

Department for Environment, Food and Rural Affairs

Triennial review of the Environment Agency and Natural England: Response form

December 2012

We are interested in hearing your views on the core questions highlighted in the discussion document. Please use this form to provide your responses to these questions. Responses can be returned to us by email (preferable) or post. We are happy to receive supplementary information, which can be submitted alongside your completed form. Full details of how to submit responses are provided below.

The closing date for responses is **4th February 2013**.

Please provide your response to each of the questions in the spaces provided (there are no restrictions on length and all boxes can be expanded). None of the questions are mandatory, however we would be grateful if you could complete all questions. Responses should be supported by strong, relevant evidence.

How to submit your response

Please send your response (alongside any other supporting information you wish to submit) by email (preferable) or post to:

- EA-NEreview@defra.gsi.gov.uk
- Triennial Review Team, Defra, Area 6D, Nobel House, 17 Smith Square, London SW1P 3JR

Confidentiality

Your response to this document may be made publicly available in whole or in part at the Department's discretion. If you do not wish all or part of your response (including your identity) to be made public, you must state in the response which parts you wish us to keep confidential. Where confidentiality is not requested, responses may be made available to any enquirer, including enquirers outside the UK, or published by any means, including on the internet.

If you do not want your response - including your name, contact details and any other personal information - to be publicly available, please say so clearly in writing when you send your response. Please note, if your computer automatically includes a confidentiality disclaimer, that won't count as a confidentiality request.

Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.

1. Please provide your contact details

Name	Nic Bilham
Organisation / Company	The Geological Society of London
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Department	
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Please tick this box if you would like to receive information about the progress of the review.	<input checked="" type="checkbox"/>

2. Please provide some information about you or your organisation

If you are responding on behalf of an organisation, please send one response per organisation.

2.1 Are you responding on behalf of an organisation?	
No – I am a private individual	<input type="checkbox"/>
Yes – <i>please answer questions 2.2 and 2.3</i>	<input checked="" type="checkbox"/>
2.2 What is your organisation's name?	
The Geological Society of London	
2.3 What type of organisation do you work for?	
Private sector	<input type="checkbox"/>
Public sector	<input type="checkbox"/>
Charity or civil society	<input type="checkbox"/>
European body/industry	<input type="checkbox"/>
Trade/business/Industry association or body	<input type="checkbox"/>
Other (please give details)	Learned society

3. Do the functions and/or form of the Environment Agency and Natural England continue to be appropriate, in terms of delivering the Government's ambition on the environment and flood and coastal risk management?

The Geological Society supports the holistic approach to environmental policy-making and implementation espoused in the June 2011 Environment White Paper for England, and the importance placed on the full range of ecosystem services. To deliver the vision set out in that document, and elaborated subsequently (for example through the National Planning Framework and development of National Character Areas), it is vital that geoscience has a continuing and enhanced role in the two bodies or their successors.

We are concerned that abiotic elements of the natural system and of ecosystems were almost absent from the White Paper, and that they appear to have been undervalued in comparison with biotic elements in much subsequent policy and implementation work. The geosphere (that is, the solid Earth) is intimately linked with the wider Earth system, which cannot be properly understood in isolation from it, and it also provides essential underpinning ecosystem services in its own right. Geoscience specialisms such as geomorphology and hydrogeology are fundamental to understanding and maintaining ecosystems and ecosystem services. There is great value in the natural landscape as it relates to tourism and leisure activities, both of which contribute significant value to the economy and to people's quality of life. The controls on production and shaping of landscapes and areas of natural beauty depend upon geomorphology and geology. Furthermore, economic growth and societal well-being depend on sustainably securing energy, water supplies and mineral resources, along with development of infrastructure, all of which depend on geoscience and on understanding the environmental impacts of these activities. To achieve the aim set out in the discussion document of maximising benefits for the environment, the economy and society, it is vital that these factors are recognised in the framework for integrated environmental management, and that there is sufficient geoscientific expertise and capacity to deliver this effectively.

We are encouraged that since the publication of the White Paper, there has been some recognition of the need to consider the geosphere and its interactions and feedbacks with other parts of the natural system. We understand that consultation with Natural England (NE) regarding the National Planning Policy Framework included geoscientific matters, which is a welcome and important step. We are also pleased that the significance of the geosphere is recognised in the remit of National Character areas, although there is some concern that there are not always effective mechanisms in place to access appropriate geoscience knowledge and expertise in developing these. We would be pleased to discuss how the wider geological community might become more engaged with this process.

NE, and more widely the Joint Nature Conservation Committee, have a strong historical track record of delivering high quality geoscience advice and capability. We are concerned that the capacity for such high quality work has recently been eroded.

The Environment Agency (EA) is the largest employer of hydrogeologists in the UK, and it

relies on a high level of expertise in a range of geoscience specialisms, including geochemistry and engineering geology, to deliver many of its core functions for the benefit of the public and businesses. These functions include the identification, prevention, management and remediation of geohazards, such as flooding, coastal erosion and contamination of the ground and water, which are underpinned and controlled by the geosphere and its processes. Their effective management supports ecosystem services such as drinking water quality, flood protection and tourism.

Whatever institutional arrangements are now put in place, it is essential that government ensures that it has identified and planned for delivery of the geoscience capability which will be required for effective implementation of policy across the full range of NE and EA functions, and to advise on future decision-making. The discussion paper notes that stakeholders have encouraged DEFRA to ensure the review investigates the full range of terrestrial and marine functions delivered by EA and NE. It also sets out the need to improve the quality of scientific and other evidence provided by EA and NE to inform decision making. We support these calls, and urge DEFRA to ensure that in responding to them sufficient attention is paid to the geosphere and to geoscience to deliver needs such as those set out above.

Our plea for sufficient attention to be paid to geoscience within the wider functions of NE and EA is not motivated by seeking benefit for our specialist community. Rather, we are convinced that in order for the limited resources available to achieve the economic, societal and environmental outcomes sought by government to be most effectively deployed, it is essential to understand the role of the geosphere and of geoscience expertise. We stand ready to help engage the wider geoscience community in improving this understanding and supporting delivery, and we would welcome the opportunity to discuss further how this might best be achieved.

The Geological Society is not best placed to comment on the institutional form of the two bodies or any successor bodies.

4. What changes could be made to provide better quality outcomes for the environment, economy and society?

In your response, you may wish to consider aspects such as scope for increased collaboration; involving other organisations; alternative delivery models e.g. civil society or private sector; functions that could be performed more effectively by other organisations.

The Geological Society welcomes the discussion meetings which were organised as part of the current consultation process, and we were pleased that several geologists were able to take part. These individuals reported that there was little awareness of the importance of the geosphere among most other participants, but that when they highlighted its role in discussion, its significance (in its own right and underpinning other elements of the natural system) was readily appreciated. A strong theme in these discussions was that increased collaboration between organisations, and better links between government and the scientific community, including geoscience, will improve the quality of outcomes. As noted above, we are keen to play our part in enabling such collaboration.

It is worth noting that while statutory bodies play an important role in the protection and maintenance of the vast wealth of designated areas and sites in England, many geologically significant, there is an extensive and highly active network of committed local groups and volunteer organisations which makes a great contribution to this work. Organisations such as local Geology Trusts /RIGS (Regionally Important Geological and Geomorphological Sites) groups and geological societies bring together professional and amateur geologists with a wide range of geoscience expertise and local knowledge. They carry out a great deal of conservation and environmental management activity, working closely with bodies such as Natural England, and in so doing add considerable value to the work of the statutory bodies. They also deliver valuable educational and outreach activities such as guided walks and talks about conservation of local heritage, further enhancing local engagement and accountability. The continuing presence of professional staff in the statutory bodies who support this work is essential for this precious volunteer resource to be sustained and used effectively.

5. Of the range of options for reform proposed to the current delivery arrangements, which do you think are the most appropriate – if any – to achieve better quality outcomes for the environment, economy and society on a sustainable basis and why?

We are not best placed to comment on which institutional scenario is most appropriate, and have no preferred option. Our focus is on the functions that need to be preserved in the new delivery scenario. Whatever the institutional arrangements resulting from the triennial review, DEFRA has responsibilities regarding the protection of 1,200 designated SSSI sites, areas identified in the Geoconservation Review, the Jurassic Coast World Heritage Site, Global Geoparks and Local Geological Sites; and working with local geoconservation groups and communities. Areas of England protected wholly or partly on geological grounds are of national and international importance to science, and are of great value in researching and teaching about environmental change. Effective delivery of DEFRA's statutory functions will depend on identifying the expertise and capacities required in a range of geoscience specialisms, and ensuring that suitably experienced professional geoscientists are in place within the delivery structure.

5.1 Do you have a strong preference for any of the options proposed?

<p>Scenario 1? (Significant ongoing reform but no major restructuring to current institutional structures)</p>	<input type="checkbox"/>
<p>Scenario 2? (Single environmental body)</p>	<input type="checkbox"/>
<p>An alternative? (Please explain in your response to question 6 your ideas for an alternative delivery option)</p>	<input type="checkbox"/>

6. Do you have any further suggestions for alternative delivery options which would achieve better quality outcomes for the environment, economy and society on a sustainable basis, and if so, how would they operate?

In the event of new institutional arrangements being established in light of the Triennial Review, duplication or gaps in delivery should be avoided. We can see the potential for Environmental Account Managers to help ensure that all relevant factors are taken into account, speed up decision making and arbitrate any potential conflicts, as suggested at the discussion meetings, as long as they are suitably trained and have access to appropriate expert advice across the full range of relevant specialisms. The importance of geoscientific understanding for integrated management of the environment is noted above, and in areas such as coastal erosion and groundwater, which have a particularly large geosphere component, managers with a geoscience background may be best placed to improve current working processes and implement new initiatives. Without a strong geoconservation voice in the statutory bodies, the delivery of appropriate and timely evidence to underpin management and policy will be threatened.

Should the bodies be merged, NE may be in danger of being 'absorbed' by the much larger EA, and care should be taken to preserve the functions currently undertaken by NE and the resources available to deliver them, especially as these in turn leverage invaluable voluntary local networks across the country.

7. Do you have any other comments that you would like to make?

As noted above, the Geological Society and other geoscience bodies valued the opportunity to participate in the consultation discussion meetings, and we welcome this approach to wider engagement regarding environmental policy-making and implementation. In particular, such discussions provide an opportunity to share with other stakeholders perspectives with which they may not previously have been familiar.

It was also refreshing to hear the Secretary of State and other members of the panel recognise the vital importance of science (including geoscience) in environmental management. We share DEFRA's commitment to building links between government, implementing bodies and the scientific community, and as noted above we would be pleased to discuss how to improve these linkages.

The Geological Society of London is the national learned and professional body for geoscience, with over 10,500 Fellows (members) worldwide. The Fellowship encompasses those working in industry, academia and government, with a wide range of perspectives and views on policy-relevant geoscience, and the Society is a leading communicator of this science to government bodies and other non-technical audiences. This consultation response has been prepared with the assistance of the Society's Geoconservation Commission which brings together Fellows of the Society with representatives of a wide range of other UK bodies with an interest in geoconservation.

