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12<sup>th</sup> December 2007

Dear Briony

**RE: Scoping Study Consultation: Brownfield Skills Strategy**

I am writing to you regarding your recent your scoping study consultation on your proposals to produce a Brownfield Skills Strategy. Thank you for agreeing to take our comments into consideration after the consultation deadline.

Environmental Protection UK agrees that there should be an adequate and appropriately skilled workforce to meet the coming Brownfield challenges. We are aware that as land availability tightens, as might be expected with increasing demand for housing to meet central and regional government targets, that these skills will be essential to address the increase in demand for Brownfield land.

We have set our response to specific questions, which relate to our work below:

**Question 1**

Environmental Protection UK believes that there is often a significant gulf between the approach to brownfield sites by skilled specialist brownfield professionals and other development professionals with some brownfield experience. In many cases this creates an over cautious attitude to tackling brownfield sites, possibly because of fear of the apparent technical complexity of many brownfield sites (contamination, remediation, waste issues etc). Is the consultation aimed at the need for trained specialists or at increasing brownfield awareness and skills generally across the board?

**Question 9**

Our members commented previously on the variability in quality of existing brownfield professionals, ranging from the excellent to the beginner level, and that any of these may be involved at all stages of brownfield development, with direct impact on the quality of submissions and decision making in relation to planning or enforcement matters. Accreditation schemes are developing (such as SiLC) but we wish to see active central government encouragement for the continuing expansion of such schemes.

**Question 4 and 8**

With regard to the proposed comprehensive review of skills, we strongly support your proposal to carry out a robust study of what relevant knowledge, skills and experience exist, whether any of these are coming from existing training, and identifying what gaps there might be now and in the future. We would be willing to ask our members to contribute to

the baseline data gathering exercise and it may also be possible to nominate members to support the Advisory Panel if this is required.

We would strongly recommend that you take into account and learn from the considerable work that regulatory bodies, including local authority organisations, have done in this area to date, and ensure that these bodies are firmly anchored in to any future development/agreements on training provision, accreditation, career development initiatives etc.

Furthermore, it seems sensible to try to determine which knowledge, skills and experience are core (e.g. technical topics) that people carrying out a particular type of work will need, as well as others that might be more specific to a particular sector.

Training provision needs to allow for both basic and advanced courses, and it needs to be recognised that training should be an on-going commitment because new people come into the field and others continue to develop their skills base.

It should also be a priority to ensure that someone takes responsibility for ensuring that high standards of quality control exist in the development and delivery of training material. We would also recommend that adequate and clear guidance is made available to complement and support any training.

In relation to the matrix included at the end of the document, Risk Assessment appears to have been missed out. This is an essential component of the initial work phase, whether it is for human health, wider environment, flood, or geotechnical issues. It is risk assessment that determines whether and what remediation/control or other measures are required to ensure development is suitable for use.

#### **Question 11**

We would note that the sub-group structure proposed appears to concentrate on the phases of brownfield development, whereas some of the biggest barriers to successful brownfield development lie in the availability of good technical understanding of the process. This is particularly so where contaminated land is involved, as the majority of brownfield land is contaminated to some degree. We hope that there will be particular emphasis on establishing the specialised technical skills availability as well as the need for existing professions to have brownfield understanding.

Thank you for the opportunity to comment on your scoping study consultation.

If you have any queries regarding our response please feel free to contact me.

Yours sincerely

Mary Devlin  
Policy Assistant