

Classifying and measuring the creative industries – consultation on proposed changes

Department for Culture, Media and Sport (DCMS)

Response of the Landscape Institute, 14 June 2013

The Landscape Institute

The Landscape Institute is the Royal Chartered body for landscape architects. As a professional organisation and educational charity, we work to protect, conserve and enhance the natural and built environment for the public benefit. The organisation champions landscape, and the landscape architecture profession, through advocacy and support to our members, in order to inspire great places where people want to live, work and visit.

In accordance with our Royal Charter, landscape architecture refers to all aspects of the science, planning, design, implementation and management of landscapes and their environments in urban and rural areas and the assessment. This includes:

- the application of intellectual and analytical skills to the assessment and evaluation of the landscape and its character and the resolution of existing and potential conflicts through the organisation of landscape elements, space and activities based on sound principles of ecology, horticulture, design, planning, construction and management;
- the planning and design of all types of outdoor and enclosed spaces;
- the determination of policies and planning for existing and future landscapes;
- the appraisal and harmonious integration of development and the built environment into landscapes;
- the conservation, modification and continuing management of the landscapes of town and countryside and sustaining their characteristic features and habitats;
- the promotion of a greater knowledge and understanding of materials and technology to enhance the appreciation of and resolution of practical landscape issues and problems; and
- the promotion of a better understanding of the principles and purposes of natural, biological and physical systems affecting or relating to the landscape.

A useful summary of the breadth of the landscape architecture profession can be found in the 2012 publication, *Landscape Architecture: A Guide for Clients*.

<http://landscapeinstitute.sigma.titaninternet.co.uk/PDF/Contribute/Landscapearchitecture-Aguideforclients2012A3.pdf>

Our response to the consultation

The Landscape Institute's responses to issues presented in the consultation document are as follows:

4.2 Defining creative occupations

What are your views of the list of creative occupations as defined above? Are there occupations which have been included which you think should not be? Are there occupations which have not been included which you think should be? What evidence do you have (if any) to support your view on inclusions or exclusions?

The proposed list of creative occupations is inadequate. This is because it is based upon the Standard Occupational Classification system which uses the same code (2431) for both architecture and landscape architecture, two quite separate professions. We note the consultation statement that "...we can only consider occupations for the list above if they are stated in terms of the Standard Occupational Classification system." Since this system is evidently inaccurate, DCMS is indicating that it wishes to continue producing inaccurate and incomplete statistics, which is a rather odd starting point for a government department to take.

Architecture is a profession publicly regulated through the Architects Registration Board (ARB). Landscape architects have been a separate profession since 1929 and have never been regulated by the ARB so to regard landscape architecture as in some way subsumed under the umbrella of a publicly regulated profession is a very serious misrepresentation of the facts, akin to categorising physiotherapists as nurses or dentists as doctors.

The importance of clearly distinguishing between a profession which is publicly regulated by the ARB and one which is not is already built into the proposed list of creative occupations, because this list has a separate code (2435) for Chartered Architectural Technologists, who are unregulated. In terms of a general description of their work, architects and architectural technologists do similar and overlapping things, but the government has plainly felt the need to distinguish between those who are undertaking such activities under public regulation, and those who are not. If this logic is sufficient to establish the need for a separate code in the case of Architectural Technologists we cannot understand why it does not apply with greater force to landscape architects, since in addition to not being regulated by ARB we are entirely distinct from architects in the scope and nature of our work, as well as being much larger and much longer established than architectural technologists as a profession.

In addition to this, The Landscape Institute is designated by the UK government as the competent authority under EU Directive 2005/36/EC (Recognition of professional qualifications) for determining how landscape architects who are nationals of other EU states can exercise their rights to recognition of professional qualifications. In this respect we fulfil the same role as ARB in respect of Architects and are clearly operating a parallel rather than a subordinate activity. The ARB will be happy to confirm to you the landscape architects do not and never have come under their jurisdiction.

The fact that the UK government mistakenly subsumes landscape architecture under architecture in its list of creative occupations causes problems for landscape architects who are not EU nationals. The UK Border Agency refers to the list of designated creative occupations and finds that landscape architecture does not appear, and as a result asks individuals seeking a work permit to prove that they meet the requirements for architecture, which is a different profession. As a result of this misunderstanding UK landscape architecture businesses have not been able to secure work permits for essential staff.

In conclusion, we believe that the established logic of the proposed list of creative occupations argues strongly in favour of having a separate code for landscape architecture, as do the detrimental effects on UK businesses of failing to have one.

4.3 Identifying creative Standard Industrial Classification groups

What are your views of the list of sectors as defined above? Are there sectors which have been included which you think should not be? Are there sectors which have not been included which you think should be? What evidence do you have (if any) to support your view on inclusions or exclusions?

The list of sectors is, once again, inadequate. There is no explanation as to why 71.11 (architectural activities) is included within the proposals yet 71.11/2 (urban planning and landscape architectural activities) of the Standard Industrial Classification system is excluded. This represents a mismatch between creative occupations and creative industries.

4.4 Creating broad industry groups

What are your views of the list of groupings as shown above? Are there other groups which you think would be preferable, given the SIC codes available to match together in these groupings?

As per our response to 4.3, again this is inadequate as it refers only to architecture, something that appears to be justified by reference to SIC code 71.11 (architectural activities). We suggest that if a broad industry group is to contain a number of different professions, it would be appropriate to call it something like 'Built Environment activities' to make clear that it is much wider in scope than architecture alone. This would be more representative of the activities covered by SIC code 71 in its entirety.

4.5 Issues which arise because of the current SIC and SOC classifications

Do the SIC and SOC codes adequately and accurately capture the full range of economic activity within the creative industries? If not, how would you better define the SIC and SOC codes.

No, they do not. A recent example is that VisitBritain has reported that the tourist value alone of Britain's parks and gardens, designed and managed by landscape architects, is £7.8bn per year (<http://www.visitbritain.org/mediaroom/pressreleases/parksandgardens.aspx>). This £7.8bn in value will not be captured or recorded by the proposed list of creative occupations, since it is not work undertaken by architects and they will not record it in their returns. This seems a rather large oversight for government data gathering on the value of the creative industries.

We believe that landscape architecture should be listed as a separate creative occupation; and that the Broad creative industry group which corresponds with SIC code 71.11 should be called 'Built environment activities'. By continuing to base its revised classification system on sources that are inconsistent, DCMS will fail to achieve its stated objectives.