

RTPI response to DEFRA Consultation on the Draft Policy Statement on Environmental Principles

This is the RTPI's response to Department of Environment, Food and Rural Affairs [consultation document on Environmental Principles](#).

About the RTPI

The RTPI champions the power of planning in creating prosperous places and vibrant communities. As a learned society, we use our expertise and research to bring evidence and thought leadership to shape planning policies and thinking. As a professional body, we have over 25,000 members across all sectors, and are responsible for setting formal standards for planning practice and education.

Environmental Principles - An overview

Q5. Do you think the overview section provides an adequate foundation for policy makers to apply the environmental principles in policy-making?

1 Yes – but perhaps it could be clearer that it will apply to all Ministers, not just DEFRA ministers.

2 The policy statement could also be clearer when it comes to describing exceptions. The Explanatory Memorandum to the Bill states in subsection (3)(b) that the exception for:

“Spending or the allocation of resources within government” refers to decisions about how money and resources are allocated to or between government departments or agencies, including at fiscal events such as Budgets and Spending Reviews. It does not refer to individual policies on which government funds could be spent. For example, in decisions on which departments should receive funds and how much, the policy statement will not apply. However, it would apply to policies which relate to spending this allocated funding which are decided by a Minister of the Crown, such as when setting up a new innovation scheme.”

We consider that this clarification should be inserted into the policy statement – and also amended to make it easier to read.

Step 1: Understanding environmental impact

Q6. Do you think step one allows policy-makers to correctly assess the potential environmental effects of their policy?

We welcome the inclusion of the definition of “sustainable development” and “the environment”.

The reference to impacts outside England needs rephrasing as follows:

“The environmental impact of a policy should be considered regardless of where the impact occurs, whether that be in England, ***other nations of the UK*** or overseas.”

Q7. Do you think step one ensures that policy-making will address the most important environmental effects?

Yes

Step 2: Understanding Which Principles are Relevant

Q8. Will step two assist policy-makers in selecting the appropriate environmental principles?

Yes

Step 3: Applying The Principles

Q9. Do you think step three provides a robust and sufficient framework for the application of each individual environmental principle?

Yes

Q10. 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?

Not entirely. The application of these principles should be iterative so, for example, if a policy is reframed or postponed as a result of applying the five principles then the principles should then be reapplied so that the impact of that decision can be considered.

Final Thoughts on the Policy Statement on Environmental Principles

Q11. Do you have any other comments on the draft policy statement which are not covered by the previous questions?

There is no mention of ecosystem services and natural capital. This is a missed opportunity as natural capital accounting would provide a means of monetising the principle of ‘the polluter pays.’