



Consultation response

Environmental Principles and Governance after the United Kingdom leaves the European Union

Date: July 2018

Description: This consultation from DEFRA sought views on the government's proposals for environmental principles and accountability for the environment.

About us

Historic Houses represents the UK's largest collection of independently owned historic houses, castles and gardens. Our family includes over 1,650 historic houses, many of which look after significant parts of the rural landscape, including important rural heritage assets.

Historic Houses places – the majority of which are situated in rural areas – generate over £1 billion for the economy, and support 33,700 full time equivalent jobs. As leading tourist attractions, events venues and rural business hubs, Historic Houses places are also vital catalysts for rural prosperity – spending over £247 million a year on goods and services, 46 per cent of which is with local suppliers.

Introduction

The historic houses and gardens Historic Houses represents are often deeply embedded in rural communities: as local heritage landmarks; as major tourist attractions; as small businesses in their own right, as well as hubs for other local businesses; as employers and clients; as providers of community space and leisure activities; and of course, as land managers and stewards of rural heritage and landscapes.

These rural landscapes are very special palimpsests of both the natural and the historic environment – reflected in the current Common Agricultural Policy (CAP) programmes such as Countryside Stewardship and LEADER. Historic Houses supports a future policy that recognises this parity by supporting farming and land management approaches that encompass the constructive conservation, sustainable use and enjoyment of both the historic and the natural environment, as part of a holistic rural landscape.

Historic Houses agrees that leaving the European Union presents an opportunity to create a bespoke national approach to protecting and improving the environment.

We can see the value in creating a body that has oversight of environmental policy, and that can hold the government to account as it delivers the 25 Year Environment Plan. While we understand that the development of the membership and scope of such a body is at a very early phase, it is concerning that there is no mention of how it will interact with the historic environment, nor is there a single mention of the historic environment in the entire consultation document.

Historic Houses would strongly encourage government to develop a world-leading set of environmental principles that acknowledges the symbiotic relationship that the historic environment has with the natural environment, and ensure any new independent body has the necessary heritage expertise to uphold those principles.

Question 1: Which environmental principles do you consider as the most important to underpin future policy making?

Historic Houses does not have a preference to any of the principles set out in the consultation document – all are important. However, we strongly recommend that the final principles recognise the importance of the historic environment to the natural environment. In the UK, much of the managed landscape is either the direct result of, or has continued integration with, the historic environment and heritage assets. Failure to acknowledge this properly in the final principles would miss an opportunity to be world-leading in environmental protection.

Question 12: Do you agree with our assessment of the nature of the body's role in the areas outlined above?

Historic Houses is concerned that the outlines of the proposed independent body do not make any reference to the historic environment. As various heritage organisations mentioned in response to the Health and Harmony consultation, the interaction of heritage assets with the landscape over the years has created our iconic landscapes, and many heritage assets (and their managers) continue to play an active part in the maintenance of these landscapes.

There is explicit reference made to the importance of the historic environment to the natural environment in the government's 25 Year Environment Plan; we would strongly recommend that the outlines of the proposed independent body are amended to recognise the importance of the historic environment to the natural environment, and the continued part that heritage assets play in ensuring sustainable environment policy.

Question 13: Should the body be able to advise of planning policy?

We certainly do not think that there should be any additional layers of bureaucracy in the planning system. The body should focus on environmental principles, which will of course interact with planning policy, but we do not think the body should be directly involved in planning policy.

Historic Houses would urge the government to publish more developed outlines relating to this for consultation before the new body is established. We would strongly recommend that if the proposed body is going to be considering any planning policy, it should be required to consult Historic England, the statutory

consultee for heritage, to understand any impact on the historic environment (either intended or unintended).

Question 14: Do you have any other comments or wish to provide any further information relating to the issues addressed in this consultation document?

As already noted in the responses to the above questions, Historic Houses would urge government to ensure that – in line with the 25YEP – the historic environment is given parity with the natural environment, and that the important, active role that the historic environment plays in maintaining a sustainable environment is recognised in the principles and outlines of the proposed body.

To this end, we strongly recommend that the definition of sustainable development is amended to better reflect the definition in the National Planning Policy Framework. This recognises that to be truly sustainable, development needs simultaneously to support economic, social and environmental objects, and defines environmental objectives as:

“to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change, including moving to a low carbon economy.”

By fully understanding the role that heritage assets and the historic environment play in developing a sustainable environment, and acknowledging this across policy, the government will be able to make the most of the opportunity to create a new national policy for the environment.

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