Landscape Institute Scotland

Landscape Institute
Inspiring great places

Scotland's Climate Change Adaptation Programme 2019-2024

Consultation response from the Landscape Institute

Date: 9 April 2019

1 Summary

The Landscape Institute welcomes the opportunity to comment on the draft of the Scottish Government's Climate Change Adaptation Programme for the period 2019-2024 which sets out how Scotland is responding to the challenges presented by our changing climate to ensure that the country remains resilient. We believe that the approach taken to develop an outcome-driven programme is positive and presents an opportunity for integrated, cross-sectoral consideration of the measures required with clear links to the Sustainable Development Goals.

We are concerned that the vision as drafted does not take sufficient account of the natural components of the environment and would like to see recognition that their protection is about more than just support for the economy and development, but to protect ecosystems and natural processes in their own right. We also note with concern that the programme significantly omits any reference to planning policy. Given that the imperative must be to ensure that future development is climate-proofed and that many actions will require physical changes over time to settlements and infrastructure, we think that this needs to be addressed within the programme.

We welcome the introduction of the concept of adaptation behaviours but question the extent to which it has been sufficiently developed. We suggest that the Scottish Government consider carefully how a sectoral approach to behaviour change may help organisations and professions to engage more meaningfully with the subject and encourage action within their own disciplines. Landscape professionals have a range of skills and expertise relevant to climate adaptation; from ensuring that green infrastructure is effectively designed and implemented to understanding the implications of change for land management practices, ecosystem services and for people's experience and use of landscapes. We are keen to understand how we can help to promote the take-up of adaptation behaviours across the landscape profession and wider built environment sector.

2 Response to specific issues and questions

2.1 Do you agree with our outcome-based approach to adaptation in Scotland?

Yes. We support the Adaptation Sub-Committee's view of the need to move to 'concrete actions' (p.9) and welcome the outcomes-based approach that the programme takes, particularly the clear links to the UN Sustainable Development Goals (SDGs). We agree that this approach appears to be more cross-cutting and should help sectors who are not considering adaptation measures to understand how and why it is relevant to them.

2.2 Do you agree that a National Forum on Adaptation should be established to facilitate discussion on climate change adaptation?

Yes. We agree that a National Forum on Adaptation should be established to provide cross-sectoral leadership and collaboration to drive forward the objectives of the programme. We strongly recommend that the Forum includes a senior landscape professional or representative of the Institute given the important role that our sector plays in the design and management of landscapes and our links with related sectors in development and land-use, where adaptation measures need to be integrated and adopted.

2.3 Do you agree that climate change adaptation behaviours should be included in the Programme?

Yes. We welcome the introduction of the adaptation behaviours concept and note the importance of behaviour change at an individual, organisational and sectoral level in adapting to the challenges that climate change presents for Scotland. From the perspective of landscape professionals, as well as our important role in mitigation behaviours, we should be seeking to consider how the sector can play a role in encouraging the take-up of adaptation behaviours e.g. the use of SUDs and other measures within housing developments and infrastructure or adopting alternative land management practices.

2.4 Do you agree that an integrated approach should be taken to monitoring and evaluation?

Yes. We are supportive of the proposed approach to monitoring and evaluation.

2.5 Do you agree with our long-term vision for adapting to climate change in Scotland?

No. At present we do not think that the vision takes sufficient account of the natural aspects of the environment. We would prefer to see the word 'environment' within the vision which at the moment refers to 'built and natural places'. These 'places' are put within the context of the support they provide for the economy and infrastructure rather than the support that spaces also offer to nature and ecosystems e.g. habitats or geochemical processes. We would suggest that the vision is strengthened to make it clear that the natural aspects of the environment are valued in

their own right as outcomes in themselves and not just because of the support they provide for the economy and development.

2.6 Does the Programme identify the right outcomes for Scotland over the next five years?

Yes. The outcomes are sufficiently high level and are broadly fine. We welcome recognition of the need to protect and value the natural and marine environment and links to SDG to restore and promote sustainable use of terrestrial ecosystems and see land as the foundation of our life on the planet. For Outcome 2 - 'Scotland's buildings and places are adaptable to Climate Change' – we would prefer to see the word 'landscapes' included instead of, or as well as, 'places' to encourage thinking about issues at a landscape scale, to recognise that the built environment comprises more than just individual buildings and to acknowledge that landscapes can be cultural and wo/man-made as well as natural.

2.7 Are there any additional policies that should be included in the outcomes?

Yes. Below we have set out some general comments which are applicable across all the policies followed by some specific comments on the individual outcomes.

General comments:
We note the comment from the Adaptation Sub-Committee in their Independent Assessment on the need to identify a senior owner for each objective to be held accountable for its delivery. In this respect, the programme would benefit from listing the responsible organisation(s) against the policies and proposals detailed.

We note that many of the policies identified are already in place and there are limited numbers of new proposals. Given the UK risk assessment from 2016 identifies the need for *more* action to address issues, we assume that the Scottish Government is comfortable that there are no gaps in the existing framework and that policies highlighted, e.g. the land-use strategy, are achieving their aims and thus making a significant enough contribution to adaptation.

We are concerned that there appears to be a significant omission of planning policy across a number of outcomes. Given that the imperative must be to ensure that future development is climate-proofed and that many actions will require physical changes over time to settlements and infrastructure, we think that this needs to be addressed within the programme. We also acknowledge, albeit with less significant concern, the omission of policy relating to education, culture and tourism. If adaptation is to be integrated into every aspect of Scottish life, we would have expected to see some reference to actions and activities within these sectors.

On adaptation behaviours, these are predominantly focused on individuals rather than organisations or sectors. Yet there is a clear role that certain professions and sectors can, and already do, play in delivering against the identified outcomes. If serious about the notion of

adaptation behaviours, we propose that you consider 'mapping' all the different levels of behaviour change and the actors involved, that might be required to deliver the outcomes.

Outcome 1
We are interested to see how changes to the Place Standard will promote relationship between place-based approaches and climate change adaptation. At the moment climate change doesn't feature prominently and arguably the tool is effective as a diagnosis for places today, but doesn't help in thinking about longer term solutions for future generations. Many LI members have experience of engaging communities using the tool and would be happy to provide feedback to those progressing this project.

We note that, despite 'climate literacy' being highlighted as a key concern in the pre-amble, none of the policies here are focused on raising levels of climate awareness in communities. How are the Scottish Government aiming to raise awareness of climate change impacts to encourage adoption of adaptation behaviours and what role do you foresee for sectors like landscape managers, planners and designers?

Outcome 2
We welcome recognition of links between access to the natural environment and health and wellbeing and policy for a Natural Health Service. It would have been good to see more policies or proposals aimed at understanding and evidencing these benefits to demonstrate the contribution that natural capital makes to health and wellbeing. Policies like social prescribing could go a long way to ensuring that people adopt adaptation behaviours.

Given that the most vulnerable groups in our population to the effects of climate change are likely to include children, the elderly, those with disabilities or those facing social and economic disadvantage, we note that there are a number of potentially relevant policy areas (education, care provision) that are only touched on lightly. Are there also adaptation actions that could be taken in these sectors?

Outcome 3
Although largely considered to be a means of mitigating climate change, we would have liked to see some acknowledgement of how circular economy policies are contributing to resilience in this outcome. Given the impacts that changes to our natural process might have on the availability of certain produce and materials, we may need to adapt by adopting policies which make resources 'work harder'.

As noted in our general comments above there is no reference in this section, beyond the provision of planning advice relating to flooding by SEPA, to the role of the wider planning policy and land-use decision-making in ensuring the economy and businesses are resilient to the effects of climate change. The forthcoming National Planning Framework 4 and Scottish Planning Policy should have regard to our changing climate and ensure that adaptation issues are integrated from the outset.

As well as providing habitats and natural processes which support the economy, landscapes and places are valued as areas of recreation, tourism and retreat. There is currently no reference to how the tourism sector will adapt to the changes that might affect our landscapes and related issues of value and use. Our members have a vast expertise in assessing and interpreting the potential impacts of change in the environment on people's experience and activities which could be useful in better understanding the implications of climate change for tourism.

Outcome 4

We note the commitment to improve water infrastructure. A recent research report 'Achieving Sustainable Drainage' produced by the Landscape Institute and the Construction Industry Council (CIC) into the implementation of Sustainable Drainage Systems (SuDS) through the planning system in England suggests that it is the effective delivery of policy rather than the policy itself which is often a barrier to the success of measures. We recommend that the Scottish Government consider similar research in Scotland which assesses the extent and take-up of SuDS. Landscape professionals have an important role to play in ensuring that green infrastructure is designed effectively to contribute to adaptation, while delivering wider landscape benefits.

The programme does not currently appear to consider the specific impacts on island communities and their economies. In particular the effects that climate change may have on transportation and communication with the islands and the measures that transport providers might consider to ensure the resilience of these services.

Outcome 5

In the previous outcome, the supporting text refers to the asset value of trunk roads and motorways, but the programme does not provide a corresponding figure for the natural environment. Recent ONS assessment of Scotland's natural assets calculated that they have a value of £273 billion.

We welcome the acknowledgement of the importance of the resilience of the natural environment and processes including landscapes to climate adaptation. This section also contains 'proposals' which we assume are for new projects rather than things already in train. More information about the lead organisations and how these might be progressed would have been welcome.

As noted above, the role of new development and the land-use planning system in promoting adaptation to climate change does not appear to be addressed in the programme. For example, there is no detail about what the new Planning Bill might usefully be doing to address adaptation e.g. through greenspace or biodiversity measures, within new developments or indeed how adaptation might be promoted through the emerging National Planning Framework 4.

3 Who we are

The Landscape Institute (LI) is the royal chartered body for the landscape profession. We represent over 5000 landscape architects, planners, designers, managers and scientists.

As a professional organisation and educational charity, we provide training, accreditation, technical advice, and standards to maintain the high quality of the landscape profession in the UK. We protect and enhance the built and natural environment for the public benefit.