Landscape Institute Scotland

Landscape Institute
Inspiring great places

Draft Infrastructure Investment Plan – 2021-22 to 2025-26

Response from the Landscape Institute

Date: 19th November 2020

1 Summary

- The Landscape Institute welcomes the Draft Infrastructure Investment Plan for Scotland, and the inclusion of Infrastructure Commission for Scotland recommendations within it. Scottish Government's 2020-21 Programme for Government aims to 'boost inclusive economic growth, build sustainable places, and increase delivery of our climate and environmental ambitions' within the Infrastructure Investment Plan (IIP).

- To ensure there is policy coherence to UN's Sustainable Development Goals, the IIP and the proposed infrastructure definition should integrate all dimensions of sustainable development: economic, social, environmental and governance. Where economic and climate resilience is developed by investment in essential and 'green' infrastructure options, leading to low carbon pathways and nature recovery. The proposed definition within the Infrastructure Investment Plan (IIP), however, does not adequately translate the climate and environmental ambitions set within the 2020-2021 Programme for Government. Infrastructure is crucial in the delivery of a sustainable recovery to tackle the ongoing climate and nature crises, and in dealing with evolved economic and social challenges posed by the pandemic.

- The IIP must recognise the breadth and depth of green infrastructure and natural capital within its framework and delivery, to map the range of environmental, societal, and economic benefits they provide and for developing a sustainable infrastructure investment plan.

2 Response to specific issues and questions

2.1 Do you support the inclusion of natural infrastructure in our definition of infrastructure? Text goes here. Use this format for specific consultation questions technical issues, or responses to individual questions.

Yes

2.2 Do you agree with the wording proposed for the revised definition?

No

2.3 If you do not agree, please provide your suggested changes and additional material to support your answers:

Natural infrastructure, is a 'strategically planned and managed network'1 of natural assets such as working landscapes and other open spaces. The current definition does not explicitly set out the breadth of natural assets, including landscapes. Components such as landscapes fall under the umbrella term of natural infrastructure and they provide a wide variety of functions and cross sectoral benefits. With lack of clarity on the multiple components of natural infrastructure, the 'nexus' between different natural assets and the extent to which they contribute, and options that enable sustainable infrastructure investments cannot be fully recognised within the IIP. Additionally, 'natural assets', within the definition, are separated from 'public' or 'safety' infrastructure, which suggests they do not provide these functions.

The definition does not refer to the term 'green infrastructure'. Green infrastructure is a network of natural and semi-natural features[2] and in relation to 'grey' infrastructure can be a more cost effective, efficient, and resilient in meeting environmental and economic objectives. Green infrastructure represents climate friendly options such low-carbon infrastructure or Sustainable Urban Drainage Systems (SUDS).

It is unclear whether the usage of the word, 'resilience' is in reference to climate change and further clarity should be provided in relation to that.

2.4 Do you agree that the steps proposed in the common investment hierarchy are the right ones?

No

[1]Ozment, S., DiFrancesco, K., Gartner, T. (2015) The role of natural infrastructure in the water, energy and food nexus, Nexus Dialogue Synthesis Papers. Gland, Switzerland: IUCN. Available at https://portals.iucn.org/library/sites/library/files/documents/Nexus-001.pdf

[2]Landscape Institute Position Statement (2020) Green Infrastructure- An integrated approach to land use https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2016/03/Green-Infrastructure_an-integrated-approach-to-land-use.pdf

2.5 If you think any adjustments are needed to the proposed investment hierarchy, please provide suggested changes (and evidence, where appropriate) to support your answers:

The LI supports the notion of an overarching and common approach that prioritises infrastructure investment decisions within the IIP. However, for the IIP to be sustainable and effectively contribute to climate, environmental, social as well as economic outcomes, the investment hierarchy framework must include consideration of natural assets, by using the natural capital approach. The natural capital approach enables the assessment of the value and benefits natural assets provide and the options available to invest in them. It is noted that while the IIP considers investment in the stock of natural assets (e.g. woodland creation and peatland restoration), that thinking is not clearly embedded within all sections of the proposed common investment hierarchy. For example, design, management and use of landscape by the public has a major impact on national infrastructure. Landscape-scale investments in regional city parks, new green belts and city-wide walkways requires resources and planning, which are currently insufficient. Covid-19 has highlighted the wellbeing and environmental value of green spaces in the public realm. To ensure green infrastructure continues to provide essential services it needs to be considered as a core economic asset that must be invested in.

Following are some instances that highlight natural assets within the proposed investment hierarchy, for a comprehensive benchmark the natural capital suite of tools must be referred to. Additional examples are also available in LI's policy paper on 'Greener Recovery: Delivering a sustainable recovery from COVID-19'[3].

- Determine future need- Prioritise green infrastructure investment in those places which have the greatest need, to tackle persistent inequalities in our communities.
- Maximise use of existing assets- Rebalance infrastructure spend from capital to revenue to ensure assets can be greened, managed, and maintained.
- Replace or new build- Create a step-change in sustainable drainage, by mandating SUDS as the default option for all new development, especially those supported through public investment. Additionally, employ a natural capital approach to new infrastructure and housing, ensuring all new developments deliver on biodiversity net gain.

[3] Landscape Institute Policy Paper (2020) Greener Recovery: Delivering a sustainable recovery from COVID-19 Available at https://www.landscapeinstitute.org/news/greener-recovery-paper-covid-19/

2.6 Do you agree that a dashboard of indicators is the best approach to enable informed decisions to be taken about the long-term trade-offs and choices in our infrastructure investments? Please provide the reasons for your response.

LI supports the dashboard of indicators approach for decision making. We recommend that natural infrastructure investment and delivery is aligned with the commitments set out in the SDGs, National Performance Framework outcomes, and the National Planning Framework (NPF4). The Scottish Government's planning policy as set within the NPF contains proposals to enhance green infrastructure, additionally we have previously[4] called for the integration of green and grey infrastructure within the NPF4.

2.7 What outcomes (and/or indicators) do you think should be included in developing a common assessment framework for prioritising infrastructure investment? In your response you may wish to consider how any of the suggested factors might:

- link to the three themes of the Infrastructure Investment Plan (enabling net zero emissions and environmental sustainability; driving inclusive economic growth; and building resilient and sustainable places); and
- help address inequality, including for protected characteristic groups, and socioeconomic disadvantage.

Following must be considered in developing a common assessment framework-

- At the top-most level: the degree to which it is providing ecosystem services, including cultural ecosystem services for people. An example of this is the Outcome Indicator Framework for the 25 Year Environment Plan[5].
- Where performance of the relevant indicators (including biodiversity) is linked to mechanisms supporting green infrastructure investment, development and enhancement, this should be linked back to planning outcomes identified and recommended within the NPF4 and the National Performance Framework.
- The degree to which it is helping deliver nature-based solutions to climate change, including green infrastructure projects.

[4]Landscape Institute Consultation Response (2020) National Planning Framework for Scotland (NPF4) – Call for Ideas: A review of existing SPP in relation to the 5 key questions posed. Available at: https://scotland.landscapeinstitute.org/wp-content/uploads/2020/04/LIS-NPF4-Review-of-Existing-SPP.pdf

[5]DEFRA (2019): Measuring environmental change: outcome indicator framework for the 25 Year Environment Plan. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/925779/25-yep-indicators-2019.pdf

- Investment in high impact upskilling opportunities for industries that are associated with tackling climate change and delivering a green recovery from Covid-19[6], including the landscape sector.
- Embedded within the NPF4[4], a strategic / national plan and policy for Landscape, Land Use, and Infrastructure to consider and design appropriately for large scale change required to deliver on priorities for climate change, loss of biodiversity, health and wellbeing.

2.8 Are there existing tools or methodologies you are aware of which you think the Scottish Government could draw on or adopt in developing its framework? You may wish to draw on examples from other countries in your response.

There are several tools to support spatial planning Integrated Biodiversity Assessment Tool, and MapX[7], Outcome Indicator Framework for the 25 Year Environment Plan[5], and the suite of tools within the UK Government guidance on natural capital approach[8].

2.9 Do you support the planned approach to developing a new approach to assessing the contribution made by infrastructure investment to Scotland's emissions targets?

Yes

2.10 Please explain and support your response with evidence.

No Answer

2.11 What are your views on the accuracy and scope of the environmental baseline set out in the Environmental Report? Please give details of additional relevant sources alongside your response.

We note that the SEA is a high-level policy position and there are limitations around providing a detailed assessment. However, the baseline for these themes is very generic and does not set out Scotland-specific indicators. We look forward to the next stage of development on this.

[6] Scottish Construction Industry (2020): Approved Recovery Action Plan. Available at: https://www.constructionforum.scot/wp-content/uploads/2020/10/Approved_Recovery_Plan_Oct2020.pdf
[7] Convention on Biological Diversity (2018): Mainstreaming of Biodiversity in the Infrastructure sector. Available at: https://www.cbd.int/doc/c/8298/46cb/5db39f803634f17b7abf45d2/sbi-02-04-add5-en.pdf
[8] DEFRA (2020): Enabling a Natural Capital Approach (ENCA) Available at: https://www.gov.uk/guidance/enabling-a-natural-capital-approach-enca

2.12 What are your views on the predicted environmental effects of the IIP as set out in the Environmental Report? (LINKED HERE[9])

The LI supports references to natural infrastructure and nature-based solutions within the SEA proposals, however the IIP needs to further demonstrate what and how those nature-based solutions can be achieved within the investment and implementation plan.

2.13 What are your views on the proposals for mitigating, enhancing and monitoring the environmental effects set out in the Environmental Report?

The LI supports:

• Utilizing existing monitoring/evaluation and reporting mechanisms to measure progress towards national and international commitments. We recommend an increased use of open data approaches and data aggregation – particularly for spatial data. This, with greater use of application of GIS, will ensure transparency in reporting and help address nationwide land use issues such as climate change.

• Involvement of landscape and green space professionals at the early stages of master planning, thus ensuring outcomes for people, place and nature are at the heart of any new development.

• Employing a sustainable design approach, which requires good data recording practice (e.g. a greater use of BIM).

• Improved data flows to inform decision making processes. For example, in high-carbon infrastructure developments, it would be critical to have embodied carbon data for raw material which would be part of such a development, or to establish biodiversity net gain it would be necessary to know the biodiversity potential of different habitats which may be impacted by a new development.

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.

For further queries please contact the policy team at policy@landscapeinstitute.org

[9] The Draft Infrastructure Investment Plan 2021-22 to 20225-26 Strategic Environmental Assessment Environmental Report https://www.gov.scot/publications/national-mission-local-impact-draft-infrastructure-investment-plan-scotland-202122-202526/