

## **Adapting to climate change: ensuring progress in key sectors**

*Consultation on the Adaptation Reporting Power in the Climate Change Act 2008*

Defra September 2009

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### **Introduction**

The Landscape Institute (LI) is an educational charity and chartered body responsible for protecting, conserving and enhancing the natural and built environment for the benefit of the public. It champions well-designed and well-managed urban and rural landscape. The Institute's accreditation and professional procedures ensure that the designers, managers and scientists who make up the landscape architecture profession work to the highest standards. Its advocacy and education programmes promote the landscape architecture profession as one which focuses on design, environment and community in order to inspire great places where people want to live, work and visit.

The LI welcomes the opportunity to submit its views as part of consultation on the Adaptation Reporting Power. The LI hopes that Defra will find our comments both interesting and useful in refining the final guidance.

### **General comments**

The LI believes it is extremely important that the public understands climate change adaptation and what the Government is planning to do in dealing with the challenges that lie ahead. It is not clear from the consultation document how the Government intends to report or how it is going to integrate the work of its departments which are excluded from the process.

We are generally concerned that, whilst the importance of adaptation is critical, the Government is expecting the public sector to absorb a new set of responsibilities. The LI would be interested to know what guidance the Government will be providing to reporting authorities which deals with adaptation in the face of declining resources.

Developing a system of reporting will not necessarily lead to real adaptation measures on the ground. The LI commends the Department on raising the profile of the need to adapt and the powers established in the Climate Change Act to instruct some organisations to report on the risks adaptation poses to them. However, it is critical that any assessment of risk, in addition to policies which reporting authorities *intend* to employ to deal with these risks, is translated into practical interventions which deal with the challenges a reporting authority has highlighted. At present this issue is not being addressed.

As part of the Adaptation Programme, the LI recommends that the Government consider making demands on the research industries in order to assist direct adaptation action based on sound evidence.

### **Who should report?**

*Q1. Are there any other sectors which you believe should have been included in this list?*

It is of great concern to the Landscape Institute that green infrastructure has not been included as one of the categories of National Infrastructure, particularly as the Centre for the Protection of National Infrastructure places an emphasis on "...those facilities, sites, systems and networks necessary for the functioning of the country and the delivery of essential services upon which the daily life in the UK depends". Its omission appears to be a contradiction to Defra's previous work on ecosystem services, a concept of vital importance which is central to green infrastructure.

Defra's own publication, 'An introductory guide to valuing ecosystem services' (2007) outlines this vital importance stating that:

*Environmental assets – like other assets – provide benefits that enhance economic performance, offer new opportunities for investment and employment, and improve living standards and quality of life*

Furthermore, the publication goes on to say that one of the central themes of Defra's work on the subject is:

*...to ensure that the true value of ecosystem services and the services provided are taken into account in policy decision-making*

Whilst green infrastructure does not represent a 'sector' as such, a range of organisations' work directly impact upon its quality and integrity, including, Natural England, the Environment Agency, regional development agencies regional spatial strategies, and local authorities' core strategies and local development frameworks.

Green infrastructure is the network of green spaces, rivers, lakes and other natural elements within and between our cities, towns and villages. It is an approach to land use design, planning and management which is underpinned by the concept of ecosystem services and recognises the vital role that these services provide, including:

- Support – necessary for all other ecosystem services, e.g. soil formation and photosynthesis;
- Provision – food, fibre and fuel;
- Regulation – air quality, climate control and erosion control;
- Cultural – non-material benefits for people, including aesthetic qualities and recreational experiences.

The definition of national infrastructure represents the basis upon which the Department will identify the various organisations to be considered as priority reporting authorities. Given the importance of ecosystem services, the Department's commitment to accounting for the concept in policy-decision making, and the fact that green infrastructure assets provide an ideal way to deliver the benefits provided by the natural environment, the Landscape Institute strongly urges the Department to add green infrastructure to the list of National Infrastructure.

Whilst vulnerable to a changing climate, green infrastructure provides many opportunities for climate change adaptation and mitigation. By adding green infrastructure to the list of National Infrastructure, those sectors and organisations responsible for its planning, design, management, maintenance and regulation will be identified and the Government can ensure that this critical asset is incorporated appropriately into climate change adaptation programmes.

*Q2. Do you agree that the criteria for identifying eligible authorities are reasonable? Are there others that might be useful?*

As outlined in response to question 1, the Landscape Institute believes that soils, water, air, food production and biodiversity are fundamental National Infrastructure assets and as such, those responsible for influencing these should be captured by the criteria. At present, they are not.

*Q3. Do you agree that Option 2 should be the preferred option given costs and benefits (including those detailed in the Impact Assessment)?*

No response

*Q4. Are there any authorities the Government proposes to direct which you believe should not be included in the priority list; or any authorities which have not been included in the list which you believe should be?*

While supportive of the inclusion of Natural England as a reporting authority in the draft document, the Landscape Institute feels there is scope for considering the organisation as a priority reporting authority, given its functions and the wide range of skills and knowledge it has to call on. Human intervention in order to harness natural systems is one of the key ways in which we will adapt to climate change and mitigate further changes. Natural England has the skills and knowledge to transform the country through its management of the natural environment. The health of our soils has to take on a new importance, green infrastructure in order to moderate climate change and help us adapt in addition to the promotion of multifunctional landscapes are amongst a range of reasons why Natural England must be a key reporting authority.

The Landscape Institute also considers that the Rural Payments Agency should be included, given the significant funding it receives and its regulatory role with respect the management of farmland.

It will be important that Government harnesses the influence of Europe. Adaptation cannot pander to legislative boundaries. It is the natural systems and process (soils, water, clean air, natural ventilation, food production, water management and biodiversity) that need to be addressed. Fragmentation of the responsibility can lead to overlooking crucial strategic aspects. Also, Europe has experience of large scale strategic interventions from which we can learn, such as the Stuttgart principles for use of vegetation and wind for a natural approach to air cooling. Our cities need natural ventilation and cooling systems – which can in part be delivered from tree planting. Another example is the need in the future to plan tree cover to combat the risk of forest fires, as just recently seen in Athens. Landscape-led approaches are of critical importance here.

In this regard we consider the European Landscape Convention (ELC) and, its definition of landscape, is appropriate. Article 1 of the ELC states that:

*'Landscape' means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors. The term 'landscape' is thus defined as a zone or area as perceived by local people of visitors, whose visual features and character are the result of the action of natural and/or cultural (that is human) factors. This definition reflects the idea that landscapes evolve through time, as a result of being acted upon by natural forces and human beings. It also underlines that a landscape forms a whole, whose natural and cultural components are taken together, not separately.*

Q5. *Are there any other authorities that would like to be invited to report on a voluntary basis?*

The Landscape Institute believes that Community Forests should be invited to respond on a voluntary basis.

Q6. *Do you agree with the additional situations in which reporting authorities may be asked to report? Are there any others that you can suggest?*

No response

#### **What needs to be done?**

Q7. *Are there any changes you would like to make to the way the Direction has been drafted?*

No response

Q8. *What in your view are the areas, if any, in which we should make specific changes to the Direction for a particular sector or organisation?*

No response

Q9. *If your organisation is a proposed priority reporting authority how long do you think it will take to respond in the detail outlined here and in the Statutory Guidance?*

No response

Q10. *Are there any particular confidentiality issues that you believe will need to be taken into account in your sector/organisation?*

No response

Q11. *What additional help, guidance and support might an authority want from the Adapting to Climate Change Programme?*

Further to our general comments, the LI strongly urges great Government support for research into the costs, benefits and methods appropriate to adaptation responses which would assist reporting authorities in taking real action

*Q12. Do you agree with the proposed role for the ASC in considering the reports? If not, what alternative or changes would you envisage?*

No response

### **How should it be done?**

*Q13. Is there any more detail that you would like to see in the draft guidance?*

The Landscape Institute feels it is important that any regulation of reporting authorities needs to consider that the full impacts of climate change are yet to be understood, and that there is a need to remain flexible in the face of ever changing circumstances and updated climate change forecasts. It is important to realise that some public bodies may appear to be irrelevant at present but could in the future become central to programmes of adaptation. The draft document needs to outline how it intends to manage changing circumstances and identification of priority reporting authorities in the future.

*Q14. Would you be able provide us with other examples or case studies that we could use to support this guidance? If so, please provide details.*

The LI's 6000 members, consisting of landscape architects, planners, managers and scientists, undertake a wide range of projects, many of which are central to adapting our environment to a changing climate. The LI's 2008 position statement [Climate Change: the challenge for landscape architecture](#) contains some examples of these. Our more recent position statement on the subject of [green infrastructure](#) also outlines some of the work undertaken by the profession which deals with climate change adaptation, among other socio-economic and environmental challenges. We would be delighted to assist the Department further with greater detail or additional case study material. It is worth noting that work undertaken by landscape professionals has already been featured on Defra's adaptation website, in the shape of [Sheffield's Manor Fields](#).

### **What are the costs and benefits?**

*Q15. Is climate change one of the risks you account for currently in your decision making?*

No response

*Q16. How do you incorporate climate change risks into your decision making?*

No response

*Q17. Do you carry out the risk assessment in-house or contract an external consultant?*

No response

*Q18. What resources are currently spent on analysing climate change risks (number of staff/ number of hours/hourly wage)?*

No response

*Q19. What's your timescale for assessing climate risks (5-10 years, 10-30 years, or >30 years)?*

No response

*Q20. Do you agree with the list of benefits? Are there any additions that you would make? Could you quantify any of these benefits?*

No response

*Q21. What adaptive measures to reduce the vulnerability of your activity to climate change would be in your remit?*

No response

*Q22. Do you have the internal capacity to fulfil the reporting obligations stated in the Statutory Guidance, i.e. compiling the forms and submitting them to Government?*

No response

*Q23. How much time and resource would you expect to put into producing this report for your organisation in terms of personnel and hours (5-10 hours, 10-20, 50-100 hours, or more than 100 hours)?*

No response

*Q24. How much of the information required under this power is already available within your organisation (in percentage terms)?*

No response

The Landscape Institute would like to thank Defra for the opportunity to contribute to its work on the use of the Adaptation Reporting Power. For any queries relating to this response, or for future consultations, please contact:

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