Land Use Inquiry:

Wildlife & Countryside Link response to call for evidence for Land Use in England Committee

26 April 2022

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 65 organisations to use their joint voice for the protection of the natural world

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Introduction

1. We welcome this inquiry into land use in England, at a time when consideration of how to reconcile the varying demands we make on our land is urgently required.
2. The range of uses to which we put land in England are united by one underpinning fact – that all require a healthy environment. The healthier the environment, the more productive the farmland, the more secure the housing stock and the greater the wellbeing of people. A struggling environment means diminishing returns from all forms of land use.
3. As the wellspring of successful land use, a healthy environment should be the primary aim of all land use spatial planning.
4. In the below response to the committee's call for evidence we set out how current land use practices are harming the environment, jeopardising long-term viability of those land uses in the process. We chart how improved land use planning, including making better use of spatial plans and delivery mechanisms already in place, could address these harms and allow the benefits of a recovered environment to be shared by all. We have responded to questions where the expertise of the Link network can add particular value and inform the committee's consideration of land use issues. As this is a very full response, we have also provided a separate one-page summary of our recommendations.

Responses to questions posed by the Committee

Pressures and challenges

1) What do you see as the most notable current challenges in relation to land use in England? How might these challenges best be tackled? How do you foresee land use in England changing over the long term? How should competing priorities for land use be managed?

5. As stated above, a healthy environment underpins all forms of land use. Our environment in decline, due to a range a factors. Foremost amongst these are climate change, poor agricultural management, development and pollution; this response profiles each of these four threats in full.[1] These threats have to be addressed if the current range of UK land uses are to be sustained over the coming decades. In the words of Professor Dasgupta in his 2021

[1] The 2019 State of Nature report details these four threats, along with a number of others: https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf

report *''continuing down our current path – where our demands on Nature far exceed its capacity to supply – presents extreme risks and uncertainty for our economies.''*[2]

6. Aligning different land uses behind the shared necessity of environmental recovery is key to overcoming these threats and assuring the long-term viability of all current land uses. A range of different spatial plans and delivery mechanisms are already in place to help achieve this, we highlight these in the below answers and set out the actions the Government needs to take to realise the full potential of these tools. We also discuss the useful role an overarching, cross-government policy statement, based around the Environment Act target to halt the decline in species abundance by 2030, could play in driving forward environmental recovery.

Farming and land management

4) What impacts are changes to farming and agricultural practices, including food production, likely to have on land use in England? What is the role of new technology and changing standards of land management?

7. Farmers and land managers manage 71% of the land in England.[3] As a result, farming practices have a consequential impact on the health of all terrestrial ecosystems and their ability to support different forms of land use.
8. Farming is essential for net zero and nature's recovery, and there is significant appetite among farmers to combine food production with world-leading climate and nature farming practices.[4] However, historically farming policy has not supported a sustainable approach to food production.
9. Poor agricultural policies have required unsustainable farming methods, which mean that over recent decades the impact of farming practices has been largely detrimental to the environment. Agriculture is responsible for 10% of our greenhouse gas emissions[5], farmland birds have declined by over 50% since the 1970s[6], and at present just 14% of England's rivers are in good ecological condition, due in part to pollutants from farming.[7] The Government will not deliver net zero or the Environment Act apex target to halt the decline in species abundance by 2030 without policy change to enable significant reform to farming practices, to ensure they help rather than harm the environment.
10. The overuse of fertiliser on farmland is particularly damaging, scarring soils and polluting waterways, reducing the ability of the land to produce food and support biodiversity. An average 40% of nitrogen fertiliser used in the UK is left unused or leaks into the environment,

[2] https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review
[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1027599/AUK-2020-evidencepack-21oct21.pdf
[4] See for example the work of the Nature Friendly Farming Network https://www.nffn.org.uk/about-us/
[5] https://www.gov.uk/government/statistics/agri-climate-report-2021/agri-climate-report-2021
[6] https://www.bto.org/our-science/publications/developing-bird-indicators
[7] https://committees.parliament.uk/committee/62/environmental-audit-committee/news/160246/chemical-cocktail-of-sewage-slurry-and-plastic-polluting-english-rivers-puts-public-health-and-nature-at-risk

contributing to soil erosion and exacerbating climate change by evaporating into the environment.[8]

11. A continued reliance on fossil fuels on farms increases carbon emissions, with the agriculture sector in 2019 being responsible for 10% of total UK GHG emissions, 68% of total nitrous oxide emissions and 47% of total methane emissions.[9] This is an outsize contribution from a sector that makes up 0.52% of our GDP[10]. According to Government data only 31% of farms were using solar energy in 2019. NFU data suggests that only 5% of farmers currently use at least one electric vehicle on their farms.[11]
12. These harms from farming practices don't just accelerate biodiversity decline, exacerbate climate change and pollute our water – they also hurt farmers themselves, increasing costs and reducing the land's ability to provide food. Rising fertiliser and fuel costs were the main cause behind "agriflation" (the index of rising costs for farmers) in 2021 – rising by 51.24% and 76.92% respectively.[12] Given that international gas supplies are a key factor in the price of both fertiliser and fuel, we can expect these costs to rise further over the months ahead. The Government's Food Security Report 2021 has highlighted the impact of carbon emissions on crop yields. *''Climate change and emissions pose significant risks to production and food security. As a consequence of unusual weather patterns associated with climate change, wheat yields in 2018 were 7% below the 2016 to 2020 average, and in 2020 were 17% below that average.''*[13] These declines affect the majority of foods produced in the UK. The long hot summer of 2018, of a type we can expect to see more of in the years ahead, saw onion yields down 40%, carrot yields down 25% and potato yields down 20%. Livestock farming is not immune - risk of thermal heat stress in dairy cattle is projected to increase by over 1000% in Southwest England, the region with the most dairy cattle.[14]
13. Soil erosion, a consequence of ecological damage caused by intensive farming practices and of climate change, is also curtailing UK food production. As highlighted by the Food Security Report: *''Estimates suggest soil degradation, erosion, and compaction result in losses of about £1.2 billion each year and reduce the capacity of UK soils to produce food.''*. An estimated 2.9 million tonnes of soil are lost from fields in England and Wales every year.[15] As well as reducing farm productivity, these losses harm freshwater ecosystems, as the soil – and chemicals bound up in it – ends up in our rivers. Nutrient enrichment caused by excessive levels of nitrates and phosphates is one of the biggest causes of poor freshwater health. This pollution accumulates at river catchment scale, causing major problems for riverine species, affecting water quality and hindering navigation when soil and silts build up at harbour entrances. The costs of water treatment and dredging operations required in these

[8] https://www.cpm-magazine.co.uk/2021/10/07/nature-natters-getting-to-the-root-of-the-problem/
[9] https://www.gov.uk/government/statistics/agri-climate-report-2021/agri-climate-report-2021
[10] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1049674/agricaccounts_tiffstatsnotice-16dec21i.pdf
[11] https://www.nfuonline.com/archive?treeid=118573
[12] https://agritradenews.co.uk/news/2021/11/01/af-records-22-farm-input-inflation-to-september/
[13] https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021/united-kingdom-food-security-report-2021-theme-2-uk-food-supply-sources#united-kingdom-food-security-report-2021-theme2-indicator-2-3-2
[14] Ibid
[15] https://nt.global.ssl.fastly.net/documents/riverlands-brochure-2020.pdf

circumstances are considerable. Nature-base solutions offer prevention rather cure, with soil-retention re-wetting, and tree planting projects upriver keeping soils in place, to the benefit of farmers and riverine species alike, as well as offering increased protection against flooding. The benefits of such NBSs are explore further in response to question 7.

14. These climate impacts on crop yields reflect the wider impact of climate change on wider biodiversity. In 2021 the Climate Change Committee reported that climate change was already risking the *''viability and diversity of terrestrial and freshwater habitats and species''* in the UK.[16]
15. A sustained drive to most UK farming practices away from dependence on imported fossil fuels and the overuse of fertilisers, and to reduce carbon emissions from the sector, will tackle the climate and ecological breakdown that threatens agriculture's very future, as well as delivering significant and sustained savings for farmers, reducing the cost of food production into the long term. It provides a case in point for the way in which environment-first solutions provide multiple benefits for different land uses.
16. While agricultural practices in the UK have been linked to the decline of biodiversity, changes to the farming system present an opportunity to enable farmers to produce food in a way that works with the grain of nature, not against it. Rather than separating nature and farming, it is vital that the two are treated as symbiotic. This will create resilience within the farming sector, create healthy food and drive climate adaptation and nature recovery.
17. The capability of the Environmental Land Management (ELM) to deliver this change to farming practices is discussed in the answer to question 5. New technologies are available to help with this transition, including more efficient AI fertiliser spreading technology. Many of these fertiliser innovations are being led by British firms, such the Salisbury based small robot company[17] and the Swindon based CCM technologies.[18] An appropriate and ambitious fertiliser reduction target, based on environmental need, could help unlock drive progress and unlock further intervention.

5) What impact are the forthcoming environmental land management schemes likely to have on agriculture, biodiversity and wellbeing? What do you see as their merits and disadvantages?

18. The Agricultural Transition Plan published in November 2020 promised a high level of ambition for ELM. The Plan billed ELM as the *''biggest change in agricultural policy in half a century''* which would *''create cleaner, greener landscapes''* and *''reverse species decline and improve biodiversity significantly''*.[19]
19. The general direction of travel for ELM, which will pay land managers for public goods is vital for addressing the climate and nature crises. However, to date, policy delivery has fallen short of the initial ambition. The first instalment of ELM, the Sustainable Farming Incentive (SFI) designed to set standards for agricultural practices to achieve change across a broad

[16] https://www.theccc.org.uk/2021/06/16/uk-struggling-to-keep-pace-with-climate-change-impacts/ Further examples of climate change impacts on UK biodiversity can be found here: https://www.rspb.org.uk/get-involved/campaigning/climate-change-effects-on-nature-and-wildlife/effects-of-climate-change-on-wildlife/
[17] https://www.smallrobotcompany.com/
[18] https://ccmtechnologies.co.uk/
[19] https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024

spectrum of farms, was announced at the close of 2021, to disappointment from the nature sector over limited ambition. Initial information about the remaining two schemes, Landscape Recovery and Local Nature Recovery, achieved a similarly muted response when released this January. In the words of RSPB: *''Whilst the rhetoric is good, the details behind this announcement are quite thin. The government has not provided much detail on what these schemes will look like, who will operate them, whether farmers will be able to access advice, clarity on eligibility or how the three schemes will operate together.''*[20]

20. Disappointment at the mismatch between ELM ambition and delivery to date is felt across nature, food and sustainable farming sectors. As Food, Farming & Countryside Commission CEO Sue Pritchard told the Land Use Committee when giving oral evidence on 5 April: *''What we are trying to do in the UK is absolutely right, but I have to say that we share the frustrations of many that, so far, progress is a little slow, and there is perhaps insufficient clarity about the vision that we have for the UK's food and farming system to give people confidence that, however tough it is to make these transitions, and it will be tough for very many people, at least we are all clear about the direction of travel.''*[21]
21. Link has recommended[22] that the Government take the following steps to ensure that ELM fulfils initial ambitions and delivers the change to farming practices required to secure a thriving future for agriculture, supported by rather than in conflict with biodiversity:
    - Develop further overarching objectives for the entirety of ELM, tying those objectives to net zero and species abundance targets and providing a vision of how farming will look at the end of the transition.
    - Set out a ratchet mechanism, showing how the ambition of the SFI will be increased over time, including a minimum requirement on farmers and land managers to manage 10% of their land for nature. Monitoring and accountability should be built into SFI (and indeed Local Nature Recovery) to ensure that progress towards meeting nature recovery goals is measured.
    - Publish further details on Local Nature Recovery with expedience. It is important that this detail confirm that Local Nature Recovery funding will not only focus on marginal and less productive farmland, as opportunities for nature-restoration exist also on productive farmland. This land need not be taken out of production if management techniques are changed. For example, altered management of floodplains could increase their ability to prevent flooding of communities, whilst allowing for productive use, such as grazing.
22. The Government should also consider afresh their earlier commitment, made in the Agriculture Act, to support *''public access to and enjoyment of the countryside, farmland or woodland and better understanding of the environment''*. This commitment has not yet been delivered through ELM, with payments linked to increasing access to the countryside still to be confirmed by Defra. This is a missed opportunity to promote overlapping land uses,

[20] https://community.rspb.org.uk/ourwork/b/nature-s-advocates/posts/is-there-hope-for-future-farming-policy-or-is-this-more-rhetoric-over-action
[21] https://committees.parliament.uk/event/13365/formal-meeting-oral-evidence-session/
[22] See https://www.wcl.org.uk/docs/WCL_Digging_Deeper_Report_14_Oct_%20Final.pdf & https://www.wcl.org.uk/docs/Link_briefing-Sustainable_Farming_Incentive.pdf

connecting people to nature and boosting wellbeing whilst opening up new income streams to sustain farm businesses.[23]

23. Link has also highlighted that the new ELM payment system for delivering nature and climate gains and other public gains is just one side of the coin. If ELM is to successfully move farming onto sustainable practices, it has to be accompanied by robust regulation and enforcement to prevent nature loss and climate change. By the end of the agricultural transition, the basic rules expected of all farmers and land managers will need to incorporate higher standards, complementing ELM and forming with it a holistic 'new normal' for farming.[24]
24. Link is concerned that the regulatory baseline for farming may actually be weakened in the transition, particularly through the loss of cross-compliance. Cross-compliance provides certain protections such as for hedgerows, soils and waterbodies that are not technically regulation, but are basic good practice. Once cross-compliance is lost, so will these basic good practice measures which farmers would previously have had to carry out to receive the Basic Payment Scheme.[25] The recent failure to fully implement the Farming Rules for Water highlights the risk of regulatory regression through the transition.[26] Link is recommending that the cross-compliance rules not in regulation become law over the course of the transition, as part of a general safeguarding and enhancement of farming standards.
25. These higher standards will also need to be effectively enforced, with appropriate resourcing allocated to enable this. This is currently lacking, for example the Environment Agency's prosecution of serious pollution incidents have reduced by 93% over the last four years, despite pollution increasing.[27] Responses to Environmental Information Requests on farm inspection and Farming Rules for Water breaches revealed that overall, the Environment Agency's agricultural regulatory officers made fewer than one farm inspection per day from April 2018 to March 2020. By way of contrast around 22,000 farm visits were made between 1993 and 1996, a rate of around twenty per day.[28]
26. Finally, the need to establish a more resilient UK food system through the farming transition should also be considered. Farming land given over to the production of biofuels, and to intensive livestock practices resulting in overgrazing, land degradation and an excess in nutrient-rich manure, is a lost opportunity for the sustainable arable farming needed to secure UK food supplies in the most land-effective way into the future, with the lightest carbon footprint. A reduction in biofuel use, and the encouragement of a dietary shift towards eating less meat, would both help to secure a more resilient UK food system.[29] Increased farming

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[23] See November 2021 Link briefing 'Public access is a public good'
https://www.wcl.org.uk/docs/Public_access_is_a_public_good-ELM_Link_briefing_Nov21.pdf
[24] See page 18 of https://www.wcl.org.uk/docs/WCL_Digging_Deeper_Report_14_Oct_Final.pdf
[25] See RSPB briefing for more information on cross-compliance loss risks:
https://www.rspb.org.uk/globalassets/downloads/documents/mind-the-gap-report-final.pdf
[26] https://rural.struttandparker.com/article/relief-as-autumn-muck-spreading-rules-clarified/
[27] For an example of the scale of the problem, see the Environment Agency's 2019 'Axe Report' which found that 95% of farms did not comply with slurry storage regulations and 49% were polluting the River Axe:
https://www.salmon-trout.org/wp-content/uploads/2020/03/Final-Axe-Regulatory-Report.pdf
[28] https://salmon-trout.org/wp-content/uploads/2021/04/Doing-its-job.stc_.pdf
[29] See the below WWF report and comment piece from Green Alliance for more on food resilience:
https://www.wwf.org.uk/sites/default/files/2022-02/WWF_land_of_plenty.pdf
https://greenallianceblog.org.uk/2022/04/05/how-to-avoid-food-becoming-putins-next-weapon/

resilience to climate and ecological breakdown would also help other land uses by reducing the need for additional land to be put into production to maintain food supplies.

27. Increased ambition for nature within ELM, buttressed by a complementary system of effectively enforced regulation, has the potential to deliver the changes in farming practices required to secure the future of food production in the UK, and to contribute to the healthier environment which this and other forms of land use relies on.

Nature, landscape and biodiversity

6) What do you see as the key threats to nature and biodiversity in England in the short and longer term, and what role should land use policy have in tackling these?

28. The impact of climate change and poor agricultural management on the environment are touched on in the answers to questions 4 and 5, the impact of development is discussed in the answer to question 7. In the response to this question, we wish to highlight the fourth major threat to nature – pollution.
29. The impact of pollution is most readily apparent in the freshwater environment. Freshwater biodiversity underpins productive, efficient and stable ecosystems, connecting drier habitats to wet, and catchments to the coast, conveying life sustaining water across the landscape and allowing species to move with it. These ecosystems also deliver a critical environmental service upon which we all rely – our supply of water. Given the foundational role of freshwater environment, it is concerning that the proportion of waters attaining 'Good Ecological Status' stands at just 14%. Freshwater species are declining more rapidly than any other group. Even our treasured and unique chalk streams, for which England holds 85% of the global total, now often run brown instead of clear, or sometimes have no water at all.[30]
30. Pollution is driving these trends. In 2020 every single waterbody failed to meet standards for Priority Hazardous Substances.[31] These are a 'motley crew' of chemicals, from the seemingly benign (used in batteries, detergents, as solvents, coolants, stain repellents and flame retardants in furniture) to the intentionally harmful (including a range of fungicides, herbicides and insecticides). What they have in common is that they are all damaging to aquatic life.
31. Chemical pollution is also wreaking habitat on other ecosystems. A study of UK soils found that 67% of the samples had multiple residues of hazardous chemicals, 25% had more than six, with around 4% continuing traces of more than ten pesticides.[32]
32. Land use policy, in the form of spatial plans, has a clear role to play to in addressing chemical pollution risks. Catchment Partnerships[33] are in place in many areas, and work with farmers, water companies and other stakeholders to develop Catchment Plans to reduce the pollution reaching our rivers and to enhance the quality of our freshwater. However, Catchment Partnerships struggle for the funding required to implement their Catchment Plans; Link has estimated the direct Government funding needs to be tripled to ensure that these spatial

[30] https://www.wcl.org.uk/docs/WCL_Blueprint_for_Water_Vision_Report.pdf
[31] https://data.gov.uk/dataset/41cb73a1-91b7-4a36-80f4-b4c6e102651a/wfd-classification-status-cycle-2
[32] https://www.soilassociation.org/media/19535/the-pesticide-cocktail-effect.pdf
[33] https://catchmentbasedapproach.org/about/

plans play an effective role. New River Basin Management Plans are also being developed to drive water quality improvements at a regional level. These plans will need to be comprehensive in order to be effective, going beyond obvious aquatic features. Freshwater wildlife relies on small aquatic habitats as well as major rivers, including swamps, flushes, ponds, small lakes, headwaters and other wet features across river basins.[34]

33. The Chemicals Strategy is a further spatial plan (covering the whole UK) which could play a crucial role in addressing the threat to nature posed by chemical pollution. Ahead of consultation on a draft Chemicals Strategy, expected for late 2022, Link and other environmental groups have called for the Strategy to overhaul chemical regulation (moving to a system of assessing and regulating groups of chemicals rather than substance by substance) and to provide a timeline for the phase-out of the use of the most hazardous chemicals.[35]
34. Chemical pollution poses a growing threat to some of our most precious ecosystems, including freshwater habitats. More investment in and a widened scope for existing freshwater spatial plans, and an ambitious approach to the new Chemicals Strategy, are required to address this threat.

7) What are the merits and challenges of emerging policies such as nature-based solutions (including eco-system and carbon markets), local nature recovery strategies and the biodiversity net gain requirement? Are these policies compatible, and how can we ensure they support one another, and that they deliver effective benefits for nature?

35. Nature is suffering significant damage from climate change, poor agricultural management, pollution and development. In the face of these sustained assaults, nature needs a place to recover in, a connected network of habitats across the country, known as a Nature Recovery Network. As described by the Wildlife Trusts *"the Nature Recovery Network is a joined-up system of places important for wild plants and animals, on land and at sea. It allows plants, animals, seeds, nutrients and water to move from place to place and enables the natural world to adapt to change. It provides plants and animals with places to live, feed and breed"*.[36]
36. Both Nature Based Solutions (NBS) and the Biodiversity Net Gain (BNG) system, if designed and implemented well, can deliver restored, expanded and connected places for nature, helping to build the Nature Recovery Network. These natural habitats can unlock multiple benefits for climate and people, when coordinated by well-resourced Local Nature Recovery Strategies (LNRSs). Some of our members question whether carbon markets and offsetting are a useful part of the solution, but if they do happen it is essential that these markets are properly regulated.
37. By restoring a range of natural habitats, we can increase the amount of carbon stored by them. The contribution from nature is essential in efforts to reach net zero, helping to compensate for unavoidable emissions as we decarbonise the economy. In this context, restored habitats are often known as NBSs. In the words of Environment Minister Lord Goldsmith *"there is no pathway to net-zero that does not involve a massive scale up of nature-*

[34] https://www.wcl.org.uk/docs/WCL_Blueprint_for_Water_Vision_Report.pdf
[35] https://chemtrust.org/wp-content/uploads/12-Key-Asks-for-the-UK-Chemical-Strategy-1.pdf
[36] https://www.wildlifetrusts.org/nature-recovery-map

based solutions. They could provide a third of the cost-effective climate change mitigation we need."[37] Research undertaken by WWF and the RSPB charts the extent of this climate potential, suggesting that restored land habitats alone could store 16,231 MtCO2e of carbon, with the potential to store an additional 278-492 MtCO2e by 2050. Marine ecosystems could an extra store 137 MtCO2e over the same time period.[38] For context, in 2020 the UK emitted 405.5 MtCO2e in 2020.

38. Restored habitats go beyond helping prevent further climate change; they address effect as well as cause by allowing us to adapt to the climate change that is already taking place. Freshwater and estuary ecosystems provide an illustrative example of this; restoring formerly wet habitats to their natural state helps these habitats to retain more water, reducing flooding events. A 2021 comparative study of a technical 'grey' flooding preventative measures and a large-scale NBS in Belgium revealed *"similar flood security, lower costs, more ecosystem services benefits and higher biodiversity values associated with the NBS option in comparison to the technical alternative."*[39]
39. The Steart Marshes saltmarsh in Somerset, jointly created by WWT and the Environment Agency, provides a robust UK example of the ability for multiple benefits to be delivered from restoring natural habitats. The whole 250 ha site is storing carbon at a rate equivalent to taking 3,830 cars off the road.[40] The site also protects local communities from flooding and provides recreational space to enhance local wellbeing. The site supports 53 waterbird species, including several IUCN red-listed species, nine bat species, and 21 species of dragonfly.[41] Further NBS sites like the Steart Marshes can be supported by:
    - The inclusion of natural carbon stores in the UK's Greenhouse Gas Inventory to encourage their creation and accelerate private funding for nature's recovery.
    - Giving stronger environmental objectives to the National Infrastructure Bank to allow for greater investment in natural capital, which would stimulate private investment in NBSs.
    - Better regulation of the emerging carbon offsets markets, to ensure that offsetting through NBSs takes place as part of a third party-verified net zero plan, adhering to standards that ensure the highest standards of environmental integrity.[42] The needs of species as the building blocks of nature should be a key driver of offset projects. It is also important to ensure that the purchase of land for carbon offsetting by private companies does not displace potentially more productive land uses for these sites or replace complex natural habitats with monocultures.[43]
40. The Environment Act requirement for development to leave sites with at least 10% more biodiversity than before, known as BNG, also has the potential to deliver significant

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[37] https://www.iied.org/cba14-closing-uk-minister-urges-countries-allocate-more-finance-nature-based-solutions-help-tackle
[38] https://committees.parliament.uk/writtenevidence/38933/pdf/
[39] https://link.springer.com/article/10.1007/s13280-021-01548-4
[40] https://www.biorxiv.org/content/10.1101/2021.10.12.464124v1.abstract
[41] https://www.wwt.org.uk/our-work/projects/creating-steart-marshes/
[42] More on the need for better regulation of carbon offsets can be found in this Link briefing: https://www.wcl.org.uk/docs/Wildlife_and_Countryside_Link_Offsetting_Briefing_23042021.pdf
[43] These concerns are set out in more detail here: https://www.opendemocracy.net/en/oureconomy/scotland-is-on-the-global-frontlines-of-the-great-net-zero-land-grab/

restoration of habitats, as well as making new housing developments better to live in.[44] In order to fulfill this potential, it is essential that BNG reinforces the mitigation hierarchy, steers development away from the most important sites for nature and is spatially aware of the needs of impacted species. The detail of the scheme (consulted on in Spring 2022) should also encourage local authorities to work with developers to deliver biodiversity gains from new development in excess of 10%. There is also a need to treat the potential for 'stacking' (multiple payments for environmental services on one parcel of land) with caution. Such multiple payments can unlock benefits but can also lead to double accounting – for example land used for BNG, already a form of nature offset, should not also be counted as a carbon offset, one site cannot mitigate two harms. A comprehensive and transparent registry system, mapping and accounting system, that can account for multiple types of credits is required.[45]

41. The most important policy plank necessary to realise the benefits from NBSs and BNG is LNRSs, which should play a strong coordinating role. If given sufficient Government support these spatial documents can give a new impetus to nature's recovery by strategically planning the restoration, buffering, and linking of habitats at a local level to enhance biodiversity. They should function as the local floorplans that will aggregate together varied natural habitat gains to form a genuine National Nature Recovery Network, protecting and linking together sensitive locations for species. In order to play this role, LNRSs will need to be effectively funded – Link has estimated a start up cost of £36 million and ongoing annual costs of £16.4 million in order to ensure this.[46] LNRSs would also benefit from stronger weight within the planning system (see answer to question 10) to ensure strategy proposals are implemented, and from an accessible central environmental data bank that is open to all and integrated with both planning and ELM, to inform strategy decision making.
42. The delivery of LNRS priorities will coordinate the restoration of natural habitats. This has the potential to bolster a range of different land uses, including climate mitigation, flooding protection and the quality of residential development, all while boosting the health of the environment by creating space for nature to recover in. The success of these documents is critical to maximising land use benefits and securing them into the long term.
43. Link also proposes a further spatial planning document to ensure that a healthy environment delivers for people. The Levelling Up Bill expected this year should include a duty on local authorities to develop, implement and monitor a Green and Blue Infrastructure Strategies. Such strategies should apply minimum standards for green and blue infrastructure within the authority area, informed by a common England-wide baseline drawn from Natural England's Accessible Natural Greenspace Standards and wider Green Infrastructure Standards. Strategies should assess current provision against these standards and outline action to meet them, including green and blue space contributions from new developments, with the overall aim of growing publicly accessible green and blue spaces for residents to enjoy, targeting those areas that are currently nature deprived. The increase in access to nature delivered by these strategies would ensure more equitable distribution of the health and wellbeing benefits that

[44] The benefits of living in nature-friendly developments are set out in this Wildlife Trusts briefing: https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf
[45] https://www.wcl.org.uk/docs/Link%20BNG%20consultation%20response%20-%20FINAL%2005.04.2022.pdf
[46] https://www.wcl.org.uk/docs/assets/uploads/Link_policy_briefing_Making_Local_Nature_Recovery_Strategies_deliver_for_nature.pdf

access to nature provides. Current green space provision results in estimated savings for the NHS of at least £100 million a year from fewer GP visits, concentrated in the wealthier areas where access to nature is highest. Natural England have estimated that levelling up to give everyone in England good access to green space would reduce NHS pressures to such an extent as to save £2.1 billion in health spending every year.[47] This is alongside other benefits from green and blue space in urban areas, such as improved management of water to reduce flooding and pollution, increased cooling to combat heatwaves and reduced air pollution.[48]

Environment, climate change, energy and infrastructure

8) How will commitments such as the 25-year environment plan and the net zero target require changes to land use in England, and what other impacts might these changes have?

44. It is important to stress that, just as climate change and ecological breakdown are interwoven and spring from the same root (over-exploitation of natural resources) so too are the solutions. We need nature to mitigate and adapt to climate change, we need to tackle climate change to recover nature. Net zero and species abundance targets should be delivered hand in glove, with progress towards one benefitting the other. In particular the transition to renewable energy can and must achieved in harmony with nature, with the right technology delivered in the right place with enough space for nature. This approach must be informed by a robust evidence base and rigorous monitoring to assess potential impacts.

9) How should land use pressures around energy and infrastructure be managed?

45. Renewable energy is vital for our energy future if we are to avoid catastrophic and irreversible climate change. In the UK we are fortunate to have a wide range of renewable energy resource potential primarily from wind, tidal and sun. Additionally, hydro and geothermal have huge potential. A balance of renewable energy land uses should be utilised to reach net zero, along with a renewed focus on the other side of the coin – helping businesses and people use less energy. Renewable energy land uses should benefit local communities and respect the needs of nature.

Land use planning

10) What do you see as the advantages and disadvantages of the existing land use planning system and associated frameworks in England? How effectively does the system manage competing demands on land, including the Government's housing and development objectives? What would be the merits of introducing a formal spatial planning framework or frameworks, and how might it be implemented?

[47] https://www.wcl.org.uk/assets/uploads/img/files/Briefing_Nature_for_Everyone_campaign_Spring_2022_002.pdf
[48] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenspace_2020_review.pdf

46. Since its beginnings in 1947, the planning system has done much to integrate environmental with other considerations. It has protected some of our most special places for nature, although this has not been enough to stem steep declines in biodiversity. Moreover, the planning system has been the subject of numerous reforms over recent years, weakening its ability to support nature's recovery. It now starts from the wrong premise. The current system is built around the belief that the delivery of private sector housing is the primary aim of planning, with the need to support other forms of land use relegated to secondary status.
47. This prioritisation of development over all other land uses through the 'presumption in favour of sustainable development' in paragraph 11 of the National Planning Policy Framework has caused acute environmental damage. In the words of the State of Nature report: *''development for housing, industry and infrastructure projects… result in a loss of natural habitats, as well as fragmentation and change to those that remain''*.[49] The ongoing destruction and degradation of habitats on a significant scale as a result of private sector housing development is incompatible with the Government's Environment Act apex target to halt the decline in species abundance by 2030. The scale of loss can be illustrated by the fact that grassland habitats the size of Dorset have been lost to development in Great Britain since 1990.[50] Over 1,000 ancient woodlands are currently under threat from development.[51]
48. As with other environmentally damaging practises, the long-term effect of development on nature-rich sites will be to jeopardise the very land use causing the damage. The continuing loss of nature-rich sites to development will hasten climate and ecological breakdown, which will in turn accelerate flooding, extreme heat and water scarcity, reducing the security of our housing stock. The Climate Change Committee's 2019 report 'UK Housing: Fit for the Future' report sets out the vulnerability of UK homes to a range of ecological & climate impacts, including the 1.8 million homes currently at risk of flooding and the 20% of total housing stock liable to overheating.[52]
49. Link has recommended three fundamental reforms to the planning system to put environmental considerations at the heart of planning, thereby arresting the loss of nature-rich sites to development and reducing the impact of climate and ecological breakdown on housing stock. These recommendations would help make sure homes are built in the right places. This improvement should be accompanied by its counterpart; making sure that he right homes are built. CPRE and the housing charity Shelter have joined forces to make a strong case for a significant increase in social housing delivery, which could do far more to alleviate the housing crisis than the current private sector led approach.[53] New social housing suitable for families, maximising brownfield opportunities, located close to public transport links and avoiding areas of high climate risk, is essential to meeting housing need.

[49] https://www.rspb.org.uk/our-work/state-of-nature-report/
[50] https://www.ceh.ac.uk/press/almost-2-million-acres-gb-grassland-lost-woodland-and-urban-areas-expand
[51] https://www.woodlandtrust.org.uk/press-centre/2020/01/thousand-threatened-ancient-woods/
[52] https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/
[53] See for example https://www.cpre.org.uk/resources/planning-for-affordable-housing-priorities-for-the-planning-bill/

50. The first recommendation from Link is to establish a clear environmental purpose for planning. This could be delivered by a duty on local authorities, in exercising functions under planning law, to contribute to delivery of the following statutory objectives:
    - Section 1 of the Climate Change Act 2008: planning should contribute to meeting Net Zero.
    - Section 1 of the Environment Act 2021: planning should contribute to nature's recovery and, in particular, to meeting the target to halt the decline of biodiversity by 2030.

    This would rebalance day-to-day decision-making to ensure the planning system is about strategic land use choices to benefit society, economy and environment, not simply about delivering housing numbers.
51. The second recommendation is to complete the protected site network, the latticework of places subject to varying designations so that nature can be protected (to some extent) in them. The network of site designated as Sites of Special Scientific Interest (SSSIs) needs particular work, being at the moment only a "representative network", offering protections to samples of particular priority habitat types, rather than all priority habitats in that category. The Government should invest in and streamline the process for designation to rapidly complete the SSSI network, safeguarding the remaining fragments of priority habitats and important places for wildlife around the country. The protection offered to SSSI's needs to be strengthened, by being put on a par with the protection afforded to Special Areas of Conservation and Special Protection Areas. This would preclude all development that could harm an SSSI. Fewer than 40% of SSSIs are in favourable condition, often as a result of damaging planning decisions in or in the vicinity of the SSSI.[54]
52. The protected site network should also be extended by a new designation to safeguard land for nature's recovery. LNRSs could be asked to find and progress sites for this new designation (which the Wildlife Trusts have proposed be called 'wildbelt'), which would protect the identified sites from development, enabling it to be managed to significantly increase its biodiversity value to support nature's recovery. This would allow land that is currently of low biodiversity value to be designated for nature's recovery at small or large scale, filling a current gap in environmental designations (for sites with currently limited value for nature, but possessing the potential to significantly improve) and helping build out a Nature Recovery Network. It is encouraging that the Government has stated in the Nature Recovery Green Paper (currently out for consultation) that it is considering a wildbelt designation. It should be noted that other proposals within the Nature Recovery Green Paper are less positive for the protected sites network, with a disappointing focus on simplifying designation names within the network, rather than strengthening and expanding it.[55]
53. This strengthening and expansion of the protected sites network would contribute towards the delivery of the Government's 30x30 target. As well as protection from harm, areas counted toward the 30% should be afforded appropriate management for nature's recovery. They should be well managed for nature and regularly monitored at appropriate intervals as part of

[54] https://www.wcl.org.uk/docs/WCL_Achieving_30x30_Land_and_Sea_Report.pdf
[55] https://www.wcl.org.uk/nature-green-paper-whats-the-big-idea-defra.asp

a programme of management and investment to ensure that they are in good or recovering condition.[56]

54. Link's third recommendation for planning reform relates to the Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) mechanisms within the planning system. These tools are intended to direct development away from nature-rich sites, but currently are failing to do so due to flaws in implementation.[57] We propose to address these flaws by requiring SEA to be conducted for all Local Plans and strategic plans, to evaluate the suitability of locations for development, with EIA's incorporating on-site ecological assessment then carried out for all sites a SEA has indicated as being potentially appropriate for development. Data collected through SEA and EIA evidence-gathering and monitoring should then be shared and made available and usable for other purposes, including LNRS work, in order to improve the existing environmental evidence base. This single streamlined framework of environmental assessment would combine the strategic oversight of SEA and the site and project-specific scrutiny of EIA and apply them consistently to direct development away from environmentally sensitive sites, and to greenlight new housing in appropriate areas.
55. These three planning reforms would reduce environmental damage from development, contributing to key Government targets for nature and climate, and helping to secure the delivery of the right homes in the right places. The lessened environmental impact from development would ensure safer homes, and greener, more pleasant places to live in.
56. The environmental impact of projects consented through the separate Nationally Significant Infrastructure Projects regime (NSIPs) also needs to be considered. The welcome decision in 2021 to require NSIPs to achieve BNG will assist with this impact, with further work being required to rebalance the regime around the need for infrastructure projects to meaningfully contribute towards net zero and nature's recovery.[58]

Conclusion

12) Which organisations would be best placed to plan and decide on the allocation of land for the various competing agendas for land use in England, and how should they set about doing so?

57. As set out in the above answers, the competing agendas for land use in England are best aligned behind one overriding aim – the recovery of the health of our environment for nature and the climate. It is only by halting and reversing climate and ecological breakdown that we can secure a sustainable future for all forms of land use, from productive farms to secure housing. Uniquely environmental solutions also have the ability to deliver complementary benefits across different land uses, from agroforestry storing carbon, providing wildlife

[56] https://www.wcl.org.uk/docs/WCL_Achieving_30x30_Land_and_Sea_Report.pdf
[57] https://www.wcl.org.uk/docs/Link%20SEA%20and%20EIA%20briefing%20FINAL.pdf
[58] See Link's response to National Infrastructure Planning Reform Programme for more on this: https://www.wcl.org.uk/docs/Link%20response%20to%20NSIP%20regime%20review%20-%20FINAL%2017.12.2021.pdf

habitats and providing new crops, to restored peatland storing carbon, cleaning drinking water and providing new access to wildlife-rich nature.[59]

58. The above answers also make clear that in many cases the spatial plans necessary for an environment-first approach to land use are largely already in place. From Catchment Plans to Local Nature Recovery Strategies, the plans and mechanisms required to plan a sustainable future lie to hand – it is now for the Government to give those tools the backing they need to succeed.
59. An overarching policy statement could play a useful role in ensuring the successful application of these existing tools. One option for the form this statement could take can be found in the suggestion made by Elliot Chapman Jones, Head of Politics at the Wildlife Trusts, when he asked about how an overarching plan could be delivered when giving oral evidence to the Land Use Committee on 05.04.22:
"It could be done through a national policy statement for land, probably co-ordinated by the Department for Levelling Up, Housing and Communities, but it needs to be coherent with all other government strategies, such as the energy national policy statement and the transport national policy statement. That could sit above a strategic land use plan that is fed in through things like local nature recovery strategies, local authorities and the nature recovery network."[60]
60. The Environment Act apex target to halt the decline in species abundance by 2030 would provide a useful destination point around which such a policy statement could be built. A more ambitious longer-term target, to increase species abundance by 10% on 2020 levels by 2042[61], could provide a longer-term destination point.
61. It is critically important that such a policy statement is shared across and owned by all Government departments. It should require not only the seizing of proactive opportunities to recover nature, but also the abandonment of environmental damaging policies. The policy statement could establish strategic environmental screening of Government spending and taxation policies, to ensure that the UK's annual budgets and multi-year spending reviews do not support individual land use practices that harm the environment that all land uses rely on.
62. This policy statement should also recognise that the 'Duty to Cooperate', introduced into the planning system as a substitute for a statutory tier of strategic planning, has failed and left us with a situation where there is no tier of statutory planning activity operating between national and local. This strategic planning gap impacts on nature; as ecological networks extend across local authority boundaries, local authority policies that stop at those boundaries can only have a limited, disjointed, impact. Whilst the reintroduction of a statutory tier of strategic planning would better equip the planning system to address the nature and climate emergency, in its absence a policy statement could go some way towards addressing this gap

[59] See examples in this WWF, RSPB and University of Oxford report: https://www.rspb.org.uk/globalassets/downloads/policy-briefings/nature-based-solutions-adaption-report.pdf
[60] https://committees.parliament.uk/event/13243/formal-meeting-private-meeting/
[61] This is more ambitious that the proposal currently out for consultation. See https://www.wcl.org.uk/government-must-aim-higher-on-nature-targets.asp

in order to reinstate and provide a 'larger than local' planning input.[62] This input should be informed by individual LNRSs, thereby responding to locally specific characteristics and reflecting natural systems.

For questions or further information please contact:

Matt Browne, Advocacy Lead, Wildlife and Countryside Link
T: 020 8078 3586
E: matt@wcl.org.uk

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Whale and Dolphin Conservation
The Wildfowl & Wetland Trust (WWT)
The Wildlife Trusts (TWT)
World Wide Fund for Nature (WWF)

[62] This is has been proposed by RSPB in their 2022 'Losing what we love' and 'Planning for nature's recovery' reports: https://community.rspb.org.uk/ourwork/b/rspb-england/posts/planning-system-failing-nature https://www.rspb.org.uk/globalassets/downloads/pa-documents/planning-for-natures-recovery-rspb-advocacy-briefing-february-2022.pdf