

# Land Use Consultation

**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](#)? [Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / I don't know]**

Agree.

**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.**

We agree that land use in England will need to adapt significantly by 2050 to address climate resilience, nature recovery, and emissions reduction while balancing food production, housing, and infrastructure demands.

**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]**

Agree

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

We agree with the intention of the principles to support strategic spatial planning and the targeting of land use incentives.

**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)

We believe that combined and local authorities (including local planning authorities) and landowners and land managers (including environmental and heritage groups) would benefit from applying these principles.

**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?**

The council would argue that to deliver the scale of land use change proposed, HM Government needs to provide farmers and landowners with a greater degree of clarity about their future intentions. We would suggest that further details should be provided about the development of the long-term Farming Roadmap (and how it will be co-designed with farmers) as a matter of urgency.

Moreover, we would emphasise the importance of HM Government prioritising the protection of high-quality farmland from development and the production of renewable energy.

The council also welcomes HM Government's commitment to developing a comprehensive Food Strategy focused on improving public health, fostering environmental sustainability, securing food production, and encouraging economic growth.

**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?**

No Response.

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

HM Government should consider the protection of high-quality farmland when identifying suitable locations for spatially targeted incentives. They should also seek to maximise land-use benefits and the efficient spending of public money.

Consideration should also be given to ensuring that spatially targeted incentives are not concentrated in less agriculturally productive areas.

**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?**

No Response.

**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)**

To reduce the risks of displacing food production and environmental impacts to other countries, HM Government (and others) should prioritise protecting the best agricultural land from permanent land changes. This will help to safeguard our own food security.

In addition, consideration should be given to monitoring land use change or production on agricultural land. This should also include accounting for displaced food production impacts in project appraisals.

**Question 9) What should Government consider in increasing private investment towards appropriate land use changes?**

It is important to acknowledge the reality that significant markets for 'natural capital' have not yet emerged and are unlikely to do so for some time. Whilst the value of nature-based solutions is undoubtable and desirable, they require large amounts of land, their efficacy is difficult to quantify and by definition are slow to work, all of which makes it an unattractive proposition to most investors.

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

The councils believe that the following changes are needed to accelerate 30by30 delivery:

- **Improving the management and enforcement of designated sites** – Many of our designated sites (e.g., SSSIs) are in poor condition and are irreversibly damaged. Natural England and other statutory bodies lack sufficient resources to effectively and routinely monitor and enforce protections. Site-specific conservation management plans with regular reviews are essential as is the ability to enforce existing rules on damaging practices.
- **Accelerating Land Designations** – Designation processes are slow and bureaucratic. The rapid designation of new Sites of Special Scientific Interest (SSSIs) is needed.

Local Wildlife Sites could contribute towards 30% where they can be shown to meet the criteria, but more information is needed on the condition of most of the sites. A report from The Wildlife Trusts shows that there is no information about the condition of 15% of the 44,000 sites, partly because many Local Wildlife Sites are in private hands and are rarely monitored. Local Wildlife Sites form a significant natural resource of good quality or restorable habitats and a focus on these could enable rapid progress to be made against the 30% target. This could be addressed with substantial investment in Local Wildlife Site Partnerships. A significant proportion of Local Wildlife Sites could be included in the 30% if they were monitored and shown to be in good condition for nature or showing demonstrable signs of ecological recovery, in line with the recommendations set out in Defra's Local Sites: Guidance on their Identification, Selection and Management: A stronger mechanism for their protection is needed.

- **Compulsory Purchase Orders (CPOs)** – Whilst landowners can be incentivised to deliver nature-positive outcomes, the best and most permanent solution is to buy up land and give it back to nature, whether through 'rewilding' or other approaches to ecological restoration. Conservation charities currently own around 2% of England. In more recent years, crowdfunded trusts and Community Right to Buy have been emerging. However, not enough of the right land in the right place comes up for sale for land purchase to be a 'silver bullet' solution to the climate and nature crises.

Since their inception, Natural England (NE) have had compulsory purchase powers and an interest in acquiring land for nature recovery and yet currently only own 0.37% of England and half of that is leasehold. They have the power to really make a difference but no means of doing so. By aligning the LUF and Local Nature Recovery Strategies (LNRS) and giving NE the resources to execute CPOs, they could rapidly, strategically and meaningfully contribute to LNRSs and 30by30.

- **Boost Landscape-scale/ Landscape Recovery Projects** – Landscape-scale projects are underfunded and slow to roll out. Scale up the Landscape Recovery schemes and prioritise funding for LNRS priorities, especially in low-productivity farmland (see above re: CPOs).
- **Support Farmers and Landowners** – Most landowners lack long term, stable incentives or technical support to deliver nature-positive outcomes. Clear, attractive, long-term financial incentives for nature-friendly farming through agri-environment schemes are needed, along with support and / or provide training and peer-to-peer learning initiatives such as the farm cluster facilitators.
- **Ensure Genuine Community Engagement** – Top-down conservation initiatives risk local pushback but if aligned carefully, the LUF can strengthen the LNRSs. Emphasise social benefits like wellbeing, flood mitigation, and the jobs created to support this.

- **Boost Political Will and Cross Departmental Buy-In** – Delivery is siloed within DEFRA and lacks government support at best and seems to be at odds with HM Treasury and DLUHC. 30by30 needs fully integrating into climate, agricultural and economic policies.

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

Potential approaches to supporting nature and food production in urban landscapes and on land managed for recreation include:

- Introducing a possible requirement in the planning system for public open spaces in new developments to be owned and stewarded either by a local or by a democratic non-profit community organisation. This would enable the development more multifunctional uses for land managed for recreation, including provision of space for nature and food production.
- Introducing a Community Right to Buy in England and amend the definition of Assets of Community Value to (a) recognise economic and environmental interests as well as social interests, and (b) consider changes of use in assets to meet local needs as well as protecting existing uses. This could support communities to - for example - acquire a derelict building with no existing community use and convert it into affordable homes and a community growing space. In Scotland, where a Community Right to Buy has been in place since 2003, half a million acres of land are now owned by communities.

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

No Response.

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

No Response.

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

No Response.

**Question 15: Would including additional major landowners and land managers in the Adaptation Reporting Power process support adaptation knowledge sharing? Please give any reasons or alternative suggestions. [Yes / No / I don't know]**

Yes.

**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 Projections 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 scenario).**
- **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)**

We believe that HM Government should prioritise providing better information on local climate impacts to inform local decision making, improve tools/guidance for turning climate information into tangible actions and support the right actions in the right places in a changing climate. In our opinion, this provides a logical step-by-step process that would support landowners, land managers and communities understand and prepare for the impacts of climate change.

**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)**

All of the above.

**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**

No Response.

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

No Response.

**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?**

We believe that HM Government should consider making most spatial data sources easier to access and, where possible, free to use.

**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)

No Response.

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

No Response.

**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

A Land Use Framework for England should be updated periodically. We believe that this should be done on a five-year cycle to ensure that it remains relevant

**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]**

No Response.