LAND USE CONSULTATION: A response by CPRE to the Department for Environment, Food and Rural Affairs (Defra); April 2025

Land Use Consultation.pdf

Contents

Introduction

CPRE, the countryside charity, welcomes the opportunity to respond to this consultation. We believe in countryside and green spaces that are accessible to all, rich in nature and playing a crucial role in responding to the climate emergency. Since our foundation in 1926, CPRE has engaged with government to bring about land use policies and a planning system is responsive to the needs of rural communities and protects our thriving landscapes.

We strongly welcome the proposed introduction of a land use framework (LUF). We have long advocated, notably through our 2018 report Land Lines, for an integrated government strategy that ties together policies on the environment, farming, land use planning and transport and clearly focuses them on addressing the key drivers of land use change: climate, nature, housing, energy and food production. England has the largest population density of any country in Europe and by 2047 is set to have the largest population, so questions of how land should best be used are of critical importance. We will increasingly need to achieve multifunctional land use – meaning multiple uses into the same spaces and consistently over time.

We are also signatories to a separate response by Wildlife and Countryside Link.

Summary and overarching principles

The introduction of the land use framework (LUF) should allow for more integrated policies and decision making, and better outcomes. It can also be a focal point for the public to become more involved in, and understand, how we meet the challenges of the demands placed on land. Defra has made some progress in providing some of the information inputs for the LUF through indicators developed for the 25 Year Plan for the Environment, but there are still major gaps in these indicators which need to be filled, for example on the quality of protected landscapes. The outcome should be living more within environmental limits and being able to expand environmental capacity rather than continue to shrink it. In England there is also an important equity dimension to land use, as there is an increasingly urgent need to spread development and quality of life more fairly between the pressurised south of the country and the relatively neglected midland and northern regions.

In England central government has also taken some good steps through the 25 Year Plan for the Environment, to set out clear objectives and targets for land use, such as on air quality and public access to nature. CPRE identifies three major objectives that an integrated strategy for land use should address:

First, since the 2000s there has been a clear lack of integration with, or influence on, policies on new development brought forward through the planning system, which the 25 Year Plan has not addressed. This has led on the one hand to a seriously unbalanced and wasteful pattern of new housing development. In particular there has been a substantially increased take of greenfield land, especially high quality agricultural land, that would often have had more functionality for food production, climate adaptation and/or nature conservation if

left undeveloped. This needs to be addressed by clear goals and objectives for sustainable development that have force in the planning process.

Second, major opportunities are not yet being taken to take a multifunctional approach to land use in peri-urban or urban fringe areas of England, including those designated as Green Belt.

Third, there is a need for a clearer direction of travel on nationally protected landscapes that achieves better management for nature, more dark skies and tranquillity, and easier access for social groups who are not benefiting now.

To address all these three challenges needs both the LUF to be brought into force as soon as possible, and to be backed by a robust suite of supporting targets and indicators – some of which the EIP already provides. But it also needs effective mechanisms for leadership, collaboration and policy development – both on farming and planning policy - at both the strategic level of individual landscapes or waterscapes, particularly at the combined authority / spatial development strategy level.

Responses to consultation questions

QUESTION 1: To what extent do you agree or disagree with our assessment of the scale and type of land use change needed, as set out in this consultation and the Analytical Annex?

Please explain your response, including your views on the potential scale of change and the type of change needed, including any specific types of change.

CPRE disagrees.

The government is in danger of underestimating the amount of land use change from undeveloped to built uses, and in particular the amount of farmland that will be developed if there are insufficient planning controls over allowing housing on greenfield sites. **CPRE therefore recommends that making effective use of land through maximising re-use of brownfield land and existing buildings should be a key principle for the land use framework** (see also our response to question 2 below).

The consultation documents refer to land take for housing projected at 30,000 ha to accommodate 1.5 million new homes by the end of this Parliament and up to 150,000ha to 2050, presumably to cover 7.5 million homes. (Analytical annex 2.2 p15).
It also states in the Consultation document (p14) that: '*the new homes and infrastructure that are needed to deliver our Growth and Clean Energy Superpower Missions are a relatively small driver of land use change*.' (our emphasis). The documents also refer to *'a limited land take'* of key infrastructure (Analytical annex p7) at 4.25 of England.

Given that the current residential footprint is – per latest 2022 Land Use Live Tables Live_Tables_-_Land_Use_Stock_2022.ods – 164,212 ha this is a near projected doubling of the housing footprint, but for only a third of the corresponding level of housing stock which is currently 25.2 million dwellings (UK government, Dwelling Stock Estimates, England: 31 March 2022). This strikes CPRE as an unnecessarily wasteful use of land, and it also appears that the projection could well be a serious underestimate of the amount of land use change involving development that will happen in practice (see below).

Added to this, there is no projection for infrastructure land take included in this section nor is there clearly analysis of the impact on land take for other services which would accompany urbanisation including community buildings, associated industry, commerce and retail buildings as well as the transport and energy infrastructure. Existing transport and energy infrastructure cover (2022 data) 573k ha of developed land of a total of 1,137,000ha.

Without further analysis of expected land take it is hard to assess the relative impact of land take projected or to conclude they are 'relatively small'.

Significantly, the Analytical Annex refers to ONS data which shows that 'The extent of enclosed farmland decreased 8% from 13,428,388 to 12,296,678 hectares between 1990 and 2021 with 4% of former enclosed farmland becoming an urban habitat (consisting of built structures and other infrastructure).' (https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalaccounts/2023#extent-of-habitats-in-the-uk section 3). Between 1991 and 2022 approximately 5.7 million dwellings were added to the stock. (Live tables on dwelling stock, table 106, accessed 22 April 2025.)

This suggests a loss of over 537,000ha of enclosed farmland over three decades, over three times the amount projected in the annex. Unless there are significant changes in how undeveloped land is valued for its ecosystem services, and previously developed land is sequentially prioritised for development, this rate of further land take of enclosed farmland appears a more realistic assessment of likely land use change to developed uses to 2050. As there is relatively little reversal of use from developed to agricultural uses this historic change represents essentially a permanent loss of capacity to produce food and other wider ecosystem services to society and the economy.

We welcome the commitment made on p.16 of the consultation paper to maintain food production while making agriculture resilient, sustainable and support nature recovery and climate mitigation and adaptation. However, we are concerned that potential land take for developed uses could reduce the quantum of agricultural land available to maintain production. This is particularly so if there are inadequate safeguards to ensure the best quality cropping land is not protected.

Based on the case made above we are also disappointed that the analysis in the Analytical Annex of the 'The scale of the land use transition' decouples the significant land use changes required in agricultural land away from agricultural use (*Category 4 – Change away from agricultural land, for environmental and climate benefits***)** from the land take for developed

uses. This means that the overall level of land use change required to meet the government's policy objectives is not clearly set out. Based on the analysis of productivity presented in the Analytical Annex (section 4.5), it is not clear that Defra factors land take for energy and transport infrastructure and housing into its conclusion that productivity gains can compensate for land use change. This is concerning as it suggests such land take is a given without considering its implications for food production.

We also question other assumptions presented in the consultation documents (and particularly on p.16 of the main consultation paper) about land use change. Our key concerns are:

i) the difficulty of assessing land use change requirements when land management change is out of scope; application of different methods of farming could have multiple knock-on effects on land required to maintain food production (while reducing pollution and input resources and supporting biodiversity, carbon storage and flow of ecosystem services). These could be up or down depending on methods deployed e.g. increased stocking rates through use of rotational grazing or temporary decreased yield via reduction in synthetic fertiliser use.

ii) the assumption that productivity increases will offset land lost from production; Total factor productivity fails to include land capability; productivity has been based on farming methods causing natural capital depletion e.g. soil biology and soil carbon loss neither of which are built into total factor productivity assessments as we understand them. For example, the consultation paper proposes removing 9% of current agricultural land from production without specifying which grades of land might be affected. As many arable soils have been degraded (through both compaction and erosion) over the past 40-50 years by farming reliant on agri-chemicals, the structure and health of soils has been affected and, unless soil health is restored, they may fail to be resilient in the face of extreme weather. This includes further erosion of topsoils, poor water retention, compaction, capping and slumping all of which will affect consistency and size of yield and onto cropping choices.

iii) **the need to assess the potential impacts of climate change induced extreme weather** It is surprising that the Analytical Annex analysis states that projection of future productivity 'does not include an explicit assessment of the effects of increased extreme weather (which would affect production with or without land use change).' [p34]

Recent CPRE research shows that, of the highest grade land in England – grades 1 and 2 under the Agricultural Land Classification system – 58% of grade 1 land and 25% of grades 1 and 2 farmland are in the Environment Agency's highest risk zone (3) for flooding [CPRE Building on our food security, 2022].

Also, much of the best farmland identified in the Consultation documents is in the East of England which is the most water stressed region of England. There is no assessment of risk of drought on food production due to changing climate and extreme weather conditions. The 2017 UK Climate Change Risk Assessment synthesis report stated that "Even low population growth and modest climate change scenarios suggest severe water supply deficits, and with high population growth and more severe climate change these deficits deepen and by the 2050s extend across the UK." (p8).

In addition, ADAS carried out updated research for the Welsh Government in 2020 of earlier work to 'assess how future changes in climate may affect agriculture in England and Wales using the Agricultural Land Classification (ALC) system as a surrogate measure'.[i] A comparison of projections based on 1960-1991 baseline climate data and more recent climate data, UKCP18[ii] shows a potential reduction in the stock of the 'best and most versatile' farmland (grades1,2 and 3a) from 37.9% down to just 15.7% by 2050 under a high emissions scenario and 5% by 2080.

ADAS has published a systematic assessment of the risks of climate for key farming sectors based on likelihood and impact under current conditions, a 2°C rise to 2050 and 2100 and 4°C rise to 2100. It identifies as high priority risks to soils, to agricultural productivity and flood risks to business sites and impacts as already major to severe/significant by 2100 including: soil erosion, aridity, nutrient loss, loss of grazing and forage quality, livestock stress, waterlogged land and loss of crops and livestock. Opportunities are considered but are mainly on arable land.
*Climate_Change_Report (ARP4) 250218_WEB.pdf

The LUF Foreword is emphatic about the threats from global warming to land and livelihoods, of farming adapting to a changing climate, flooding and patterns of pests and diseases and that the LUF is aimed to 'inform discussion on how we can guarantee our long-term food security' .(Foreword to Consultation document p6) . The failure therefore to assess the potential impacts of climate change induced extreme weather on productivity and so on food security is all the more surprising and remains to be explained and justified.

[i] SP1104 The impact of climate change on the suitability of soils for agriculture as defined by the Agricultural Land Classification p15

[ii] Capability, Suitability & Climate Programme. Rerun SP1104 with UKCP18 data | ADAS Welsh Government | March 2020 ADAS's 2020 study used the same methodology as SP1104 which used UKCP09 data in which an assessment of the ALC grade was carried out using existing soil and site parameters from the National Soil Inventory (NSI) on a 5 km grid across England and Wales. The climate data for the NSI point were taken for the 5 km cell in which it resides.

QUESTION 2: Do you agree or disagree with the land use principles proposed?

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / I don't know]

Please provide any reasons for your response including any changes you believe should be made.

CPRE agrees. We recommend that the description of the principles and what they include also needs to be further improved. Given the complexity of land use and associated issues the proposed five principles are good and relevant but insufficient overall, and we believe

additional principles will be needed. The proposed five principles are set out in italics below, with our response to each following:

1. *Co-design: Support for participation and leadership at the local and regional scale to develop and align spatial strategies and assess the fairness of changes in land use.* CPRE response: We agree, but it is critical that such co-design is supported by a holistic, integrated approach by national government. With new devolved structures, there are likely to be issues with engaging with new or restructured authorities; local government changes will take several years to bed in. The process also needs to include people in the decision-making process including land managers who will deliver the changes needed. We see the case for a land use commission, or an existing body such as the Office for Environmental Protection, to take on the role of delivering an integrated approach and helping combined authorities develop similar frameworks at the sub-national level.

2. *Multifunctional land: Enable multiple benefits on land, targeted according to opportunity, societal needs (such as the health benefits of co-locating new homes and nature), and environmental pressures (such as reducing pollution).* CPRE response: We agree, but we have concerns about the approach to ecosystem services as set out under 3 below. We recommend that the final Framework:

- Recognises (in broad terms) where multiple ecosystem services or other benefits are already being delivered, such as through forms of agroecological or regenerative farming or conservation management; and
- does more to identify where multifunctional land use is possible, for example mixed-use built development containing housing and community facilities; and nature recovery through woodland and wetland creation and carbon sequestration.

3. *Playing to the strengths of the land: Support and spatially target land use change to locations where benefits are greater and trade-offs are lower. Give priority to land uses that are more scarce or spatially sensitive (for example grid capacity places restrictions on new renewable generation sites or protecting land that is best suited for food production).* CPRE response: We agree with the need for a spatial approach. Scarcity should also be considered in relation to high quality agricultural land and assessed at a sub-regional or regional scale so that local capacity is retained for production especially of crops which are perishable and best supplied via shorter supply chains. Land use change involving agricultural land loss also needs to be assessed locally (see our comments about the ALC system under Q19 below). We recommend that the final LUF should show a more developed understanding of:

- landscape, with landscape character assessment used to identify the strengths, vulnerabilities and valuable characteristics of different areas of the country.
- Supporting ecosystem services such as the carbon cycle and the water cycle, and the impact on them of consuming land for built development and infrastructure.

4. *Decisions fit for the long-term: Take a long-term view of changing land suitability, prioritising resilience (including to the impacts of climate change). This could include planning for new homes that are resilient to climate impacts, such as flooding and overheating.* CPRE response: We agree. 'Long term' should be defined more widely to encompass climate change impacts to 2080 or 2100. Decisions on land use change need to be based on a cross-party consensus, which could be achieved through working with the relevant Commons select committees, so they are not undermined by future changes in government and short-term politics.

'Resilience' also needs to be defined better. When applied to the ability of natural systems resilience surely should include the ability of the whole system to withstand shocks which do not create system change and deterioration to a new stable state which risks permanently reducing ecosystem function and outputs. This is critical to land use issues. CPRE recommends a system level assessment of emerging risks to the ability of land to deliver environmental services, for example risks to peaty soils of drying and failure to retain carbon or produce food.

There also needs to be a clear long-term strategy within the LUF aimed at delivering the UK's net zero and nature recovery targets, as well as greater spatial fairness through a commitment to regeneration and an urban brownfield first planning policy.

5. *Responsive by design: Land use policy, including spatial prioritisation and targeting, needs to be responsive to new data, opportunities and pressures.* CPRE response: We partially agree, but it is particularly important that the LUF policies seek to develop, and are also informed by, the best data, particularly on land use change to development. This should include development of new or updated data sets, improved and wider access to existing data (such as the Cranfield manged national soil inventory series), the harmonisation of data and, over time, supporting the standardisation and amalgamation of granular land holding data from farmers and land managers.

CPRE recommends additions to the text, or additional principles, around:

1. Proper integration of policies between government departments, especially farming and forestry; planning and housing; energy development; and transport. As we made clear in our 2017 report Land Lines, a major issue in land use policy in England has been that policies on farming and forestry land use have been made by different departments and in complete distinction from planning policies governing new development and urban areas. A further review of the National Planning Policy Framework should take place in the light of the final land use framework policies, so that there is consistency between the two documents.
2. Different land uses should be planned for on a more equal footing to reflect their importance; not built development at all costs.
3. Reduction in all types of pollution. CPRE's tranquillity mapping in particular has looked to highlight spatial issues around concentrations of light and noise pollution, as well as the health benefits of minimising it. We recommend that tranquillity mapping is highlighted as a key evidence tool, should this principle be adopted.
4. Cumulative load and carrying capacity. The natural carrying capacity of land needs to be assessed ideally at national, regional and sub-regional level to establish whether it can accommodate land use change. To give two examples:
    - The East of England faces significant water stress yet new development proposals will add to water demand and sewerage load.
    - The accumulation of poultry farms in the Wye Valley were assessed on a development-by-development basis leading to an excess of nutrients in the Wye and its tributaries and serious deterioration of river body health through eutrophication. There was no assessment, through either planning policy or decision making, of the cumulative load on the river catchment.
5. Connectivity. This is implicit in 'Playing to the strengths of the land' but needs more explicit assessment to cover a range of issues. These include:

- land use change to deliver conservation functions at a landscape scale joining up across landholding boundaries so that landscapes can support wildlife populations at a viable scale and wildlife can move through the landscape through green corridors.
- requiring commercial woodland management to be at an appropriate scale, for example in areas where there is also a shift to lowland peat rewetting, wet agriculture (paludiculture). Similarly, energy crop production should be well linked to processing facilities for new products e.g. biomass for heating or construction materials.
- connectivity in urban landscapes or those changing to urban use in particular sustainable resilient transport, energy and water utility systems as well as access to employment, education, healthcare and space for recreation including local greenspace and countryside.

6. Permanent versus temporary land use change. This needs to be explicitly factored into all decisions. CPRE recommends that the LUF should expect decision makers to consider needs from and for land against overall land stock and its capacities. Where land use changes permanently, for example when changed to a developed use where soils are stripped, compacted and capped then such land will not foreseeably be returnable to say agricultural use without extensive remediation and costs. Such decision should be weighted differently than land use changes between agricultural or forestry uses which are more readily reversible and at lower cost such as where soils have not been widely altered. Such decisions need to factor in future risks to land supply for the whole range of land uses, especially climate change-related changes such as permanent or long term loss of land to river and saline flooding, and loss or downgrading of soil quality. This issue is particularly salient in the East of England where so much high quality land is under flood threat and locked in sea level rises will exacerbate this and drainage costs.

QUESTION 3: Beyond Government departments in England, which other decision makers do you think would benefit from applying these principles?

Combined and local authorities (including local planning authorities)
Landowners and land managers (including environmental and heritage groups)
Others (please specify)

CPRE recommends that the government provides, through the finalised land use framework, for greater community connections and influence, to include explicit encouragement for sub-national land use frameworks to sit below the national one. This issue was highlighted in Land Lines and in 2022 our research into land management schemes in Green Belt areas highlighted a need for greater community involvement in the design and reporting of schemes.

Sub-national expression of the LUF is likely, in our view, to best sit at the strategic (combined) authority level. This is where Spatial Development Strategies and Local Nature Recovery Strategies will sit, for example, and where many of the policy levers and funding

will sit. There could be a case as with the London Mayor for a dedicated Environment Strategy. The LUF will need to find expression in other geographic scales by articulating its interactions with catchments and landscapes, and individual local authority level. Including the LUF in the Devolution White Paper would give it weight with strategic and local authorities.

QUESTION 4: What are the policies, incentives and other changes that are needed to support decision makers in the agricultural sector to deliver this scale of land use change, while considering the importance of food production?

Protection of domestic food production requires clarity on the role of the LUF in relation to key strategies and policies across other departments which will affect land use. This includes the NPPF and other national strategies, particularly on energy, as well as Local Plans and Local Nature Recovery Strategies. The Consultation document states at p.21 that:
"We will also need to ensure that the agricultural potential of land is fully considered in land use decisions taken outside the farming system so that less of our high-quality farmland is taken out of production."

CPRE recommends that:

- the LUF and NPPF should contain coherent and mutually reinforcing policies on protecting the highest quality - best and most versatile – land;
- changes of use of BMV land to development are monitored through Land Use Change statistics; and
- relevant authorities are guided to invest capacity, knowledge and skills to understand agricultural land quality and its significance for food production, including through an enhanced ALC database.

We agree that less high-quality land should in preference be taken out of production but, in the case of grades 1 and 2, given the risks of climate change to future land quality and potential impacts on production and productivity, there should be a strong presumption against development of such land. In simple terms the more of such land that is lost to other uses – especially if permanent loss – the more displacement there will be of arable production to lesser quality land or a greater imperative to increase yields elsewhere. Such yield increases need to be achieved at reducing the overall burden on nature and the climate, not merely the relative environmental cost per unit of production.

In terms of supporting agricultural decision makers to deliver land use change, the LUF should set out clearly how it integrates vertically with other strategies and policies within Defra including the 25 Year Farming Roadmap and expected new Food Strategy as well as the existing Farming and Countryside Programme (FCP). Our current understanding is that

the LUF will sit below Environment Act targets but above the 25 Year Farming Roadmap, new Food Strategy and FCP delivery mechanisms. [1]The relationship between these policy tools needs to be transparent at national level but also how these subsequently are expected to work down to regional, sub-regional and local levels, where we could expect agricultural decision makers to be directly engaged. This as noted above also means there should be a clear read across to other local policies and delivery tools such as Local Nature Recovery Strategies and Biodiversity Net Gain funding which could drive land use change.

CPRE believes that the national LUF needs to be replicated at sub-national, preferably combined authority level (see also response to question 3 above) so that there is a governance structure which can engage key stakeholders in shaping policies and incentives locally which will drive land use change. This should include as a given farmers, landowners and their tenants but also enable involvement of the wider community affected by land use change. This issue was highlighted in CPRE's Land Lines report and in 2022 our research into land management schemes in Green Belt areas (CPRE, *The countryside next door: Why we need to invest in greener, healthier Green Belts*, report 2022) highlighted a need for greater community involvement in the design and reporting of environmental schemes.

At the level of influencing land managers/ farmers directly we recommend that a wide range of measures be deployed including:

- Environmental land management schemes
- private finance for carbon sequestration/ storage and other ecosystem services which have verified and standardised metrics, and are well-regulated to reduce risk to farmers
- a revised and regularly updated regulatory baseline to underpin good farm practice
- supply chain practices which ensure fair dealing with farmers but also reward farmers for shifts towards more sustainable/ nature friendly forms of land management, ideally rewarded through the market (insetting)
- public procurement which recognises high environmental standards and values this highly in points scored for tender assessment
- improvements to on-farm advisory capacity and mechanisms for knowledge sharing, including facilitated farmer clusters.

(Footnote 1: Personal communication from Defra staff at Defra in-person Futures co-creation workshop: England's 25-year Farming Roadmap on 5 March 2025.)

QUESTION 5: How could Government support more land managers to implement multifunctional land uses that deliver a wider range of benefits, such as agroforestry systems with trees within pasture or arable fields?

We agree that " In the next few decades, global land use will come under increasing pressure. Agricultural production will need to keep pace with the growing demand for food whilst reducing emissions." (p22).

It also states that 'The principles are intended to transform policy and incentives for land use change in England, protecting land with the greatest long-term potential for food production' (ibid).

CPRE believes that, first a significant and widespread agricultural transition to sustainable and nature-based farming is needed if England is to effectively address climate change and reduce the environmental impact of food production, and we recommend that the LUF includes a policy to support such a transition. The impact of management changes to land use requirements – for example initial potential yield penalties for shifts to no or min till management – should be factored into wider analysis of land use change and the demands on land.

Second, the LUF must explain clearly what it understands by multifunctional land use(s). Principle 2 (p18) refers to "**Multifunctional land:** Enable multiple benefits on land, targeted according to opportunity, societal needs (such as the health benefits of co-locating new homes and nature), and environmental pressures (such as reducing pollution)."

The approach in the consultation paper appears to be that multifunctional land use implies an explicit focus on delivering multiple functions, and this is also bound up with multiple benefits. Though we agree this is highly desirable and should apply to both developed and undeveloped land uses, this appears to miss out recognition that undeveloped land which has healthy ecological functioning will be often, by virtue of being undeveloped, be delivering multiple benefits through the operation and interaction of natural systems. Also, multifunctional should, as per our introduction to this response, often involve achieving multiple uses into both the same spaces and consistently over time.

Farmed land that is well stewarded can and does fit into this category. Building on the definition of Hansen and Pauleit this means policy – including critically farm support measures – should 'explicitly consider 'multiple ecological, social, and also economic functions' of land in a 'managed process', 190 Hansen, R., & Pauleit, S., Ambio, 'From multifunctionality to multiple ecosystem services? A conceptual framework for multifunctionality in green infrastructure planning for urban areas' (2014), vol.43, pp 516–529: https://link.springer.com/article/10.1007/s13280-014-0510-2 [accessed 22 November 2022]).

There should be greater recognition within policy – both in the LUF and more widely - that open land – land not under development where soils have been capped, sealed or removed – and particularly well-stewarded farmland already delivers multiple benefits in a range of environmental services including carbon sequestration/storage, water infiltration, retention and recharge, supporting below and above ground biodiversity, nutrient cycling etc. This is only weakly recognised in existing national planning policy (NPPF para 125, December 2024). This statement should be strengthened as a minimum to enable better protection of land for food production and wider benefits.

We argue therefore that Government measures to support enhanced delivery of multifunctional benefits should apply across the wider farmed landscape as a core element

of promoting a transition to sustainable food production across the land use sector, and linking this to an integrated land use policy. Such measures should include:

1. A strategy for research and development (R&D) to cover integrated and whole farm approaches including integrated farm management, organic, regenerative and agroecological approaches; this should include support for demo farms, farm visits to enable peer to peer learning and knowledge exchange.

2. The provision of independent advice to farmers about how to apply new approaches to their farms; typically regenerative and agroecological approaches rely much less on inputs of synthetic chemistry so agronomists aligned to producers of agrichemicals have few incentives to promote these approaches alternatives to farmers.

3. Provision of grant and/or loan support for investment in equipment and skills development/ training required to adopt these approaches.

4. Policy support for delivering particular habitat types and landscape features that help deliver multifunctionality, for example hedgerows (see response to question 6 below.)

Overall, part of government R&D expenditure in agriculture should be targeted at identifying land management approaches which optimise delivery of multiple other (ecosystem services)/ benefits in addition to the production of food and fibre. Following the Hansen and Pauleit definition advanced above this would mean addressing how agriculture can deliver multiple co-benefits alongside production.

QUESTION 6: What should the Government consider in identifying suitable locations for spatially targeted incentives?

CPRE agrees that maintaining agricultural capacity to deliver significant levels of domestic food production is critical. This must be achieved in the context of addressing and adapting to climate change, reversing the loss of nature and increasing demands on land for other purposes, not least built development, production of renewable materials and energy. Defra monitoring shows that the amount of land in agricultural use, and the proportion of the food we consume that is grown in this country, have broadly remained stable; however, within this there has been a noticeable decline on both counts in recent years.

CPRE recommends that areas that need hedgerow planting or restoration should be considered when identifying suitable locations for targeted incentives. To follow on from Question 5, hedgerows are a good example of how we can achieve multifunctional land use; they can form an ecological network that can also provide climate adaptation and landscape character benefits. In May 2024, CPRE published ‘Aiming high for hedgerows’, based on research we commissioned from the Organic Research Centre. This research shows where hedgerow action should be focused around England and identifies areas that are of highest priority for hedgerow creation and restoration. Indicative targets for each landscape have

been determined, describing the kilometres of new and enhanced hedgerow that could be delivered to achieve the 2037 Environmental Improvement Plan (EIP) hedgerow target to support farmers to 'create and restore 30,000 miles of hedgerow by 2037 (and 45,000 miles in total by 2050). This research is based on Natural England's National Character Area profiles. See overview.

The emerging 48 Local Nature Recovery Strategies should also be considered when spatially targeting incentives.

To spatially target large areas for altered land uses, the LUF must consider future risks and capacities of land holistically at national level to identify the main areas for win-wins and trade-offs. The ability to mitigate production losses – assuming that land use changes will be a reversion to less productive but more environmentally sensitive management – in other areas will be essential.

Targeting should consider areas of significant historic or ongoing damage to land and where restoration could deliver major and multiple benefits. One key issue will be ensuring metrics are in place to assess ecosystem services or benefits deliverable from targeted land use change with up to date data available at the scale required to make policies and decisions at a sub-regional or local level. This applies particularly to restoration of areas of peatland including upland blanket bog but also low lying intensively farmed peatland. There are major trade-offs to consider in targeting lowland peatland, much of which is used for significant food production. This argues for a more sophisticated analysis of not only identifying benefits and trade-offs within a given area but also what the mitigation opportunities are elsewhere. In the case of lowland peatland, existing fertile organic soils in such areas have been (on wasted peatlands) and are being destroyed and will disappear over the longer term. Such land is also highly vulnerable to flooding. (see CPRE 2022, *Building on our food security*.) There is thus a high risk of depleted soils which do not maintain food production in the longer term, or become a stranded asset due to persistent flood damage.

In the case of lowland peatland the LUF should identify the distribution of high quality mineral soils and elevate their protection to enable displacement of peatland production to these areas should they be targeted for rewetting for example.

QUESTION 7: What approach(es) could most effectively support land managers and the agricultural sector to steer land use changes to where they can deliver greater potential benefits and lower trade-offs?

We agree with the consultation text (p22) that a potential issue of fairness arises with prioritising land use changes in less agriculturally productive landscapes. We start from the assumption that most farmers in such areas have as their primary motivation the production of food but that many will already have diversified or be using off-farm income to underpin their farming for food production. Land use change may be more successful where new opportunities are already available which can underpin the food farming that remains, albeit on a reduced land area.

In the broadest sense then this means that Government – including but not limited to Defra - should support any such transition with a holistic rural strategy. If land use change implicitly means moving away from food production then we would urge Defra to build into its approach rural development policy and funding and join this up with the LUF and other farming related policy work (The 25 Year Farming Roadmap and Food Strategy) to support forms of diversification on farms. These should support the economic adjustment of land-based producers with knock on effects in rural communities in these areas offering new economic opportunities – in general support for the infrastructure to support diversification and adding value to farm-based businesses. This could include supporting local food supply chains, on-farm and local processing of land-based products, marketing and procurement initiatives. Shifts to more woodland or agroforestry could drive new businesses working with timber, timber wastes, tree crops including fruit and nuts.

The consultation text indicates that Defra will follow a process of 'spatial prioritisation of outcomes and the spatial targeting of financial incentives for land use change (…..) set out in the Farming Roadmap' (p22).

The consultation document is not explicit about the extent to which Government is willing to disincentivise certain land uses in areas where these are known to be damaging or whether it is willing to use a wider range of policy levers Government to promote land use change. We believe that regulation should be included as one of the tools government deploys, backed by fair and proportionate enforcement.

The relationship between regulation and ELM incentives remains unclear since the move away from the CAP and the loss of Cross Compliance. This relationship needs to be clearly restated so that incentives can be deployed to maximise outcomes for the environment and value for public money.

CPRE recommends the use of National Character Areas in the LUF to help spatial prioritisation of policies, because as a concept they integrate human and ecological aspects of landscape as well as geography and geology. Statements of environmental opportunity already set out in NCA assessments could form the basis for identifying locations for enhancement, as per recent CPRE research with ORC on suitable locations for hedgerow restoration -to meet current hedgerow targets in the EIP- where there has been the most evident depletion.

QUESTION 8: In addition to promoting multifunctional land uses and spatially targeting land use change incentives, what more could be done by Government or others to reduce the risk that we displace more food production and environmental impacts abroad? Please give details for your answer.

Monitoring land use change or production on agricultural land
Accounting for displaced food production impacts in project appraisals
Protecting the best agricultural land from permanent land use changes
Other (please specify)

CPRE recommends policies in both the LUF and NPPF to deliver effective and efficient use of land including brownfield first planning. This relates to CPRE's longstanding campaigning for planning policies using previously developed land for most new housing in preference to greenfield, and building housing at medium or high residential densities to minimise the loss of greenfield land.

The Government should future proof agricultural production by making a realistic assessment of land and its quality and future land stock cross referenced to quality under known locked in climate change as well as horizon scan for the risk of higher emissions scenarios and their impacts on food production. An update of the ALC classification system to account for the most up to date temperature and rainfall data is urgently required for this.

We agree that displacement will occur within the UK and needs to be factored into the assumptions Defra makes on the risk of increased flooding or drought to high quality land especially in East Anglia. CPRE's 2022 report *Building on our food security* showed that:

- nearly 60% of all grade 1 and nearly 25% of Grade 1 and Grade 2 land is at risk in the highest zone 3 flood areas;
- much of the low lying peatland also needs to be rewetted to cut extremely high losses of carbon to the atmosphere; and
- such peatland produces some 40% of UK vegetables so provision needs to be made to future proof this production and target other safer areas of primarily grade 1 and 2 mineral soil not lowland peat.

CPRE recommends that the government introduces a strategic approach to horticulture: either a separate comprehensive horticulture strategy or horticulture addressed fully within a new national food strategy, with analysis, policy and measures consistent with the future Land Use Framework. This strategic approach to horticulture would need to ensure strong protection for mineral grade 1 and 2 soils to underpin stabilisation of production (if peatlands are rewetted or flood damaged) and growth in this sector. Vegetable production areas declined in the early 2020s, and they remain a food type we produce too little of, with environmental impacts being displaced by importing high quantities.

More generally, government should address risks within production and core areas of weakness in UK fresh food supply – notably horticulture and production of fruit and vegetables - as well as identifying opportunities to produce highly nutritional foods which can be produced by the agricultural sector as it transitions to more sustainable models of production: particularly legumes and other protein crops as break and nitrogen fixing crops in longer more diverse rotations and nuts and fruit from permanent crops in agroforestry.

Protection of best quality land (grades 1 to 3a) is critical to avoid displacement effects. See also our responses to questions 4 and 19 in this response..

Monitoring of land use change and production change is increasingly important. This could be via a requirement to submit simple cropping details from farmers signed up to ELM.

Importantly, changes away from food production to other forms of 'farming' and production will be needed especially to monitor pressure on land use from energy crops for biofuels, biomass and AD. Recent research by CPRE using June Farm Survey data (2010-2021) to assess changes in robust farm types – particularly with reference to Green Belt and Comparator Areas – shows a shift of 2219 farms from food production categories to Other/Non classifiable farm types. The Farm Survey data provides no further analysis of this category or any explanation of changes in farm robust type. Monitoring of such changes out of food production and analysis of what such farms are now producing as well as why they have changed would inform Defra understanding of drivers of displacement of food production. [CPRE Farming-on-the-edge-FINAL.pdf February 2025, Table 7 pp14-15.

QUESTION 9: What should Government consider in increasing private investment towards appropriate land use changes?

Regulation and standardisation of metrics that drive private investment, for example for carbon and natural capital is needed. This would improve certainty for potential providers such as land managers and owners, and build trust that such markets are reliable and claimed benefits are valid. This should also reduce unnecessary duplication of metrics and multiple different approaches which are confusing and inefficient.

The government is also trying to address this issue through its Nature Restoration Fund proposals in the Planning & Infrastructure Bill. That has recently (in February 2025) come under heavy criticism from ecologists, see Planning-Reform-Working-paper -Development-and-Nature-Recovery-LONG.pdf. The ecologists' point highlights the need for holistic land use and planning policies that are consistent with retaining the mitigation hierarchy. A lot of the recent good practice in land use change has come from water company investment being linked to agri-environment schemes, but that has been undermined by both reduced financial support for farmers as well as increasing problems with sewage observed elsewhere.

Government should consider the interface between private investment, regulation and taxation including tax reliefs which might drive up private investment in beneficial land use change.

QUESTION 10: What changes are needed to accelerate 30by30 delivery, including by enabling Protected Landscapes to contribute more? Please provide any specific suggestions.

Strengthened Protected Landscapes legislation (around governance and regulations or duties on key actors) with a greater focus on nature

Tools: such as greater alignment of existing Defra schemes with the 30by30 criteria23

Resources: such as funding or guidance for those managing Protected Landscapes for nature

Other (please specify)

CPRE believes that Protected Landscapes (National Parks and National Landscapes) have a vital role to play in nature conservation and biodiversity. Not only is the current first statutory purpose of National Parks 'to conserve and enhance natural beauty, wildlife and cultural heritage' (with biodiversity an essential component of natural beauty), but across these protected landscapes extensive and healthy habitats are needed to provide the ecosystem services that are the 'heartbeat' of the rest of the country.

The importance of protected landscapes to nature conservation is underlined by the statistics. No less than 50% of the sites identified nationally as priorities for conservation are found in our Protected Landscapes, together covering 24% of England, and over half of Sites of Special Scientific Interest (SSSIs) lie inside our National Parks and National Landscapes. Similarly, over 40% of all National Nature Reserves and Ancient Woodland are located here. Our Protected Landscapes offer the most important concentrations of natural habitat in England, but we also share the view as members of Wildlife and Countryside Link that more can be done to enhance the contribution of protected landscapes to nature recovery. (see Wildlife & Countryside Link 2023, *Achieving 30x30in England on land and at sea*).

CPRE recommends that the first statutory purpose should be strengthened so that it includes nature and biodiversity. The wording of the amended statutory purpose will be vital as including 'nature recovery' in the purpose would require explanatory notes on what is defined as 'recovery'. National Parks and National Landscapes have significant potential to drive nature recovery, supporting national policy objectives such as 30 by 30 and the Nature Recovery Network.

It is vital in any amendments to the two statutory purposes, the Sandford Principle continues to be upheld. This gives primacy to the first purpose if there is conflict between the two statutory purposes.

All protected landscape Management Plans recognise the need for increased and better wildlife management, but we believe these Plans could be more ambitious. Government should prioritise the introduction of strong regulations (through the powers in the Levelling Up and Regeneration Act 2023) which require public bodies to help deliver the purposes of Protected Landscapes. Management Plans should identify areas needing urgent attention and set specific targets based on nature and biodiversity enhancement. They should prioritise holistic landscape-scale habitat conservation and restoration, linking fragmented habitats, over individual species restoration plans. Once a Management Plan is in place for a protected landscape, the biodiversity objectives and targets should be monitored regularly to identify successes, and in the case of failures, adjustments should be made and implemented appropriately. It is a positive commitment that Natural England will monitor and evaluate progress against key outcomes and support individual protected landscapes to translate these targets in their Management Plans.

The role of Local Nature Recovery Strategies should also identify opportunities for places that can help deliver 30% of land for nature by 2030. This could also include Green Belt land. To help achieve the aim for 30% of land delivering for nature by 2030, a spatial designation

like the Green Belt could play a critical role in identifying areas with potential for nature recovery.

The Other Effective Area Based Conservation Measure (OECM), is internationally defined by the Convention on Biological Diversity as 'a geographically defined area other than a Protected Area, which is governed and managed in ways that achieve positive and sustained long-term outcomes for the in-situ conservation of biodiversity, with associated ecosystem functions and services and where applicable, cultural, spiritual, socio–economic, and other locally relevant values'.

The OECM could be a useful approach to recognise where areas in the Green Belt or other undesignated countryside around large towns and cities might already meet the 30by30 standard. It could help identify areas in the Green Belt with 30by30 potential. Land identified as OECMs may be primarily managed for different objectives, but those objectives must be compatible with delivering effective conservation and biodiversity outcomes equivalent to those delivered by effectively managed protected areas. With support and investment in these areas identified as potential OECMs, they can be improved to meet the 30by30 criteria, be officially accredited as OECMs, and contribute to the 30% target. There is potential for areas within England's Green Belts to be identified for biodiversity value and for strategic management plans to be developed so that those areas can be in effective management and enhancement for nature recovery.

We understand that Defra is currently developing a mechanism to formally recognise OECMs in England and we recommend incorporating any recognised OECMs into future updates of the LUF.

QUESTION 11: What approaches could cost-effectively support nature and food production in urban landscapes and on land managed for recreation?

CPRE recommends that the LUF should include policies to achieve the better management of countryside around towns, including land designated as Green Belt as well as around other large urban areas. We consider that the 'urban fringe' covers 22% or just under 3 million hectares of land in England. This includes Green Belts around towns and cities (there are 14 in total in England), which are protected in planning policy to remain open or undeveloped to prevent unrestricted urban sprawl. Examples include Oxford and Nottingham. It also includes 'Comparator Areas' which are areas of land around urban centres (of more than 100,000 people) that are not covered by existing Green Belts. Examples include Leicester and Hull.

Since the publication of our 2026 Vision for the Countryside in 2008, we have called for better management of urban fringe areas, and in 2022 (CPRE, The Countryside Next Door, 2022) we found that areas of Green Belt were seeing less investment than the countryside as a whole. An integrated land use policy and more investment could also now help prevent Green Belt land from being designated as 'grey belt' by local authorities purely to allow housing development on it.

Given its proximity (by definition) to large cities, Green Belt and other urban fringe land should have a key role to achieve other national targets, especially supporting the health and wellbeing of millions of people and improving and diversifying access to training in green skills. The current Environmental Improvement Plan includes a commitment to 'Green the Green Belt as set out in the Levelling Up White Paper by identifying key areas for nature restoration through the roll out of Local Nature Recovery Strategies'. It could also play more of a role in supporting targets in the Climate Change Act (2008) which commits the UK government by law to reach net zero by 2050.

The Green Belt already has a higher-than-average percentage of deciduous woodland (at 19%) and is home to 34% of England's Community Forests and 39% of Local Nature Reserves, accounting for 60% of the land created in Local Nature Reserves since 2010.

In 2015, the Natural Capital Committee recommended creating 350,000 ha of new woodland and wetland close to urban areas. This could be achieved by targeting ELM scheme funding as well as other funding options such as biodiversity net gain.

Creation of new woodlands could also provide a generation of green jobs, with skills and training needed to deliver tree planting that enhances local landscape character. Strategic delivery of tree planting within Green Belt should work with the landscape and not be at the expense of other habitats such as species-rich grasslands. It would also support the creation of tree nurseries with local UK grown stock.

There is also a particular need for a specific policy intervention. Urban fringe farmland makes a significant contribution to overall UK food supply, providing 20% of all cereals and around 10% or more of many major food groups. The soil quality under urban fringe land is disproportionately good relative to the rest of the UK, and it is essential not to dismiss this potential. We must instead support current farmers and encourage new farming initiatives, such as community supported agriculture schemes, to bolster food production and security in these areas. But at the same time urban fringe areas have greater fragmentation of land parcels, reduced use for agricultural production nearer to urban areas and increased use by recreational owners such as for livery. (CPRE Farming-on-the-edge-FINAL.pdf February 2025.)

In CPRE's 'Aiming high for hedgerows' research (May 2024) a case study focused on the creation of multifunctional hedgerows for urban orchards in inner-city Manchester. An unused bowling green was transferred to community management by the local council, under the administration of The Orchard Project. In this area, a food orchard has been created containing fruit trees and herb beds, which will be available to the local community for recreation and food foraging. All planting and site development activities are undertaken by local volunteers managed by a part-time project officer. A 50-metre mixed native species hedgerow with some edible fruit species has been planted along one side of the orchard. The hedgerow was planted in October 2023 and took 12 volunteers four hours to plant.

QUESTION 12: How can Government ensure that development and infrastructure spatial plans take advantage of potential co-benefits and manage trade-offs?

For the Land Use Framework to be an effective tool, it needs to consider town and country planning, agriculture, transport, energy and other infrastructure policies, both national and local, and bridge current gaps between government departments. The House of Lords inquiry into land use in England in 2022, made a series of recommendations including setting up a cross-governmental land use commission. This would ensure that planning decisions took account of agricultural policy and designations, energy proposals etc. and vice versa. If the government is not minded to set up a new body, we would recommend an increased role for an expert body with a measure of independence, such as the Office for Environmental Protection.

We support proposals to introduce spatial development strategies to improve cooperation and coordination across local authority boundaries. Current land use decisions and policies are taken at a local or neighbourhood level, whereas many land use designations and protections as well as housing targets cover a much broader area.

When the coalition government abolished regional planning in 2010, it threw out a huge amount of valuable policy work including a focus on regenerating neglected urban areas and sensitive expansion of renewable energy. A problem with local planning since is that this policy vacuum has never been properly filled, and instead there has been a narrow focus on allocating enough land to meet housing targets. In 2022 we found that in inspector's plan examination reports, there was only one mention of climate for 24 mentions of housing (CPRE 2022: *Climate emergency: time for planning to get on the case*).

We also strongly support the government's moves towards producing a land use framework for England. SDSs should provide sub-national land use frameworks to both sit below the national one and inform future revisions. For SDSs to work well, there need to be effective policies within them on better land use to support and inform the national framework, including managing development to prevent nutrient pollution of rivers. The damage to the River Wye was caused by a series of poor planning decisions with little or no strategic spatial approach. We recommend that the government sets a policy expectation that SDSs will have effective policies on climate mitigation and nature recovery. This in our view will involve active participation in SDS processes by Defra agencies, as well as training for examining inspectors so that they look at these wider issues as well as just housing sites.

In order for SDSs to be effective and implementable there needs to be 'buy-in' not just from planners, who will have to update Local Plans in line with newly adopted SDSs, but other departments within local authorities. CPRE recommends a multi-disciplinary approach to spatial planning drawing on work done across energy, transport, agriculture and planning. Spatial energy plans and transport plans need to be integrated into the process to ensure constraints and opportunities are considered.

QUESTION 13: How can local authorities and Government better take account of land use opportunities in transport planning?

Understanding how spatial choices impact infrastructural considerations will be key to delivering on all Government missions. Different land uses have varying transport implications as trip generation and travel patterns will change based on the activity in a particular place, requiring different levels of transport infrastructure. We are committed to delivering a transport system that works better for people across the country and enables growth and access to opportunities. Key to this is adopting a vision-led approach to identifying transport solutions that is better integrated into land use considerations and established, well designed, sustainable and popular places.

CPRE wholly endorses a vision-led approach that leads to improved integration of land use and of transport planning and which is governed by climate change considerations. This approach is absolutely essential for sustainability – as we state in our transport policy [2].

CPRE has long made the case in various submissions to government and parliament of the need for a national Land Use Strategy that incorporates a national Transport Strategy. Also, in our transport policy, we not only express support for the integration of land use and transport policy – as required by the National Planning Policy Framework[3] - but we make their integration a key overarching objective. We argue that government departments should integrate planning and strategy implementation and provide leadership to sub national, regional, sub regional and local authorities to deliver all three pillars of sustainability. Society, the environment and the economy should carry equal weight.

Planning for new development should require, as a first consideration, sites which are able to deliver a seamless public transport system in conjunction with a network of safe and attractive routes for walking, wheeling and cycling. It should, in parallel, consider how such sites reflect proximity to employment offers and their procurement or expansion. Such measures could effectively combine three land uses – road, housing and industrial - within one properly planned negotiation.

Located within or sustainably connected to an existing settlement, sites must provide guaranteed good access by non-car modes – trains, light rail, high quality sustainably fuelled buses – and safe walking and cycling facilities and routes. This means that renewing cities through an urban brownfield first approach (see our responses to questions 1 and 2 above) is preferable to out-of-town development.

Unfortunately, there seems to be almost no appreciation within the Government of the many barriers that exist. These – such as, for instance, poor access to railway stations – make it extremely difficult to achieve an effective public transport network that influences and complements land use and lifestyles, even often within and around major cities. Yet actions such as making it possible for the mobility-impaired to access all railway platforms

[2] https://www.cpre.org.uk/resources/cpre-transport-policy/

[3] https://www.gov.uk/guidance/national-planning-policy-framework/9-promoting-sustainable-transport

and all buses would not only diminish harmful emissions by reducing car use but, as a rule, would not involve any new land take.

There also needs to be a much greater understanding of the impacts of mis-locating large infrastructure, even infrastructure which – on the face of it – appears to be sustainable. For instance, strategic rail (and road) freight interchanges (SRFIs) should only be endorsed following serious scrutiny. Too many SRFI proposals have come forward for locations where the rail capacity and/or the local road capacity is inadequate and often on Green Belt sites. (We applaud the recent decision by the Secretary of State not to allow the SRFI at Hinckley). Additionally, we would make the point that simply locating large logistics sheds near motorway junctions is not necessarily good practice.

The existing transport appraisal system rarely functions as it should but, in any event, it needs to be made far more robust – as frequently called for by the Transport Planning Society and any number of transport professionals and NGOs, including ourselves. The current system does not give sufficient weight to environmental capacity or landscape. Economic arguments, often speculative, are allowed to dominate and conditions that accompany planning permissions are often not enforced.

Similarly, Section 106 agreements which would benefit local communities are frequently either ignored or watered down following viability reports. Hence, permissions are often given for development sites in poorly connected places on the promise of new transport provision that never materialises. This is in addition to viability assessments being routinely used by developers to reduce or get out of delivering affordable housing.

In rural areas, development should be focused on local service centres which act as hubs for transport provision. Currently, a high proportion of development is going into rural locations with few facilities and poor or no public transport. Such developments generate large numbers of vehicle movements and often lead to a semi industrial/ urban landscape in the countryside. Other impacts can be congestion, increased greenhouse gas emissions, poor air quality and noise and light pollution. A recent report by Transport for New Homes, 'What is being built in 2025' makes this case very well and flags up good and bad practice, while CPRE's own transport policy champions a sustainable transport hierarchy.

Rural areas should not be thought of as dormitories; the countryside should not be seen as easy prey for new roads and distribution centres; and all planning decisions should be influenced by climate change considerations.

Planning can be better, and we wholeheartedly endorse the ground-breaking approach depicted in the 2024 Create Streets and Sustrans publication Stepping off the road to nowhere. This demonstrates how to plan for more homes, save money, save the countryside, and create happier, greener places.

QUESTION 14: How can Government support closer coordination across plans and strategies for different sectors and outcomes at the local and regional level?

See responses above to Question 4 (combined authorities) and Question 12 (role of spatial development strategies).

QUESTION 15: Would including additional major landowners and land managers in the Adaptation Reporting Power process (see above) support adaptation knowledge sharing? Please give any reasons or alternative suggestions

[Yes / ~~No / I don't know~~**]**

We agree that it would be beneficial to add major land holding bodies not already covered in the Adaptation Power Reporting Process. The current list covers major strategic infrastructure but, apart from Water companies, broadly fails to cover land use. Given the strategic importance of agriculture to food security and population well-being as well as the major potential for land use management and use changes to mitigate climate change risk and the necessity of adaptation, this already seems a significant omission.

The process should be extended not least to notable public / institutional landed estates including The Crown estate, Church Commissioners, Ministry of Defence, National Trust, Forestry England, Local Authority estates (including council farms) as well as major private and corporate landowning estates. Public estates particularly Government and local authority should demonstrate leadership and join-up between public policy and estate management practices in this respect.

Although there will be undoubted up-front costs to undertaking such reporting, there should also be concomitant gains to these organisations in identifying risks and planning for adaptation to avoid future costs. We are unable to comment on what threshold should be set for land estate size. A review of costs could be undertaken to ensure they are not disproportionate to estate size. Given the potential for knowledge and information sharing across the land-based sector and to some extent to standardise the reporting process (see also below Q16 and potential government support in this process) efficiencies should be possible to reduce costs so they are not onerous.

QUESTION 16: Below is a list of activities the Government could implement to support landowners, land managers, and communities to understand and prepare for the impacts of climate change. Please select the activities you think should be prioritised and give any reasons for your answer, or specific approaches you would like to see.

Providing better information on local climate impacts to inform local decision making and strategies (for example, translating UK Climate Projections29 into what these mean in terms of on-the-ground impacts on farming, buildings, communities and nature)

Providing improved tools and guidance for turning climate information into tangible actions (for example, how to produce an adaptation plan for different sectors)

Developing and sharing clearer objectives and resilience standards (for example, a clear picture and standards of good practice for each sector under a 2°C climate scenario30)

Supporting the right actions in the right places in a changing climate (for example, prioritising incentives for sustainable land uses where they will be most resilient to climate change)

Other (please specify)

CPRE recommends that the LUF should include policies encouraging a rooftop first approach for renewables. This relates directly to our current campaign for a rooftop first approach to new solar development and our belief that undeveloped farmland will often have more environmental functionality (for example for extensive farming and/or creation of many forms of habitat) if it isn't developed for large scale ground mounted solar.

All of the activities mentioned in the question have merit. CPRE recommends that the LUF should clearly identify the mechanisms to be used, for example planning policies or financial incentives, for delivering sustainable land use in the most resilient locations. The LUF itself could provide the structure within which these approaches have traction and, with government support, could lead to adaptation planning at the community scale. CPRE re-emphasises here the need for an LUF governance framework, including at least combined authority-level land use policies within spatial development strategies (see response to question 12 above), as well as protected area management plans – which could feed off these other approaches. In particular, Dartmoor National Park is already developing a land use strategy of its own. Sub-national policies would comprise Local Nature Recovery Strategies (LNRS), but in future could also include a local Climate Adaptation Plan. This could then feed off the localised information provided by Government as well as apply guidance on objectives and standards for each land use sector into the plan. This could inform the LUF and this in turn – depending on its eventual iteration – enable government and private finance support to be targeted towards appropriate actions within the local area.

CPRE recommends a governance structure to bring local landowners, land managers and other key stakeholders together including representatives of the community, in order to deliver action and delivery on the ground in a coordinated way. Ad hoc interventions by individual land managers would still occur if supported by relevant financial incentives from government. This level of local participation and collaboration should increase local buy-in to changes which may significantly alter local landscapes.

QUESTION 17: What changes to how Government's spatial data is presented or shared could increase its value in decision making and make it more accessible?

Updating existing Government tools, apps, portals or websites

Changes to support use through private sector tools, apps or websites

Bringing data from different sectors together into common portals or maps

Increasing consistency across spatial and land datasets

More explanation or support for using existing tools, apps or websites

Greater use of geospatial indicators such as Unique Property Reference Numbers (UPRNs) and INSPIRE IDs to allow data to be more easily displayed on a map

Other (please specify)

CPRE recommends that there should be clear, high quality and freely available mapping data provided by government through a single, public, application programming interface (API) to support local areas to produce land use policies of their own. The interface should allow local and combined authorities to extract queries tailored to their area of geography. The mapping provided with the consultation paper is insufficient for local communities to judge the implications of land use change for their area.

The current Magic.gov.uk website provides data layers from across government. CPRE recommends that MAGIC needs to be improved, or replaced with a new tool, so that the data is presented in a way that helps inform decisions about land use. Overlaying of different data sets cannot be effectively done on MAGIC at present.

The emerging Local Nature Recovery Strategies will include habitat maps. CPRE recommends that these are added to an improved spatial data set that is available nationally. This could be underpinned by data gathered by volunteers e.g. on the condition of existing hedgerows and that may be held digitally at Environmental Record Centres.

Use should also be made of Natural England mapping relating to:

- Green Infrastructure: https://naturalengland.blog.gov.uk/2024/10/31/mapping-our-green-and-blue-spaces-the-green-infrastructure-mapping-project/

- the 159 National Character Area profiles and the data/information within them, which includes key facts and data about an area and statements of environmental opportunity to enhance the character of each unique landscape: Natural England - National Character Area Profiles - National Character Area Profiles

QUESTION 18: What improvements could be made to how spatial data is captured, managed, or used to support land use decisions in the following sectors? Please give any reasons for your answer or specific suggestions.

Development and planning: such as environmental survey data

Farming: such as supply chain data and carbon or nature baseline measurements

Environment and forestry: such as local and volunteer-collected environmental records

Recreation and access: such as accessible land and route data

Government-published land and agricultural statistics

CPRE's response considers the different sectors mentioned in turn, apart from environment and forestry where we have no specific thoughts at this stage.

Development and Planning: Up to date and consistent data should not just be available for decision-makers, but also for those tasked with devising Local Plans, new Spatial Development Strategies and Neighbourhood Plans, and applicants assessing whether they are likely to receive planning permission for development on a particular site.

In recent years CPRE has raised issues with, and sought to provide informed data or commentary, in relation to:

- The Agricultural Land Classification (see questions 1 and 2 above and 19 below)
- The availability and suitability of brownfield land for housing (in our State of Brownfield series of reports)
- Green Belt and other urban fringe land, both rates of development and beneficial use of land within them (see questions 4, 10 and 11 above)
- Local green space designations supported by national planning policy (reports in 2022 and 2023)
- Protected landscapes, specifically rates of development (in our State of AONBs reports as well as our 2016 report with CNP, *National Parks: Planning for the Future*)
- Tranquil areas, mapping areas that are relatively free of noise and visual intrusion (CPRE's 2005 tranquillity mapping). This mapping has been widely used and/or adapted, particularly in protected landscapes, and we would be keen to work with the government to update the mapping and make it more accessible.

An example of a national dataset that is widely used by both planners and applicants is the UK Flood Map for Planning (Flood map for planning - GOV.UK), which clearly demonstrates if a site is likely to be at high risk of flooding from various sources. This is publicly available and clear so there can be no dispute between planning officers, members of the public and applicants as to why a site should be granted permission or not relating to flood risk based on the sequential and exception tests in the NPPF.

For other technical assessments, including Environmental Impact Assessments, required for planning, data is limited and generally collected on a site-by-site basis by consultants paid

for by the applicant. Councils then must interrogate assessments submitted and hire separate consultants if information is disputed. This takes time and costs money for both parties. Both applicant and decision-maker should be relying on the same evidence and information, this would improve trust and certainty in the development management process and likely lead to quicker decisions being made.

Farming: such as supply chain data and carbon or nature baseline measurements

Farming greenhouse gas (GHG) emissions are falling in real terms but are now proportionately increasing relative to other sectors as those sectors do better in cutting theirs. Agricultural GHG emissions have fallen by 16% since 1990[1]: from 58.2 MtCO2e in 1990 to 49.2 in 2021. As a share of UK total emissions they have risen from 6.8% (1990) to 11% (2020) and are projected to rise to 30% by 2050. [2] [3]

We remain deeply concerned that farming and the wider land use sectors are failing to cut emissions rapidly enough with their share of national emissions rising. This represents a policy failure over decades. Far from offering the potential to offset emissions from other intractable sectors, the agricultural and Land Use, Land-Use Change and Forestry (LULUCF) sectors combined do not appear to be on track to achieve carbon neutrality by 2050.

This argues strongly for assessment of emissions from the land-based sectors, particularly farming, at the business and land holding level for two main reasons:

- To raise business awareness and stimulate action to drive down on-farm / holding-level emissions
- To feed into and build towards a nation agriculture emissions target and emissions reduction pathway.

CPRE wants to see farmers adapt and improve their energy use, land management and stock of natural assets to work on a whole farm basis towards production which is carbon neutral then carbon negative. This should include: retaining and building stored carbon through effective management of existing natural assets (grassland, trees, hedgerows, wetlands and soils); expansion of native woodlands and wetlands in suitable locations (without significantly compromising food production); and use of alternative approaches and technologies to reduce existing use of fossil fuels and overall energy demand for farming.

We think a requirement to report using a standardised on-farm carbon assessment beginning with a baseline and regular (frequency to be determined) reporting would enable farmers to assess and plan their own performance but, in addition to being a stimulus to action, build confidence among farmers to be able to sell their surplus carbon credits into private markets . This could be an important income supplement including potentially for supply chain insetting and rewards from major food companies and retailers. Critically farms should be enabled to sell genuine verifiable and long-term carbon storage in natural sinks as carbon credits into well-regulated private markets once they consistently generate surplus carbon storage, over and above any offsetting of farm emissions. Importantly Government can play a central role in standardising methodologies for assessing carbon in farming and

ensuring such markets are regulated so that farmers and to build trust of those buying and selling in carbon markets.

[1] BEIS/ONS 2020 UK Greenhouse Gas Emissions, Final Figures 1 February 2022 National Statistics, p21

[2] BEIS/ONS 2020 UK Greenhouse Gas Emissions, Final Figures 1 February 2022 National Statistics, p21

[3] Skidmore, C. Mission Zero Independent Review of Net Zero, January 2023

Environment and forestry: such as local and volunteer-collected environmental records

See response to question 17 above.

Recreation and access: such as accessible land and route data

See response to question 17 above.

Government-published land and agricultural statistics
Please see comments re the ALC system under Q 19 below.

Based on the answers above to Q8, 10 and 11, and our recent analysis and recommendations in CPRE Farming-on-the-edge-FINAL.pdf February 2025, CPRE has identified further issues with published agricultural statistics. Data from the Defra June farm surveys does not allow us to understand a number of issues which could better guide policy making and government funding and action – particularly for urban fringe areas but also other areas of countryside. We still lack a clear understanding of:

- How areas of commercial farmland are managed, whether production is sustainable and resilient or the direction of travel.
- How other non-commercial land is managed and for what purposes.
- Why farms move into different forms of crop/livestock production or out of food production altogether,
- What other services including environmental goods and services farms deliver beyond food output.

In such areas there is an urgent need to better understand the threats and opportunities for the sector and determine what measures could better support it to grow and thrive. CPRE recommends that the government extends current data collection to understand trends within the urban fringe as well as the wider countryside, and farmer/land manager behaviour and business decision making to better target policy, delivery of policy and value for money of spend.

QUESTION 19: What improvements are needed to the quality, availability and accessibility of ALC data to support effective land use decisions?

This is a critical question. Our recent research shows that:

- There are several serious issues with the ALC system and with its application both currently and looking ahead, including:
    - the use of old climate data for ALC grading. Using more up-to-date data drastically reduces the amount of predicted BMV land, the nation's best land for food production
    - the impact of intensive farming practices degrading prime agricultural land in lowland peatlands and potentially impacting on its ALC grading
    - ALC survey data use in planning policies and decisions, which has allowed over 14,000ha of BMV land to be lost to development
    - legacy system issues relating to the age of the ALC system and its evolution over time, creating conditions for it to be misinterpreted and misused by decision-makers.
- These issues raise questions about the accuracy and reliability of the ALC system and whether it is an appropriate tool in land use research and decision-making.
- Based on our analysis of the issues, including conversations with a range of experts in interviews and a roundtable, we make five recommendations to policymakers:

  1: Conduct a review and update of the ALC system, including implementing ADAS' 2022 recommendations to, at a minimum, update the ALC's climate dataset[i]

  2: Re-survey lowland peatlands

  3: Better protect BMV land in the planning system, including through an urban brownfield first approach to new development (see responses to questions 1 and 2 above).

  4: Use an updated ALC system as one tool in the Land Use Framework.

  5: Implement immediate annual monitoring of change of use of such land particularly to permanent development (especially where soils are sealed or capped).

See Grounded-Insight-ALC-report-for-CPRE-Feb-2025.pdf. CPRE has also reported on this in CPRE Building on our food security, 2022.

This data should then be used on a regular basis to inform future iterations of the LUF and UK Food Security reports.

A review of the ALC system and underlying data (in relation to our first recommendation above) is urgent and important. Any review will need to consider at what granular level the data will be deployed for land use decisions. The 'provisional pre-1988 mapping which underlies much of the coverage of England's soils/land was mapped to provide data at a strategic level via data analysis and reconnaissance but at a scale of minimum 80 hectares but not down to field parcel scale. Other more detailed mapping since 1988 has been done in and around urban areas. However, the wider countryside has not been mapped in

sufficient detail. This means ad hoc ALC assessments take place at a field scale when development is proposed but are not in place for wider decision making on land use and other land use change. The review should consider the cost-benefit of extending the mapping to underpin the LUF – that in turn will depend on the scale of other spatial analysis that will be used to assess different land capabilities a spart of assessing potential ecosystem service benefits and trade-offs of land use change.

It will be equally important that those tasked with using the ALC system for decisions around land use made at national, regional, sub-regional and local authority level also are fully aware of the ALC data, factor it into their decision making and give due importance to soils and high quality land (referred to as best and most versatile grades 1,2 and 3a) in their planning processes. Planning officers and where relevant planning committees need to be supported, educated and trained to understand the ALC system data and its relevance to their decision making. The last government research we are aware of into the effectiveness of policy to protect high quality land in the planning process showed this policy was ranked in the bottom two of a range of planning issues and the presence of BMV land did not represent a 'veto parameter'.[1]

Since then national planning policy on protection of high-quality land has been weakened not strengthened.

[1] Defra Soil Research Programme, *Review of the weight that should be given to the protection of best and most versatile (BMV) land - Technical Report SP1501/TR* - Final Report 2011, viii-ix

[i] ADAS 2021-22 Soil Policy Evidence Programme ALC Technical Review Scoping study August 2022 Report code: SPEP2021-22/02 |Welsh Government

QUESTION 20: Which sources of spatial data should Government consider making free or easier to access, including via open licensing, to increase their potential benefit?

See also response to Question 17 above.

CPRE recommends that there should be new baseline soil health maps by 2028 and that these should be open data. Government should also include open data/mapping of current and future ELM scheme members, including those under the Sustainable Farming Incentive, Countryside Stewardship and Landscape Recovery.

We could supply CPRE's 2022 mapping of Local Green Space designations in England and mapping of light pollution and dark skies using 2015 satellite data. We are also keen to work further with government to update our tranquillity mapping published in 2005 (see also response to question 18 above), and have already carried out (in 2024) preparatory research on this issue in partnership with Natural England.

QUESTION 21: What gaps in land management capacity or skills do you anticipate as part of the land use transition? Please include any suggestions to address these gaps.

Development and planning

Farming

Environment and forestry

Recreation and access

Other (please specify)

The land use transition we need to make will undoubtedly require farmers to apply more knowledge and be more adaptive to adjust their land management and business model to a more volatile climate and economic context.

We anticipate that farmers will need to manage their land in significantly different ways to build its resilience to climate change and sustain or increase outputs in a more difficult context. Many conventional inputs in use today – primarily pesticides and synthetic fertilisers – will no longer be available. They may be regulated out of use as neonicotinoids have been, due to toxicity or because of the recognised externalities of ammonium nitrate production.

We believe farmers will need to transition to more nature-based and regenerative management, rebuilding soil health and resilience in the land, and sustaining yields with much reduced inputs, while increasing the other or ecosystem services the land provides.

Recognised elements of regenerative approaches include greater cropping and plant diversity (including permanent crops such as agroforestry), protection of soils through green cover, minimising soil disturbance via low or no tillage and reintegrating livestock, often combined with rotational grazing. These elements are fundamentally synergistic so that management actions complement each other. We believe these approaches by reducing damage to natural capital will be capable of delivering a sustainable yield based on the carrying capacity of the land when soils are in good health and will reduce the need for expensive and damaging inputs (see above) but also antibiotics and drug treatments for livestock. However, these approaches will require a range of skills that may not be present or have diminished as farming has become more specialised:

- Management of particularly grazing livestock and its welfare but also integration of pigs and poultry into arable rotations; support for young farmers managing flying flocks to work with arable farmers could be a good way forward to support new entrants with minimal capital as well as established business without livestock skills.

- Managing trees and hedgerows in the farmed landscape with skills in planting, tree protection, mulching approaches as well as hedge management and laying.

- Broadened knowledge of a wider range of crops as rotations broaden and their cultivation requirements as well as skills of managing more complex rotations that work with the specifics of the farm and its land/soils

- Increased understanding of soils, soil interactions including soil biology and its relationship to plant health and growth as well as soil management options and understanding soil data.

- Greater ability and willingness to collaborate locally with neighbouring farmers to reduce fixed costs e.g. via machinery sharing or in joint ventures to process and market produce but also across the wider farmed landscape to work together on landscape scale land use change.

- Defra's own published evidence shows that UK farmers have less business training than counterparts in continental Europe (e.g. France or the Netherlands) and that a minority put together formal business plans or management accounts. Farmers need to develop and apply these skills to assess their profitability, costs and margins.

QUESTION 22: How could the sharing of best practice in innovative land use practices and management be improved?

We agree with submissions from Wildlife and Countryside Link and Sustain that two key elements to support sharing of best practice are:

- Supporting peer to peer learning networks already operating (for example Innovative Farmers Network and farmer clusters) as is well understood that farmers are open to and learn best form each other.
- Continue to invest in independent advice – such as the Future Farming resilience Fund but ensure that where farmers are supported with business advice that this incorporates advice on approaches which drive more sustainable land management with improved profitability.

We also recommend that the government should explore:

- elements of continuous professional development could be a precondition for the ELM offer, and some of the funds allocated could be hypothecated for attending workshops, and visits to demonstration farms or research stations.
- Government support or sponsoring of outreach events on agroecological or regenerative farming approaches. These could build on the success of Groundswell and The Oxford Real Farming Conference. Also, there could be sponsored workshops on innovative practice at more mainstream agricultural shows, especially as these are more likely than Groundswell or ORFC to attract major sponsorship funding from the agricultural sector.

QUESTION 23: Should a Land Use Framework for England be updated periodically, and if so, how frequently should this occur?

Yes, every 5 years

~~Yes, every 3 years~~

~~Yes, another frequency or approach. Please provide details.~~

~~No~~

~~I don't know~~

CPRE believes that the LUF must be updated periodically if it is to have any ongoing or lasting impact on land use change. We would recommend every 5 years as this both fits with the political and land use planning cycles, and prevents the cost from becoming too onerous.

Making Government effective in policy co-creation
For this process to be meaningful, we know that Government will need to speak with one voice on land use and clarify how its different policy objectives interact spatially. Implementing the principles in this consultation (page 18) would support this, but broader changes to how the Government coordinates land-related policies across departments may also be required. Government will consider how best to co-ordinate and provide:
A strategic oversight function to ensure the right information and policy is in place to enable delivery against a long-term land use vision;

A cross-governmental spatial analysis function to produce evidence-based advice on strategic implications across different demands on land;

Processes to embed land use considerations in strategic Government decisions;

Open policy-making processes in collaboration with research organisations.

QUESTION 24: To what extent do you agree or disagree with the proposed areas above?

Please include comments or suggestions with your answer.
[Strongly agree / ~~Agree / Neither agree nor disagree / Disagree / Strongly disagree / I don't know~~**]**

CPRE strongly agrees with all of the above. We see the case for a land use commission, or an existing body such as the Office for Environmental Protection, to take on the role of delivering an integrated approach and helping combined authorities develop similar frameworks at the sub-national level. See also our responses to questions 2 and 12 above.

CPRE
April 2025