

Triennial Review Team
Defra
Area 6D
Nobel House
17 Smith Square
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1 February 2013

Dear Sir or Madam

Defra's Triennial Review of the Environment Agency and Natural England

I write in response to Defra's discussion document on the proposed restructures of the Environment Agency and Natural England on behalf of the London Climate Change Partnership (LCCP). As a partnership of organisations with the role of helping London to adapt to a changing climate, we do not see it as within our remit to advise on which is the preferred option for the restructure. This is in recognition that climate change is an important, but not the only, function that must be protected and improved upon as part of Defra's review. Therefore, instead of putting forward a response to the consultation questions in full, LCCP would like to highlight a few considerations which it feels are important:

1. Climate change adaptation must continue to be a top priority for EA/NE, regardless of the outcome of the review. This means that it must be mainstreamed across the functions of the organisation(s) as well as having a department focussed on the issue.
2. Mainstreaming adaptation across the organisation(s) will require resource allocated against it, but LCCP believes that this action is necessary to cause a step change in EA/NE's ability to make England more resilient and adapting to climate change.
3. Climate change will place additional stress on the already stretched natural resources of cities, and it will affect high concentrations of people, businesses and services as a result. It is vital that any restructure does not weaken EA/NE's existing activity in cities in favour of rural priorities, and that core cities, including London, remain a high priority.
4. Until recently the Environment Agency and Natural England have both been active members of the London Climate Change Partnership, bringing with them different areas of expertise and knowledge. Environment Agency is still a very active member. We have seen a benefit in the differences of approach and remit between the organisations, and when Natural England withdrew from LCCP because of a refocus in priorities, its input was missed. EA/NE has such a rich and diverse set of roles that it is nearly impossible for this to be represented by any one person as part of the partnership. LCCP would therefore like to note that whether there is a single body or not, the quality of EA/NE's interaction with stakeholders will still be dependent on a network of staff communicating with one another, rather than a single individual being able to represent the whole.

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5. As a partner of EA/NE, we are hopeful that the review and any consequent restructure can be conducted in a timely and efficient way, so as to minimise the disruption to EA/NE's core functions and confusion to stakeholders.

6. As the process of creating a single environmental body in Wales has just been completed, we are sure that there will be some valuable lessons drawn from the process by Defra.

Please feel free to contact us if you would like clarification on any of these points, and I wish you the best of luck with the review process.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'Gerald Acher', with a long horizontal flourish extending to the right.

Sir Gerald Acher CBE LVO
Chair
London Climate Change Partnership