Dear Mr David

BGS response to Petition PE1277 – Geodiversity Duty

1) Response to specific points raised in the petition

Petition Text

BGS is currently working in partnership with SNH to establish the evidence base for a geodiversity framework for Scotland. We intend to report on our findings in late spring 2010 and expect this report will be useful to the Scottish Government in formulating policy on geodiversity.

BGS agree that geodiversity should be incorporated into the planning system in Scotland. The vehicle for this should be the new consolidated SPP and the proposed update to PAN 60 Planning for Natural Heritage. BGS were disappointed by the limited reference to geodiversity in the SPP consultation document and recommend that reference is more explicit.

Not incorporating geodiversity assessment into the planning system would potentially put at risk sites and landforms that should be for designated as Local Geodiversity Sites (LGS).

2) Section 4 – additional information:

Para 1: BGS agrees that geodiversity is under-represented and undervalued in current national planning guidance and as consequence it would appear there are no duties on local authorities to protect and enhance their local geodiversity. We also agree that funding for local geodiversity audits and action plans have been difficult to obtain within Scotland. In contrast, external funding for BGS to carry out geodiversity work has been more readily available in England and Wales, mainly from the Aggregates Levy via MIRO and Natural England and Welsh Assembly Government ALSF. Also, in England PPS 9 (Biodiversity and Geological Conservation) obliges regional planning bodies and local planning authorities to ensure that the potential impacts of planning decisions on geological conservation are fully considered:

Plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests. In taking decisions, local planning authorities should ensure that appropriate weight is attached to designated sites of international, national and local importance; protected species; and to biodiversity and geological interests within the wider environment.

Para 4: For information BGS has also been commissioned to prepare desk-study geodiversity audits for the Loch Lomond & The Trossachs National Park Authority, Harris Development Ltd and The Applecross Trust, and will shortly conduct a more substantial audit for the Cairngorms National Park Authority.

Para 5: BGS agrees that auditing and ‘officially’ designating LGSs with the local authority will allow conservation of local/regional geodiversity to take place and ensure that in planning for development local geodiversity is a material matter taken into consideration. An LGS is not a statutory designation. This raises the issue of what authority do RIGS groups have in designating LGSs, and what is the role of SNH and BGS?
Para 6: Positive social outcomes – The **North Pennines** Area of Outstanding Natural Beauty (AONB) was Britain’s first European Geopark. Their investment in a geodiversity audit and action plan was vital to underpin a range of geodiversity interpretation, tourism, education and conservation projects. These projects are all about helping local people and visitors to enjoy, understand and look after the area’s rich geological heritage, while supporting the local economy.

Para 7: There is growing recognition of the benefits of **outdoor learning** within the Curriculum for Excellence. Local Geodiversity Sites could provide an important resource for outdoor learning and **science outdoors** in particular. For this to work effectively, a network of LGSs would be required across Scotland. BGS agree that explicit recognition of geodiversity in planning would assist in reaching this goal and we believe it would also help with the Scottish Government’s **National Outcomes**, specifically Outcome 3 – **Our young people are successful learners, confident individuals, effective contributors and responsible citizens**.

We note that good practice **guidance** on Local Nature Conservation Sites (including geodiversity) in Scotland does exist, but we are unsure what impact this has on the planning process.

Para 10: Although LGS data may be collected by RIGS volunteers, BGS advocate the adoption of a UK standard for collection and storage of LGS data. As the UK’s principal centre for earth science information and expertise, BGS is the natural home for such data which could be made available over the web. For collection of geodiversity data, BGS has developed a database, based on the **UKRIGS** system and BGS best practice. This system was used to collect geodiversity data for the **Greater London Authority** and East Dunbartonshire Council.

Para 11: BGS agrees that, where a site or area of value for local geodiversity is developed for other purposes:

1. Site investigation (SI) records (boreholes and trial pits) are made available to the BGS national archive and shared with interested parties. We would go further and recommend that all **Scottish** SI records should be legally required to be deposited with BGS to ensure their preservation for the long-term public good, as currently happens in **Northern Ireland**.
2. Access to temporary excavations for recording (photography etc) the temporarily exposed geodiversity features is offered to interested parties and records are lodged with BGS.
3. In rare cases, site works (e.g. in quarries or opencast sites) through the planning process result in the production of 'conservation sections'

3) **Response to specific questions raised during the discussion on the petition**

**Should geodiversity be incorporated in the planning system? What are the risks with not doing so?** – see 1) above

**Should a local geodiversity action plan process be mandatory and if so, why?** – BGS does not presently have an agreed policy on GAPS. However, I do not believe **Geodiversity Action Plans** (GAPs) should be made mandatory. A GAP or Local Geodiversity Action Plan (LGAP) process sets out long-term objectives, short-term measurable targets and identifies human and financial resources necessary to achieve these. These can only realised by a partnership approach between, for example, local RIGS groups (where they exist), local communities and voluntary groups, local authorities, and SNH and landowners. A GAP requires a geodiversity audit as its foundation. BGS believes that it would instead be preferable if **geodiversity audits** were made mandatory, for these can alert planning authorities to an area’s geological sites and landforms. For example, in England the first key principle of PPS 9 states:

> Development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their areas. These characteristics should include the relevant biodiversity and geological resources of the area. In reviewing environmental characteristics local authorities should assess the potential to sustain and enhance those resources.

However, in lieu of a geodiversity audit, planning authorities can currently submit an informal enquiry to BGS about the geodiversity merits of any particular site.

[www.bgs.ac.uk](http://www.bgs.ac.uk)
4) General points

In addition to National Outcome 3 mentioned in section 3 above, BGS believes the designation of a network of Local Geodiversity Sites could assist with the following Scottish Government National Outcomes:

**Outcome 6** We live longer healthier lives. LGSSs can provide areas for outdoor recreation, particularly walking which can improve physical and mental well-being.

**Outcome 10** We live in well-designed, sustainable places where we are able to access the amenities and services we need.

**Outcome 12** We value and enjoy our built and natural environment and protect it and enhance it for future generations.

**Outcome 14** We reduce the local and global environmental impact of our consumption and production.

LGSSs, particularly in urban and peri-urban areas could provide valuable greenspace areas where people can learn about and experience the natural environment. An awareness of geodiversity can assist with appreciation of the limits of the Earth’s natural resources and the effects of climate change. Former building stone quarries can often make suitable LGSSs and help reinforce the connections between the built heritage and the natural environment and enhance a sense of ‘place’. However it should be noted that an LGSS designation should not preclude future re-opening of such quarries for the purpose of obtaining material for historic building repair.

**Outcome 11** We have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others.

LGSSs can provide opportunities for involvement in local RIGS or wildlife groups and build community ‘ownership’ of their local geodiversity.

**Outcome 13** We take pride in a strong, fair and inclusive national identity.

For its size, Scotland has the most varied geology, natural landscapes and landforms of any country on the planet and is recognised the world over for its leading role in formulating and developing the principles of geological science and still maintains a key role in this regard. However, Scotland’s maintenance of a research base for geology depends fundamentally on its preservation of an accessible network of LGSSs – these are irreplaceable cultural assets. Initially, Scottish geologists have pursued the maxim the present is the key to the past, but increasingly, it is being recognised that knowledge of the past is key to understanding the present and future, especially in regard to climate change issues and impacts. BGS believes Scotland should be a world-leader in setting geodiversity policy.

On the cultural side, the sense of place imparted by Scottish landscapes (with geodiversity as their foundation) is part in the Scottish psyche:

…….“stone voices: the way in which human experience in this difficult northern place has been built so intimately into the geology and post-glacial ecology of Scotland that a people and its stones form a single cultural landscape” (Neal Ascherson Stone Voices: The Search for Scotland)

**European and international dimensions:** In 2004 the Council of Europe Committee of Ministers adopted a recommendation (Rec(2004)3) on conservation of the geological heritage and areas of special geological interest. Also in 2004, the European Federation of Geologists in collaboration with IGU, IUGS, EUCC, ECSSS, IAG, IUSS, and many national and European organizations related to Geoheritage published a manifesto on Earth Heritage and Geodiversity.

Yours sincerely

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