know]

The target needs to be more ambitious with a delivery date that isn't 15 years away. The role that local authorities can play in contributing to the delivery of the target needs to be considered. Our recent [Clean Air Net Zero \(https://www.uk100.org/publications/yes-we-can-z-local-leaders-delivering-clean-air-and-net-zero\)](https://www.uk100.org/publications/yes-we-can-z-local-leaders-delivering-clean-air-and-net-zero) report highlighted the importance of addressing nutrient pollution from agriculture as one of the four priority areas where local authorities can work to meet their Net Zero ambitions and address pollution at the same time. Addressing the impact that nitrogen is having on the air and the water is an urgent challenge and we advocate that the Government is ambitious in its approach as there are important co-benefits that can be delivered as a result.

The promotion of more sustainable agricultural practices in their own farms and in partnership with communities has real promise to tackle the issue at scale. This consideration should be factored into the approach, and to the level of ambition set in the target, we urge the government to rethink the timeframe, bringing it closer to mitigate additional severe damage occurring in the future.

Target proposals for woodland cover

- 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/Disagree/Don't know]

On average, only 11% of urban areas are currently covered by 'trees outside woods'. These trees tend to be a varied selection of native and non-native species. In many urban areas there is huge potential to expand the tree canopy cover and deliver multiple benefits for both people and wildlife. Some councils are already taking action, such as Wycombe Council, which proposed that all new developments should include at least 25% tree canopy cover. The Natural Capital Committee's third report to the UK Government highlighted the huge benefits of creating new woodland close to where people live. These benefits include mental health well-being, improved air quality and reduced flood risk.

In more urban environments, NBS offer a number of significant economic opportunities. Firstly, property values benefit from an increase in green spaces in towns and cities – studies show increases between 5% and 18% in property values in greener and more afforested streets. By making town and city centres greener, we make them more attractive and more hospitable environments in which consumers like to spend time. As a result, urban afforestation drives increased footfall and demand in towns where high streets increasingly struggle to compete against online retail and delivery giants such as Amazon.

The Humber: Hull Frontage scheme, a £42 million flood defence scheme to upgrade the defences along the edge of the Humber Estuary to protect the city of Hull from tidal flooding. It is a particularly low-lying area, with over 90% of its area below high tide level. Not only will the Humber: Hull Frontage scheme reduce the risk of flooding from the estuary for 113,000 properties, domestic as well as commercial/retail and public, but it will also provide marine ecosystems, and new opportunities for maximising the economic and social benefits of being surrounded by and working with not against water and nature, following the experience in the Netherlands for example.

Do you agree or disagree with our proposed level of ambition for a tree and woodland cover target? [Agree/Disagree/Don't know]

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

The independent Committee on Climate Change, which advises the UK Government and devolved administrations on emissions targets, recommends increasing woodland cover in the UK from 13%²¹ to a minimum of 17% by 2050, and ideally, to 19% to ensure the country achieves net zero carbon emissions. This

six percentage point increase equates to about 1.5 million hectares of additional woodland. New targets and policies for woodland cover must also take into account additional losses of trees. For example, the UK faces the loss of approximately 150 million mature trees and 2 billion saplings and seedlings due to ash dieback disease in the next 10 to 20 years.

The majority of tree cover expansion should be delivered with native woods and trees, due to the importance of tackling the nature and climate crises together. However, the UK needs significantly higher levels of all types of tree cover, including sustainable production focused plantations, which will often be a mix of native and non-native tree species. A core principle for all expansion is that it should not detrimentally affect important local wildlife, and should seek to maximise future wildlife value.

Target proposals for resource efficiency and waste reduction

- Do you agree or disagree that our proposed method of measuring the target metric is appropriate? [Agree/Disagree/Don't know]
- [If disagree] What reasons or potential unintended consequences can you provide or foresee for why the government should consider a different method?

We agree with the aim of the proposed method of measuring the target metric which aims to drive both waste minimisation and recycling of unavoidable Waste. We agree with the inclusion of waste that is sent to landfill, put through incineration (including energy from waste incineration), sent overseas for energy recovery or used in energy recovery for transport fuel within the target metric. This is necessary to ensure that the target for reducing waste doesn't just lead to waste being diverted from landfill to incineration with energy recovery, which still results in significant emissions. Including energy recovery and incineration within the target metric will help to drive waste minimisation at source.

Emission reductions from waste have not improved in the past few years due to a plateau in UK recycling and significant growth in greenhouse gas emissions from EfW plants. Based on the most recent year of official UK emissions data, total waste sector emissions increased by [3.7% from 2017 to 32.9 MtCO₂e in 2018](#). More local authority waste is now incinerated for energy than recycled or composted in England. In [2018 there were 6.8 MtCO₂e/year of emissions](#) from the use of waste for power and heat (mostly energy from waste incineration plants), a doubling in emissions since 2013. Of waste treatments, incineration with energy recovery (R1) increased by 15.5% from 2016 to 2018 and incineration (excl. R1) increased by 28.3%, whilst recycling only increased 4.3%. This is concerning, and so targets to reduce waste must ensure that they work to reduce the amount of waste which is incinerated, with or without energy recovery, and drive waste

minimisation and recycling instead. The [CCC states that to be on track for Net Zero](#), sending biodegradable waste to landfill must stop by 2030 or earlier and that recycling rates should increase from around 45% in England to 65% by 2025 and 70% by 2030 - and so it's crucial that the residual waste target incentivises this significant increase in recycling rates which is needed.

• 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.

Extended producer responsibility policies and Deposit Return Schemes would be some of the most effective policies in meeting a resource productivity target as these policies incentivise the development of a circular economy in which waste prevention is prioritised first, then reuse, followed by recycling and finally energy recovery, with incineration or landfill being used only when none of the above are possible. Policies which move waste up this Waste Hierarchy will be the most effective at meeting the resource productivity target.

To reduce waste we must add economic value to materials currently treated as worthless and 'throwaway'. Providing economic incentives for people to recycle and for companies to reduce waste through introducing a deposit return scheme and an extended producer responsibility have been shown to be highly effective in reducing waste and increasing recycling. Norway's [DRS](#) has led to 97% of plastic bottles being returned.

To support the meeting of the resource productivity target, local authorities will need enabling powers including the power to pilot charging for residual waste as part of a wider behaviour change campaign, and the power to intervene in the commercial waste market in line with Net Zero ambitions.

Air quality

Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target? [Agree/**Disagree**/Don't know]

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

Our network of local and combined authority leaders sent a joint letter to George Eustice as a response to this consultation, pledging their commitment to meet the WHO-10 guideline for PM2.5 by 2030 in partnership with the UK Government. In the letter which we coordinated, local leaders urged the Government to bring forward the PM2.5 target of 10ug/m³ to 2030 in line with the WHO's interim guideline, and to provide local leaders with the powers and funding to meet this target.

Evidence that we have collated tells us that with small additional support from the UK Government, achieving WHO-10 for PM2.5 is feasible by 2030. Modelling by Imperial College for [The Clean Air Fund's 2022 report 'The Pathway to Healthy Air in the UK'](#) found that 99% of the UK is likely to comply with WHO-10 by 2030 as a result of existing Government policies and plans. This means that with a small increase in ambition, meeting WHO-10 across the whole of the UK is entirely feasible by 2030. We know from [work undertaken by the CBI](#) that this will deliver a significant economic dividend for the UK – a £1.6 billion economic benefit and three million working days gained by reducing sickness absence.

The Mayor of London has pledged to meet the WHO-10 guideline for PM2.5 by 2030. He outlined how this could be achieved in a 2019 report ['PM2.5 in London: Roadmap to meeting World Health Organisation guidelines by 2030'](#), (all of which are included in the Governments "Clean Air Strategy 2019"), which found that with certain additional measures from the UK Government, achieving WHO-10 for PM2.5 is feasible by 2030 in the most polluted city in the country.

Setting WHO-10 as the UK target for PM2.5 in 2022, and meeting it by 2030, is necessary, beneficial and achievable. It will set us on a pathway to clean air across the UK and deliver continuous improvements for health, the economy and the climate.

- Do you agree or disagree with the level of ambition proposed for a population exposure reduction target? [Agree/**Disagree**/Don't know]
- [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

We advocate that the Government should put in place a longer term target to meet the WHO's updated guideline for PM2.5 of 5ug/m³ as many areas across the country already meet the PM2.5 guideline of 10ug/m³ but this is still not considered to be a safe level by the WHO, which updated its guidelines in 2021. It is important that a 35% population exposure reduction target is put in place for areas already meeting 10ug/m³ with a deadline which is sooner than 2040, to reduce the public's exposure to levels of air pollution which are above the WHO's new guideline. WHO-10 should no longer be seen as a safe level of air pollution and so the Government should set a more ambitious deadline to meet the 35% reduction in population exposure target of 2030. A more ambitious population exposure reduction target is essential for protecting people's health from the numerous severe health impacts of air pollution.

It is welcome that the consultation proposal recognises that "these targets will also reduce health inequalities and contribute to levelling up objectives. Currently, areas of high deprivation tend to have greater exposure to PM2.5. Our proposed targets would ensure that this gap decreases, so that exposure is more

consistently lower across all communities.” Lower income groups and BAME communities are disproportionately impacted by poor air quality, and it is essential that the process of ensuring that a 35% population exposure reduction is achieved prioritises ensuring that these communities are no longer exposed to disproportionately higher levels of air pollution. More clarity is needed on how this will be ensured and how the 35% population exposure reduction target will be calculated.