

## ***The Government Consultation on Land Use Planning***

This consultation closes on the 25th April 2025. It is an important initiative to try to balance the need for new development and economic growth against the decline in biodiversity, reducing emissions and adapting to climate change, finding more sites for green energy production and associated infrastructure, and improving food security. The link below will take you to the consultation.

<https://consult.defra.gov.uk/land-use-framework/land-use-consultation/>

You can see from the responses we propose that what can be said in response to each of the numbered questions is limited to a few short paragraphs. Some of the responses below are near to the limit allowed.

The responses below are amended from the previous draft to take account of comments made at the meeting of the Climate Change Group on the 19th March. This will now form our response to the consultation and will be submitted before the 25th April.

### ***Draft Response 2***

#### ***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?***

Land use classification should be updated to include the current soil condition. This would preserve the best land and downgrade the importance of more marginal arable land. Without this the government's objectives look unachievable.

Food security should not result in exporting our carbon emissions. If more forests are created here from agricultural land this could mean importing food from countries where forests are burnt to export food. However, a switch to regenerative agriculture in this country would enable us to make a huge carbon reduction and improve the nation's food security in a more sustainable long term way.

The supporting analysis suffers a lack of consideration of the role of salt marshes in carbon sequestration, in providing the breeding ground for marine life and also its value in coastal protection. The loss of salt marsh area in this century has been dramatic and alarming.

Development in the Sussex coastal plain is sandwiched between the South Downs and a rising sea level. It should not be subject to unachievable housing targets when food security and biodiversity considerations are taken into account.

Hugely important areas of landscape and biodiversity quality such as Chichester Harbour has had its wildlife and amenity value degraded by pollution from agricultural run-off, from sewage pollution but also from the disturbance of habitats by users of new development on the fringe of the area of designation.

## ***2. Do you agree or disagree with the land use principles proposed?***

The consultation mentions the value of participation and leadership at the local scale but doesn't refer to any examples of what this means in practice. The Manhood Peninsula Partnership is a great example of partnership and leadership. It has a very successful record in taking leadership in innovation and driving progress on land use planning matters concerned with adapting to climate change and improving local biodiversity such as the Medmerry Scheme. The government's response to the consultation should take the opportunity to support such partnerships so they can be protected in the current proposed changes to local government structures.

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

See answer to question 2 above. This should not exclude community and interest groups with a clear interest in the issue.

## ***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?***

There should be clear financial incentives for farmers to move towards regenerative agriculture and they should be supported in terms of guidance and research. It is clear that farming as a commercial business has an overall poor return. Given that most farmers have some land that is not capable of making a profit they should be allowed to find other suitable uses for such land such as PV's. There should be some conditions imposed to ensure that the increased financial yield of such land is invested in switching to regenerative agriculture. In this way the farmer benefits and the nation benefits.

As a result of climate change there are areas of agricultural land that are subject to transition over a long period from good agricultural land to flooded land. Again it may prove possible for suitable development to occur if this can be done in a water

compatible way. The national benefit could be greater areas of managed marshland and salt marshes and the biodiversity and other benefits these can bring

***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?***

Ongoing dialogue is necessary with all stakeholders to find ways to achieve this. The move to regenerative agriculture and the reinstallation of hedgerows in arable land would help achieve better productivity through regenerative agriculture.

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

The government should look for ways of ensuring that areas which are subject to changes due to sea level rise and climate change have the right incentives to develop productive partnerships in a similar manner to the Manhood Community Partnership. However, even successful partnerships such as these struggle to maintain ongoing revenue support for the administration necessary and the government or local government should provide some funding for these.

***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?***

Land Managers need to engage more with local communities to ensure they have support for innovative initiatives and new plans. Mechanisms should be found such as the Manhood Peninsula Partnership arrangement to achieve this.

***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?***

The government should be clear on the impact of any reductions of agricultural land in this country and the resulting carbon emissions elsewhere in the world. They should also make this information publicly available

In addition, trading partners should be open and auditable about their carbon emissions from agricultural uses. We should place tariffs on imports from those countries which do not reveal such information or have high associated carbon emissions compared with home grown crops or meat production.

Protecting the best agricultural land from permanent land use changes - questions under Q8

The issue is more complex than the outdated agricultural classification would suggest. Within areas of good arable land there are fields where flooding or other issues affect the yield even though they may have the same designation as better quality land.

This inferior land should be considered for PV arrays if it is close to the national grid for efficient feed in of electricity. PV arrays generally have a life of 40 years so would allow the land to naturally regenerate and benefit from biodiversity improvements. PV arrays are best placed in areas of significant sunshine which are also areas of high arable yields.

So in conclusion a Local Area Energy Plan may be the best vehicle to resolve the best location for PV's and other green energy generators.

### ***9. What should Government consider in increasing private investment towards appropriate land use changes***

See comments made in the answers to previous questions.

### ***10. What changes are needed to accelerate 30by30 delivery, including by enabling Protected Landscapes to contribute more?***

Many areas of protection outside National Parks have very significant biodiversity value but can become crowded out by adjacent development and pollution from agricultural run-off and sewage pollution can be devastating. These areas need additional protection to provide a buffer zone of development around them which restricts the level and type of development which can occur to ones which do not place additional pressure on them.

The best approach to improving biodiversity is to expand existing rich habitats or to connect them by green corridors.

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

The Transition Towns movement is prominent in this area and more towns should be encouraged to follow its approach.

Small grants from local authorities help with on-going projects and volunteer input is essential to most of the projects. Volunteering by the community as a whole should be encouraged as it promotes healthy lifestyles, is enjoyable and reduces loneliness for older people as well as increasing local food production. In some cases more allotment land should be made available where demand requires it.

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

Local Area Energy Plans are one way of achieving co-benefits and managing trade-offs and should be encouraged. They may also have the potential of reducing local protests against renewable energy development proposals which are in compliance with the plan.

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

Due to on-line shopping and home working, existing town centre developments now have a significant reduction in retail and employment activity. Fewer car commuting and shopping trips provide the opportunity to make better use of on and off street parking spaces for new retail and social purposes and in some cases residential uses. The provision of car parking spaces is now less important to the viability of towns centres. This means also that a further restriction of parking supply can be used to promote public transport use and walking and cycling in place of car journeys.

Redundant areas around the edge of town centres would benefit from a master plan approach which includes assisting vehicular movement, especially public transport, bus and walking routes. This could be achieved by allowing local authorities to make use of compulsory purchase to assemble land for development compatible with their master plan.

And the same applies to out of town areas. For example, in Chichester the Portfield Retail area has developed randomly and the layout of development now provides poor access to motorists, bus users, and pedestrians alike. The resolution of this problem would also benefit from a master plan approach.

New cost effective solutions capable of being implemented in existing urban corridors are possible such as e-ways. These should be tried as they promise cost effective and much less damaging effects on local environments.

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

This is something which should be discussed in an open and public way using forums and expert panels to respond to this issue and for regional politicians to respond to their scrutiny.

**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 in the text box below.***

The process should not be restricted to major land owners and land managers. Other organisations such as the Manhood Peninsula Partnership and local climate change groups should be invited to participate.

**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.**

As a climate change group we do not have in depth experience of agricultural business' and accordingly it is difficult to prioritise. It appears to us, however, that all activities listed are required in some way.

***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?***

***Please select all that apply and provide reasons for your answer(s).***

We are very much in favour of easy public access to the Government's spatial data assisted by on-line tutorials about accessing and using the data.

***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.***

Land use data should be fundamental to making decisions on land use plans and in assessing planning applications. Whatever data has been taken into account and how such data has influenced proposed recommendations and decisions should be clear in public planning documents.

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

This is a specialist area and we are content to leave this to the specialists in this area.



**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 answers to questions 17 and 18.

**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.**

The most innovative and commercial decisions are likely to be made by well trained people in the industry and accordingly by large landowners. Small farmers should be encouraged through the NFU to not lag too far behind them and the government should ensure through appropriate publicity how the industry is changing.

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

See answer to Q21.

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

It should be updated in response to climate change and other pressures and shocks to the system so we suggest at least every 5 years.

- 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.

**24. To what extent do you agree or disagree with the proposed areas above?**

Processes in place do not mean that there would be guarantees that the right outcomes will be achieved. The areas above seem sensible but should continue to be used only if they achieve the right outcomes.