



# ENVIRONMENTAL POLICY FORUM

c/o Society for the Environment  
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[www.envpolicyforum.org.uk](http://www.envpolicyforum.org.uk)

The Rt Hon Michael Gove MP

Secretary of State for Levelling Up, Housing and Communities

The Rt Hon Thérèse Coffey MP

Secretary of State for Environment, Food and Rural Affairs

6 September 2023

## **Subject: Amendments to the Levelling-up and Regeneration Bill**

Dear Secretaries of State,

The Environmental Policy Forum (EPF) is a coalition of 13 professional bodies and learned societies representing around 70,000 environmental professionals across a variety of related disciplines. The views expressed in this letter are those of professionals, close to practice, duly qualified, and often working in industry, many running successful businesses.

On behalf of this extensive network of experts, we are writing to express our deep concerns regarding proposed amendments to the Levelling-up and Regeneration Bill, which would weaken the nutrient neutrality requirements for building new developments.

We wish to state our support for the [position of the Office for Environmental Protection \(OEP\)](#) in this matter. We are keen to emphasise the following three key points, which together represent our most significant areas of opposition to the proposed amendments:

- i. **A regression in law:** The proposed amendments threaten objectives for water quality and the condition of protected wildlife sites, which amount to a regression in law. It's vital to note that this regression in law comes at a time of a decline in nature and a water quality crisis. As required by the Environment Act, this regression in law would require an admission that the Levelling up and Regeneration Bill would reduce the level of

environmental protection provided for by any existing environmental law. That it is not an amendment to the Environment Act seems irrelevant in terms of practical outcomes.

- ii. **Incoherent policy undermining delivery:** The proposed amendments reflect incoherent policy, as they undermine the delivery of various welcome government commitments and announcements – notably:
- The ambitious legally binding environmental targets as set out in the Environment Act 2021 (including halting the decline of species by 2030).
  - The Environmental Improvement Plan, with the proposed amendments meaning the public will pay for increased water pollution. This undermines the underlying commitment to the ‘Polluter Pays’ principle.
  - The Nutrient Mitigation Scheme for developers, announced earlier this year.
  - The UK’s commitment to the Kunming-Montreal Global Biodiversity Framework, to protect at least 30 per cent of our land and sea for nature by 2030.

We feel strongly that unless a joined-up approach is taken across government policy, delivery of our environmental commitments – including those noted above – cannot be achieved.

- iii. **An urgent need to consult the experts:** The proposed amendments have been tabled despite insufficient consultation with the experts – those with the knowledge and experience of delivering the current nutrient neutrality requirements. This lack of consultation is reflected in the clear opposition of the Office for Environmental Protection, the independent body the government established to hold it to account.

Unfortunately, increasingly limited scrutiny and impact assessment of environmental policy is not isolated to these proposed amendments. Notable examples include just a ten-day consultation window being given for the revised air quality strategy consultation, and no consultation took place at all on the interim targets in the government’s environmental improvement plan.

We ask that the government refer to its own [Code of Practice on Consultation](#) in this case and engage with the views and concerns of the environmental professional community. The EPF stands ready to assist, provide further evidence for our arguments and, as always, are happy to discuss in greater detail.

Yours Sincerely and signed on behalf of the following organisations,

Jason Reeves  
Head of Policy, Chartered Institute of Ecology  
and Environmental Management



Lee Marshall  
Policy and External Affairs Director,  
Chartered Institution of Wastes Management



Louise Simpson  
Executive Director, Institute of Chartered  
Foresters



Ben Goodwin,  
Director of Policy and Public Affairs, Institute  
of Environmental Management and  
Assessment



David Bunt  
Chief Executive, Institute of Fisheries  
Management



Joseph Lewis  
Policy Lead, Institution of Environmental  
Sciences



Dr Emma Wilcox  
Chief Executive, Society for the Environment



Notes:

1. The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading professional membership body representing and supporting over 7,300 ecologists and environmental managers in the UK, Ireland and abroad. Their Vision is of a society which values the natural environment and recognises the contribution of professional ecologists and environmental managers to its conservation. [cieem.net](http://cieem.net)
2. The Chartered Institution of Wastes Management (CIWM) is the leading professional body for the waste management sector representing over 5,500 individuals in the UK. Established in 1898, CIWM is a non-profit making organisation, dedicated to the promotion of professional competence amongst waste managers. CIWM seeks to raise standards for those working in and with the sector by producing best practice guidance, developing educational and training initiatives, and providing information on key waste-related issues. [ciwm.co.uk](http://ciwm.co.uk)
3. The Institute of Chartered Foresters (ICF) is the Royal Chartered home for tree professionals across the UK. It is the only UK body to offer both Chartered Forester and Chartered Arboriculturist titles. As part of its ongoing strategic objectives, the Institute regulates standards of entry to the profession; supports members and provides guidance to professionals in other sectors; offers educational advice and training to both students and tree professionals seeking to develop their careers and works to foster a greater public awareness and understanding of forestry and arboriculture. The Institute has more than 2,000 members who practice forestry, arboriculture and related disciplines in the private sector, central and local government, non-government organisations, charities, universities and colleges throughout England, Northern Ireland, Scotland and Wales. Integrity, excellence, collaboration, sustainability, and transparency form the basis on which they operate and these values underpin all of their strategic objectives. The Institute works with forestry sector organisations and higher education institutes to promote forestry and arboricultural career paths to young people, in order to ensure the continued growth of this dynamic sector and address the ongoing skills shortage. [charteredforesters.org](http://charteredforesters.org)
4. We are the Institute of Environmental Management and Assessment (IEMA). We are the global professional body for over 20,000 individuals and 300 organisations working, studying, or interested in the environment and sustainability. This is a growing and evolving profession, and we are committed to supporting, encouraging and improving the confidence and

performance as well as the profile and recognition of all environment and sustainability professionals. We also help and support public and private sector organisations, governments and regulators to do the right thing when it comes to environment and sustainability related initiatives, challenges and opportunities. We work to influence public policy on environment and sustainability matters. We do this by drawing on the insights and experience of our members to ensure that what happens in practice influences the development of government policy, legislation, regulations and standards. We are the professional organisation at the centre of the sustainability agenda, connecting business and individuals across industries, sectors and borders. [iema.net](http://iema.net)

5. The Institute of Fisheries Management (IFM) is an international organisation of people whose aim is to support and promote sustainable fisheries management for the benefit of our members, fisheries, wildlife and society. [ifm.org.uk](http://ifm.org.uk)
6. The Institution of Environmental Sciences (IES) is a membership organisation representing professionals from fields as diverse as air quality, land contamination and education - wherever environmental work is underpinned by science. We promote and raise public awareness of environmental science by supporting professional scientists and academics and by standing up for the voice of science, scientists, and the natural world in policy. [the-ies.org](http://the-ies.org)
7. The Society for the Environment (SocEnv) is comprised of 25 Licenced Bodies, with over 600,000 members between them. It received a Royal Charter in 2004, which empowers it to regulate the Chartered Environmentalist, Registered Environmental Practitioner and Registered Environmental Technician professional registrations globally. There are now over 8,000 environmental professionals currently registered who share a common vision of delivering sustainability through environmental professionalism. [socenv.org.uk](http://socenv.org.uk)