

# Response to Consultation on Environmental Targets

On behalf of South Oxfordshire and the Vale of White Horse District Councils

## Note:

Please refer to the [consultation document](#) to understand the context of the response.

This response was coordinated by the Climate and Biodiversity Team Leader. Responses to questions on waste were provided by Recycling Project Manager and the response to questions on Air Quality provided by the Environmental Protection Team.

Questions 1-5 provide information on the organisation responding to the consultation.

## Target proposals for biodiversity on land

### Question 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**

### Question 7

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

**N/A**

## 2030 and long-term species abundance targets

### Question 8

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

**Agree**

### **Question 9**

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

**N/A**

### **Question 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?

**Agree**

### **Question 11**

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

**N/A**

## **Long-term wider habitats target**

### **Question 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**

### **Question 13**

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

**N/A**

### **Question 14**

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

**Agree**

### **Question 15**

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

**N/A**

### **Question 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.

**N/A**

## **Target proposals for biodiversity in the sea**

### **Question 17**

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

**No Views**

### **Question 18**

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

**N/A**

## **Target proposals to improve water quality and availability**

### **Question 19**

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

**No response provided (not relevant to South or Vale)**

### **Question 20**

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

**N/A**

# Nutrient Pollution

## Question 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**

## Question 22

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

**N/A**

## Question 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?

***We agree that setting individual catchment targets is appropriate as this will allow the Government and the Defra bodies to focus their efforts on those catchments that make the biggest contribution to nutrient pollution. Setting higher percentage targets in these areas will help the delivery of the overall national target.***

# Nutrient pollution from wastewater

## Question 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?

**Agree**

## Question 25

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

**N/A**

**Question 26**

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

**Agree**

**Question 27**

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

Please provide reasons for why government should consider a different level of ambition.

**N/A**

## Water Demand

**Question 28**

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

**Agree**

**Question 29**

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

**N/A**

## Target proposals for woodland cover

**Question 30**

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

**Agree**

**Question 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 (but evidence report is not available yet)**

### **Question 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**

### **Question 33**

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

**Agree**

### **Question 34**

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

**N/A**

## **Target proposals for resource efficiency and waste reduction**

### **Question 35**

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

**Agree**

### **Question 36**

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

**N/A**

# Proposed metric for reducing residual waste

## Question 37

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

**Agree**

## Question 38

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

**N/A**

## Question 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**

## Question 40

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

**Agree**

## Question 41

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

**N/A**

# Resource productivity

## Question 42

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

***No response provided as the questions in this section are unclear.***

## Question 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?

**N/A**

## Question 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.

***No response provided as the questions in this section are unclear***

# Target proposals for air quality

## Question 45

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

**Disagree**

## Question 46

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

***Despite the consultation report outlining the very severe impacts pollution has on human health across the country and how taking action as soon as***



***possible is crucial, the proposed compliance target date for the objective is 2040, which seems too far away.***

***According to figures recently published by NHS England, an average of 5% of deaths in those aged over 30 can be attributed to PM2.5- We therefore believe the compliance date of this target should be far more ambitious in order to prevent further loss of lives and improve the quality of life and health of all UK citizens, especially those of sensitive receptors and less advantaged communities.***

*Also, bringing the compliance date forward would help relieve the current burden air pollution-related illness for the NHS.*

#### **Question 47**

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

**Disagree**

#### **Question 48**

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

***The consultation report states that population exposure will be quantified by means of monitoring sites on the Automatic Urban and Rural Network, with more sites being added to the network to support assessment of these targets. Due to the nature and size of the monitoring equipment compliant with AURN criteria, it will be difficult to place new monitoring stations in many areas where the population is exposed to high PM2.5 levels, such as the, often narrow, pavements in street canyons. We therefore have concerns that the number of monitoring sites available to assess compliance with this target will not allow an accurate assessment.***