Defra: Consultation on Environment Targets 2022

Westminster City Council consultation response

Please find below consultation response from Westminster City Council to the Defra consultation on environment targets 2022 (https://consult.defra.gov.uk/natural-environment-policy/consultation-on-environmental-targets/).

Officer contact details can be found at the end of this response.

Biodiversity

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

While we support the general principle of an action to increase canopy cover, Westminster believes that the baseline figure for this has not yet been adequately established. The target is to increase canopy cover from 14.5% to 17.5% in England by 2050. However, we would welcome more information on how this baseline was established. Forest Research statistics suggests that woodland cover in England is only 10%. The other 4.5% (to make up the 14.5%) is presumably comprised of trees outside woodland, but the supporting text says 'small woods, groups of trees and individual trees (including urban trees) *will be* assessed by remote sensing...', which implies there isn't a current assessment. As such, we are unable to provided unqualified support for the target.

The GLA's target is to increase the capital's tree canopy cover by 10% of the current area by 2050. This would represent an increase in canopy cover from 21% of London's area to 23%. Westminster City Council's current Climate Action Plan contains a target to 'maintain, plant and protect Council trees to support a long-term increase in tree canopy cover, targeting a 10% increase of existing cover by 2050'. This is in currently in line with Greater London Authority targets, however we are investigating how our own target target could be reviewed to make it more ambitious. We would be keen to ensure that any Government targets are in line with and take into account local targets such as that set by the GLA.

Increase species abundance by at least 10% by 2042, compared to 2030 levels.

Westminster supports the aim of increasing species abundance by 10% between 2030-2042, however local authorities will require further, up-to-date guidance on how this can be achieved. Since the Natural England guidance on biodiversity net gain (BNG), including a definition and list of irreplaceable habitats in England, is not due until Summer 2022, we cannot yet comment on the likelihood of Westminster achieving 10% net gain as we do not know the habitats in question. It will be important for us to see this guidance and its implications for the NPPF, London Plan and City Plan to understand how we can feasibly reach 10% net gain.

We note that from the supporting documents that the proposed indicator covers 1,071 species for which there is have sufficiently robust data. We would welcome information on how this indicator will be tracked and improved on as more data is made available for other species.

Updated guidance on how best to complete Biodiversity Reports every 5 years, also required be the Act, is also necessary for us to understand what is expected of us from Natural England and Defra.

We would also welcome more nuanced, regional guidance and access to specialist contacts within Natural England, who can advise on the specific aims and challenges to increasing species abundance in dense urban areas such as Central London. We note that a recent Defra commissioned survey suggested fewer than 10% of local authorities reported that their current expertise and resources will be adequate to deliver biodiversity net gain targets. For local authorities to support Government targets in this area, more support and resources are urgently required.

Westminster's biodiversity and natural habitats face very different challenges to suburban and rural England, and open space deficit in general means that achieving 10% net gain here will be a slower, more complex process.

However, we support the principle to achieve this nationally and we will commit to contributing as much as we can, largely through maintaining, supporting and improving existing green space and achieving additional gain via the planning process which we have already committed to doing in our City Plan.

Improve the England-level GB Red List Index for species extinction risk by 2042, compared to 2022 levels.

Westminster notes the proposed development of a Red List Index within the Government's 25 Year Environment Plan Outcome Indicator Framework.

We welcome this overall target but requires further information on which species this will apply to and how we measure reduced extinction risk (i.e. X number of species removed from the Red List), following any improvements made to the Red List Index. In addition, we understand that Red List assessments for individual species will need to be repeated every 10 years in order to monitor change via the Red List Index, and would welcome information on this updating process will take place – the background information for this target notes that this may be done on a rolling basis.

We note that high-level habitat management and restoration stood out as collectively the most important action for most species, while bespoke species measures (targeted actions, including site re/introductions and reinforcement) were considered key to recovery of over 40% of species. The creation of an England-level list will not take into account major differences in species abundance and distributions within England, and more guidance would be welcomed for the urban context of central London. We would request that Government investigate the potential for a 'London-level' or specific 'Urban-level' Red List Index, which would enable urban local authorities to better develop our own targets and interventions.

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.

Westminster welcomes this aim, but will require more nuanced, regional guidance on how to restore wildlife-rich habitats in an urban context, where open space deficiency is a challenge and the number of SINCs has reduced in recent years. We will require close working with Natural England on how to achieve this and a proportional approach to restoring 500,000 hectares which takes into account local authorities' different geographies.

Water

Targets on nutrient pollution from abandoned mines, agriculture and phosphorous wastewater – no comments as not relevant

Reduce the use of public water supply in England per head of population by 20% by 2037

While we support efforts and targets to improve water efficiency and reduce average water usage, as a local authority we are constrained in what activity we can undertake to support this.

Current Building Regulations have a water efficiency requirement of 120 litres per person per day. They also contain an optional requirement, which we adopt in Westminster's current City Plan (in conjunction with the London Plan). In the City Plan we say the following:

> *As Westminster falls within an area classified as "seriously" water stressed, all development should maximise water efficiency. Residential development should meet the optional water efficiency requirement of 105 litres or less per person/day in line with Policy SI5 of the London Plan. This will be secured by condition.*

We note that the current Building Regs target and the optional target which we require for new development are both more stringent than the target of 122 litres per person/day which forms the basis of the proposed 20% reduction target by 2037. As such, in Westminster we are already expecting new development to go beyond this national target, 15 years ahead of schedule.

It is however understood that the proposed national target is for all water consumption, not just that from new residential development. As a result we are supportive of the proposed target, but would request more information from Government breaking down how this will be achieved, given our example shows that some aspects of water management are already far more ambitious.

Waste

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.

Agree / Disagree with the proposed scope of the residual waste target being 'all residual waste excluding major mineral wastes'?

Westminster agrees with both the scope of the target and of the method of measuring the target – a new calculation for working out residual waste which focuses on the end-point of the process.

We also note that due to its central London location, Westminster has a uniquely challenging set of circumstances with regards waste collection. The high proportion of visitors to the West End, short term lets and higher than average levels of Airbnb (and other holiday letting) usage make utilising waste targets calculated at per capita rates particularly challenging for us. We believe additional powers to regulate short term lets are required for local authorities, which will help drive up recycling rates and reduce waste. In addition, lack of space for on street and in property recycling make increasing recycling levels (thus reducing residual waste) particularly challenging in central London and we would welcome further discussions with you on how to best meet these challenges.

Agree / Disagree that our proposed method of measuring the target metric is appropriate?

We agree this is appropriate. A kg per person (by population) metric is considered by Westminster a better method of measuring the target metric than on a per household basis.

Agree / Disagree that local authorities should have a legal requirement to report this waste data, similar to the previous legal requirement they had until 2020?

We agree that this should be a legal requirement, however we are concerned at the burden of additional reporting requirements for local authorities, without any further provision of funding to

help local authorities to meet these targets. This is particularly relevant for Westminster with the uniquely challenging circumstances of the West End set out above.

In addition, any addition reporting requirements need to be considered alongside additional burdens currently coming into force, which will increase pressures on local authorities. This includes proposals for mandatory digital waste tracking to be applied to local authorities following on from other reforms to waste and recycling services, such as the reform of Extended Producer Responsibility for packaging (EPR). The Government must outline whether and when additional funding or resourcing will be made available to local authorities to support them in this.

It is also important to note that waste from commercial (and industrial) sources makes up a significant proportion of overall waste. As such, we believe there should be reporting requirements related to business waste, with the responsibilities for reporting lying with waste collection and disposal companies.

Agree / Disagree with the level of ambition proposed for a waste reduction target?

We agree with the level of ambition proposed – this aligns well with the GLA's waste reduction targets set out in the London Plan (e.g. 65% recycling rate in London by 2030 and 0% biodegradable or recyclable waste to landfill by 2026 – which Westminster has already achieved as we send 0% to landfill.)

Westminster asks that Defra commits to transparently evaluating the target and the method of reporting in future years. It is important that as well as providing an update to Government on local authority progress towards any proposed target, that the reporting and evaluation methods are clear and straightforward, and not unduly resource intensive. We also ask whether Defra will be looking into other potential targets around waste which will be more specific or focused, for example around the circular economy and carbon neutrality of construction waste, which are targets covered in the London Plan.

Agree / Disagree with proposed metric for considering resource productivity?

Agree.

Of the possible policy interventions described, which do you think will be most effective to meet a resource productivity target?

It is currently difficult for us to comment on policy interventions until we have seen the second Waste Prevention Programme which Government is planning to publish in late 2022, along with responses to previous consultations such as the "Consistency in Collections" Defra consultation from July 2021 to which we provided a comprehensive response. We hope that this future document will provide more details of which policies should be adopted or continued to meet any resource productivity target, and we would like to see a particular focus on promoting circular economy work.

Air Quality

Annual Mean Concentration Target ('concentration target') – a target of 10 micrograms per cubic metre (µg m-3) to be met across England by 2040

Westminster believes the Government should be far more ambitious with regards strengthening of the current Target for annual mean PM2.5.

It is recognised that there is no level of long-term exposure to fine particulates that do not have adverse health effects, therefore it is important that targets aim to reduce concentrations as far as

possible. As such, the current national air quality objective for PM2.5 of 25 ug/m3 has long been considered not nearly stringent enough to tackle this issue.

The proposed move to an annual mean target of 10 ug/m3 is a step in the right direction, however it simply does not go far enough. We note that the newly proposed target is merely equivalent to the target that has been set for local authorities in Scotland since 2016. We do not consider equivalence with a six year old target set for a country with already lower levels of air pollution to be particularly ambitious.

In addition, the modelled concentrations set out in Figure 2 of the consultation report shows that the vast majority of the UK has been meeting the proposed 25ug/m3 target since at least 2018. Again, we question the ambition of Government given it is proposing a target which has already been met across the country for at least the last four years.

At the very least, if a 10ug/m3 is to be introduced, we believe it should be implemented as an interim target, to be met by 2030 at the absolute latest, and not 2040 as a final target as proposed. The Imperial College London 2022 report 'The Pathway to Clean Air', commissioned by the Clean Air Fund notes that simply by continuing to implement current policies, combined with a modelled electrification of the road transport fleet, would result in the vast majority of the UK meeting a 10ug/m3 target by 2030.

For example, the report found that weighted by the number of people at risk, 41% of local authorities had PM2.5 exposure levels above 10ug/m3 in 2018. This should fall to less than 1% by 2030 if current trajectories are met. Equally, 6.4% of the UK and 82.6% of London exceeded 10ug/m3 in 2018; these figures should reduce to 0.2% and 0.6%, respectively, in 2030. The report finds that that achieving a 10 ug/m3 annual mean by 2030 could lead to an increase in average life expectancy across the U.K, with an attendant huge reduction in cases of heart disease, asthma symptom days in children and a variety of other economic benefits. This report makes it crystal clear how the 10ug/m3 annual mean by 2040 target proposed by Government is wholly inadequate and not fit for purpose.

Westminster City Council has committed to working towards the 2021 World Health Organisation (WHO) guidelines for air quality. For PM2.5, this is an annual mean concentration target of 5 ug/m3. We believe the Government should follow this example and match the national air quality targets to the WHO guideline targets.

Westminster, and central London, has the worst air quality in the UK. London boroughs and the Mayor of London are leading the way in advocating for ambitious action and ambitious targets to improve air quality in order to improve the health and wellbeing of our residents. It is more than disappointing that the Government does not feel the same way.

Population Exposure Reduction Target ('exposure reduction target') – a 35% reduction in population exposure by 2040 (compared to a base year of 2018)

Westminster welcomes this commitment to reducing population exposure to harmful PM2.5 emissions, but again, we strongly question the level of ambition shown by the target. There is no accepted safe level for adverse health impacts from PM2.5, and so we would encourage reconsideration of this population exposure target and the wider annual mean PM2.5 target given the public health impacts of these decisions

The most recent London Atmospheric Emissions Inventory (published in 2021) shows that average concentrations of PM2.5 were approximately 19% lower in 2019 compared to 2016. The LAEI also shows that in 2019, 1.2m Londoners were already living in areas below the newly proposed target of 10ug/m3.

It follows that a tougher target for PM2.5, more stringent than the 10ug/m3 proposed, would result in a greater reduction in population exposure to harmful air pollution. This is borne out on a national level in the March 2022 'Pathway to Clean Air' report, which is highlighted in the section above.

RESPONSE ENDS

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Whether you would like your response to be confidential (if yes, please state your reasons): No