

Response ID

Submitted to Drought: how it is managed in England
Submitted on 2025-01-10 14:16:20

About you

Are you responding as an individual or on behalf of an organisation?

Response on behalf of an organisation or group (for example, charity, not-for-profit organisation, trading body)

Organisation name :
Historic England

If you selected other, please specify:

What sector do you represent?

Government and regulators, Environment

If you selected other, please specify:

What is your email address?

Your response :

Can we publish your response?

Yes

If you answered no, please tell us why.:

Consultation questions

Question 1. Before reading 'Drought: how it is managed in England', how familiar would you say you were about drought management in England?

Somewhat

Question 2. Refer to Section 1: 'Drought in England – an overview'. Does this section clearly describe drought in England?

Agree

Why do you think this?:

Question 3. Refer to Section 2: 'Drought impacts and mitigations'. Does this section clearly describe the impacts of drought and some of the actions other sectors take to mitigate these impacts?

Disagree

Why do you think this?:

Section 2 (Drought Impacts and Mitigations) makes no reference to the impacts of drought upon the historic environment (eg. impacts such as upland or lowland heath wildfires, desiccation of archaeological and palaeoenvironmental deposits, particularly within peat or wetlands). These are well evidenced internationally (Fire risk management guide: protecting cultural and natural heritage from fire, UNESCO 2024 and nationally (A Climate for Change: Adaptation and the National Trust, National Trust 2023). Indeed, section 2.4 (Environment) appears to be predicated solely upon ecosystems/habitat impacts within the context of the requirement to carry out impact assessments under the Habitat Regulations. It would be helpful for the historic environment to be referenced within this section. We also note that Forestry Commission statistics on wildfires demonstrate that protected landscapes are disproportionately affected. This is important given that cumulatively, protected landscapes contain just under half of England's Scheduled Monuments, over 50,000 Listed Buildings, 800 area designations and portions of several internationally significant World Heritage Sites.

Question 4. Refer to Section 3: 'Planning, management and response'. Does this section clearly describe the responsibilities of the Environment Agency, government, public bodies and local responders in drought planning, management and response?

Disagree

Why do you think this?:

Historic England is the government's statutory adviser on the historic environment - it mirrors the role of Natural England, but for heritage. There is, however, a strong spatial correlation between the natural and historic environments - put simply, nature and heritage co-exist within the same places and spaces and are often complementary and inter reliant. As for question 3, we therefore think that it would be helpful for Historic England to be similarly referenced under Section 3.2 (Government and Public Bodies). In particular, given the requirement for statutory consent where operations or actions might affect designated heritage assets, Historic England should be referenced as a consultee where environmental triggers that affect designated heritage assets are likely to be impacted by drought plans. Similarly, local authority historic environment services should be included in relation to impacts upon non-designated heritage and landscapes.

Question 5. Refer to Section 4: 'Our drought teams and actions'. Does this section clearly describe the Environment Agency's drought stages, response arrangements, drought actions and triggers, monitoring and data?

Disagree

Why do you think this?:

Noting our comments above, we recommend that sections 4.4.2 and 4.5.2 are amended to read respectively "localised wildfires with impacts on cultural and natural heritage" and "widespread wildfires with impacts on cultural and natural heritage".

Under 5.2.6 it might be helpful to reference use of the Emergency Alerts service. This could be a crucial tool at the onset of severed flash flooding, with increased risk during times of drought.

Under 5.3, we note that Historic England does not currently receive these situation reports. Inclusion of Historic England within the circulation would help it to better plan its responses.

Question 6. Considering your responses to questions 4 and 5, how well do you understand the scope and purpose of Environment Agency area drought plans described in sections 3 and 4?

Very

Why do you think this?:

We understand the plans - but we suggest that in terms of environmental impacts specifically, it would be appropriate to extend their coverage to ensure that the historic environment is fully included.

Question 7. Refer to Section 5: 'How we communicate with others'. Does this section clearly describe the Environment Agency's role in drought communications and the tools we use to do so?

Neither agree nor disagree

Why do you think this?:

Question 8. Refer to Section 6: 'Recovery'. Does this section clearly describe the Environment Agency's role in recovery and how we seek to learn from each drought?

Agree

Why do you think this?:

Question 9. After reading 'Drought: how it is managed in England' and answering these questions, are there any inaccuracies you would like to highlight or any other suggested improvements you would like to make?

Your response :

With regard to our earlier comments, we'd just want to reiterate that in our view the guidance takes a somewhat narrow and limited approach to the definition of the environment and it would be appropriate to explicitly recognise the hazards, risks and impacts that drought has upon heritage, along with Historic England's role as a statutory adviser.

Question 10. After reading 'Drought: how it is managed in England' and answering these questions, do you have a better understanding of how droughts are managed in England, the respective roles of the organisations and groups involved, and how they work together to minimise the impacts of drought?

Very much

Why do you think this?:

Question 11. Which operational areas are you most interested in with respect to drought? (Select any that apply)

All (National)

Question 12. What are your thoughts about how drought has been managed in your local area?

Your response :

Question 13. Do you have any specific concerns about local environmental drought impacts that you would like us to know about?

Your response :

Question 14. How engaged did you feel with the Environment Agency and other stakeholders during the last period of prolonged dry weather or drought?

A little

Why do you think this?:

Question 15. How do you think the Environment Agency and others can better work together during prolonged dry weather and drought?

Your response: