

Response ID ANON-JVC4-2Z3D-T

Submitted to **Consultation on the Draft Policy Statement on Environmental Principles**

Submitted on **2021-05-24 14:16:57**

Foreword

You and Your Organisation

1 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason:

2 What is your name?

What is your name?:

Ruth Beckley

3 Are you responding:

On behalf of an organisation

4 What type of organisation are you responding on behalf of? [Please note this question only applies if you are responding on behalf of an organisation]

Non-governmental organisation

If responding on behalf of an organisation, please provide the name here. :

Association of Local Government Archaeological Officers

Background

Policy Statement on Environmental Principles

5 Do you think the overview section provides an adequate foundation for policy makers to apply the environmental principles in policy-making?

No

Please provide any additional information in support of your answer:

No. In its current form, the overview section does not adequately address the stated aim. The section is vague and open to interpretation. Excluding heritage from the Environment Bill does not provide sufficient guidance for the Government and public bodies. In omitting heritage from the Bill, there is a significant risk that future Environmental Improvement Plans will be undertaken without consideration of the historic environment. If the whole of the environment – both natural and historic – is not fully appreciated then there is a significant risk of irreparable damage caused to an irreplaceable resource and will not, ultimately, achieve the goal of leaving the environment in a better state than we found it.

Process for Applying the Policy Statement

6 Do you think step one allows policy-makers to correctly assess the potential environmental effects of their policy?

No

Please provide any additional information in support of your answer:

No. Our 'cultural' and 'natural' landscape is inextricably linked, this land has been extensively shaped and affected by human interaction for millennia. The rural environment we have inherited is the product of interaction between people, the landscape and nature over thousands of years. As a consequence, all rural interests should be considered together in policy and schemes; they cannot be considered mutually exclusive. Cultural heritage should be given equal weight alongside other interests and outcomes as part of a holistic approach to the rural environment. It will only be possible to leave the environment in a better condition than we inherited it if cultural heritage is fully integrated in agricultural policy and land management.

7 Do you think step one ensures that policy-making will address the most important environmental effects?

No

Please provide any additional information in support of your answer:

No. While we understand the distinction you are trying to make between the natural and historic environment with your definitions. It remains a fact that steps taken to address the 'environmental impact' will affect the cultural heritage inherent in the landscape. That affect can be for the benefit of both or the detriment of one, continuing to treat them as separate entities in policy making decisions will ultimately lead to a situation where we will not be leaving our environment in a better state. Excluding heritage from the Bill misses the potential joint value and the potential public benefit of improving and enhancing the landscape. Activities such as shrub removal or reduction that can allow a greater variation in species, monitoring of wildlife habitats on both designated and undesignated heritage assets, restoration of dry stone walling contributing to public benefit, providing access to and interpretation of heritage assets that include wildlife aspects. Historic waterscapes including canals, dykes and lakes that have been created as a direct result of human interaction since the Roman period are highly visible features of the environment around us and they are often popular among local enthusiasts. Greater engagement with these groups to promote both the cultural and natural aspects will promote local engagement and interaction and develop a greater sense of place.

Step 2: Understanding Which Principles are Relevant

8 Will step two assist policy-makers in selecting the appropriate environmental principles?

Other

Please provide any additional information in support of your answer:

This step remains too vague to be of practical use. It feels more like a reiteration of what the principles are rather than providing any further understanding. Fuller details with examples or scenarios might assist in understanding what principles is more appropriate.

Step 3: Applying The Principles

9 Do you think step three provide a robust and sufficient framework for the application of each individual environmental principle?

Q10 - Integration:

No

Q10 - Prevention:

No

Q10 - Rectification:

No

Q10 - Polluter pays:

No

Q10 - Precautionary:

No

Integration Principle - Please provide any additional information in support of your answer:

This principle feels less well thought out than the others. There is no clear guidance on how this fits in with other policies beyond the Environment Bill. While the principle itself is sound, it is currently too high level to meet the requirement of 'robust and sufficient'. If the Environment Bill does not consider the totality of the components that make up the environment around us it does not address the intention of the principle in a 'robust and sufficient' manner.

Prevention Principle - Please provide any additional information in support of your answer:

While more in-depth, there is still no clear guidance on how this fits in with other policies beyond the Environment Bill. While the principle itself is sound, it is currently too high level to meet the requirement of 'robust and sufficient'. If the Environment Bill does not consider the totality of the components that make up the environment around us it does not address the intention of the principle in a 'robust and sufficient' manner.

Rectification Principle - Please provide any additional information in support of your answer:

While more in-depth, there is still no clear guidance on how this fits in with other policies beyond the Environment Bill. While the principle itself is sound, it is currently too high level to meet the requirement of 'robust and sufficient'. If the Environment Bill does not consider the totality of the components that make up the environment around us it does not address the intention of the principle in a 'robust and sufficient' manner.

Polluter Pays - Please provide any additional information in support of your answer:

While more in-depth, there is still no clear guidance on how this fits in with other policies beyond the Environment Bill. While the principle itself is sound, it is currently too high level to meet the requirement of 'robust and sufficient'. If the Environment Bill does not consider the totality of the components that make up the environment around us it does not address the intention of the principle in a 'robust and sufficient' manner.

Precautionary Principle - Please provide any additional information in support of your answer:

While more in-depth, there is still no clear guidance on how this fits in with other policies beyond the Environment Bill. While the principle itself is sound, it is currently too high level to meet the requirement of 'robust and sufficient'. If the Environment Bill does not consider the totality of the components that make up the environment around us it does not address the intention of the principle in a 'robust and sufficient' manner.

10 Do you think the process for applying the policy statement (the three steps) provides a robust and sufficient framework for the application of the environmental principles as a whole?

No

Please provide any additional information in support of your answer:

No. At this stage the policy statement is too high level to provide a 'robust and sufficient' framework, it does not take into account other factors that might affect the application of these principles and it does not address all aspects of the environment. Excluding heritage from the powers and provisions of the Bill reduces the potential effectiveness of any strategy or target on enhancing the environment. Additional consideration needs to be given to include a commitment to the enhancement of the environment including heritage and natural aspects within a policy statement on environmental principles and inclusion in targets of the Environment Improvement Plans.

Final Thoughts on the Policy Statement on Environmental Principles

11 Do you have any other comments on the draft policy statement which are not covered by the previous questions?

No

Please provide any additional information in support of your answer:

We welcome the introduction of the Environment Bill and the steps it takes in seeking to protect our landscape, however, we have significant concerns about the exclusion of the cultural heritage from the definition of the environment in this Bill. We feel that the Environment Bill stands in opposition to the 25 Year Environment Plan that sought to enhance 'beauty, heritage and engagement with the natural environment'; to the Agriculture Bill that covers both cultural heritage and natural heritage; and to the recent Landscapes Review that embraces the cultural and natural heritage of National Parks and AONBs. ALGAO supports smarter ways of working but safeguards that protect the historic environment/cultural heritage against damage and robust compliance/inspection regimes must be retained. ALGAO members could be involved in historic environment monitoring and or inspections, if funding was available.

Consultee Feedback on the Online Survey

12 Overall, how satisfied are you with our online consultation tool?

Satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it.: