

BGS Response - Defra Consultation - Nature Recovery Green Paper: Protected Sites and Species

Question 7: What degree of reform do we need to ensure a simpler and more ecologically coherent network of terrestrial protected sites?

Answer: Option 2 - Lighter touch reform including streamlining existing site designations (SACs, SPAs, and SSSIs).

Comments: A lighter touch reform that includes streamlining existing site designations would bring with it the opportunity to better rationalise and improve the understanding of protected sites, including the rules for protecting them.

It would also provide the opportunity to better consider the whole spectrum of requirements for nature recovery including geodiversity which is not mentioned in the consultation document. Geodiversity supports a multiplicity of habitats across a variety of temporal and spatial scales. The characteristics of the physical substrate, soil properties, geomorphological processes and landforms and water availability all have a significant impact on habitat diversity. Geodiversity is under the same threats from inappropriate development or neglect as biodiversity, yet there are real benefits to wider society for managing its conservation in the same way as biological conservation.

Sites of geodiversity significance should be considered due to their complementary role alongside biodiversity in nature recovery. There are a number that are not protected under national legislation and should be considered within the reforms. These include Geological Conservation Review (GCR) Sites (those not already designated as SSSIs) and Local Geological / Geomorphological Sites (formerly known as RIGS – Regionally Important Geological and Geomorphological Sites).

Question 8: What degree of reform for the marine protected area network do we need to meet our biodiversity objectives and commitments?

Answer: Option 2 - Continuing to manage existing site designations (SACs, SPAs, and MCZs) similarly, streamlining our approach by to refer to them all as Marine Protected Areas (MPAs).

Comments: This should be approached in the same way as terrestrial sites to ensure that there is consistency. Therefore, by streamlining existing site designations it would bring with it the opportunity to better rationalise and improve the understanding of protected sites, including the rules for protecting them.

As with terrestrial sites, more consideration should be given to geodiversity within marine protected areas as part of the proposed reforms. Geodiversity supports a multiplicity of habitats across a variety of temporal and spatial scales. Within the marine environment, the characteristics of the physical substrate, geomorphological processes and landforms will all have a significant impact on habitat and species diversity.

Question 10: Should we reform the current feature-based approach to site selection and management to also allow for more dynamic ecological processes?

Answer: Yes, for both terrestrial and marine sites.

Comments: Many of our most important protected sites are dynamic in nature as a result of their underlying geology. Our geodiversity has inherent value for its own sake but also provides the means to understand past and future environmental changes, along with providing the crucial physical

aspects underpinning our landscapes, coastal zones, farmland, terrestrial and marine ecosystems and ecosystem services. By taking a more integrated and interconnected approach to site selection, the interdependencies of biological processes and features on geological and geomorphological systems and processes can be fully considered. This is particularly relevant for optimising the resilience of key ecosystems processes in the face of current and future threats such as climate change.

Question 19: What are your views on our proposal to establish priority areas for afforestation?

Answer: Whilst it is appreciated that the proposed Afforestation Strategic Assessment scoping project will ease the administrative burden for those wishing to undertake afforestation projects, it should be stressed that any assessment should always be appropriate to the likelihood, nature, scale and location of significant effects on the environment.

It is essential that geodiversity be considered alongside biodiversity when carrying out assessments, especially geomorphology and soils, including changes in the stability/instability of landforms, hydrological and hydrogeological responses, substrate properties and soil properties. The loss of geodiversity as a result of an inappropriate Afforestation Strategic Assessment would not only be at the expense of an essential component of the fundamental requirements of nature recovery but it would be to the detriment of ecosystem resilience, sensitivity and its response to climate change

Question 20: What are your views on our proposed criteria to achieving our 30 by 30 commitment?

Answer: The proposed criteria for achieving our 30 by 30 commitment lacks any mention of the need to consider geodiversity alongside biodiversity. It is now recognised that a more integrated approach to nature conservation and protected area management, that includes both biodiversity and geodiversity is much more beneficial than considering biodiversity alone. By ensuring an integrated approach that includes geodiversity and biodiversity it will help to maintain the resilience and adaptive capacity of the natural environment, and will provide support for all of the associated ecosystem services all of which will have the co-benefit of enhancing biodiversity and promoting nature recovery as a whole.