

Natural England Consultation for draft Climate Change Policy, September 2007**Response of the Landscape Institute****Introduction**

The Landscape Institute is the Chartered Institute in the UK for Landscape Architects, incorporating designers, managers and scientists, concerned with enhancing and conserving the environment. The Landscape Institute promotes the highest standards in the practice of landscape planning, design, management and research, representing members in private practice, at all levels of government and government agencies and in academic institutions and commercial organisations.

In addition to our attendance at Natural England's consultation workshop, the Landscape Institute welcomes the opportunity to respond formally to the draft climate change policy. The Landscape Institute would like to offer its full support in progressing the issues raised by the draft policy and is eager to develop a positive working relationship on climate change with Natural England. The Landscape Institute is itself in the early stages of developing a policy on climate change. This will be informed in part by the results of a climate change survey we are currently undertaking with our members. Additionally, our forthcoming annual conference will this year focus on climate change which will also help shape our policy position.

General comments on the draft climate change policy

The Landscape Institute welcomes Natural England's draft climate change policy and is very encouraged by its content. In particular, we are very pleased by the recognition of landscape-scale approaches to adaptation and dynamic designation systems and objectives to account for the impacts of climate change.

The Landscape Institute agrees with Natural England that the majority of climate change policy has, to date, focussed on climate change mitigation and welcomes the draft policy's focus on adaptation processes. Whilst we recognise the need to organise the policy, we do have concerns, which were shared by many at the consultation workshop, that the inter-connectivity of adaptation and mitigation is not more explicitly detailed within the draft document. We would like the policy to therefore acknowledge the potential difficulties of separating the two.

The Landscape Institute is concerned that landscape character, distinctiveness and visual elements seem to be taking lesser prevalence than might have been expected and hoped for. The Landscape Institute would like to see the acknowledgement of the importance of the landscape elements of the natural environment and we would like to see spatial planning referred to under both adaptation and mitigation.

The Landscape Institute believes that the importance of greenspace multi-functionality is not sufficiently emphasised throughout the policy. This could be in part because some aspects of multi-functionality relate to flood mitigation (Environmental Agency) however the Landscape Institute sees this as significant in terms of both adaptation and mitigation. It is not simply about coppicing willow and wetlands; there are huge opportunities in urban areas, both existing and new, to adopt a Green Infrastructure approach to ensure that greenspace is contributing to both climate change adaptation and mitigation as well as performing many other functions. The Landscape Institute recommends that Natural England's draft Climate Change policy clearly recognises Green Infrastructure as a concept and a planning, implementation and management approach, particularly in respect of Natural England's priorities for climate change and the urban environment and in respect of maximising enjoyment of the natural environment.

We believe that the policy would benefit by referring to work already being conducted in the North West by Natural England as part of its contribution to the North West Climate Change Action Plan. Natural England is the lead organisation on the scoping of the potential climate change impacts on the region's landscape, sensitive habitats and species and the contribution of natural systems to carbon sequestration and reduced flood risk and this work could help inform the development of a national methodology. We are also aware that DEFRA has conducted work on a National Adaptation Framework although we are unclear as to how this will be taken forward but presume Natural England will liaise with DEFRA and clarify this within the policy. Additionally, we would like to see some reference to a framework within which the climate change policy sits with regards both the rest of the UK and internationally.

Finally, we are concerned by the absence of any detail regarding the monitoring or measurement of outcomes as a result of the implementation of mitigation and adaptation strategies and would like to see the policy address this.

Specific comments on the draft climate change policy

Assessing the risk and vulnerability of the natural environment, pages 4 & 5, figure 1

Regarding the consistent approach sought in assessing the risk and vulnerability of the natural environment, we suggest that Natural England refers to research recently completed by UKCIP and EPSRC entitled "Adaptation Strategies for Climate Change in the Urban Environment" (ASCCUE). This includes a sound risk management framework which could be used in both urban and rural contexts.

Adaptation principles, page 5

The Landscape Institute welcomes the landscape-scale approach to adaptation however such strategies will need to be flexible, for example, in built-up areas the scale may need to be different. The policy states that "Adaptation strategies should seek to build resilient natural systems and processes..." In addition to this, the Landscape Institute would like to see some reference to flexible natural systems.

The Landscape Institute is unsure as to why flood risk management has not been included. Is it because it represents a concern of other agencies (e.g. Environment Agency) or if it is a straightforward omission? We would like to see this clarified in the policy document. Finally, we are concerned that the importance given to biodiversity conservation has not been similarly afforded to landscape character.

Adaptation strategies for the natural environment, page 5

The Landscape Institute is keen to learn more about Natural England's piloting of an approach to the assessment of the impact of climate change on the natural environment and feels that it would be helpful if the policy contained further information about this. Furthermore, there is work being undertaken as part of the evidence to the Hampshire Climate Change Commission on Landscape Impacts of Climate Change. The Landscape Institute considers this is relevant to the research mentioned in the policy document.

Adaptation policies, page 6

Following the consultation workshop, the Landscape Institute understands that other policy positions are to follow as part of a suite of policies on climate change adaptation, such as a policy statement on green belt, growth points and housing development and also a separate policy on Green Infrastructure. We feel it is important that these are listed within the policy being consulted upon and would like to ensure that as a stakeholder we are involved in the consultation process on these issues.

Proposed policy statement for coastal realignment, pages 7 & 8

The Landscape Institute considers this policy statement is applicable to all aspects of land use planning and not exclusively in terms of coastal realignment. However, the proposed policy position on spatial planning in relation to coastal realignment is very generic. There needs to be more detail on how this should be realised, both operationally and in the context of the sub-national review of economic development and the implications of this for spatial planning at the regional level, and in terms of the planning principles that should underpin the approach.

Climate change in urban areas. Page 8

The Landscape Institute considers that this section needs expanding in a number of areas:

- New urban areas need to be mentioned, covering both designated growth points and larger redevelopment areas where there are opportunities for masterplanning and designing adaptation features such as in some of the housing market renewal areas.
- Other key issues also include air pollution, glare, heat gain, heat islands, shade (lack of it/need for it), existing established tree species dying, low availability of groundwater, vegetation loss, the importance of physical green linkages for wildlife and sustainable transport and sustainable urban drainage systems.

- The Landscape Institute welcomes the recognition that urban greenspace has an important role to play in climate change adaptation. It is an all-encompassing urban greenspace, which includes urban woodland down to street trees, which can play a role.
- The Landscape Institute would like clarity as to which research Natural England is referring when discussing the evidence base in its policy. The Landscape Institute feels that ASCCUE (as referred to earlier in relation to adaptation strategies on page 5 of the draft policy) is most relevant here and would like the policy to reflect this.

Climate change in urban areas policy position, Page 8

The draft policy states that “There is an increasing need to integrate the natural environment into the design of urban areas as a key strategy for helping people adapt to climate change.” The Landscape Institute feels that the term “increasing need” should be replaced with “fundamental need”.

Land use: energy infrastructure, page 9

Whilst the Landscape Institute recognizes that the impacts of sustainable energy infrastructure may be relatively short-term compared with those of other energy infrastructure installations, it is important to recognise nonetheless, that such impacts may be significantly adverse, and as such, due consideration should be given to landscape impact in the design, planning and installation and decommissioning of such infrastructure. Using good practice and Landscape and Visual Impact Assessment methodology, the incorporation of energy infrastructure into a methodology does not allow for people getting used to things over time. This would be too subjective for professionals to feel able to anticipate. Please do not assume that the Landscape Institute is not supportive of sustainable energy, it is simply that we would not wish to see Landscape and Visual Impact Assessment relegated to a residual or secondary consideration on the basis of perceived “short term” impacts when areas of England are being identified for sustainable energy.

Secondly, the Landscape Institute understands that there is to be a National Policy Statement on different types of energy requirements if the proposals in the Planning White Paper are confirmed in a Bill. The Landscape Institute believes therefore that Natural England’s contribution should form part of that, rather than setting up a different spatial plan as proposed in the policy statement.

Land use: biofuels, page 10

The Landscape Institute considers the conflicts that Natural England is proposing to address need to include the very real potential that biofuel planting could fundamentally alter the landscape character, together with the impact from CHP plants. Furthermore, we believe that research on biofuels must also address the impact of meeting the 10% fuel target domestically on food production – particularly given the allied importance of reducing food miles, and therefore imports, on climate change mitigation.

Land management, page 11

The Landscape Institute is concerned that this section is almost exclusively devoted to peat and that there are many other land management contributions to climate change mitigation that should be mentioned. For example, forestry, greenspace management, countryside stewardship. If these are the responsibility of other agencies then we feel it would be helpful to mention this within the policy.

Land management policy position, page 11

From a consistency perspective, we feel that this policy position may benefit by referring to DEFRA’s Code of Practice on Carbon Offsetting, though this should not be construed as the Landscape Institute’s endorsement of the Code of Practice.

Sustainable recreation, page 12

The Landscape Institute fundamentally disagrees with the formulaic approach in the statement regarding accessible greenspace within 300m of homes and that this would lead to a reduction in the impact on climate change. Quantity of greenspace is not sufficient to ensure that people do not travel to other greenspace. Greenspace must be well-designed and well-managed. Another factor that must be taken into account is that people will use one type of greenspace for their regular, daily activities but also be prepared to travel further and want to visit greenspace with other attributes, for example, remoteness, tranquility, culture, history, all of which have extra

draw. The Landscape Institute therefore recommends inclusion of the importance of design and management aspects of the greenspace.

Sustainable recreation policy position, page 12

We believe that socio-economic aspects need to be referenced here so that the increased demand on recreation activities as a result of population growth and the development of new urban areas are adequately addressed.

Natural England's own operations, page 12

We commend Natural England for its challenging target of halving its carbon footprint within 3 years.

The Landscape Institute would like to thank Natural England for being given the opportunity to contribute to the draft policy on Climate Change. For any queries relating to this response, or for future consultations, please contact::

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