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Pathways to engagement: the natural and historic environment in England

Introduction

In 1864, George Perkins Marsh suggested 'Man has too long forgotten that the earth was given to him for usufruct alone, not for consumption, still less for profligate waste'.[1] At around this time , we saw a rise in the protection of both nature and culture across the United States and Europe – with many who fought that battle often stewards of both heritages.[2] Indeed, cultural and natural heritage were viewed as interconnected and indivisible, with similar traits of being both non-renewable and a limited resource. Yet in management, we seem to treat these two legacies differently, or at least separately, despite a clear 'ethic shared among nature conservationists, social scientists, and cultural advocates' on the 'importance of diversity and the processes that create it'[3] as well as the need to pass them down to future generations.

However, the 'opposition between nature (the non-human) and culture (the human)' is increasingly being seen as 'untenable',[4] particularly as we accept that 'no aspect of nature is unimpacted by human agency' and 'no artefact devoid of environmental impress'.[5] With the idea of nature and culture as separate domains increasingly viewed as an artificial divide, it is timely to question what lessons can be learnt from conservation and management efforts across both the natural and cultural heritage environments.

The fluctuating relationship between both culture and nature can be seen through the changes within UNESCO declarations and practices, as well as through revisions of its definitions.[6] UNESCO's effort to recognise and reflect the complexities of the relationships between nature, culture and multiple world perspectives is increasingly becoming apparent in resolutions to the World Heritage Convention. How these interdependencies are reflected across the practices and policies worldwide is yet another hurdle. It has been suggested for many years, if not decades, that an integrated approach or framework needs to be explored: how these approaches are worked into policies and the bureaucracies of activities is yet another challenge.[7] This paper addresses the relationship between the two environments, and explores overlaps between the two sectors when working towards policy advocacy.

Overlaps and gaps

The discussion and debate that continues over the interrelationship – or symbiosis – between culture and nature, as well as how the two may be linked in heritage conservation strategies may be seen as a consequence of a Eurocentric understanding (or lack thereof) of nature and culture. From this perspective, in simple terms, nature is understood as not human-made and in that respect rather distinct from what we understand as culture, despite being profoundly shaped by human activity as well as being constructed by human intellect's understanding and valuing of nature. It is the unique perspective that each culture (or group of cultures) has on nature, culture and their own interrelationship with nature and culture which lends itself to decisions made on the management and conservation of the two. The 'self-understanding of human beings in relationship to the wider world is evidenced by differing concepts of nature', Dailoo and Pannekoek argue, and in that 'nature is a key part of humanised, culturally defined places'.[8] And although there may be different views on what comprises heritage across peoples and time, the attachments and values reflected on heritage are 'universal'.[9]

Natural and cultural spaces can be described as a 'meeting place of nature and people, of past and present, and of tangible and intangible values',[10] and existing conservation strategies equally are acts of human – or cultural – intervention, further supporting a dependency between the culture-nature domain. Cultures have, over millennia, integrated closely as human communities with the local environment – modifying it, understanding it, using it, and managing it for their own purposes.[11] In turn, nature has provided the base and source for all human activity. The overlap is clear: while there is no natural environment devoid of humans or human footprints, equally there is no human activity devoid of nature. Yet, generally a Eurocentric perception, 'people are not often treated or regarded as part of the biosphere; certainly not as part of biodiversity'.[12] Eurocentric values continue to 'remain uncomfortably ambivalent as to the status of

humans with respect to nature'[13] in which we separate ourselves from biodiversity within ecosystems, although this approach is slowly starting to shift.[14]

Looking at UNESCO: Approaches to reconciling the nature-culture domain:

The reconciliation of the nature-culture divide is certainly dependent on influencers and agendas of key stakeholders involved with environmental policymaking. Initiatives, such as sustainable development, come from a political objective to reconcile ongoing development with environmental integrity.[15] These political objectives – driven from prevailing values, shared beliefs or cultural practices- may be influenced or shaped over time by changing understandings through advances in science or technology, although science and technology do not always shape the final decisions and actions. Indeed, as is more visible in today's socio-political landscape, 'at any given moment […] values and beliefs may be more important in the shaping of public policy than the results of the latest scientific research'.[16] This cannot be overstated : mindsets and practices often trump scientific research which might question normalised behaviours.

While overall there is a recognition of the importance of acting against environmental degradation, we often remove human agency from the formula. To exemplify this further, global agreements that are most supported and are evident through higher signatories address environmental degradation directly as an issue. However, the global conventions that are relevant to environmental degradation – the Convention on Biological Diversity (CBD), the Convention to Combat Desertification, or the Convention on International Trade in Endangered Species of Wild Fauna and Flora, for example tend to ignore culture as an aspect of resource management.[17] In many instances it is often easier to deal with *material* issues rather than open up the scope of considerations to include culture and its practices. This, however, is now changing to some degree. The artificial barrier between culture and nature is increasingly disappearing in Western discourse: not only is there more uncertainty about the division between the two environments, but there is an increased level of interest from stakeholders that is influencing various organisations, including UNESCO and UNEP, to pursue work joining the two. For example, the *2003 UNEP Governing Council Resolution on environment and cultural diversity* referred to the importance of further examining this issue in cooperation with UNESCO, with particular attention to its implications for human well-being.'[18] These interrelationships are not uncommon, seen through a plethora of research now exploring the links and interplay between cultural heritage and the natural environment.[19] This ongoing effort of the interplay between culture and nature is actually reflected in, for example, the UNESCO 1972 Convention for the Protection of the World Cultural and Natural Heritage, the 2001 Convention on the Protection of the Underwater Cultural Heritage, the 2001 Universal Declaration on Cultural Diversity, and 2003 Convention for the Safeguarding of the Intangible Cultural Heritage.[20] More particularly is the attention brought to cultural landscapes through the World Heritage Convention Management Guidelines for Cultural Landscapes, which has played a significant role in revising World Heritage concepts of culture and nature. Indeed, the entanglement between the cultural and natural is difficult, at best, to separate. 'With constant deepening in the knowledge and understanding to this value, especially the aggravated damage to the natural and cultural heritages caused by natural disasters and unsustainable economic growth, the world heritage protection and heritage site development have become one of the hotspots attracting the worldwide attention'.[21] The nature-culture connectivity, however, has been more apparent within conservation efforts of indigenous peoples who recognise a clear relationship between their identity and culture, shared values and nature itself.

Policy in the UK

The heritage of nature and culture in UK policy is complex. Parliament passes literally thousands of statutory instruments each year, and so in many instances, it is difficult to pin down how to effectively secure strong relationships between both nature and culture. Are there the resources necessary to revisit decades of legislation and rethink (then implement) them embedding this new paradigm of entangled heritages? Looking at UK legislation that protects the environment, there are over 300 statutory instruments ranging from access to the countryside to carbon budgets. The scope is almost endless, whether the focus is on pollution or conservation or community wellbeing or climate change.[22] Figure 1 below is a table of some UK primary legislation that relates to the 'environment', to demonstrate the range of topics covered.[23]

UK Primary Legislation Search for 'the Environment'
Pollution
Control of Pollution Act 1974
Environmental Protection Act 1990
Wildlife
Wildlife and Countryside Act 1981
Weeds Act 1959
Badgers Act 1991
Protection of Badgers Act 1992
Hunting Act 2004
Conservation
Planning (Listed Buildings and Conservation Areas) Act 1990
National Parks and Access to the Countryside Act 1949
National parks of England and Wales and National parks of Scotland
Ancient Monuments and Archaeological Areas Act 1979
Countryside and Rights of Way Act 2000
Climate Change
Climate Change Act 2008
Planning and Energy Act 2008
Energy Act 2008, 2010, 2011

Figure 1 UK Primary Legislation Search for 'Environment'

By taking a broad definition of 'the environment', we can see a range of Acts that clearly relate to *both* the natural and historic/cultural environment. It is also clear that the Acts separate nature and culture through their focus. This separation is also reflected within governmental departments: for example, Historic England sits within the Department of Digital, Culture, Media and Sport (DCMS)[24] whereas nature-focused organisations, such as Natural England or the Environment Agency, sit within the Department of Environment, Food and Rural Affairs (Defra). This separation is not just technical, but political. A 'distinguishing feature of the environmental policy-making is the potential for conflict between the many competing interests involved'[25] – and of course, as the environment is the basis of all activities we do, interests are plenty, particularly land use. The competing issues can be as wide in scope as cross-national, with environmental issues increasingly seen as a global crisis, yet management solutions tend to be more localised and addresses particular regions and their interests. Although government needs to address and resolve competing interests, as a political system its very nature reflects the power dynamics and conflict of interests embedded across a huge range of issues and activities. 'Environmental issues cross cut a huge variety of governmental activities – transport, agriculture, trade and so on – and these separate policy arenas tend to provide a great deal of influence for development-oriented interests.'[26] It is in these instances it becomes easier to see the similarities between both natural and historic environments, when faced with destruction or habitat loss through land use, conversion impact, and development activities. It could be suggested that land use and development act as catalysts for the rise of the environment as a political issue, largely due to the public becoming more attentive and expressing strong concern for and interest in their environments. New waves of environmental concerns tend to form at times of rapid environmental transformation. Whether such effects are caused by adverse economic and land use practices or as the result of natural disasters, this is one of the intersections where the protection and conservation of natural and cultural 'ecosystems' become fundamental to the 'sustainable development' discourse. It is a discourse characterised recently by the efforts of individuals in the heritage sector to create bridges between the nature-culture sectors.[27]

England's National Planning Policy Framework

The UK's revision of its National Planning Policy Framework (NPPF) in 2019, though, is a telling example of how the nature and culture sectors work independently to challenge common potential impacts to the environment. The NPPF, originally published in 2012, is the consolidation of many of the UK's previous Planning Policy Statements (PPS) and Guidance Notes (PPG), covering all national planning issues from housing to design (Figure 2). The UK Government published the Framework as a 'dramatic simplification of planning guidance to encourage sustainable growth' that 'safeguards the environment'.[28] A presumption in favour of sustainable development was introduced, suggesting that 'proposals should be approved promptly unless they would compromise the key sustainable development principles set out in the draft Framework'.[29] Yet despite these statements, concerns from both the natural and historic environment sector continue to be raised.
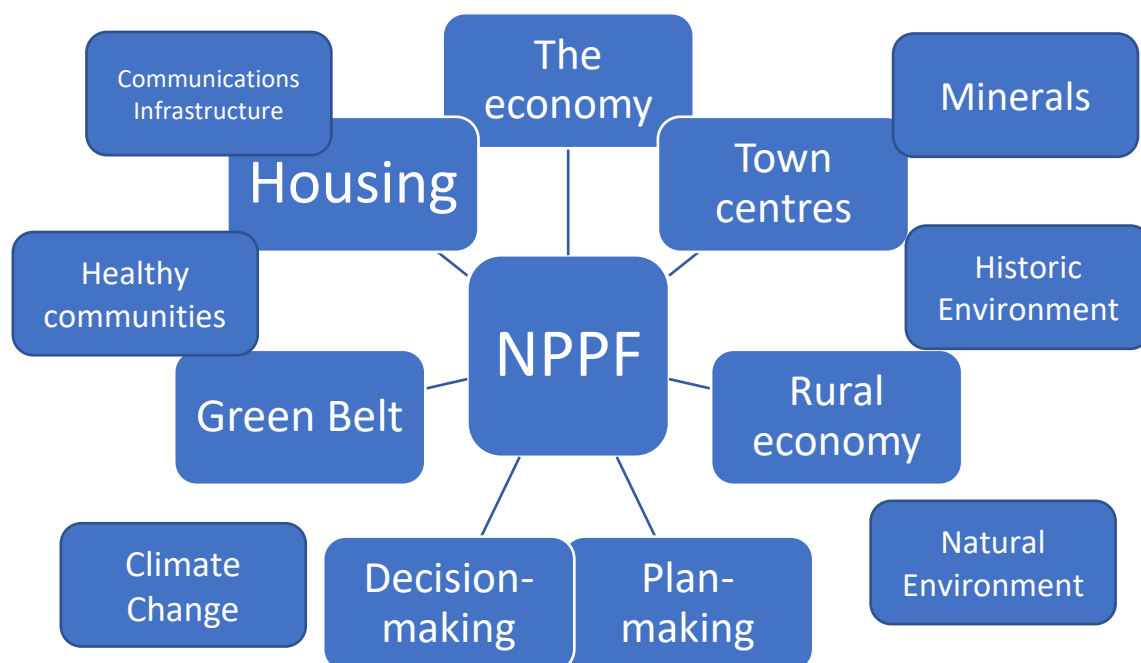

Figure 2 Areas covered in the NPPF

In July 2018, the UK's Ministry of Housing, Communities and Local Government (MHCLG) published the revised NPPF for technical consultation, after which the updated version was available from February 2019.[30] According to MHCLG's *Government response to the draft revised NPPF consultation* which includes a summary of consultation responses, a total of 3,222 consultations were received (see Figure 3 for details). Of the campaigns, there was a total of 29,224 submissions with some 74% of those coming from natural environment organisation campaigns with no explicit historic environment campaign mentioned. While there was not an historic environment campaign similar to the natural environment, a range of historic environment and heritage organisations – from local authorities to private archaeological contractors - submitted consultations. These included Historic England, the Institute of Historic Building Conservation, the Chartered Institute for Archaeologists, the Heritage Alliance, Rescue, the Ancient Monuments Society, the Association of Local Government Archaeological Officers, the Society of Antiquities London, and many more.

Type of consultation respondent

Personal view	1,726
Local authority[1]	336
Neighbourhood planning body, parish or town council	204
Private sector organisation[2]	290
Interest group or voluntary organisation[3]	442
Other	224
Total	**3,222**

We also received responses in the form of a number of campaigns on specific issues. The table below provides a breakdown of the overall number of responses including campaigns and general submissions.

Campaigns

Woodland Trust campaign	8,095
General Aviation	4,530
Local Wildlife Sites campaign	13,020
National Parks campaign	357
General submissions	3,222
Total	**29,224**

Figure 3 Type of Consultation Respondents/Campaigns for the NPPF Revision. Credit: MHCLG, 2018

Heritage Environment Legislation, Policy and Guidance

Overall, the response from both the natural and historic environment sectors has demonstrated that the NPPF revision clearly raises a set of concerns. Below are some of main concerns highlighted from those involved and interested in protecting and conserving the environment, defined as both natural and cultural, in the 2018 consultation for the revision of the NPPF.[31]

To contextualise, in many instances the further simplification of the UK planning process means that the relationship between environmental legislation, policy and guidance may not be explicitly mentioned within policies, such as the National Planning Policy Framework.[32] In some instances, much of the associations between legislation and policy are made in footnotes or simply removed. For example, Paragraph 9 of the earlier 2012 NPPF aimed at the 'pursuit of seeking positive improvements to the quality of the built, natural and historic environment' with reference to the Natural Environment White Paper of 2011. This paragraph is now removed in the revised NPPF along with its reference. The revised policy cuts the use of the terms 'natural environment' and 'historic environment' from mention within the current NPPF from 38 to 24 times.[33]

In recent years the European Union (EU) has been profoundly influential on the United Kingdom's environmental policy sector and a significant question is how the UK will emerge post-Brexit. The UK government has indicated its promising ambition to support the environment with its 25 Year Environment Plan, but lacks detail and at present covers England alone acknowledging 'coordination challenges associated with devolved policies'.[34]

The lack of strong domestic policy and issues of accountability aside, much of the UK's environmental policies are rooted in either United Nations (UN) or EU policy. The UK is signatory of some 40 international agreements, but additionally there are — international agreements entered into by the EU alone, meaning that 'unless and until the UK itself ratifies EU-only international environment agreements' the UK can lose these protections.[35] According to a 2017 National Audit Office's Report, for example, 'approximately 80% of Defra's areas of responsibility are currently framed by EU legislation and 25% of EU laws apply to its sectors'.[36] There remain ongoing issues and challenges of enforcement for many of these EU and international environment agreements, which are reliant on full and proper implementation as well as availability and effectiveness of UK enforcement mechanisms.

These examples frame the UK's position in effectively handling ongoing issues and challenges facing the environment, however, while further simplification may enable some interests into action, it will disable others.

Revisions impacting Community Relationships with the Natural and Historic Environment

Similar concerns toward the NPPF revisions were identified by both the natural and historic/cultural environment sectors, are evident in the consultation responses. One of the most obvious points was the apparent disconnect between the natural and historic environment's relationship with 'positive growth', understood as 'making economic, environmental and social progress for this and future generations'.[37] This disconnection is reinforced by the removal of the 2012 NPPF Ministerial Foreword by the Rt Hon MP Greg Clark (Minister of State in DCLG, 2010-2012) who had provided an insightful start to the policy document by clearly defining the terms 'sustainable' and 'development', and the intention of sustainable development as being about 'change for the better, and not only in our built environment'.[38]

The disconnect continues through the removal of the 2012 Introduction, which highlighted an explicit connection to local people, framed as 'local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities'.[39] The revision also removed an introductory paragraph of UN Resolution 42/187 on the broad principles of sustainable development as well as a paragraph stating the interrelationship between the economy, society and the environment as 'mutually dependent' and 'not [to] be undertaken in isolation'.[40] The clear connection between sustainable development and communities in the 2012 version, with the communities' association alongside the UK planning system seen through a statement referring to people and communities being 'allowed' back into planning, disappeared from the revision.

Today the 2019 NPPF explicitly removes communities from the heart of environmental protection, and the has extinguished the relationship between what it means to be truly sustainable by empowered communities able to recognise and value their own environment, or further enrich and enhance their lives.[41] The revision also suggests that the three key domains of sustainability – that is, the economy, social, environmental- are 'not criteria against which every decision should be judged', working against the initial 2012 statement in which sustainability was a 'golden thread running through both plan-making and decision-taking'.[42]

What is important here is that both the natural and historic/cultural heritage sectors reply heavily on communities, their involvement, and relationship with planning to enable protection of the environment. The symbiotic relationship between communities and environments enables us to value the benefits afforded to us through the protection of natural and cultural heritages. The 2019 revision does not mention the significant contributions heritage (e.g. historic buildings, places and landscapes) provides to our national and local communities and economies.

Plan-making and Decision-making

More importantly, there is an increasing threat to resources, whether that is in-depth local knowledge or appropriate evidence, required to help deliver evidence-based decisions of a higher standard.[43] This is particularly evident in the proposed removal of the requirement that local planning authorities should have access to 'up-to 'date evidence about the historic environment' in order to 'assess the significant of heritage assets and the contribution they make to their environment'.[44] While the outcry against this revision resulted in this principle paragraph remaining within the current NPPF at para 169, that its removal was even considered is indicative of the current climate. At present, historic environment records (HER) across England are suffering tremendously as a consequence of cuts to local government operate.[45] In reality, if these records are not properly resourced nor funded efficiently, the system for assessment prior to development will not work even if it is embedded into policy frameworks.[46]

The motivations, or drive, to speed up the decision-making process of the planning process in order to build a 'strong, competitive economy', combined with a reduction in resources, have jeopardised proper assessment and management of natural and historic environments. These motivations and interests are predominantly held by stakeholders who see regulatory obligations as red tape. An example of this is seen in the current progress of the 'Green Belt (Protection) Bill 2017-19' making its way through UK Parliament.[47] The Green Belt, which was originally conceived as a ring of countryside around London, was first raised as an idea by the Greater London Regional Planning Committee in 1935 as a means to prevent urban sprawl through an urban containment policy. A decade later in the Town and Country Planning Act 1947, the concept was picked up and extended to other local authorities which were then allowed to include

such proposals in their own development plans. According to research by Natural England and the Campaign to Protect Rural England,[48] England's 14 Green Belts now cover more than a tenth (12.4%) of the country and are accessible to 30 million people. Despite being much prized worldwide, the Green Belt has been criticised by international organisations, such as the Organisation for Economic Cooperation and Development (OECD), which has surprisingly recommended the UK start building on the Green Belt. Their view is that restrictions (for example, planning conditions) placed on housebuilding are responsible for the booming property market, raising prices some 7.6 times higher than the average annual salary.[49] In this approach, the provision of housing without question trumps the preservation of the Green Belt. Whether this is a legitimate argument or not, the contested nature of what is viable or profitable once again highlights areas of conflicting interests.[50]

It is such conflict of interests that highlight fundamental concerns of how decision-making relevant to the environment and its use are made. Despite the recurring narrative that people are and should be at the heart of planning, local opposition to development can often be labelled and dismissed as NIMBYism (*Not In Back Yard),* implying 'citizens have illegitimate or irrational selfish (or narrow) reasons for opposing facilities', rather than discussing the nuances and 'complexities of public opinion'.[51] These dynamics and the absence of stakeholders central to decision-making often leads to issues of trust between planning authorities, developers and residents, which acts as a key barrier to any progression.[52]

Conserving and enhancing the 'environments'

Competing motivations, interests and agendas behind development are key factors in winning support for development. Land value and private property assets are rarely detached from decisions on development, and are rooted in many discussions in which power dynamics emerge. For example, civil design and planning specialist Sturzaker suggests that the 'rural elite' prevent 'much-needed new housing' being built in the countryside, and that people with 'local connections' enable exclusionary and discriminatory behaviour toward those in need of housing.[53] The identification of such motivations behind the conservation and enhancement of natural and historic environments is important in its suggestion that the pursuit of environmental protection may inadvertently be entangled with sustaining existing power dynamics. It also raises issues of accessibility, and questions who is excluded from the benefits of environmental conservation and enhancement,

Natural and cultural heritage assets are irreplaceable resources that contribute to wider social, cultural, environmental *and* economic benefits through effective conservation.[54] Wider changes and challenges – from the need for industry, infrastructure, and housing to increasing populations and climatic challenges – require both thoughtful and flexible approaches for effective management and positive strategy.[55] However in order to have that flexible and effective approach for management, we need to start thinking fluidly across boundaries. There are instances in which guidance and reports demonstrate an entanglement between the two environments/heritages (e.g. see Figure 4), or indeed Local Plans reference the protection of both natural and historic environment under a single heading, but more needs to be done to open the doors of collaboration between the two sectors. Anecdotally, practitioners tend to see the grass greener in the other sector, envying what are considered 'successes' by the other sector. For example the current goal from the historic environment sector to create a Cultural Capital Valuation mirrors the Natural Capital Valuation; meanwhile the natural environment sector sees the creation of a new cross-departmental Heritage Council in UK parliament, and the NPPF (para 194 (b)), stating destruction of designated assets as 'wholly exceptional', as 'wins'.

Figure 4 Natural England provide a 'Technical Information Note' to offer guidance on historic environment features when considering the management of woodlands

'Years of campaigning pay off': the Woodland Trust and the NPPF

An indication of how advocacy from the natural environment perspective played out during the NPPF revision is the Woodland Trust campaign. The example also highlights the importance of advocacy and engaging in the consultation process.

One of the criticisms of the 2012 NPPF is that it had an opportunity to improve protections that were embedded in previous planning policy protections, such as the 'Planning Policy Statement 9: Biodiversity and Geological Conservation'[56] (for the natural environment) or the 'Planning Policy Guidance 16: Planning and Archaeology'[57] (for the historic environment). Instead previous PPSs or PPGs were either replicated or diluted with little apparent effort to improve the link between nature and culture. The disconnect was picked up by the Woodland Trust, the UK's largest woodland conservation charity, who used the chasm as a basis of their 2017 campaign to improve the protection of ancient woods and trees in the English planning system.[58] The Trust would highlight in their campaigning, lobbying and technical submissions the imbalance between the protection and value placed on England's irreplaceable natural heritage versus its historic heritage.

This discrepancy can be seen in the 2012 Framework. For example, in consideration of nature, Paragraph 118 states (italics added):

> planning permission should be refused for development resulting in the loss or deterioration of *irreplaceable* habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, *unless the need for, and benefits of, the development in that location clearly outweigh the loss…*

However, in relation to the 'irreplaceable' environment of heritage assets, we see loss as 'wholly exceptional' rather than an issue of 'outweighing the loss', as seen in Paragraph 132 states (italics added):

> As heritage assets are *irreplaceable*, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, *should be wholly exceptional.*

For the cultural heritage/historic environment sector, the lack of protection was challenged and despite the addition being diluted from previous guidance and statements, the case was carried. Some heritage practitioners, however, at the time were frustrated by the introduction of the term 'asset' rather than resources, suggesting a commodification of heritage, despite its earlier use in the draft 2009 Heritage Protection Bill.[59] The inconsistency raised by the Trust's campaign, nevertheless, shows the gap between values placed on nature and culture by decision-makers working in policy production. More relevant, the campaign strategy also pointed to a gap in how both the natural and historic environment sectors fail to communicate effectively. It is often the case that each sector acknowledges the successes and benefits of the other, but rarely work together to push for the 'environment' as a whole.

The success of the Woodland Trust's campaign saw Government documents begin to address the imbalances in protections toward the natural environment, finally referring to woodlands as 'living cultural heritage', notably within Defra's 2014 publication *'Keepers of Time, A Statement of Policy for England's Ancient and Native Woodland'* (italics added):[60]

> England's ancient woodlands and trees represent a *living cultural heritage*, *a natural equivalent* to our great churches and castles. They are also our richest wildlife habitat and are highly valued by people as places of tranquillity and inspiration.

Ultimately the benefits of the Trust's concerted campaign would see the 2019 NPPF revise protections, seen in Paragraph 175c:[61]

> development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) *should be refused, unless there are wholly exceptional reasons* and a suitable compensation strategy exists…

The phrase 'Exceptional reasons' is linked to footnote 58 of the 2019 NPPF, which includes infrastructure projects 'where the public benefit would clearly outweigh the loss or deterioration of habitat'. This again lends itself to how we value or balance, or indeed judge, what 'clearly' outweighs the destruction of natural and historic environments. In pursuit of any development, the natural (and potentially historic) environment *will be* modified or destroyed, the question is to what extent, and for what end? In the end, nothing has *ultimate* protection, and as the planning system is increasingly liberalised, the endeavour to find a positive planning balance continues.

The Environment Bill

The Environment Bill currently making its way through Parliament at time of writing is yet another example of the divergence between the two environment sectors, in which the historic environment sector has been left behind.

The context is important. In 2008 the *Heritage Protection Bill for England and Wales* was intended as the first legislation after 30 years which would cover heritage.[62] It followed the 2004 Green Paper *Review of Heritage Protection: The Way Forward* and the feedback received from the White Paper *Heritage Protection for the 21st Century*. The Bill was set to replace the *Historic Buildings and Ancient Monuments Act 1953,* the *Ancient Monuments and Archaeological Areas Act 1979,* and *Planning Act 1990.* At the time, the then Culture Secretary Andy Burnham had said:

> Heritage protection is as important as anything else we do in this Department [DCMS].
> But nobody can sit in an office in London and decide what is heritage or not. Local

> communities have strong feelings about their own heritage and it is important that those voices are heard.
>
> By unifying the protection regimes, encouraging wider participation, and making the system more transparent we aim to make heritage protection easier to understand and manage, and help it become an integral part of public life.

Culture Minister Margaret Hodge agreed:

> This draft Bill is a really important step along the way to making our system of heritage protection more democratic and, where necessary, more effective. It has been many years in preparation and will make a real difference to the way that ordinary people all over the country engage with our built environment.

Despite cross-party support, the Bill was dropped for the second time by 2009, with the Council of British Archaeology Director Mike Heyworth commenting that the 'lack of Government commitment to these uncontroversial and widely supported reforms is deplorable'.[63]

Fast forward to 2018 and the Conservative Government announced a policy paper, *A Green Future: Our 25 Year Plan to Improve the Environment,*[64] which builds on both the Industrial Strategy (to transform productivity) and a Clean Growth Strategy (to drive green innovation). Potentially triggered by an aim to deliver a Green Brexit, the UK Government published a consultation on *Environmental Principles and Governance* which ran from May to August 2018, receiving some 177,000 responses.[65] The historic environment sector was adamant that cultural and historic concerns be included in the *Environment Bill,* with calls to define the environment as:

> … the totality of all the external conditions affecting the life, development and survival of an organism, including the naturally, socially and culturally produced physical surroundings on which humanity is entirely dependent in all its activities. The environment can be divided into physical, biological, social and cultural factors, any or all of which can influence health status in populations.[66]

However, these efforts to include cultural heritage in *The Environment Bill* have so far failed. The current draft at time of writing stating:

> Conversely, legislation concerning the following matters, for example, would not normally constitute environmental law as defined here, and therefore the majority of legislation within these areas would be outside the scope of the OEP [Office for Environmental Protection]: cultural heritage.[67]

Heritage organisations such as Historic England have raised concern over this explicit omission, again highlighting the division of roles between government departments. Defra is simply not equipped to deal with heritage-related concerns, which may well be why cultural heritage is explicitly not included in this monumental bill. Ultimately this situation makes it more difficult to implement much-needed change in the separation of the two environments/heritages.

Net Gain

Net gain is understood as development that leaves resources in a better state than before. It goes beyond outweighing losses with gains to actually doing everything possible to avoid loss while simultaneously making gains valuable locally.[68] The UK's Defra opened the consultation on Net Gain in December 2018 to February 2019 to 'improve the planning system in England to protect the environment (biodiversity net gain) and build places to live and work'.[69] Within the *25 Year Environment Plan,* the policy towards using and managing land sustainably is by 'embedding an "environmental net gain" principle for development, including housing and infrastructure',[70] with the ambition to 'expand the net gain approaches used for biodiversity to include wider natural capital benefits, such as food protection, recreation and improved water and air quality'.[71] To evaluate net gain, Government hopes to 'robustly value everything we wish to in economic terms', recognising 'wildlife [as] a particular challenge'.[72] The Plan states 'initiatives to protect and improve the natural world and cultural heritage…are economically sensible'.

The urgency of tacking the threat to biodiversity cannot be stressed more, reiterated by the landmark report by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) earlier this year which announced that without action 'there will be a further acceleration in the global rate of species extinction, which is already at least tens to hundreds of times higher than it has averaged over the past 10 million years'.[73] The message is that the protection placed on the ecosystem needs to be prioritised despite strict cost-benefit calculations favouring development over protection, which may have net economic costs. Yet biodiversity nevertheless continues to sit within an ecosystem of habitats and environments which, as discussed earlier, are part of a mix of interests and agendas, including key global and national (societal) priorities. Meeting the needs of conserving, restoring and sustainably living with and off nature (and biodiversity) is a complex issue.

Market mechanisms and priorities rarely ensure the protection and conservation of ecosystems and their services, yet it is clear through the successes of the Natural Capital Valuation and the work of the Natural Capital Committee that the next step for the cultural heritage sector is to work towards a Cultural Capital Valuation to highlight cultural net gain. 'By costing nature [and culture], you ensure that it commands the investment and protection that other forms of capital attract'.[74] It is certain that there will be an upcoming investment in cultural capital value in the coming years, which – in many instances – may be easier to value than nature itself. As a note of caution, it is worth highlighting that 'markets are often unable to address important intra- and intergenerational equity issues associated with managing ecosystems for this and future generations, given that some changes in ecosystem services are irreversible'.[75]

Bridging Gaps

'The world has witnessed in recent decades not just dramatic changes to ecosystems but equally profound changes to social systems that shape both the pressures on ecosystems and the opportunities to respond'.[76] In 2005, the major assessment of the human impact on the environment commissioned by the United Nations (UN) was published as *Ecosystems and Human Well-being: A Framework for Assessment* by the Millennium Ecosystem Assessment (MA), to explore the relationship between ecosystems and human well-being, integrating economic, environmental, social and cultural aspirations with information from both the natural and social sciences. The report successfully demonstrated the relationship between nature and culture through its simple starting point of defining 'ecosystem':

> …humans, with their cultural diversity, are an integral part of ecosystems' which itself is a 'dynamic complex of plant, animal and microorganism communities and the non-living environment interacting as a functional unit'.[77]

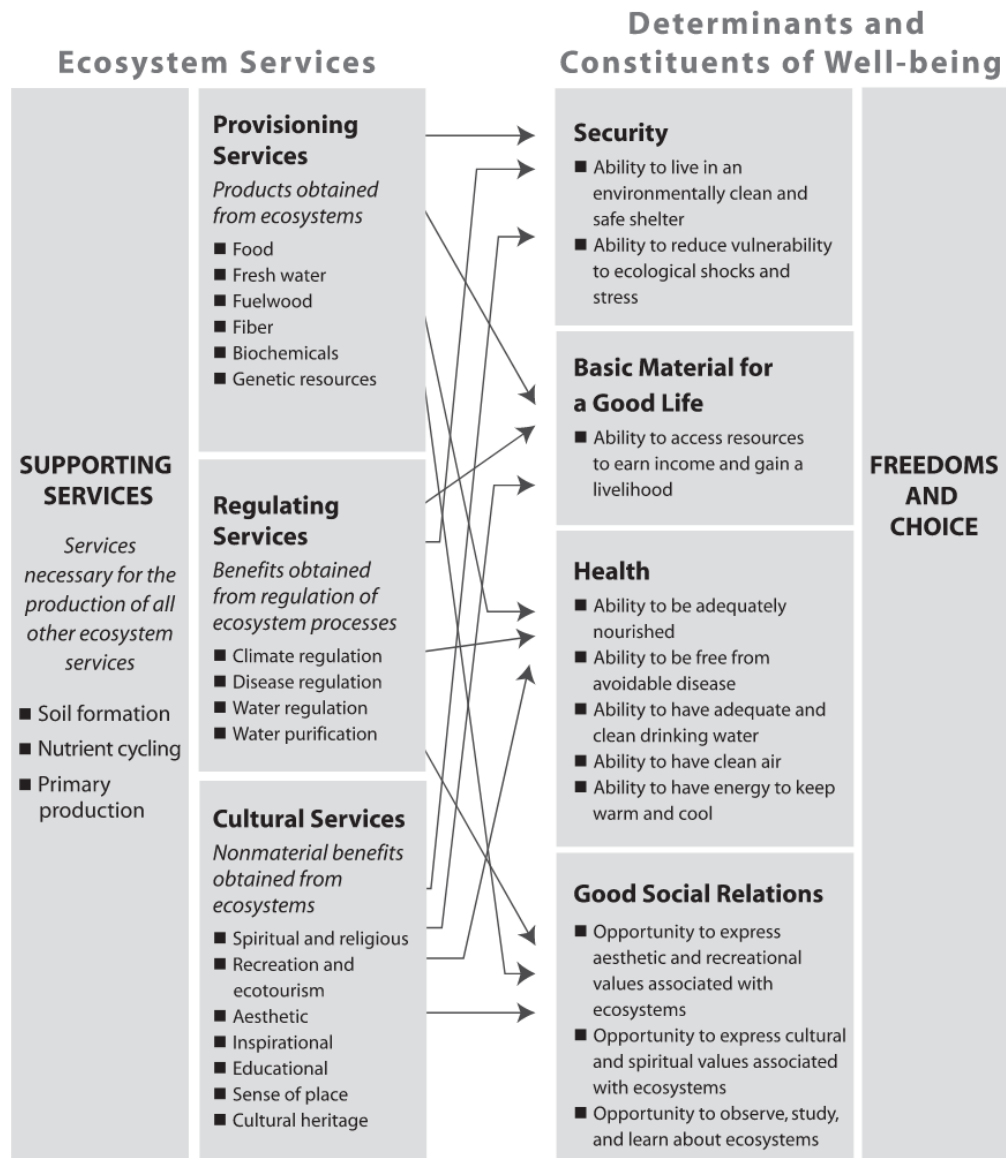It further examined ecosystem services as benefits people obtain from ecosystems (Figure 5).

Figure 5 The relationship between Ecosystem Services and Well-being. Direct image from *Ecosystems and Human Well-being: A Framework for Assessment, Pg 5*

Around the same time as the MA report, Natural England on behalf of Defra delivered the *Environmental Stewardship* (ES) scheme. In the scheme farmers and land managers are paid to protect and enhance the environment and wildlife of their land through effective management. The aim of the ES scheme is to conserve wildlife (biodiversity); maintain and enhance the quality and character of the landscape; protect the historic environment; protect natural resources; promote public access to and understanding of the countryside; conserve rare breeds; manage flood risk, and; mitigate and adapt to climate change. In a 2008 report on the environmental benefits of the scheme *Provision of Ecosystem Services through the Environmental Stewardship Scheme*, it was stated that:

> The natural environment and ecosystems provide a wide range of valuable services that benefit people (ecosystem services). Reflecting the Millennium Ecosystem Assessment framework these services can be classified as the supporting services essential to life (such as photosynthesis and soil formation); the provisioning services (such as the provision of food, fibre and fuel); the regulating services (from climate regulation to the regulation of air, soil, water and pollination); to the cultural services associated with human well-being (including cultural heritage, sense of place and recreation). The

conservation of biodiversity for its own sake is also often considered as a separate and discrete service in its own right.[78]

There is little evidence to suggest the environment, or ecosystem, can or should be understood as anything other than an entangled entity. Management and policy change impact an ecosystem in multiple ways. Health, access to basic resources, security (as opposed to conflict), social relations and empowerment are all related to changes in ecosystem services, and are impacted by heritage management and policy changes. Decisions of these and more areas are made by a range of decision-makers that work at local, municipal, provincial, national and international levels – making the decision-making process 'complex and multidimensional'.[79] How human activities affect the ecosystem as a whole is undeniable, yet all economies are completely dependent on the ecosystem itself. Practical mechanisms for protecting both natural and cultural environments need to include, rather than exclude, the needs of local communities as well as their knowledge and cultural values.

In this paper we have highlighted some of the issues related to the natural and historic environment the complexities in English legislation and the organisational structures which make it difficult to work towards an integrated approach which enhances, protects and conserves both the natural and cultural heritage. In the paper we suggest each sector acknowledges the accomplishments and representation in legislation and policy, but need to communicate more effectively. Working together and facilitating engagement between the two sectors, was a key objective of the 2018 Conference *Engaging with Policy in the UK: Responding to Changes in Planning, Heritage and the Arts.*[80] It is unassailable that there is a need for greater understanding and wider examination of the factors which divide the sectors, and the impact this has on conservation and enhancement of the environment as a whole. It is important to considering how closer working coordination and cooperation across the sectors may result in more effective lobbying and more substantive improvements.

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[1] George P. Marsh, *Man and Nature* (1864). Pg. 36

[2] David Lowenthal, "Natural and Cultural Heritage," *International Journal of Heritage Studies* 11, no. 1 (2005). Pg 84.

[3] David Harmon, "A Bridge over the Chasm: Finding Ways to Achieve Integrated Natural and Cultural Heritage Conservation," ibid.13, no. 4-5 (2007). Pg 386

[4] Rodney Harrison, "Beyond "Natural" and "Cultural" Heritage: Toward an Ontological Politics of Heritage in the Age of Anthropocene," *Heritage & Society* 8, no. 1 (2015); ibid.. Pg 27, 30

[5] Lowenthal. Pg 81

[6] Shabnam Inanloo Dailoo and Frits Pannekoek, "Nature and Culture: A New World Heritage Context," *International Journal of Cultural Property* 15, no. 01 (2008). Pg 25

[7] See this volume: "*Power of Place – heritage policy at the start of the new millennium", The Historic Environment: Policy & Practice* (2019). and Georgina Holmes-Skelton's article "*For everyone?: finding a clearer role for heritage in public policy-making", The Historic Environment: Policy & Practice* (2019).

[8] Dailoo and Pannekoek. Pg 27

[9] Lowenthal. Pg 81

[10] Adrian Phillips, "Why Lived-in Landscapes Matter to Nature Conservation," *APT Bulletin: The Journal of Preservation Technology* Association for Preservation Technology International (APT), no. 34 (2003).

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[12] Ibid.

[13] Ibid.

[14] For further reading, see scholars such as Latour, Haraway, Morton, and Descola who explore the Anthropocene.

[15] Marie-Christine Cormier-Salem and Thomas J. Bassett, "Nature as Local Heritage in Africa: Longstanding Concerns, New Challenges," *Africa* 77, no. 01 (2011). Pg 10

[16] Bridgewater, Arico, and Scott. Pg 408

[17] Ibid. Pg. 406

[18] Ibid. 408

[19] For example, see Harrison; Madeline Brown and Timothy Murtha, "Integrating Natural and Cultural Resources in North American Large-Landscape Conservation," *Environmental Practice* 21, no. 2 (2019).

[20] Bridgewater, Arico, and Scott.

[21] MIN Qing-wen LI Wen-hua, SUN Ye-hong, "Discussion on the Scientific Research of Natural and Cultural Heritage," http://en.cnki.com.cn/Article_en/CJFDTotal-DLYJ200604000.htm.

[22] We should, however, be careful when exploring UK Acts as the devolved governments of Scotland, Wales and Northern Ireland often progress independently with their own legislation (e.g. Northern Ireland's 2011 *Wildlife and Natural Environment Act;* Scotland's 2011 *Wildlife and Natural Environment Act* and *Historic Environment Scotland Act 2014;* Wales' 2016 *Environment Act* and *Historic Environment Act*).

[23] See UK Environmental Law https://en.wikipedia.org/wiki/United_Kingdom_environmental_law

[24] Previously the Department for Culture, Media and Sport

[25] Robert Garner, *Environmental Politics: Britain, Europe, and the Global Environment* (New York: St Martin's Press Inc, 2000). Pg 9

[26] Ibid.

[27] Particular historic environment individuals are known within the nature sector and are known for their work and efforts to bridge the chasm between the nature-culture divide. Additionally, there has been extensive efforts to embed cultural heritage into environmental policy and practice from the early 1990s. See Steve Trow, "Archaeology and the State We're In: Defining a Role for Historic England in the Archaeological Practice of the Twenty-First Century," *The Historic Environment: Policy & Practice* 9, no. 2 (2018).

[28] MHCLG, "Dramatic Simplification of Planning Guidance to Encourage Sustainable Growth," GOV.UK, https://www.gov.uk/government/news/dramatic-simplification-of-planning-guidance-to-encourage-sustainable-growth--3.

[29] Ibid.

[30] See UK Government, *Changes to planning policy and guidance including the standard method for assessing local housing need* (London: MHCLG)

[31] Note that the reference to the '2018 consultation of the NPPF' refers to the *Draft* that was put under consultation, not that which was finally published in February 2019.

[32] See this volume: Nigel Hewitson, "The Disconnect between Heritage Law and Policy: How Did We Get Here and Where Are We Going?," *The Historic Environment: Policy & Practice* (2019).

[33] The NPPF 2012 mentioned the natural environment 14 times and historic environment 24 times, whereas the current NPPF mentions the terms 6 and 18 times respectively.

[34] Charlotte Burns, Viviane Gravey, and Andrew Jordan, "Uk Environmental Policy Post-Brexit: A Risk Analysis," (London: Friends of the Earth, 2018).

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[36] National Audit Office, "Implementing the Uk's Exit from the European Union: The Department for Environment, Food & Rural Affairs," (London2017). Pg.5

[37] DCLG, "National Planning Policy Framework," ed. Department for Communities and Local Government (London, UK: The Crown, 2012).Pg. i

[38] Ibid.

[39] Ibid. Pg 1

[40] DCLG, 2012. Paragraph 8. Pg 3

[41] See AMS *Defending Historic Buildings* Response.

[42] Draft NPPF. Paragraph 9. Pg 5; NPPF, 2012. Paragraph 14, Pg 4

[43] We see the section on 'Using an appropriate evidence base' removed (for example, see paragraphs 169 and 170).

[44] DCLG. Paragraph 169. Pg. 41

[45] Local government deals with 95% of the historic environment that falls outside the responsibilities of Historic England. See https://www.archaeology.co.uk/articles/features/after-the-cuts-scorched-earth-or-clean-slate.htm

Also see https://www.bbc.com/news/uk-england-46443700 (accessed September 2019) to demonstrate that spending on culture has fallen by 43%.

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[51] Susan Hunter and Kevin M. Leyden, "Beyond Nimby: Explaining Opposition to Hazardous Waste Facilities," *Policy Studies Journal* 23, no. 4 (1995). Pg 602.

[52] Sam Sims and Nicolas Bosetti, "Stopped:Why People Oppose Residential Development in Their Back Yard," (London: Centre for London, July 2016). Pg 24

[53] John Sturzaker, "The Exercise of Power to Limit the Development of New Housing in the English Countryside," *Environment and Planning A: Economy and Space* 42, no. 4 (2010).

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[68] Julia Baker and Balfour Beatty, "Biodiversity Net Gain: Good Practice Principles for Development," ed. CIEEM, CIRIA, and IEMA (CIEEM

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[71] Ibid. Pg. 33

[72] Ibid. Pg. 135

[73] IPBES, "The Global Assessment Report on Biodiversity and Ecosystem Services," (IPBES, 2019). Pg. 3

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[76] Ibid. Pg. 7

[77] Ibid. Pg. 4 and 52. The definition of the ecosystem here is adopted from the Convention of Biological Diversity (1992: Article 2).

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[79] Ibid. Pg 15

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