

Northern Ireland Environment Strategy – ClfA response

Submitted via online form

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What age are you? (Optional)

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Chartered Institute for Archaeologists (ClfA) & Council for British Archaeology (CBA)

1a. Do you agree with Strategic Environmental Outcome (SEO) 1: 'Excellent air, water, land & neighbourhood quality'?

Yes/No

Comments (Please limit your response to 120 words)

1b. Are you content with SEO 1 tables (1 to 6)?

Yes/No

Comments (Please limit your response to 120 words)

Table 6: Historic buildings (whether designated or undesignated) often contribute to local character or have heritage significance. These buildings must not be subject to policy which is based on an unjustly pejorative view on dilapidation. Any policy to tackle dilapidation should pay careful attention to local heritage significance and streetscape character. In addition, any dilapidation policy should include clear preference for repair, reuse, and adaptation, in order to preserve embodied carbon and ensure compliance with SEO 5. There is strong evidence to show that the environmental benefits of repair and maintenance of existing buildings over demolition and rebuild is preferable in terms of lifetime carbon cost.

This should be central to this action's environmental contribution. This is not explicitly recognised in table 6. For this reason, SEO5 should be added to the list of SEOs that this action contributes to.

2a. Do you agree with Strategic Environmental Outcome (SEO) 2: 'Healthy & accessible environment & landscapes everyone can connect with & enjoy'?

Yes/No

Comments (Please limit your response to 120 words)

We strongly support SEO 2, noting in particular the importance of recognising that the historic environment is a part of the environment and that it is important to health and wellbeing of society. It can be enhanced through positive engagement with people and the provision of quality places for enjoyment and learning. Integrated consideration of the cultural and natural elements of the landscape is critical to good management.

In our experience, without clear and explicit inclusion in targets and measures for policies that this positive principle of integration can be undermined in practice. To avoid this, Government departments must ensure the correct relationships and expertise is in place to deal with issues which cross portfolios. Cross-departmental MoUs can be useful to ensure responsibilities are clearly understood, resources allocated, relationships between departmental teams are effective, and progress is regularly reviewed.

At several points in the SEO 2 tables, language defaults to exclusively 'natural' where a wider inclusion for the heritage or the historic environment would be important. Omissions such as this undermine the positive strategic principles and illustrate how easy it can be for heritage to fall through the cracks.

The aim should be that the historic environment contributes to social, economic and environmental outcomes, including by providing a range of added benefits to natural environmental outcomes.

2b. Are you content with SEO 2 tables (7 to 12)?

Yes/No

Comments (Please limit your response to 120 words)

There is much to support throughout these policies, but useful tweaks could help to solidify the principle of inclusion of the historic environment across the policies and thereby improve the likelihood that the historic environment delivers a positive contribution to environmental outcomes.

Table 7: We strongly support the recognition that landscapes are shaped by nature and people, with explicit reference to historic environment. However, the Future Vision/Outcome section defaults to language of the 'natural beauty and character of our landscape'. We suggest that inclusion of 'cultural and historic' in order to echo the principles stated earlier in the section.

Table 8: We strongly support the need to connect people with the environment. There is similar data to suggest that access to culture (as well as nature) is beneficial. As the Strategy recognises that the historic environment is an integrated part of the environment, it would make sense to ensure that targets for connecting people to the environment also included cultural heritage. For example, baseline measures should include visits to cultural attractions and places of heritage significance, as well as natural places. Targets for provision of recreation on government owned land should include heritage-based activities. These places are, of course, overlapping, underlining the value of an integrated approach to connection people with culture and nature.

The strategy should include wording that makes it less likely that actions under this policy will omit inclusion of the historic environment where inclusion would be helpful. Including appropriate wording in the Future Vision/Outcome section would be helpful (e.g. 'Everyone is enabled to connect to the natural *and historic* environment'). A specific measure for the historic environment in the 'By 2050' section would be a significant positive step.

Table 12: We are pleased that the Strategy includes reference to the fact that current agri-environment support arrangements do not currently encourage farmers to care for historic monuments on their land and recognises that this lack of realistic management option is a reason why heritage assets' condition continues to decline. Ensuring that the current Environment Strategy provides a clear target for agri-environment scheme development and future improvement will be very helpful.

We are delighted that a future vision/outcome to increase "understanding of the relationships between our natural and historic environment, culture and arts, enabling collaboration and leading to benefits for our local communities and economy" is included. However, we suggest that an excellent first step in achieving this goal will be to ensure that other policies in the Strategy are reviewed to make sure that these relationships are recognised.

We are also pleased to note the target on integration of marine historic environment considerations into environmental impact assessment decision-making.

We suggest that the action/target to work across government to progress actions which support delivery of the PfG would be strengthened by commitment to an MoU between DAERA and DfC.

We note that investment in actions which conserve or enhance heritage assets as part of agri-environment scheme create positive benefits such as preserving or creating habitat for wildlife. This should be part of the reason for strong provision for the historic environment

in future agri-environment schemes. We suggest that SEO 3 could therefore be added to the 'actions also contribute to' section.

3a. Do you agree with Strategic Environmental Outcome (SEO) 3: 'Thriving, resilient & connected nature and wildlife'?

Yes/No

Comments (Please limit your response to 120 words)

3b. Are you content with SEO 3 tables (13 to 15)?

Yes/No

Comments (Please limit your response to 120 words)

4a. Do you agree with Strategic Environmental Outcome (SEO) 4: 'Sustainable production & consumption on land and at sea'?

Yes/No

Comments (Please limit your response to 120 words)

4b. Are you content with SEO 4 tables (16 to 24)?

Yes/No

Comments (Please limit your response to 120 words)

We are broadly supportive of the content of tables 16-24, however, we would welcome the addition of 'historic environment' to table 16's Future Vision/Outcome list of issues which Future Agricultural Policy will seek to assure sustainability on. This would tie into aspirations articulated under SEO 2.

5a. Do you agree with Strategic Environmental Outcome (SEO) 5: 'Zero waste & highly developed circular economy'?

Yes/No

Comments (Please limit your response to 120 words)

We note that SEO 5 does not reference the issue of the carbon footprint of new building (though construction is responsible for one of the largest carbon footprints of any industry). We hope that the principle of keeping technical and natural materials in circulation longer to retain their embodied carbon is to be applied to policies on repair and maintenance of existing buildings versus new build.

There is strong evidence, for instance from England (Historic England 2020 - *Carbon in the Built Historic Environment*), relating to the environmental benefits of retaining and adapting existing traditional buildings, and positive approaches to policy in Scotland's draft National Planning Framework 4 that may provide useful inspiration for NI Government. It would be most beneficial to see an additional table in this section specifically relating to building repair, retention and adaptation principles.

5b. Are you content with SEO 5 tables (25 to 27)?

Yes/No

Comments (Please limit your response to 120 words)

As above, we would welcome a policy on the retention and adaptation of existing buildings as a preference over new build.

6a. Do you agree with Strategic Environmental Outcome (SEO) 6: 'Fair Contribution to UK net zero greenhouse gas emissions & improved climate resilience and adaptability'?

Yes/No

Comments (Please limit your response to 120 words)

Like all others, historic environment sectors have a role to play in meeting the challenges of climate change adaptation and net zero emissions targets. The sector will do this through; reducing the carbon footprint of its own activities (e.g. archaeological investigations), assisting in the communication of key climate changes principles and evidence from the archaeological record, facilitation of green energy and carbon sequestration works through archaeological mitigation on wind farm developments and peatland restoration, and much

more. We therefore welcome the target of involving all Departments in the delivery of appropriate policies to achieve carbon reduction goals.

6b. Are you content with the SEO 6 table (28)?

Yes/No

Comments (Please limit your response to 120 words)

7. Did you find the Environment Strategy content user friendly and easy to follow?

Yes/No

If "No", please suggest any improvements you deem appropriate.
(Please limit your response to 120 words)

8. Do you have any other comments or contributions?

Comments (Please limit your response to 120 words)

In both the introduction and section 6 (Departmental responsibilities) we are pleased that the historic environment is covered, but in each section the text focusses on a narrow vision of historic assets as separate from wider environmental issues and assets. While the impact of climate change on heritage assets is important, there is also a potential for heritage assets to contribute towards environment benefits. We would welcome additional sentences in both sections to articulate that DfC will work with DAERA to ensure that the heritage resource, while protected, is used to its maximum potential as a way to add value to wider environmental goals – be it through informing people about climate change using information from the archaeological record, to contributing to public engagement through getting people out in our natural and cultural landscapes, to providing biodiversity benefits, and sustainable, efficient buildings.

Our response also emphasises that various elements of the SEOs in this Strategy are overlapping or have mutual relevance to one another. We strongly urge government to

review the document to ensure consistent recognition of these overlaps. At present there are many places in which the document fails to adequately recognise overlaps.

We support the use of the Environment Strategy as Northern Ireland's first EIP, though we note the unsatisfactory definitions of 'environment' in the Environment Bill, which excludes the historic environment. We urge the Northern Ireland Executive to make its own decisions about monitoring of the Strategy's commitments to the historic environment and to treat these issues in the same way as those which are defined within the Environment Act.