Land Use Consultation: Link response

24 April 2025

This response is on behalf of the environmental coalition Wildlife and Countryside Link (Link).

Introduction:

A Land Use Framework (LUF) for England should serve as a central mechanism for delivering the legally binding targets set out in the Environment Act 2021, as well as the broader environmental commitments outlined in the Environmental Improvement Plan. Achieving these goals—alongside other national land use objectives—will require substantial changes in how land is managed over the coming decades. With increasing pressure on land from competing priorities, and no unifying vision or plan to guide decision-making, a Land Use Framework is not just desirable—it is essential. However, for it to be effective, the Framework must be backed by the right policies, institutional support, legal authority, and financial mechanisms. Without these, it risks becoming yet another well-intentioned strategy that fails to drive real change on the ground.

Furthermore, in recognising that our watercourses have been substantially modified to provide additional land by land drainage schemes and other river modification practices, the vision must also present a clear plan for river restoration, and define how we want our rivers and lake margins to look in future, within the broader concept of creating additional space for water and delivering river and pond restoration.

An effective Land Use Framework must: 1) set out the quantum of change needed based on a shared evidence base, 2) connect with the policy-making and decision-making levers across the Government and across sectors to actually drive land use change, and 3) be transparent, with regular cross-Government reporting and accountability, and adaptive to changing circumstances and progress against targets

This land use consultation does begin to establish a shared environmental evidence base and does clearly express what change in land use over time is needed to meet some environmental targets. However, the analysis is currently likely an underestimate of the land use change needed to meet nature and climate targets in England. For example, the land use change identified is not sufficient to meet the target to protect 30% of land by 2030 (only by 2050) and it is not clear if the land use change identified will meet species targets.

There are also, in our view, some important gaps in the evidence and areas where the analysis should be strengthened, including the impacts of land use and land management on water quality, flood risk and climate adaptation, public access to nature, and land management practices. In addition, the analysis does not account for land use management (Categories 1 and 2 farmland are scoped out of the consultation), which, if action in these categories and in Category 3 were scaled up, could have an important impact on the overall analysis of land use change needed to achieve environmental targets. The Land Use Framework must contain as robust an evidence base and analysis as possible, as well as recognise in some places where its expression of land use change is a baseline and ambition must go

beyond in order to meet environmental targets. It will need to adapt to new evidence emerging as this is developed, for example, the forthcoming peat map of England.

To drive land use change on the ground, certainty of outcomes and expected delivery pathways is essential to guide decision-making. While we understand the Government's intention that the Framework should not be prescriptive, if it is too open and discursive then it will not achieve change. Implementation of the land-use framework should include a mixture of more determinative approaches (such as expanding designation of highly protected sites for nature) and incentive-based approaches (such as significant weighting in the Environmental Land Management (ELM) scheme and new public funding to deliver the national infrastructure requirements identified in the Framework), alongside clear guiding principles.

Spatial prioritisation of financial incentives will be vital, as the consultation document identifies. There are other important levers that the Government has, including regulation and policy-making. To support its implementation, the Land Use Framework must be spatial to identify important areas and potentially important areas at a national level that are needed to meet the Government's environmental objectives and other land use objectives. While the Land Use Framework should not be a determinative map, national spatial modelling and mapping will be essential to identify place constrained national and regional natural assets, such as rivers and lakes or peat, and existing infrastructure, such as roads, to create a shared evidence base/understanding and to help inform integrated and holistic decision-making. It should also help identify opportunities, including for nature recovery and for delivering on multiple land use objectives. This will also need to reflect local and regional data and objectives, from a variety of local and regional plans, LNRSs.

The two most impactful tools that the Government currently has are 1) regulation around protected sites, protected landscapes, and permitting, and 2) financial incentives for land management. To help implement the Land Use Framework, regulations should be properly enforced, especially in key locations, such as protected sites in poor ecological condition. Statutory nature conservation bodies such as Natural England and the Environment Agency must be properly resourced to carry out advice and enforcement of regulation. ELM schemes must be properly funded to meet the scale of the challenge and spatially targeted to ensure value for money. Private markets must be well-regulated and primed to drive investment in ecosystem services, with a Natural Capital Market Framework, based on the recently developed framework in Scotland needed to foster responsible, values-led private investment in nature.[1]

Across sectors and scales, there must be joined up and integrated decisions on land use. Proper integration of the Land Use Framework into strategic spatial planning and national planning policy, in particular with respect to national infrastructure, will also be important to ensure the planning of major infrastructure such as roads, rails, new towns, and energy infrastructure is compatible with nature and climate goals. We recommend the Government produce a National Spatial Plan, alongside the Land Use Framework, to help secure coordination between the various sector specific spatial plans that are in development. This should support the achievement of 30x30 alongside emerging plans such as the Strategic Spatial Energy Plan. As well as integrating planning at a national level, there should be a mechanism for guiding delivery of environmental objectives at a relevant spatial scale. For example,

[1] Scottish Government. (2024). Natural Capital Market Framework. https://www.gov.scot/publications/natural-capital-market-framework/

through “adding up” responsibilities for habitat creation through Local Nature Recovery Strategies, the framework should assess where there are gaps and where insufficient progress is being made to meet national environmental targets. In turn, this should inform the ratcheting up of ambition of the framework to ensure that the UK is on track to meet environmental objectives.

Finally, a Land Use Framework must be adaptive over time, with regular and transparent reporting, cross-Government scrutiny and accountability, and a mechanism to ratchet up action if progress towards land use objectives and therefore environmental targets is not as intended. We recommend a Cabinet Office or other cross-Whitehall delivery group which conducts this reporting and iteration, with goals and reporting for all Departments to help drive action across Government.

We welcome this consultation on land use and we look forward to engaging further with the Government on a robust, holistic and effective Land Use Framework, including how it joins up with other existing and proposed plans and strategies, including the Farming Roadmap, Food Strategy, Strategic Spatial Energy Plan, the plan to deliver 30x30 on land in England, Animal Welfare Strategy, and Climate Change Committee pathways and carbon budgets. It is important that it is likewise informed by the forthcoming recommendations from the Water Commission.

Responses to selected 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?

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

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 the evidence and analysis in the land use consultation and its accompanying Analytical Annex provide a useful starting point in assessing the scale and type of land use change needed in England. However, we believe the analysis remains patchy and inadequate in several areas due to gaps in evidence and flawed assumptions. As a result, it underestimates the level of land use change required to meet England’s environmental and societal objectives.

The Land Use Framework should articulate the quantum of change required over time in a transparent, evidence-based manner to guide shared vision-setting, policy development, and implementation. While the consultation outlines some figures, further refinement and integration of evidence are necessary to ensure that the proposed changes are sufficient to meet environmental targets.

Gaps in the analysis for meeting Environmental Targets

The land use change identified is not sufficient to meet some environmental targets, such as the target to protect 30% of land and freshwater by 2030. Although the greatest opportunities for environmental benefits will unarguably come from land use change on agricultural land, the framework should consider how other existing land uses could be changed. For example, plantation woodland should not be ignored in this assessment.

The role of wetlands in delivering multiple solutions should be better represented within these four Categories. Category 3.1 misses the opportunities associated with paludiculture systems (e.g. sweet

grains, watercress). Species-rich grassland habitats have been included within Category 3.2, but food production is not necessarily a limited output; for example, species-rich floodplain meadows provide protein-rich forage for cattle, whilst re-wetted grasslands could contribute to increased productivity by improving drought resilience. Saltmarshes could be included under either Category 3.1 or 3.2.

It is not clear if the land use change identified is sufficient to meet some environmental targets, including the target to halt and reverse the decline of species abundance by 2030 and 2042 respectively, the species extinction target, the water quality targets, and the net zero by 2050 target. As the analytical annex states, there is no analysis of any of the outcomes-based targets in the Environment Act. Understanding the amount, types, and locations of habitats needed to support the species abundance target, for example, is crucial in delivering this legally-binding target. To deliver the water quality targets and public expectations, as set out by the Water Commission, adequate and ecologically functioning riparian buffer strips will be needed for rivers, lakes and ponds on farmed land – this should also be factored into the analysis. The Rivers Trust has evidence on how much land and the impact on agricultural land types required for buffers along all main rivers. Their analysis demonstrates that instituting a statutory regulatory baseline of 6 m buffers along main rivers in England could contribute up to 3% of the target to create and restore 500,000 ha of wildlife rich habitat outside of protected areas, and potentially up to 25% if applied to all watercourses. Forest Research UK has evidence on where woodland should be targeted in order to help achieve water objectives.[2] Furthermore, there is no analysis of the land use change needed to meet the Global Biodiversity Framework targets to which the UK has committed to delivering domestically, and crucially, which are not already included in the Environment Act or Environmental Improvement Plan, including the target to restore at least 30% of degraded ecosystems. The Land Use Framework should include an analysis of meeting these outcomes-based targets, as well as the area-based targets.

There is likewise no analysis of the land use change needed to meet the access to nature outcome in the Environmental Improvement Plan, and more generally, no evidence on green infrastructure, including publicly accessible green and blue spaces, included in other analyses. Publicly accessible land can be lost even when it is classed as open access land on which the public have the freedom to roam away from the public rights of way network in some cases where tree planting takes place and also due to development. For example, the Land Use Framework could identify areas of trade-offs and potential benefits for delivering for nature and people together. There is already a robust dataset on publicly accessible green and blue spaces and people's access from Natural England.

Finally, there is no analysis of the land use change needed to meet climate adaptation goals under the National Adaptation Plan 3. This raises the broader question about how to ensure the Land Use Framework is adaptable to the future, in particular to a changing climate. Addressing this is partly about evidence, such as including flood risk data, and partly about ensuring a robust and transparent process of review and iteration of the land use analysis and framework to ensure it is up-to-date and driving change as needed into the future.

Multifunctionality and Agricultural Land Use

The framework does not sufficiently consider how land management within Category 1 contributes to meeting environmental goals. Nor does the amount of land use change being proposed account for

[2] https://www.forestresearch.gov.uk/research/opportunity-mapping-targeting-woodland-creation-for-water-objectives/

the multifunctional opportunity if Categories 1 and 2 farmland (out of scope of the consultation) transition to agroecological methods. Less land would need to be taken out of production if actions in these categories and Category 3 were scaled up across all farms. For example, only 4% of land is being targeted for creating silvoarable or silvopastural systems, whereas 9% is demarcated as a complete change away from agricultural land. Similarly, there should be more strategic focus on the use of different categories of grasslands that constitute over 40% of England's land and are the single largest land use category. For example, floodplain meadows are productive enough to be regarded as agricultural land falling within Category 1. In certain situations they are the land-use capable of producing the most food. Depending on their context, floodplain meadows will fall into Categories 1, 2, 3.1 and 3.2. There is a clear opportunity for the Government to better integrate multifunctionality across land use/land use change so as not to create unnecessary trade-offs in food production. Where, per hectare, such land is relatively unproductive, there will be minimal risk of "unnecessary trade-offs".

In this regard, clarification is needed over how high-quality land is defined and whether an assessment of pollution impact has been accounted for. Prioritising these farms will be prohibitive to progressing to targets, unless safeguards are in place to ensure productivity is not at the cost of the environment, human health, animal welfare and the climate. In particular, the focus on land use change should not incentivise a move to intensive farming as this would undermine the Government's achievement of environmental targets and objectives, and significantly worsen farmed animal welfare.

Nutrient circularity, agrochemicals and water quality

Increasing nutrient circularity under Category 1 will be essential to reducing the impact of land use on nature. Currently, too much nitrogen and phosphorous is applied to the land and much of these nutrients are subsequently lost to water bodies. This contributes to pollution of freshwater environments, including eutrophication and harmful build of nutrients. Management of land under Category 1 must contribute to reducing the overapplication of nutrients through proper nutrient management as part of whole farm planning and circularity in nutrient systems. For example, by reducing nutrient inputs through managing more semi-natural grasslands that thrive without (or with little) fertilisers and pesticides. In addition, as a further example, increased use of technologies such as anaerobic digestion and hydrothermal carbonisation can turn biodegradable waste into useful organic fertilisers that replace synthetic inputs, reduce nutrient pollution and restore soil health. Changes to grassland management, with less frequent cutting and cut-and-collect to boost biodiversity, can simultaneously produce grass cuttings that can be transformed from waste into useful resources such as biofuels, peat replacements and bio-based construction materials. Circular approaches must be incentivised to cover the upfront cost of investment in the technologies required, as well as encourage use of organic fertilisers from circular technologies. This could be achieved through schemes such as ELM providing support for organic fertiliser use. Increased collections of household food waste through the upcoming Simpler Recycling changes will facilitate this by increasing availability of feedstocks for organic fertiliser technologies and support must be provided for farmers to adjust to using the outputs as opposed to synthetic fertilisers. This should be accompanied by nutrient budgeting/Nitrogen Strategies to prevent nutrient surplus from any source.

To support increased circularity of nutrients it is necessary to tackle chemical and plastic pollution of fertiliser sources. This particularly applies to sewage sludge. Currently, most sewage sludge applied to agricultural land is not tested for harmful contaminants including microplastics, PFAS (poly- or per-fluorinated alkyl substances), pharmaceuticals and personal care products (PPCPs), and chemical flame

retardants. Recent research shows plastics and chemicals can build up in soils with repeated application of sewage sludge, impacting soil health.[3] Likewise, because of this agricultural land is often a significant source of microplastics in our rivers, ponds, and ultimately the ocean. Tackling the problem at source also means helping to address the problems in our water bodies. This limits the benefits of this circular nutrient source. To allow safe application of this important resource, the Government must improve monitoring of contaminants in treated sewage sludge products and introduce tighter legislation for its agricultural use until contaminants are better controlled. Prevention of contamination at source should be achieved through tighter controls and restrictions on plastics and chemicals in the UK, including PFAS, bisphenols and flame retardants. Finally, the Government should consider investing in upgrading and future-proofing sewage management systems (e.g., utilising nutrient recovery technologies which remove harmful contaminants while producing a nutrient rich resource).

Similarly, the Land Use Framework must also account for the impacts of pesticide and agrochemical use on land, water quality and biodiversity, which are currently underrepresented in the analysis. Pesticides are a significant and growing driver of freshwater biodiversity loss in England, with residues frequently detected in rivers, lakes, ponds, and groundwater—posing risks to aquatic life, ecosystem health, and drinking water sources. Despite this, the only reference to chemicals in the Analytical Annex relates to their introduction to soil, with no meaningful consideration of their role in water pollution. To meet water quality targets and species abundance goals, the Framework must support a transition to low-input systems and promote Integrated Pest Management (IPM) as standard practice across all farming categories. This includes a stronger emphasis on monitoring pesticide use and environmental residues, alongside investment in advisory services to guide farmers through pest prevention, biological control, and targeted chemical use as a last resort. The current lack of data and oversight around pesticide impacts undermines the ability to accurately plan land use change that delivers for freshwater ecosystems. Robust water quality monitoring and reporting must therefore be integrated into the Framework's evidence base to ensure that reductions in agrochemical inputs are both achieved and measured.

There should be a spatial analysis about types of agricultural land (in particular Categories 2 and 3) and where they are best suited. Better control is needed over acceptable land uses for example within the floodplain, where there should be a presumption against arable and maize cultivation, and a presumption in favour of the restoration of species rich productive agricultural land uses such as floodplain meadows where land use change is critical to protect water and soils. Supporting and targeting water-friendly farming practices on steep erodible soils and within floodplains would go a long way to reducing chemical-laden run-off and floods whilst enhancing infiltration to replenish aquifers and helping re-build fertile soils that can hold and filter water.

The assumption that agricultural productivity increases will offset land lost to production appears overly optimistic in light of the failure to seriously address climate impacts in the consultation document. This is not reflected by current data; yield increases have been declining globally and we cannot sustain the rate of change, before we account for the significant impacts on yield caused by the climate and biodiversity crises. Crop yields and soil resilience are both extremely vulnerable to climate impacts and extreme weather making such assumptions potentially unreliable.

[3] https://www.fidra.org.uk/download/james-hutton-institute-re-assessment-of-environmental-risks-from-sewage-sludge/

Spatial Planning and Strategic Land Use

The claim that the land use change required to deliver 1.5 million new homes is relatively minor oversimplifies the issue, around 30 thousand hectares (0.2%) by the end of the Parliament, focusing solely on the physical footprint of housing on parcels of land. This overlooks the significant resources required for construction, as well as the potential to regenerate existing developed land to accommodate housing, thereby reducing pressure on previously undeveloped areas. It also fails to consider the ecological implications of urban expansion. The location of new developments matters greatly, as poorly situated housing could compromise land designated for nature, undermining efforts to meet biodiversity targets.

Water availability poses another critical constraint. The area occupied by water bodies is even smaller than that proposed for housing, and current supplies may be insufficient to provide clean water to, and especially to dilute and transport wastewater from, these new homes—whether treated or untreated. The construction of additional reservoirs should be considered as part of planning for housing and supporting infrastructure. Likewise, it is essential to consider the challenge of achieving nutrient neutrality once new developments are connected to water services. There is a notable gap in the evidence base regarding the impact of housing growth on freshwater environments. For instance, if a protected site is already in poor condition due to pollution from nearby housing or roads, it cannot contribute meaningfully to goals like 30x30 or the recovery of species abundance. Moreover, habitat fragmentation caused by new development may have disproportionate effects on biodiversity outcomes. While building new water treatment works is feasible, supporting river systems to receive and safely dilute increased effluent is far more difficult. Nature-based solutions offer some promise, but a cultural and policy shift is needed within the water industry and among its regulators to move away from defaulting to conventional grey infrastructure.

The analysis is missing any evidence on flooding risk, coastal erosion and increasing saline intrusion. Both now and into the future, flooding, coastal erosion and increasing saline intrusion will have significant impacts on what land is available for different uses. CPRE's *Building on our food security* report highlights that almost 60% of Grade 1 agricultural land at risk of flooding falls within the Environment Agency's Category 3 flood risk classification.[4] This should be factored into the analysis of the amount and type of land use change needed, both for accuracy and for future-proofing the Land Use Framework for a continually changing climate.

For the sake of transparency and to enable broader collaboration, it would be beneficial to publish—or at least signpost—to the datasets underpinning this analysis. This would allow others, including landowners and land managers, to contribute updates and improvements to the baseline. Reliable, up-to-date data on land characteristics is essential to ensure that decisions within the Land Use Framework are grounded in an accurate and comprehensive understanding of land, its capabilities, and its constraints.

There are questions around how current the existing baseline data is, particularly in terms of on-the-ground activity on farms and estates. Over the past year alone, many have undergone significant changes in farming practices, which may not be reflected in current datasets. CPRE has recently examined the Agricultural Land Classification (ALC) system, raising concerns about its accuracy and

[4] https://www.cpre.org.uk/wp-content/uploads/2022/07/Building-on-our-food-security.pdf

continued suitability as a tool for land use research and decision-making. Their findings highlight the need for a review and update of the ALC.[5]

At a minimum, the framework should be using the most recent climate datasets and reassessing degraded lowland peatlands to accurately determine the current stock of high-quality land. Additionally, the Priority Habitat Inventory maintained by Natural England contains notable data gaps, including mis-recorded or entirely missing records of key habitats, further underscoring the need for improved data quality and completeness.

Finally, the Land Use Framework should be clear that the quantum of change it is setting out is a baseline. Following on from that assessment, the Land Use Framework should aim to drive action to delivery beyond this minimum amount of land use change needed to meet environmental targets.

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.

We recommend the addition of a further principle:

"Respecting ecological integrity: ensure decisions contribute to the maintenance and enhancement of critical natural infrastructure and natural capital. This should include prioritising land uses that connect, buffer, enhance and expand important habitats and species populations to create thriving and resilient ecological networks that support biodiversity and associated social benefits, and economic resilience."

The principles need to focus on the development and implementation of agricultural, environmental and land use policies which are: more ambitious than current proposals and targets; more coherent across land use sectors and policy departments; and more joined up within Defra. Link believe that improvements could be made to the principles proposed in this consultation to do this.

The introductory narrative which Defra have included is welcome, stating that that the principles "need to be integrated into decision making processes and supported by data, decision support tools and resources" to be meaningful. Link agree with this but urge Defra to go further and join up policy measures, so that LNRSs and 30x30, for example, are key considerations underpinning the principles.

What is missing from the principles is an explicit emphasis on avoiding harm to nature, species, and habitats, as well as on protecting the value of ecosystem services. In many cases, it is less appropriate to pursue 'multifunctional' land use where such use could compromise ecological integrity. This could be set out in a new principle or within principle 3 to include protection for protected sites and irreplaceable habitats as a top priority. Additionally, the examples given under the principles are about delivering homes and infrastructure not harmonising sustainable food production with nature restoration and climate targets.

[5] https://www.cpre.org.uk/news/uk-farmland-at-risk-under-system-using-1940s-data-new-report-reveals/

Connectivity is implicit in 'Playing to the strengths of the land' but needs more explicit assessment to ensure landscapes can support wildlife and woodland populations at a viable scale (avoiding isolated habitats and species) and wildlife can move through the landscape through green corridors.

Principle 2 should be strengthened to ensure it carefully considers the current use of the land and recognises what it is already delivering before change is decided. Like principle 3, this must not allow degradation of irreplaceable habitats.

The consultation places too strong an emphasis on safeguarding prime farmland. This approach risks an outcome where land use change, such as renewable infrastructure or tree planting, will be disproportionately directed to lower grade agricultural land which is more likely to be of high nature value, such as species-rich grasslands. Therefore, there must be safeguards in place to prevent important habitat being damaged by harmful activity such as development or mismanagement.

Link suggest that the framework principles must include a focus on agroecology, an approach that applies both ecological (the relationship between plants, animals, humans and the environment) and social concepts and principles to the design and management of sustainable food and farming systems.[6] Placing the focus on agroecology would support principle 3 to 'play to the strengths of land' by ensuring the focus in decision-making is grounded in sustainable food production, meaning targeting the right farming in the right places There are simultaneous opportunities to also support climate mitigation and adaptation and nature recovery which must be considered equally, for example by restoring floodplain meadows. The focus of this principle should first be working on the mitigation hierarchy and integration.

It is vital that other upcoming Defra initiatives such as the Farming Roadmap, Food Strategy, Animal Welfare Strategy and any future planning policies are developed in parallel with the policies in this LUF, and that sustainability, nature recovery, nutritional security and animal welfare are at the heart of all of these strategies. This is also true for the water environment, including the Flood and Coastal Erosion Risk Management strategy. It is a huge risk to the success of the framework if they are not joined up, and principle 1 must be stronger to ensure this is the case.

Similarly, a principle should include the need to be closely integrated with systemic change to food system and supply chains. Dietary change resulting in the consumption of less meat was a key recommendation of the Climate Change Committee's recent 7th Carbon Budget, but this is not referred to in the Consultation documentation. To get more out of less land whilst ensuring food security increases (one of Defra's 5 priorities), there must not be a continuing shift to more intensive agriculture, particularly intensive animal farming, under the guise of 'sustainable intensification'. By consuming more plant-based foods, and prioritising organic, regenerative, or agroecologically produced foods, dietary patterns will lead to reduced demand for intensive animal feed and factory farmed animals, supporting soil health, biodiversity and nature. Intensively growing monocultures of cereals for feeding farmed animals, is a wholly inefficient system for proving food and nutrition security, is incompatible with environmental sustainability goals and it is unclear how this ensure resilience of production over medium to long term. These dietary changes would ease pressure for

[6] https://www.soilassociation.org/causes-campaigns/a-ten-year-transition-to-agroecology/what-is-agroecology/

pastureland which can be used to deliver other services for society, and divert arable land to produce calories for human consumption instead of animal consumption. Doing so wastes food and resources which could be utilised for human consumption. An agroecological approach would better play to the strengths of the land without resulting in trade-offs (e.g., intensification of animal farming).

We agree with principle 4 but urge it to go further and include a focus on restoring resilient ecosystems. It is important to consider how the built environment is managed in this consultation as well as the rural landscape. We also note that this principle is not met if the LUF focus is towards food production. Defra should be clear on what farming should go with the land use change envisioned, such as promoting horticulture for upping domestic food security while protecting/restoring lowland peat.

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)**

All of the above.

At the moment, duties on these decision-makers to take into account the environmental considerations articulated in the Framework are weak. The Government could help operationalise the environmental at the local level with a clear statutory duty on authorities to contribute to delivery of the Climate Change Act 2008 targets and the Environment Act 2021 targets, having regard to the Land Use Framework.

Local planning authorities are of critical importance. Their power will only increase with the introduction of further unitary authorities. The success of the new Land Use Framework is dependent upon its effective use by local planning authorities. It is critical therefore that its introduction is accompanied by increased efforts to build knowledge, skills and experience amongst local authority staff and direct sufficient funding towards enforcement. Combined and local authorities (including local planning authorities) should apply the principles set out in the Land Use Framework in all their policy-making, plans, and decisions which impact on land use. Furthermore, based on the data and evidence in the Land Use Framework and the analysis of land use change identified in the Land Use Framework, these authorities should align their policies, plans and decisions with the achievement of this land use change and aim to contribute to the achievement of environmental targets.

Local authorities who are the Responsible Authority for developing LNRSs must align with national environmental targets, including as identified in the Land Use Framework. The Land Use Framework should also help Responsible Authorities and supporting authorities to identify where the biggest potential trade-offs and benefits might occur in order to guide engagement with landowners as part of the development and implementation of LNRSs.

Local planning authorities should apply the Land Use Framework principles when developing local development plans, including their policies and allocation of sites for development. They should also go further to consider aligning their local development plans with the achievement of land use change

identified in the Land Use Framework in order to contribute to achieving environmental targets. In addition, strong legislative requirements and clear guidance on how LPAs should take account of LNRS will be key to implementation.

As Local Highways Authorities (LHAs), local authorities have a legal duty to maintain and update the Definitive Map of public rights of way within their areas. Under the Countryside and Rights of Way Act 2000 (CROW Act), they are also responsible for developing Rights of Way Improvement Plans to address existing deficiencies. In fulfilling these responsibilities, local authorities should apply the principles of the Land Use Framework and use its data and evidence—such as information on public rights of way, wildflower-rich road verges, and accessible green and blue spaces—to guide their policies, plans, and decisions. This should support the broader commitment to ensure that everyone has access to nature within a 15-minute walk from home.

In their role as managers of public estates, local authorities should actively use their land to support the achievement of environmental targets, aligning their actions with the principles and spatial modelling set out in the Land Use Framework. This includes managing public green spaces to deliver multiple benefits—for biodiversity, climate mitigation (e.g., reducing mowing frequency to enhance habitats and lower emissions), and public health and wellbeing. This approach should also extend to council-owned farmland, such as estates managed by smallholding authorities like Cambridgeshire. These principles can be embedded in farm estate management strategies and reflected in the conditions of Farm Business Tenancies. More broadly, the same principles could be applied to other forms of public institutional land, including land managed by The Crown Estate. Natural England's Green Infrastructure Framework provides valuable principles, standards, and guidance for designing and maintaining multifunctional green and blue spaces. These should be fully integrated into local authority land management practices.

Authorities appointed to develop Strategic Development Strategies, being introduced in the Planning and Infrastructure Bill, should apply the Land Use Framework principles when developing Strategic Development Strategies, including their policies and the identification of infrastructure needed. They should also align their Spatial Development Strategies with the achievement of land use change identified in the Land Use Framework in order to contribute to achieving environmental targets.

Landowners and land managers (including environmental and heritage groups) should apply the principles set out in the Land Use Framework in all their plan-making and decision-making. They should use the data and evidence, and land use change outcomes set out in the Land Use Framework to inform their plans and decisions, in order to most effectively contribute to the achievement of environmental targets and other land use objectives. Major landowners, including Government departments, should aim to make a significant contribution to the land use change outcomes identified in the Land Use Framework, and a connection to fiscal incentives e.g. ELM payments, is key to securing this.

Other actors should also use the Land Use Framework to contribute to the achievement of environmental targets. These include public bodies such as the Forestry Commission and water companies, which develop plans and policies that influence land use and management and may also directly own or manage land. Wildlife and Countryside Link has called for a statutory nature duty for the Forestry Commission, to ensure that its decisions and actions actively support nature recovery and

biodiversity goals, in line with broader environmental commitments. Embedding such a duty would align the Commission's work more closely with the objectives of the Land Use Framework.[7]

Catchment partnerships—groups of organisations that collaborate to manage water quality and quantity at the catchment scale—could also benefit from applying the Land Use Framework's evidence base and principles to inform integrated, place-based catchment plans.

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 Land Use Framework consultation signals significant land use change for agricultural land but does not indicate how these changes are actually to be brought about.

Nor does the LUF consultation provide clarity on the connections between the LUF and a plethora of policy and legislative initiatives which will impact agricultural land including: the Environment Act targets; the Environmental Improvement Plan; the Planning and Infrastructure Bill; the proposed 25 year Farming Road Map; Food Strategy; Animal Welfare Strategy; Water Commission; agreed Climate Change Committee pathways and carbon budgets; the Strategic Spatial Energy Plan; and other development frameworks and local planning instruments such as Local Nature Recovery Strategies.

If the LUF does not provide such clarity then it will largely fall to the Farming Roadmap and the Food Strategy to do so. Link notes that to date, little information has been provided on what will be included in the Roadmap, nor on the extent of any formal consultation on the Roadmap.

In the absence of greater detail in the LUF, the Farming Roadmap will need to set out how the contemplated agricultural land use change will be implemented, providing a clear, predictable, long-term and sustainable plan to support farmers to make these land use changes. In light of this, delivering the scale of land use change envisioned by the LUF consultation —without undermining food production—calls for a range of policies, incentives and other changes as follows.

Better and more targeted public financial incentives

Public funding through the ELM scheme must be increased or at the very least maintained if the proposed land use changes are to be delivered. In England, four years into the development of the new ELM schemes, a fully rounded offer is not available to farmers and uncertainty prevails. This delayed, patchy system causing insecurity for farmers is a far cry from the expected post-Brexit farm support system of generous rewards for nature friendly farming. The two high-ambition ELM schemes, Countryside Stewardship Higher Tier and Landscape Recovery have been continuously deprioritised and access to funding in these schemes is restricted by resourcing capacity. Greater support will be needed for these high-ambition options which will be critical to achieving the transitions contemplated.

There have been suggestions emanating from Government that farming should be treated like any other business and must stand on its own two feet. But there is a distinction to be made between the

[7] https://wcl.org.uk/docs/assets/uploads/Link_Briefing_A_nature_duty_in_the_Forestry_Commission.pdf

business of farming and the role which farming plays in developing and maintaining the land. There is an interdependence with nature which no other business sector shares. Farming does not just produce the food we eat but is also central to efforts to tackle the nature, climate, and public health crises.

The principle of "public money for public goods" underpins the ELM scheme and continues to be appropriate. Farmers are entitled to the full value of any public good provided – this is critical and must not be cut. A better-resourced, more targeted and more ambitious scheme would enable the contemplated land use change to take place, and provide a boost to food security, flooding and river and air pollution prevention, wildlife recovery and aid rural communities.

The level of funding is one matter, but it is equally true to state that the ELM scheme – and Sustainable Farming Incentive (SFI) in particular - could be made substantially more effective and efficient in its use of public funds and its influence on land use and land use change. There is currently no strategic framework to inform, guide and direct what each of the ELM schemes needs to deliver in terms of land use change, multifunctionality, achievement of nature and climate targets, climate adaptation and farming livelihoods, as well as their interaction with other schemes.

The Government must recognise and support the broad suite of agricultural multifunctional land uses beyond those already well recognised and established within the sector. Certain options within ELM are particularly financially attractive and made accessible to farmers. This is driving uptake of those options rather than ones that would 'play to the strengths of the land' within that specific farming system or spatial context, or options which deliver outcomes that are needed to realise ELM's contribution to the UK Government's nature and climate targets.

Safeguards need to be put in place within ELM that minimise the risk of perverse incentives because a particular land use change is disproportionately financially more lucrative, and promoted, than other more environmentally beneficial ones. Current approaches by RPA actually deduct funding if features beneficial for nature conservation (e.g. even those specified in SSSI favourable condition statements) are implemented. Similarly, the herbal ley SFI option has been used to destroy thousands of hectares of rare and threatened priority habitat grasslands, as well as other high nature value grasslands, in order to create a temporary habitat that provides fewer environmental benefits when compared to the permanent, semi-natural grasslands.

ELM needs more appropriate policy steers on issues such as catchment level management, nutrient management, permitting, horticulture, peatland and organic production and public access if it is to genuinely help deliver the objectives of the LUF. There are also clear opportunities to link ELM with LNRS example by including payment uplift for actions in identified priority areas or favourable scoring for applications in competitive schemes which link proposed actions to agreed LNRS priorities.

Private finance

Private finance cannot replace public investment but has an important supplementary role.

At the moment, however, private investment remains limited. We recommend the introduction of a Nature Recovery Obligation on key polluting sectors. This should comprise: (1) requirements at sector and business level to disclose and report on impacts on nature; (2) requirements to develop nature-

positive plans alongside net zero plans; and (3) statutory requirements to invest in nature recovery actions that go well-beyond offsetting, in line with a sector's current and historical responsibilities. This could follow a market-based or a contribution-based approach.

Introducing mechanisms such as carbon credits or ecosystem service payments can encourage farmers to adopt practices that benefit both the environment and long-term farm viability. These mechanisms can help offset the costs of adopting new practices or transitioning land use.

In addition to providing public funding, the Government therefore has a key role to play in helping establish well-regulated private markets in ecosystem services, to secure further investment to reward environmental delivery and to support farmers in creating diverse and resilient farm businesses.

Leveraging private sector funding is crucial for scaling up nature recovery efforts and ensuring long-term environmental sustainability. A key example is investment in Landscape Recovery Projects, which align with farming priorities and are increasingly required to explore blended finance models, combining public and private funding to maximise impact.

There is currently a significant gap between landowners seeking to deliver nature-positive projects and large institutional investors, such as local government pension funds, who have the capital but require low-risk, scalable opportunities. Bridging this divide will require the development of blended finance models and risk hedging mechanisms, such as guarantees, first-loss capital, or outcome-based payments, to provide the financial assurance needed to attract institutional investors to nature markets. Without these tools, many promising land-based projects remain too small or uncertain to secure the investment needed to scale.

The Land Use Framework should help guide this private investment to high-opportunity areas.[8] Beyond individual projects, there is also a strategic need to advance the previous Government's commitments under the Nature Markets Framework, particularly the ambition to mobilise at least £500 million of private investment per year into nature recovery by 2027, rising to over £1 billion by 2030.

Delivering on this goal will require robust policy support, investor confidence, and mechanisms to connect capital with high-impact projects. Notably, the Natural Environment Investment Readiness Fund (NEIRF) is playing a key role by supporting early-stage projects to become investment-ready, helping to build a strong pipeline of credible, scalable opportunities for private finance. Initiatives such as the Defra sponsored 'Projects for Nature Platform', supported by Lloyds Bank, are also helping to bridge the gap between capital and projects, albeit in a voluntary way unlike the NEIRF. Ensuring these frameworks and platforms are effectively implemented will be essential to unlocking the full potential of private sector funding for nature recovery.

Equally, regional coordination, including at the catchment, LNRS, or sub-national level, must be central to delivery, particularly to help support the aggregation of small-scale projects to deliver at a strategic scale. In doing so, the Land Use Framework must help inform forthcoming devolution and strategic spatial planning reform to ensure these are aligned to integrate, and support, nature recovery with wider economic and environmental priorities.

[8] One proposal for how this could be done is the idea of nature investment/enterprise zones: nature-based-economies-rewilding-britain.pdf ; Natural Investment Zones (NIZs)

Regulatory adjustments

The relationship between regulation and ELM incentives remains unclear since the move away from the CAP and the recent loss of Cross Compliance. In particular it is clear that many of the options included in the SFI should be standardised across all farms. Regulation should set a fair but firm baseline for all farm businesses to encourage land use change and protect the natural environment. This regulatory relationship needs to be clearly restated so that incentives can be deployed to maximise outcomes for the environment and value for public money.

Similarly, regulation could be appropriate to steer land use change away from unsuitable locations for example, woodland planting on semi-natural or restorable permanent grassland.

Funding for nature-friendly farming and land management funding must be accompanied by robust regulatory frameworks to deliver effective implementation and accountability, to ensure long-term value for money. Strong, well-implemented regulations will need to ensure that funds are allocated efficiently and transparently, whilst setting clear benchmarks for environmental improvements and safeguarding against potential misuse or greenwashing.

Existing legislative tools need to be enforced, and enforcement mechanisms need sufficient resourcing to be effectively implemented. Statutory Nature Conservation Bodies and Local Planning Authorities are amongst the stakeholders that will need to have the capacity and expertise to achieve the goals of the LUF.

As already noted, to support increased circularity of nutrients it is necessary to tackle chemical and plastic pollution of fertiliser sources. This particularly applies to sewage sludge. Currently, most sewage sludge applied to agricultural land is not tested for harmful contaminants including microplastics, PFAS, pharmaceuticals and personal care products, and chemical flame retardants. Recent research shows plastics and chemicals can build up in soils with repeated application of sewage sludge, impacting soil health.[9] This limits the benefits of this circular nutrient source. To allow safe application, the Government must improve monitoring of contaminants in treated sewage sludge products and introduce tighter legislation for its agricultural use until contaminants are better controlled. Prevention of contamination at source should be achieved through tighter controls and restrictions on plastics and chemicals in the UK, including PFAS, bisphenols and flame retardants. Finally, the Government should consider investing in upgrading and future-proofing sewage management systems (e.g., utilising nutrient recovery technologies which remove harmful contaminants while producing a nutrient rich resource).

Supply Chain

Shifting land use towards sustainable, resilient, and nature-friendly farming will be out of reach for many farmers without a fair return from the market. For this transition to be viable, healthy and sustainable food must be properly valued throughout the supply chain—enabling farmers to adopt new, environmentally responsible business practices. Currently, many farmers are trapped in a system defined by low returns and unfair market conditions, making the shift to nature-friendly farming unaffordable.

[9] https://www.fidra.org.uk/download/james-hutton-institute-re-assessment-of-environmental-risks-from-sewage-sludge/

Organic farming illustrates this challenge well. Following the recent SFI announcement, farmers transitioning to organic—an intensive two-year process requiring full compliance with organic standards—can no longer rely on the bespoke support scheme, now folded into the broader SFI. During this transition period, they are not even allowed to market their products as organic. Meanwhile, demand for organic food in the UK is rising steadily—up over 7% last year—yet domestic production remains at just 3%. Despite being a fully assured model of nature-friendly farming, organic agriculture will continue to struggle for fair returns in the domestic market unless it is recognised as a key element of land use change and the wider agricultural transition.

Regulators such as the GCA and ASCA need to better work together to stop supply chain abuse, as a better-regulated supply chain is needed to help increase transparency and fair play, ensuring that farmers are fairly rewarded by the market and maintain competitiveness in a global market.

The government has reiterated its commitment to strengthening supply chain fairness as a means of improving farm profitability and has confirmed that sector-specific codes will be overseen by the Agricultural Supply Chain Adjudicator. However, existing protections for farmers are fragmented, creating loopholes that larger supply chain actors can exploit. A fair supply chain starts with a stronger, expanded Groceries Code Adjudicator- one with real power to deter unfair supermarket practices, which remain a major source of pressure on farmers.

Public procurement

Public procurement policies will have some influence on farmer decision-making. The Government recently reaffirmed a pledge that 50% of publicly procured food will come from local or higher environmental standards and that government catering contracts will be required to prioritise high-quality, high-welfare food, ensuring that at least half of public sector food spending is directed toward British producers or those meeting stronger environmental standards. This is greatly welcomed, however we urge the government to back these commitments with legally binding rules to ensure rapid take up. There is also good reason for the Government to go further here, by setting ambitious procurement targets for healthy, sustainable and nature-friendly plant-based foods.

Investments in data and innovation

Reliable data on land characteristics is essential to ensure that decisions in the LUF are based on up to date and broad-based understanding of land, its capabilities and constraints. From land use and soil assessments and improvements in the Agricultural Land Classification to supporting Local Environmental Records Centres and ensuring developers use the data to inform their decisions, there is much that could be done to underpin decision making in relation to the changes contemplated by the LUF.

Responsible innovation can play a role in new modes of sustainable and decarbonising food production. Investment should flow towards environmentally positive innovation including organic, agroecological and regenerative farming practices that allow for improved sustainability without sacrificing yields.

Advisory Services and Capacity Building

The complexity of the land use changes proposed, and the incentives required whether through ELM, private finance or regulation mean that initiatives that build capacity among farmers—through

advisory services, training programmes and knowledge-sharing networks— will be critical to ensuring that land use changes are adopted effectively and that innovative practices are disseminated across the sector.

Greater investment in a national advisory service will be required which is provided freely, or at low cost, to help farmers achieve good environmental outcomes from their land, and make the most environmentally effective use of the ELM scheme. Given the comment above about the effectiveness of ELM support, nuanced advisory support is needed that can help a farmer assess what is genuinely going to deliver environmental gains on their land (and be financially attractive).

Robust stakeholder engagement

Successful change such as that contemplated by the LUF will require ongoing dialogue among farmers, local communities, environmental organisations, and government bodies.

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?

The Government must recognise, support and integrate the broad suite of agricultural multifunctional land uses beyond those already well recognised and established within the sector, for example organic farming delivers benefits for nature and is backed by an assurance scheme. In this consultation just 4% of land is being targeted for creating silvoarable or silvopastural systems, whereas 9% is demarcated as a complete switch away from agricultural land. Existing high-yield farmland could integrate land use changes to be better maintained agroecologically/in harmony with nature, without trade-offs in food production.

Conditions should be applied to multifunctional land uses to work in harmony to raise animal welfare standards by providing trees as shade for farmed animals and to improve public access to nature in the rural landscape.

The abrupt disruption to SFIs will make delivering this goal much more difficult. Incentives need to be provided to accelerate delivery, coupled with well-resourced advisory services to provide training and support to make this a success. Confidence building for farmers and providing long-term certainty should be a focal point of this principle.

As noted, there must be a clear matrix to prevent 'easy' or particularly financially attractive options of multifunctional land change being selected within ELM over other options that would 'play to the strengths of the land' with greater outcomes that are needed to realise ELM's contribution to the UK Government's nature and climate targets. For example, the herbal ley SFI option (CSAM3) has been used to destroy rare and threatened priority habitat grasslands, as well as other high nature value grasslands, in order to create a temporary habitat that provides fewer environmental benefits when compared to the permanent, semi-natural grasslands. This is due to limited safeguards and monitoring for the option eligibility, and the disproportionately high financial reward for herbal leys compared to other options. A National Audit Office (NAO) review found that ¼ of the SFI budget was spent on herbal

leys.[10] This represents poor value for public money, as herbal leys are not appropriate and do not establish well in all farming contexts.

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

To maximise the effectiveness of spatially targeted incentives, the Government should adopt a holistic, data-driven, and ecologically sound approach to nature recovery, climate resilience, and sustainable land use across England.

Catchment-based planning for water quality

The Government should integrate a catchment-based approach when identifying suitable locations for spatially targeted incentives. This would ensure that land use decisions contribute to improving water quality, enhancing freshwater biodiversity, and supporting wider ecosystem health. For example, concentrating incentives—such as deintensification payments—within key catchments could maximise water quality improvements by significantly reducing nutrient and pollutant run-off across the entire catchment. At present, diffuse pollution mitigation schemes often fail to achieve their full potential because they are targeted too diffusely. Spatial incentives should be coordinated with Catchment-Based Approach (CaBA) partnerships, which offer a proven model for delivering integrated water and land management solutions. Strengthening the role of these partnerships, ensuring adequate funding, and linking local and national delivery mechanisms will be crucial for the success of spatially targeted incentives.

The health of a catchment—considering both freshwater biodiversity and terrestrial habitat integrity—should also help guide spatial planning decisions and mapping. In some cases, financial incentives may be the most effective tool for encouraging landowners to adopt nature-friendly practices, whereas in other cases, regulatory measures may be more appropriate to prevent harmful land use practices. A flexible approach, based on ecological need, is essential.

Multifunctionality, spatially targeted incentives and Agroecology

Before implementing spatial targeting, the Government must clarify its approach to multifunctionality and agroecology. A well-defined policy framework will help avoid unintended consequences, such as incentivising agricultural intensification in inappropriate areas. Spatially targeted incentives should be designed to promote clearly and robustly defined sustainable land management; that balances food production with nature recovery, flood mitigation, carbon sequestration, and public access to green space, and crucially ensure key environmental outcomes, as well as actions, are delivered - in line with achieving national environmental targets. Progress facilitated by the LUF against these targets must be a key component of associated long-term governance mechanisms, including cross-government monitoring and reporting.

A strategic, National Nature Recovery Network should directly underpin the LUF, to provide a structured approach to spatial incentives and meeting our environmental targets, including 30 by 30.[11]

[10] https://www.nao.org.uk/wp-content/uploads/2024/07/farming-and-countryside-programme-1.pdf
[11] nature-based-economies-rewilding-britain.pdf ; Strategic Nature Network

This network should guide investment in nature recovery, ensuring that incentives contribute to a cohesive and resilient ecological network. A strong connection to regional, area-based coordination will be central for successful delivery, particularly the aggregation and connection of nature recovery projects at scale. To achieve this, the nature recovery priorities of the Land Use Framework—and the objectives of LNRSs —must be reinforced, integrated into, and supported further by planned devolution, strategic spatial planning reforms, and the associated long-term governance and reporting structures for the Land Use Framework in relation to nature recovery targets.

To help drive regional delivery, the Government should consider how the Land Use Framework could support spatially prioritised public and private finance for ecological priorities, ensuring that land use changes deliver measurable environmental outcomes. By identifying large-scale, spatially-targeted investment opportunities in natural capital assets, the Land Use Framework could improve certainty for businesses, partnerships, landowners, and communities to collaborate on large-scale nature recovery projects that generate both ecological and financial returns.

In addition, protected sites and priority habitats should be key considerations in spatial targeting, particularly considering significant ongoing concerns regarding their condition and deterioration.[12] Establishing buffer zones around these areas can enhance their resilience and prevent edge effects from adjacent land uses. Natural England Nature Networks Evidence handbook recommends buffers of 50 to 100 metres for vulnerable habitats, and this should be embedded throughout the associated delivery mechanisms of the LUF.[13] Spatial incentives should likewise support habitat restoration and management practices that enhance ecological integrity within and beyond protected areas.

The Government should also consider the impact of spatial incentives on legally protected rights of access. Incentives that restrict access to publicly valued landscapes should be carefully managed to prevent loss of recreational and cultural benefits. Where access restrictions are necessary for conservation, clear justification and alternative provisions should be made. Furthermore, enhancing access to high-quality natural environments can have a multiplier effect on public support for conservation initiatives.

Furthermore, spatial targeting should not be limited to financial incentives but should also include regulatory measures to create a comprehensive policy framework. For example, in overloaded catchments where nutrient pollution is a significant concern, and spatial incentives should be linked to permitting decisions to ensure effective nutrient management. The spatial element of environmental permitting should be incorporated into land use planning to align incentives with the health and sustainability of catchments. To achieve this, we recommend that the Land Use Framework is integrated meaningfully into the planning system, or developed further into a national spatial plan, to help inform all aspects of spatial planning. Lessons can be drawn from the Scottish Land Use Framework and the Welsh approach to land use planning, both of which emphasise integrated, multi-benefit land management. Aligning England's framework with these approaches can facilitate cross-border collaboration and ensure that best practices are incorporated into policy development.

[12] planning_ahead_on_land_and_sea.pdf
[13] Nature Networks Evidence Handbook - NERR081

Integration with planning reform

The Land Use Framework must be closely integrated with the Government's ongoing planning reforms, including proposals for a Nature Restoration Fund (NRF), if pursued. If enacted, this fund should support and dovetail with the Land Use Framework by providing targeted financial resources to restore degraded habitats and improve ecological connectivity, through supporting strategic-scale nature recovery interventions. Alongside this, the Government should take steps to enhance protections for nature sites in the planning system, ensuring that land use changes do not undermine biodiversity and ecosystem services. The introduction of a Wildbelt designation would be a critical step in this regard, providing a new planning mechanism to protect and restore degraded land, safeguard nature recovery areas, and prevent further loss of biodiversity. Embedding a 'Wildbelt' into planning policy, alongside a well-funded Nature Restoration Fund, guided by effective, robust and thorough Environmental Delivery Plans (EDPs), would help ensure that spatial incentives contribute to a coherent, and legally protected, network of nature recovery sites. However, without significant amendments to the Planning and Infrastructure Bill, there is considerable concern about the potential of EPDs and the NRL to achieve their full potential.[14] Where EDPs are decided to be appropriate, with sufficiently robust evidence, they should seek to target areas identified in the relevant LNRS. Furthermore, the proposed Strategic Development Strategies, and strategic spatial planning reforms outlined in the Planning and Infrastructure Bill, must align with - and support - the environmental goals of the Land Use Framework.[15] Planning reform must help reinforce the mitigation hierarchy, and support the value of the Land Use Framework in helping to steer development away from the most sensitive and rare nature areas and sites, as well as promoting vital nature recovery opportunity areas.

Natural England's Green Infrastructure (GI) Standards should be integrated more comprehensively into any spatial targeting to ensure that land use changes do not result in a loss of public access to nature.[16] Any land use change affecting rights of way, open access rights or publicly accessible green spaces should be offset through strategic GI planning. Where public funds are used for nature recovery, considerations around public access should be central to decision-making, with a particular focus on District Natural Greenspace standards to maintain equitable access to nature.

Data and the need for a National Environmental Data Hub

Spatial incentives should prioritise ecological connectivity and restoration, ensuring that habitats for key species are linked and that protected areas are expanded or buffered appropriately. This aligns with the Government's biodiversity goals and the important principle of placing "*the right amount of the right type of nature in the right places*." Tools such as Defra's MAGIC Map, Local Nature Recovery Strategies priority areas, and data from Local Environmental Records Centres should support this targeted approach. Additionally, there is a clear need for a National Environmental Observatory (an environmental data centre) to provide consistent, high-quality data to guide decision-making.[17] Such an Observatory would act as a central hub for monitoring environmental change, consolidating data

[14] 20250408WCLJointPlanningLetter.pdf ; Planning_and_Infrastructure_Bill_Second_Reading_Briefing.pdf
[15] Planning and Infrastructure Bill - Parliamentary Bills - UK Parliament
[16] GI Standards
[17] planning_ahead_on_land_and_sea.pdf

from across land and sea, and providing accessible, up to date insights on the state of nature and land use. It would help ensure that policy and investment decisions are informed by robust, up-to-date evidence, supporting more effective and adaptive land-use planning.

Despite a few exceptions where local adaptation data has been developed effectively into spatial tools, such as the London Triple Jeopardy Mapping[18] and the Bristol keep cool mapping tool[19], the availability of spatial data on adaptation risk remains a challenge, beyond national flood risk datasets. The integration of Local LNRS into spatial targeting would be a positive starting point to ensure that investments in land use change support multiple environmental and societal objectives, particularly where these consider climate adaptation. Beyond this, the Government must explore further support for local responsible authorities to develop the relevant spatial tools and datasets for integrating climate adaptation and resilience into spatial planning and incentives or develop a suitable national tool and data repository of associated climate risks, expanding beyond current flood risk mapping to include a full, comprehensive array of risk factors.

Targeting incentives in areas prone to flooding can support nature-based solutions, such as wetland, pond and floodplain meadow restoration and native woodland creation to enhance flood resilience while delivering co-benefits for biodiversity, carbon sequestration, and water quality. The Land Use Framework, together with other policy systems including planning, must insist on the latest, up-to-date data being used to inform and guide decision making, accounting for future flood risk and the impacts of climate change, including through surface water flooding – as well as potential for ecological and wetland restoration. Datasets used for decision making must be dynamic and regularly updated to reflect evolving risk, rather than a static moment in time.[20]

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?

The policies, incentives and other changes referenced in the reply to Question 4 will all be required to enable land managers to achieve the outcomes sought by the LUF.

In particular, a mix of clear and integrated local and national planning, targeted financial incentives – both public and private, regulatory reform, enhanced and effective advisory services, and active stakeholder engagement will all be required to achieve the land use objectives.

At national level, there needs to be an effective process to determine suitable geographies for this kind of decision making. It is not clear whether this has yet been established but this needs to encapsulate multiple aspects of rural land use. National Character Areas (NCA) 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, such as for hedgerow restoration.

[18] Mortality Risk from High Temperatures in London (Triple Jeopardy Mapping) - London Datastore
[19] The Keep Bristol Cool mapping tool
[20] Bricks and Water: Flood and Coastal Erosion Risk Management Policy for a New Government | Policy Connect

Local level guidance will be particularly important in sensitive environments. For example, arable farming on lowland peatlands can be extremely damaging Similarly, supporting and targeting water-friendly farming practices, such as managing floodplain meadows, on steep erodible soils and within floodplains would go a long way to reducing chemical-laden run-off and floods whilst enhancing infiltration to replenish aquifers and helping re-build fertile soils that can hold and filter water. Groups of farmers with flood-plain land could be encouraged to take up appropriate SFI and Countryside Stewardship Higher Tier measures, Local Nature Recovery options, and long-term land use change through the Landscape Recovery scheme.

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.

Reducing the displacement of environmentally damaging food production overseas will require the effective implementation of the measures described in response to Question 4. In addition to maximising the efficient, and minimising the harmful environmental impacts of, use of best quality agricultural land in England, demand-side measures to reduce our consumption of the most damaging food products and food waste, and trade measures to ensure that high environmental standards for food are maintained will also be important.

Protection of best quality land (grades 1 to 3a) is critical to avoiding displacement effects. If such land is lost – which is currently occurring, due to weak NPPF policy – or production moves to lesser quality land where yields will be lower or less consistent or require more costly inputs to sustain high yields, this will increase the risk of displacement while also increasing risk and cost to producers. High value agricultural or nature land must not be sacrificed for development. Instead, efficient land use must be prioritised which ensures that suitable brownfield/previously developed land, which has been ecologically assessed as not being of importance for wildlife, is prioritised.

Investment in research and technologies that boost productivity on existing agricultural land—such as precision agriculture, improved crop varieties, and better nutrient management—so that higher yields can be achieved, along with innovation in circular food systems that reduce waste and recycle nutrients within the domestic economy, would both lessen the pressure on global production systems.

It should be noted that there is not just a risk of displacement abroad, but also at home. Safeguards need to be built in to prevent the inappropriate use of high-value agricultural land for means other than agroecological food production (for example bioenergy, animal feed, inadequate land sparing/sharing arrangements). Fertile, high-yield agricultural land should not be designated for animal feed, intensive maize or infrastructure, and should be prioritised for varied and sustainable crop production for consumption.

There are climate-related risks to high quality land that need to be considered. A quarter of all grade 1 and 2 land in England is at risk in the highest zone 3 flood areas, rising to nearly 60% of highest grade 1 land. Much of the low-lying peatland also needs to be rewetted to cut extremely high losses of carbon to the atmosphere. 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 that

is not lowland peat. This would require a comprehensive horticulture strategy to protect such land and underpin supply chain changes to enable the industry to restructure and fairly reward production. Vegetable production areas declined in the 2020s when it remains a food type we produce too little of - resulting in displacement impacts by importing high quantities of vegetables.

There is currently no regular monitoring of the loss of the highest grades of land. This should be a prerequisite to better protection to ensure policy is working effectively. This could be achieved via a requirement to submit simple cropping details from farmers signed up to ELM. Changes away from food production to other forms of 'farming' and production will also need to be recorded to monitor pressure on land use from energy crops such as biofuels, biomass and AD.

Reducing displacement will also require demand-side measures. Reducing food waste and encouraging dietary shifts - reducing meat consumption and increasing the amount of fruit, vegetable, and plant-based proteins in our diet as well as moving horticulture away from areas of lowland peat - would reduce land pressure while also being consistent with the recommendations of the Climate Change Committee in its 7th Carbon Budget.

Without demand-side shifts, the LUF could result in inappropriate intensification to maintain current diets. Intensive animal farming has grave consequences for animal welfare, is a major source of water pollution and greenhouse gas emissions and is heavily reliant on huge quantities of imported feed. Pigs and poultry consume the most soy in the UK, with 3 million tonnes imported annually, mostly from South America, where soy production drives deforestation.

The discourse on food security must be adapted to include nutritional security whereby adequate food meets the needs of the population through a healthy diet. This would see a reduction in the large volumes of unhealthy food sold which encourage obesity and other health issues, as well as often having increased environmental and climate impacts. It would also see an increase in the consumption of nutritious, sustainable and less land-intensive plant-based foods.

Trade policy must also be considered. To achieve its policy aims the Government must commit to core environmental and animal welfare standards in trade to protect British standards, support UK farmers and raise standards globally. Food produced to lower animal welfare standards than our own should not be imported into the UK. The Government should also establish robust sustainability standards and certification schemes for imported agricultural commodities. This ensures that foods entering the domestic market are produced under environmentally responsible conditions, reducing the chance that domestic land sparing simply shifts production pressures abroad.

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

A key consideration in increasing private investment in appropriate land use changes is the need for a Land Use Framework that not only collects data but actively informs and channels the relevant policy levers to ensure meaningful action. Without such a framework, data alone will be insufficient in driving the transformative changes needed for nature recovery. WC Link strongly supports the development of a national spatial plan, as championed by the Royal Town Planning Institute (RTPI). A national spatial plan would provide a comprehensive, strategic approach to land use that coordinates efforts across different sectors and regions, ensuring that land use decisions align with environmental, economic,

and social goals. This approach has already shown its potential in Wales, where the Government has implemented a national spatial strategy that integrates land use planning with climate and biodiversity goals.

Given the urgency of meeting the 2030 target for biodiversity recovery and addressing the nature decline targets set out in the Environment Act 2021, it is essential that the Land Use Framework plays a more substantial role in planning and policy. With limited time remaining before these critical deadlines, the framework must be designed to facilitate and streamline investment in nature-positive land use, ensuring policies are aligned across sectors to drive coherent and coordinated action.

A Climate Peatlands Fund would help unlock the full potential of peatland restoration for carbon sequestration while delivering significant ecological and societal benefits. Establishing such a fund is a cost-effective, nature-based solution to climate change that would pay long-term dividends for both the environment and global communities.

The Government must consider a range of critical factors to increase private investment in appropriate land use changes, particularly in nature-positive business models. One of the most fundamental elements is the need for long-term policy certainty and coordinated support. Investors, businesses, and market participants require clear and stable policy signals to foster long-term confidence in nature-related investments. The Government must ensure that policies related to biodiversity and other nature-based initiatives remain consistent, avoiding disruptive fluctuations or shifts in direction. Frequent policy changes can undermine investor trust, as seen in the sometimes-uncertain landscape surrounding Biodiversity Net Gain (BNG). Stability and clarity are essential for nurturing a thriving market for nature-positive investments.

Mechanisms such as pump-priming through initiatives like the Natural Environment Investment Readiness Fund (NEIRF) and Scotland's Facility for Investment Ready Nature in Scotland (FIRNS) are essential for building early-stage market infrastructure. These efforts must be scaled and sustained to bridge the current gap between landowners and sources of institutional capital, such as local government pension funds, which are often risk-averse and require credible, aggregated investment propositions.

Connected to the point of certainty, private investors in nature recovery markets also need government policy commitments to match the long timelines required to successfully deliver these goals. Nature recovery and developing associated markets are inherently long-term processes that demand significant lead-in times to mature and develop. Government policy must reflect this reality by committing to long-term support and ensuring that there is a predictable framework for development. Moreover, policies such as Environmental Delivery Plans (EDPs) and the Nature Restoration Levy should consider upfront seed funding to 'pump prime' the market. By providing initial financial support and investment, the Government can ensure that environmental compensation projects are ready and available from day one, facilitating quicker progress and securing early-stage investment.

There is growing appetite within sectors like construction, as evidenced by the Green Construction Board's Biodiversity Roadmap, for broader policies to underpin new markets for ecosystem services.[21] However, it is essential to note that existing policies, such as Biodiversity Net Gain, should be fully realised before developing new, broader requirements. A focus on enhancing Biodiversity Net Gain

[21] Biodiversity Roadmap

provides a robust foundation for nature-positive land use changes, an approach which could later be expanded to consider other ecosystem services.

Process simplicity is also crucial to consider. Complex, burdensome systems can hinder the pace of investment and implementation. The Government should ensure that policies promoting land use changes are clear, streamlined, and easy to navigate for both businesses and investors. Furthermore, there must be a commitment to developing effective, user-friendly digital infrastructure that supports the delivery of these policies. This includes systems that facilitate monitoring, reporting, and compliance in an efficient and accessible manner, ensuring that participants can engage with the policy system without unnecessary barriers. The Government should explore how the Land Use Framework could help to spatially target public and private investment in large-scale nature recovery projects.[22] By creating stable, predictable conditions for investment—alongside regulatory incentives—these could foster collaboration among businesses, landowners, and communities on large-scale nature recovery projects that yield both ecological and financial returns. The Land Use Framework could play a key role in directing these by aligning regulations and funding streams with land use priorities to encourage participation and investment. Integrating NIZs with other spatial initiatives—such as protected area expansion, sustainable agriculture, and green finance mechanisms—would further amplify their impact.

Public bodies can play a crucial role in de-risking investment in land use changes by acquiring land, particularly stranded assets, to repurpose these lands for biodiversity restoration or climate mitigation projects. These projects become viable for new investment, leading to new market opportunities with stability and alignment with long-term policy alignment, giving private investors confidence to participate. In some cases, land use change will not necessarily generate income and so there will be a role for Government to play.

However, the Government's recent consideration to exclude nature from the scope of the National Wealth Fund sends a concerning signal. This exclusion represents a missed opportunity to recognise the critical role that natural capital plays in underpinning the long-term health and resilience of the UK economy. By sidelining nature from major investment vehicles like the National Wealth Fund, the Government risks undercapitalising one of its most strategic assets. This decision undermines the growing momentum toward a nature-positive economy and signals a lack of coherence between economic planning and environmental ambition. To truly build an economy fit for the future, nature must be treated as core economic infrastructure and integrated into national investment strategies.

Finally, effective enforcement and resourcing are key to ensuring that policies are successfully implemented and that the desired outcomes are achieved. There are concerning instances where post-decision environmental enhancement has been poorly monitored, evaluated, and reported, leading to suboptimal outcomes. For example, reports on the implementation of Biodiversity Net Gain have highlighted deficiencies around compliance risk and excessive use of exemptions. [23] The Government must ensure that robust enforcement mechanisms are in place, alongside adequate resources to support these efforts. By addressing these challenges, the Government can create an environment where private investment in nature-positive land use changes can thrive and contribute meaningfully to long-term environmental goals.

[22] Report: Rewilding and the rural economy | Rewilding Britain
[23] WCL_BNG_updated_briefing_FINAL.pdf

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 criteria**
- **Resources: such as funding or guidance for those managing Protected Landscapes for nature**
- **Other (please specify)**

All of the above. Plus a significant expansion of the protected site network and rapid improvement in the quality of management to bring protected sites into favourable condition. The LUF should include the expansion of high levels of protection for the most important ecological assets as an explicit and quantified objective, linked to delivery of 30x30.

To support implementation, we recommend that all relevant public authorities should have a statutory duty to contribute to delivery of the Environment Act 2021 targets and Climate Change Act 2008 targets, guided by the LUF, including key organisations such as the Forestry Commission and Crown Estate which make critical land use (and sea use) decisions.

As the Government has recognised, large portions of National Parks and National Landscapes could, if strengthened with the framework, tools and resources, be improved for nature to meet the 30x30 criteria and contribute towards the target.

We welcome the Government's commitment to amending the statutory purposes for Protected Landscapes to better support nature's recovery and people's access to and engagement of these landscapes. 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'. 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. We also support the reform of Protected Landscape governance to place greater emphasis on nature recovery in National Park Authority decision-making, requiring a greater proportion of Board members to have relevant expertise, and for all members to have relevant training.

At the same time, the Government should prioritise the introduction of strong regulations (through the powers in the Levelling Up and Regeneration Act 2023) which place clear expectations on public bodies to help deliver the purposes of Protected Landscapes (in other words, clarify the implementation of the new duty on public bodies to seek to further the purposes of Protected Landscapes) and set out clear expectations for the contents of Protected Landscapes' Management Plans and the contributions of public bodies to preparing and implementing Management Plans. Management Plans should identify priority nature recovery areas where nature recovery will be accelerated to help contribute to the 30x30 target. Local planning authorities and statutory planning guidance should be updated to reflect that LPAs must take prepare and help deliver the PL Management Plan (this is especially important in National Landscapes, which are not the planning authority of the area). The regulations should also set out an accountability, reporting and scrutiny, and escalation mechanism which protected landscape bodies or others can take should a public body not be complying with the duty to seek to further the purposes or not be contributing to the formation and delivery of the Management Plan.

These new duties and regulations have the potential to lead to a significant step change in how nature recovery is delivered in Protected Landscapes – for example, for the freshwater environment, which is managed at several different scales and by many different actors, a Management Plan which specifies Water Framework Directive targets and actions set out in existing river basin and catchment management plans and then requires public bodies such as water companies to implement the actions in the Management Plans.

Additionally, statutory guidance should be updated to ensure preparation of LNRSs are fully aligned with Protected Landscape Management Plans. Statutory consultee status should be given to the Chilterns, Cotswolds, and Chichester Harbour National Landscapes which are independent legal entities (unlike National Landscapes hosted in local authorities) and would allow them to contribute more to restoring nature and conserving and enhancing natural beauty by representing those interests in the planning system.

As the Government has recognised, increased funding for National Park Authorities and in National Landscapes to ensure their purposes (current or amended) can be delivered effectively. The historic and current funding deficit is a significant barrier to Protected Landscapes contributing more to nature recovery. In those National Parks where public bodies own and manage significant land holdings, they should be required to contribute towards the cost of habitat restoration, recognising the "polluter pays" principle. For example, the Ministry of Defence should contribute towards peatland restoration where unexploded ordinance can add to the cost; the forestry bodies should be required to remove plantations to restore Ancient Woodland, peatland and open habitats and to tackle issues with self-set conifers seeding from nearby plantations; and water regulators must ensure that water companies reduce pollution and comply with high standards across all National Park waterways. In addition, reforms should support greater public and community ownership of land in National Parks and National Landscapes, including a requirement that any land over a certain size is first offered for community or public purchase when put up for sale, supported by a Treasury backed capital fund to support public sector purchase of land in Protected Landscapes.

Providing both advice and funding to landowners and land managers is crucial for enabling more land to contribute to nature's recovery and meet the 30x30 criteria. The extension of the Farming in Protected Landscapes (FiPL) scheme within Protected Landscapes was a positive step and should be continued at least until 2030. Certainty in funding and support is key, as this initiative offers one of the most effective ways to build strong relationships with land managers and bring them into the ELM scheme. Both within and beyond the borders of Protected Landscapes, a well-designed, sufficiently funded, and targeted ELM scheme is essential for achieving England's environmental goals, including the 30x30 commitment. Beyond protected landscapes, there are a number of actions that Government can take to accelerate delivery of 30x30 on land in England.

The Government has published its 30x30 on land criteria – the application of these criteria, through guidance and the assessment process, must be robust and aligned with international standards set out by the IUCN, in particular in relation to OECMs.

The LUF is an opportunity to identify associated national nature assets, including protected sites, irreplaceable habitats, priority habitats, as well as potential 30x30 areas (in line with a National Nature Recovery Network to ensure a resilient and connected ecological network across the country) and ensure that their protection and improvement is integrated across policy-making and decision-making

regimes that guide land use, including agriculture, permitting, planning and development. The Land Use Framework should help guide the forthcoming plan to delivery 30x30 on land in England, in particular where incentives and action for nature should be targeted and the extent of land use change needed to achieve 30x30.

To achieve 30x30, the Government must improve the condition of existing protected sites. An effective and well-implemented Land Use Framework could be helpful in ensuring land use choices do not degrade nearby protected sites, including the choice of location for development and infrastructure. Updated monitoring by Natural England and enforcement of existing regulations must occur here in order to improve the condition of the protected sites network and ensure sites are in favourable, or genuinely recovering, condition so that they can contribute to the 30x30 target.

The protected sites network should be significantly expanded. While protected sites were largely absent from this consultation, instead we think that the Land Use Framework could play a vital role in helping to map out existing and potential areas for protected sites to help create a better, bigger and more joined up protected sites network. There are already several reviews recommending the expansion of the protected sites network and suggesting areas for designation – the 2016 UK SPA Review should be urgently implemented and the Phase 2 report published.

Beyond protected sites and Protected Landscapes, the remainder of the 30% target will be made up by Other Effective Area-based Conservation Measures or OECMs. In line with the Land Use Framework, the Government should look to spatially target incentives for large-scale nature recovery projects towards the potentially most important areas for biodiversity. In particular, the Landscape Recovery tier of ELM should be well-funded and long-term to support large-scale nature recovery projects. 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.

Other tools that could help support 30x30 delivery at scale could be embedding biodiversity conservation as a secondary objective for land managed by water companies to enable more investment in, and monitoring of, measures that benefit biodiversity as well as achieving water quality/management objectives.

While the 30% target is important, with the potential to create a resilient, connected and thriving ecological network across the country, this must be supported by nature-friendly practices and living in harmony with nature across the other 70% of the country.

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

Expanding urban and peri-urban food growing can make cities more nature-friendly while promoting local food production, especially as the 2024 Food Security Report indicated the UK is very dependent on imports for fruits and vegetables.[24] Increasing the number of allotments and community gardens can enhance biodiversity, improve food security, and foster social cohesion by providing spaces for food education, skills training, and community engagement. Making land multi-functional—such as

[24] Defra. (2024). United Kingdom Food Security Report 2024.

integrating food production within urban green spaces—can help offset the loss of agricultural land and ensure that urban development supports both people and nature. However, while peri-urban agroecology and allotments have a crucial role, it is also essential that the Land Use Framework (LUF) maximises co-benefits in areas where food production is not feasible, such as road verges and other urban green spaces. These areas can still contribute to biodiversity, climate adaptation, and ecosystem resilience through initiatives such as pollinator-friendly planting and rewilding projects.

Furthermore, one of the most effective ways to support nature and food production in urban landscapes is through green infrastructure design and management. Nature-based solutions can help cities adapt to and mitigate climate change while enhancing biodiversity. For example, creating wildflower-rich grasslands (such as road verges or within parks) improves floodwater absorption, prevents soil erosion, and increases carbon sequestration. Additionally, deeper-rooting wild herbaceous perennials provide greener, more resilient turf that can flower throughout summer droughts, benefiting pollinators that support urban gardens and allotments. These measures not only contribute to environmental sustainability but also enhance the resilience of urban green spaces. To ensure long-term success, planning policies and funding mechanisms must support these initiatives. Natural England's Green Infrastructure Standards should be made mandatory in all new development and local authorities should also consider how to meet these standards in existing communities.

There is increasing awareness of the impact that light pollution can have on wildlife, by interrupting natural rhythms including migration, reproduction and feeding patterns. Man-made light is known to cause confusion to migrating birds, often with fatal outcomes, and many of us will have heard birds singing late into the night in trees lit by a streetlight. Light pollution can cause a great deal of distress to humans. This includes disrupted sleep, and in some cases has driven people to move house. Recent studies suggest that exposure to light at night can disrupt the body's production of melatonin, a brain hormone best known for its daily role in resetting the body's biological clock. Light pollution is increasing exponentially, with unequivocal evidence on the impacts of species, ecosystems and human health. Light pollution is not solely an urban issue and therefore consideration across land use must be accounted for to support nature and people. Adopting comprehensive effective national lighting strategies (such as the recently published Wales Good Practice Guidance document on planning Dark Skies,[25] backed by light pollution reduction targets, would ensure a harmonisation of reducing impacts on nature while delivering community friendly lighting.

Planning policies must prioritise the protection and creation of allotments, school grounds, and wildlife rich brownfield sites to prevent further loss of green space. A spatial approach to urban greening, such as the one taken in London's Green Link Walk, can enhance access to nature while providing green corridors that encourage physical activity and well-being. Transport for London's London Leisure Walking Plan is an example of how cities can create strategic green walking routes that restore nature and improve access to green spaces, particularly in areas where such access is currently limited. Given its proximity (by definition) to large cities, Green Belt could 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.

By integrating green infrastructure, urban food production, public access to nature, and strong policy support, cities can create landscapes that are both ecologically and socially beneficial. These

[25] Welsh Government. (2025). Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies in Wales.

approaches will help ensure that urban development enhances biodiversity, climate resilience, and community well-being in a cost-effective and scalable way.

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

Implementing the Land Use Framework will require a collaborative approach to balance economic development with environmental sustainability, ensuring that development and infrastructure spatial plans are designed to maximize co-benefits while effectively managing trade-offs.

This means not only supporting housebuilding and energy infrastructure, but also progress towards meeting statutory targets under the Environment Act 2021 and fulfilling commitments under the Global Biodiversity Framework, such as halving nutrient waste by 2030 and meeting our 30 x 30 commitment. Achieving this balance requires spatial planning that is closely integrated with existing government initiatives, including ELM schemes, the Environmental Improvement Plan targets, and the Farming Roadmap. Aligning these policies will ensure that spatial plans deliver multiple benefits, including nature recovery, climate resilience, and sustainable food production.

To help achieve this, the Government should embed a stronger role for Natural England's Green Infrastructure (GI) Accessible Greenspace Standards into spatial planning.[26] These standards provide a framework for ensuring equitable access to high-quality and wildlife-rich green spaces, benefiting both people and wildlife. Development and infrastructure projects should be designed to enhance and expand accessible greenspaces, improving public health and well-being while also contributing to biodiversity goals. Where land use changes impact access to greenspace, these standards should be used to mitigate or offset negative effects, ensuring that development does not come at the expense of public access to nature.

While the Land Use Framework is primarily focused on land, it must also account for the interconnections between terrestrial, freshwater, estuarine, and marine environments. The consultation document's reference to strategic spatial planning for water management is welcome, but it is essential that spatial plans also link to estuarine and marine systems to avoid unintended trade-offs and maximise potential co-benefits. Without such integration, land-based development could exacerbate issues such as coastal pollution, marine habitat degradation, and nutrient overloading in estuaries. For example, in Norfolk, WWF has supported analysis of freshwater and marine water quality, linking activity on land to downstream impacts. Similar holistic approaches should be embedded within the Land Use Framework to ensure that water systems are protected and enhanced as part of spatial decision-making.

Similarly, land use planning must take account of changes required in coastal areas, which cover both land and sea. The Land Use Framework should cover down to the mean low-water mark. This is necessary to account for changes in land use that will affect important coastal habitats, such as onshoring of offshore energy cables and creation of new ports, in order to account for trade-offs for

[26] GI Standards

nature and climate from construction of new coastal infrastructure. Changes in coastal land use needed to restore nature also need to be planned for as part of the Land Use Framework. For instance, saltmarsh and seagrass restoration will require changes to land, sea and intertidal zones, requiring join up across terrestrial and marine licensing and planning systems. Currently, the requirement for multiple licences and lack of join up across different agencies is making restoration difficult, limiting co-benefits from restoration projects to nature, climate adaptation and mitigation, and wellbeing of coastal communities.[27]

The role of Catchment-Based Approach (CaBA) partnerships and Catchment Partnerships must also be strengthened to ensure that governance mechanisms link local and national delivery effectively. These partnerships provide an exemplar model for coordinating land and water management at the catchment scale, ensuring that incentives, regulations, and funding mechanisms are aligned with environmental priorities. To fully capitalise on this approach, spatial planning must be directed, funded, and mandated in a way that supports integrated catchment management.

Additionally, stronger links to LNRSs are needed to ensure that regional-scale action is properly accounted for within the Land Use Framework. LNRSs should be a key tool for identifying priority areas for biodiversity enhancement and ensuring that spatial planning supports nature recovery across different landscapes and ecosystems. However, LNRSs must be given greater weight in the planning system to be effective, as recent guidance to merely 'consider' them is too weak to drive meaningful change. They represent a crucial delivery mechanism for achieving the Land Use Framework's nature goals, however, they are not sufficient on their own. Strengthening LNRSs requires both enhanced policy weight to ensure their recommendations translate into planning and land-use decisions, and allocating responsible authorities sufficient resourcing to support their effective implementation.

The Land Use Framework must align with and reinforce the Government's planning reforms and devolution agenda by ensuring that it shapes spatial planning and spatially targeted measures such as the Nature Restoration Fund (NRF). This alignment is crucial for directing investment and project priorities in a way that avoids a conflict between economic growth and environmental sustainability. By embedding the Land Use Framework into national and local decision-making processes, the Government can ensure that infrastructure development contributes to statutory environmental targets under the Environment Act. A well-integrated approach will help deliver nature restoration at scale, guiding land use changes that enhance biodiversity, improve climate resilience, and create greener, healthier communities while ensuring that economic development and infrastructure expansion align with long-term environmental goals. The Land Use Framework should likewise act as a guide for ensuring that infrastructure priorities support the achievement of statutory targets under the Environment Act. By embedding environmental considerations into regional and local decision-making processes, the Framework can help ensure that investments, development and infrastructure are strategically planned to deliver nature recovery and climate resilience alongside economic benefits.

To maximise the effectiveness of the Land Use Framework, the Government should build on it to introduce a National Spatial Framework or Plan for England, as recommended by the Royal Town

[27] Restoring our seascapes - Blue Marine Foundation

Planning Institute (RTPI).[28] Strategic spatial planning should go beyond the Land Use Framework and spatial approaches to strategic energy planning. Both documents, alongside other strategic approaches such as water catchment planning, should be brought together and drawn-upon to produce a National Spatial Plan. This National Spatial Framework or Plan would then provide a strategic, long-term vision for land use across the country, helping to align infrastructure, housing, and environmental priorities in a way that ensures sustainable development. The 'Future Wales: The National Plan 2040' offers a valuable example of how a national spatial strategy can successfully coordinate planning and investment across multiple sectors while embedding climate and nature recovery goals.[29] Such a framework would enhance the Land Use Framework by providing a structured, overarching approach to spatial planning, ensuring that land use decisions support nature recovery, climate adaptation, and sustainable growth. It would also create a more coherent policy environment, improving coordination between local, regional, and national decision-making processes. By establishing a National Spatial Framework, the Government could ensure that development aligns with the UK's environmental commitments, while facilitating investment and infrastructure in a way that supports both economic resilience and ecological restoration.

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

The Land Use Framework (LUF) has a crucial role to play in guiding both local and national land use decisions and ensuring that transport planning aligns with wider environmental and spatial planning goals. By embedding a strategic approach to land use, the LUF can help maximize the ecological and social benefits of transport corridors, and enable a more integrated and sustainable approach to infrastructure development.

To ensure that national parks and other natural spaces are accessible to all, the Government must prioritise substantial investment in public transport, particularly bus services and train infrastructure. This is crucial for meeting access-to-nature targets and ensuring that people from all walks of life, including those in rural and less well-served areas, can access these vital spaces. Without adequate and reliable public transport options, particularly in rural areas, individuals are limited in their ability to visit nature reserves, national parks, and other natural habitats. Rural bus services are especially critical for connecting communities to these areas, enabling both work-related travel and opportunities for engagement with nature. By investing in a comprehensive public transport network, the Government can help break down barriers to nature access, supporting long-term sustainability and ensuring that our natural spaces are accessible to all sectors of society.

One of the most underutilised land resources in transport planning is the extensive 'soft estate' of road verges, trainlines, and towpaths, which, with appropriate management, can serve as vital linear green infrastructure. The LUF can help unlock the full potential of the vast 'soft estate' by acting as a lynchpin for cross-departmental policy updates that promote multifunctionality in transport land. If given

[28] RTPI | A National Spatial Framework for England
[29] Future Wales: The National Plan 2040 | GOV.WALES

sufficient weight in decision-making and spatial planning, the LUF can provide the necessary framework to ensure that these linear spaces are not merely treated as by-products of infrastructure but as integral components of a resilient ecological network. By promoting a strategic approach to land use and infrastructure planning, and if it is given sufficient weight and bearing in decision making, the LUF can support the creation of these species-rich 'linear mosaic' corridors, increase landscape permeability for wildlife and help restore connectivity across urban and intensively cultivated environments. Many road verges, in particular, contain remnant grassland biodiversity that has been lost elsewhere due to agricultural intensification and development, and the LUF can help promote their protection and appropriate management at both national and local levels.

To proactively support the multifunctionality of transport land, the Land Use Framework must be accompanied by updates to key policies and guidance documents that shape transport infrastructure design and management. One such critical update is the long-awaited revision of the *Manual for Streets*, which provides design guidance for residential and urban streets. Updating this document to integrate principles of biodiversity, green infrastructure, and climate resilience would ensure that new and existing streets are designed to support both ecological and social benefits. Additionally, updates to highways guidance and regulations, including the *Design Manual for Roads and Bridges (DMRB)*, should explicitly encourage greening measures such as tree planting, sustainable drainage systems (SuDS), and habitat corridors within transport corridors. The *Highways Act 1980* also requires revision to ensure it facilitates, rather than impedes, the integration of green infrastructure within highway land, particularly in relation to tree planting and maintenance responsibilities. Agencies such as, Great British Highways, have an important role in contributing to a wildlife-rich network of infrastructure through their internal biodiversity and climate strategies. For example, Highways England adopted a new policy of Low Nutrient Grasslands to create wildlife-rich grasslands, reduce maintenance costs, and reduce carbon emissions.[30] Aligning these policy frameworks with the ambitions of the LUF, and using cross-departmental implementation of the LUF is a catalyst for this change, would create a more amenable regulatory environment for local authorities and transport planners to maximize the environmental and societal benefits of transport land, while ensuring consistency across national and local decision-making.

By implementing targeted management practices, local authorities can enhance biodiversity within these spaces while also meeting their statutory Biodiversity Duties, and the LUF can provide the necessary strategic direction to ensure consistency and effectiveness across different regions. For example, the careful management of wildflower-rich road verges and grassland green spaces can improve ecological health, store carbon, and reduce carbon emissions, all while cutting maintenance costs. One effective approach is adopting reduced-frequency mowing regimes that incorporate zonation and periodicity, ensuring public access needs are balanced with biodiversity benefits. Collecting cuttings rather than leaving them to decompose helps manage soil fertility over time, reducing excessive vegetation growth. This not only leads to lower maintenance costs but also significantly cuts carbon emissions by minimizing the need for frequent grass cutting. Dorset County Council provides a compelling case study, where the implementation of a cut-and-collect approach on

[30] https://www.gov.uk/government/news/breaking-new-ground-with-eco-drive-to-bring-the-countrys-verges-to-life

road verges led to a 50% reduction in grass cutting frequency within three years and a 45% cost saving over six years.

The Land Use Framework should actively support the role of LNRSs in ensuring that transport corridors contribute to wider nature recovery goals. LNRSs are a crucial means for realising, aligning with, and delivering the spatial goals of the LUF - by identifying local biodiversity priorities and potentially coordinating efforts across different land use sectors, including transport infrastructure. By strengthening, giving sufficient spatial weighting to both LNRSs and the LUF, local and national authorities could ensure that transport corridors are planned and managed in ways that enhance ecological connectivity, restore habitats, and contribute to nature-based solutions for climate resilience. The targeted management of road verges and transport-adjacent green spaces (such as Roadside Nature Reserves) should be explicitly recognized within the LUF as a means of delivering LNRS objectives, ensuring that transport planning aligns with the broader ambition of creating a National Nature Recovery Network. However, while LNRSs can be used to promote better management practices and guide nature recovery efforts, they should not be as the sole delivery mechanism for nature recovery. To be fully effective, LNRSs need greater weighting in planning decisions, ensuring they have a stronger legal and policy influence. Their effectiveness as a tool for delivery also depends on stronger integration into policies and financial incentives beyond just their role in the Biodiversity Net Gain (BNG) metric's strategic multiplier. A more significant bearing on wider land use policies and funding mechanisms would ensure that LNRSs can genuinely drive nature recovery at scale and support the multifunctionality of transport corridors as part of a broader, spatially coherent land use strategy.

Beyond biodiversity benefits, the biomass collected from these management practices can contribute to the bio-circular economy. Grass cuttings can be converted into green energy through anaerobic digestion, producing biomethane as a renewable energy source, as well as biochar or hydrochar, which can improve soil health and act as a carbon store. This approach offers a sustainable solution for managing green infrastructure while reducing the financial burden on local authorities. By investing in technologies that transform vegetation waste into valuable bio-based commodities such as bio-fertiliser, councils can further align transport planning with environmental and economic sustainability goals. The LUF should provide guidance on how these approaches can be scaled up and integrated into regional transport strategies, ensuring that land use decisions optimize both environmental and economic benefits.

In addition to promoting the ecological potential of road verges and other transport corridors, it is essential the LUF help address the fragmentation of habitats caused by transport infrastructure. Infrastructure projects often create barriers to wildlife movement, reducing connectivity and weakening ecosystem resilience. Addressing this issue requires better integration between transport and spatial planning, ensuring that new developments include mitigation measures such as green bridges and tunnels. The LUF should actively support the strategic connectivity elements of initiatives like National Highways' Sustainability Strategy, particularly its proposed investment in key green bridges.[31] These structures play a crucial role in reconnecting fragmented habitats, facilitating species

[31] Environmental Sustainability Strategy - National Highways

movement, and strengthening ecological networks. Moreover, they should be strategically linked to LNRSs and broader nature enhancement priorities, helping to establish a cohesive strategic National Nature Recovery Network with associated packages of support for nature-based businesses aligned to locally determined land/ marine use plans that align with the Government's wider land use and nature recovery ambitions.[32]

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

In order to support closer coordination across plans and strategies for different sectors and outcomes at local and regional scales, a genuinely holistic approach is required.

This should be driven by Government demonstrating how different plans and strategies are compatible with one another, and crucially, how they interconnect and work together to meet key objectives across biodiversity recovery, net zero, and nutritional security. For example, how they drive action to achieve legally binding targets within the Environment Act 2021, and the Climate Change Act 2008. Government should also explore more spatially sensitive objectives and how these can be applied across different plans in order to provide a consistent framework and tool for defining outcomes – for example, 'Favourable Conservation Status' for species and habitats which is currently being trialled at different spatial scales.

Identifying clear, consistent objectives across plans will drive a holistic, coordinated approach that will help to realise – and deliver – co-benefits, whilst also facilitating more effective understanding and management of trade-offs. To help achieve this, Government should introduce a clear nature and climate duty on regulators and planning authorities.

Further to identifying consistent objectives, Government should build capacity for effective regional-scale governance, to support greater coordination across plans and strategies at the local and regional levels. Effective models of regional and local implementation and governance, such as the Catchment Based Approach (CaBA) and associated Catchment Partnerships, and LNRSs, should be further funded, strengthened and integrated to increase their capacity and impact.

As stated, the CaBA approach is an exemplar model for coordination land and water management across a number of stakeholders and sectors, and for aligning incentives, regulations and funding mechanisms. In 2023-2024, Catchment Partnerships engaged over 21,000 new primary stakeholders including members of the public, farmers, local businesses and community groups. For every £1 invested by Government, CaBA partnerships have raised £3 from non-governmental funding sources, further to £38.5 million of wider Government funding invested via collaborative catchment approaches.[33] Greater resourcing and clearer mandate from Government would help unlock further benefits and impact.

[32] nature-based-economies-rewilding-britain.pdf
[33] https://catchmentbasedapproach.org/wp-content/uploads/2025/03/CaBA-Benefits-Report-2023-2024_V0.1.2.pdf?utm_source=CaBA+and+Rivers+Trust+Mailing+List&utm_campaign=9bd8525c07-EMAIL_CAMPAIGN_2019_05_29_02_38_COPY_01&utm_medium=email&utm_term=0_5785643b8e-9bd8525c07-272657939&mc_cid=9bd8525c07&mc_eid=56197e2df8

Spatial plans such as LNRSs and Catchment Management Plans should be shaped by community engagement, with local priorities co-defined with local communities and stakeholders. This will help to secure local buy-in, and ensure that under-represented groups are not excluded. Government should sufficiently resource responsible authorities to enable such community engagement to take place.

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]

Including additional major landowners and land managers in the Adaptation Reporting Power process would support adaptation knowledge sharing. By expanding the range of participants in this process, a broader spectrum of insights, challenges, and solutions related to climate adaptation could be shared across sectors. Landowners and managers are often the ones implementing on-the-ground changes and therefore could provide valuable, practical knowledge that can help refine adaptation strategies. However, this should be done with clear incentives, such as funding and support for participation, as simply requiring landowners to take part might not be effective without tangible benefits to encourage their involvement.

The National Adaptation Plan (NAP) and adaptation advice should be effectively implemented through integrated, funded services, such as a farm advisory service. While the ELM scheme is a step in the right direction, it may not be sufficient on its own to tackle all the adaptation needs, particularly in areas like precision breeding for adaptation, or flood and drought infrastructure, which are not fully addressed by ELMS. A funded, targeted advisory service that includes expertise in these areas could help landowners make more informed, practical decisions.

Regarding the impacts of climate change, while some effects, such as temperature changes or extreme weather events, are relatively easy to predict, responses by species are more difficult to anticipate. These require more nuanced analysis beyond just shifting climate models, and should involve biological monitoring and long-term research into ecological responses. Ensuring that we have the right suite of measures to support adaptation—beyond just what is available in the current frameworks—is crucial. The idea that bigger is better is important, but collaboration and buy-in from all stakeholders (including landowners, farmers, and other land managers) are needed for meaningful change. This is particularly relevant to 'harder to reach' farmers and landowners, as they are not only a valued part of this collaboration but will require assistance in adapting to the changing future. However, this collaboration should come with the necessary funding, so that participants can implement measures effectively and efficiently. Requiring participation without providing the resources could undermine the success of any such process.

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)

All of the above.

Supporting the right actions in the right places, such as prioritising incentives for sustainable land uses, is crucial to help landowners, land managers, and communities understand and prepare for the impacts of climate change. Government-led initiatives that guide and incentivise resilient land uses are key to fostering long-term sustainability and adaptability, ensuring that land management systems remain productive and sustainable in the future.

One of the most promising approaches to consider at scale is agroecology. Agroecology, which integrates ecological principles into farming practices, is a key driver of resilient farming systems that can adapt to the volatility of weather patterns and the broader impacts of climate change. Agroecology focuses on creating biodiversity-rich ecosystems, improving soil health, and enhancing water management—all of which are critical for improving resilience to extreme weather events, such as floods and droughts. The use of agroforestry, cover cropping, integrated pest management, and low-input management of species-rich habitats can help landowners make their operations more climate-proof and improve long-term sustainability.

To effectively implement agroecology, farmer-led research and peer-to-peer learning should be prioritised. Farmers and land managers often possess deep, practical knowledge of the land they manage. By encouraging peer-to-peer networks and supporting farmer-led innovation, the government can facilitate the sharing of best practices, innovative solutions, and locally tailored approaches that help with adaptation to climate change. This can lead to practical, actionable strategies that are grounded in real-world experiences.

Another important area to focus on is adaptive planting. Adaptive planting involves selecting and planting tree species that are more likely to thrive in the changing climate. This includes choosing species that are climate-resilient and ensuring a diverse mix of species to guard against the risks of pests, diseases, and extreme weather events. For instance, planting a variety of tree species rather than relying on a monoculture helps ensure long-term resilience. Adaptive planting strategies should also be extended to community gardens where local biodiversity can be supported, and communities can play a role in building climate resilience.

While adaptive planting is a valuable strategy for enhancing resilience in commercial plantations, a different approach is often more appropriate for native woodlands managed primarily for conservation. In these settings, improving the overall condition of the woodland—such as enhancing

structure, encouraging natural regeneration, and increasing biodiversity—may offer the most effective means of ensuring resilience to climate change. Well-functioning native woodlands can already possess the adaptive capacity needed, especially when allowed to develop naturally and without the pressures of monoculture or intensive management.

Where native woodland creation is the goal, and a suitable seed source is nearby, natural colonisation is often the best option. This allows locally adapted species to establish in appropriate microhabitats and promotes genetic diversity through natural processes. It also avoids compromising the ecological identity or "nativeness" of the woodland.

WWF's Wholescapes approach offers valuable insights into creating holistic strategies for land management.[34] This framework emphasises the need for landscape-level planning that integrates biodiversity conservation with climate adaptation efforts. Supporting farmers and land managers in adopting a landscape-scale approach can help ensure that our land management systems can thrive despite the challenges posed by a changing climate and other environmental stressors.

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 websitesubp**
- **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)**

Enhancing the accessibility and utility of the Government's spatial data is essential for informing decision-making and effective land use planning. Accessible ecological data will enable the government, local authorities and other bodies to better track the cumulative contributions of activity to the Environmental improvement Plan (EIP) targets across England, and to spatially target appropriate land use interventions.

Greater strategic investment in remote sensing data is especially vital. The Joint Nature Conservation Committee (JNCC) has exemplified this approach by developing analysis-ready data (ARD) products from Sentinel-1 and Sentinel-2 satellites, enhancing accessibility for public sector applications.[35] Establishing a centralised web portal, to disseminate such data, would help facilitate species modelling and provide insights into habitat changes, thereby supporting biodiversity conservation efforts. The potential for developing and applying modelling approaches, especially with improvements in statistical analyses and use of AI, is significant, and would provide significant benefit across a number of different policy areas. To maximize the utility of these datasets, it is crucial to adopt an open-access approach or foster partnerships among private entities, government bodies, and civil society

[34] Wholescape: Seeing the bigger picture | WWF
[35] https://jncc.gov.uk/news/jncc-broadens-access-to-satellite-data-development-of-analysis-ready-data/

organizations. Currently, the high costs associated with accessing quality data, such as Ordnance Survey maps, soil data, and often data from Local Environment Record Centres, pose significant barriers to non-licensed organizations. Collaborative licensing agreements and shared resources would democratize data access, enabling a broader spectrum of stakeholders to engage in environmental planning and conservation initiatives.

There are also Natural England's 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. This is a useful spatial dataset that is publicly available.[36]

Integrating data from diverse sectors into unified portals or maps would further enhance decision-making processes. The establishment of a National Environmental Observatory, as advocated for by Link, could serve this purpose by consolidating existing government-held data and resources. Such an observatory should also reference external data sources, including the National Biodiversity Network Trust's species data platform (NBN Atlas), non-governmental organizations, and Local Environmental Record Centres.[37] This comprehensive data repository would provide a holistic view of environmental metrics, facilitating more informed and cohesive policy development. These approaches should be developed alongside supporting national recording programmes to maximise their value and to engender the support needed to make them sustainable.

Ensuring consistency across spatial and land datasets is vital for seamless data integration. Standardising geospatial indicators, such as Unique Property Reference Numbers (UPRNs) and INSPIRE IDs, would allow for more straightforward mapping and analysis. Additionally, enhancing existing government tools, apps, and websites with user-friendly interfaces and comprehensive support materials would empower users to effectively leverage these resources. The JNCC's provision of Web Map Services (WMS) layers, which permit users to combine and display map layers from various sources in multiple GIS software environments, exemplifies how technical innovation can broaden access to complex datasets.[38]

In addition, there are currently significant shortcomings in the current Agricultural Land Classification (ALC) system used to assess land quality for arable production and cumulatively, the stock of land available to produce consistently good to high levels of production. The recent report by CPRE et al reveals that the ALC relies on outdated climate data, which leads to substantial overestimations of land productivity.[39] This misclassification poses a threat to the LUF's ability to accurately identify and protect its most valuable farmland. To best fulfil its function, the LUF needs accurate, up-to-date spatial data to ensure that associated land use planning effectively balances agricultural productivity, environmental sustainability, and other competing land use demands.

The Government should update the ALC system to incorporate current climatic data and improve the accessibility of spatial data to inform land use decisions. An immediate update to the ALC system is essential to reflect contemporary climatic conditions, as continued reliance on outdated data misrepresents land quality and risks permitting development on high-grade farmland that should be

[36] https://nationalcharacterareas.co.uk/
[37] https://www.wcl.org.uk/docs/putting_England_on_track_meeting_2030_species_targets.pdf
[38] https://jncc.gov.uk/our-work/web-map-services-wms/
[39] Grounded-Insight-ALC-report-for-CPRE-Feb-2025.pdf

protected. Bringing this data up to date would also provide planning authorities with a stronger evidence base, enabling more informed decision-making. Equally important is ensuring that detailed ALC mapping is freely available and consistent across all regions, so planners, farmers, and policymakers can access high-resolution spatial data without restrictions. The current fragmented approach, where decision-makers often rely on incomplete or inaccessible datasets, hampers effective land use planning. Integrating ALC data within the Government's digital planning tools, including additional interactive mapping platforms for the Land Use Framework, which would further strengthen decision-making by allowing real-time, data-driven assessments of land suitability. The Land Use Framework should not be a determinative map, but national spatial modelling and mapping will be essential to identify place constrained national and regional natural assets, such as rivers or peat, and existing infrastructure, such as roads, to create a shared evidence base, understanding and to help inform integrated and holistic decision-making. It should be spatial to identify important areas and potentially important areas at a national level that are needed to meet the Government's environmental objectives and other land use objectives. This will also need to reflect local and regional data and objectives, from a variety of local and regional plans.

Embedding this information within digital systems would help support more transparent and coordinated land use planning, helping to reduce conflicts between agricultural, housing, and infrastructure developments. A thorough understanding of the baseline condition, extent and species abundance of habitats and species is needed, before an assessment of land use change can be made. Accurate ecological data and advice underpins good and timely decision-making in planning at local and national levels. A long-term commitment to regularly reviewing and refining the ALC methodology is also essential to ensure it remains responsive to changes in climate, soil conditions, and evolving land use priorities.

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

The effective capture, management, and use of spatial data are essential for informing land use decisions across various sectors. However, there are significant gaps in how this data is currently structured and applied, particularly in tracking environmental outcomes and supporting nature recovery efforts. For example, ELM actions are intended to contribute towards the UK Government's statutory climate and nature recovery targets, yet there is no clear monitoring and evaluation framework in place to assess which outcomes are being successfully delivered. Without robust tracking mechanisms, it is impossible to determine the effectiveness of these schemes or make necessary adjustments to ensure they achieve their intended goals.

A major challenge in environmental and land use data is the lack of readily available, well-structured spatial information. The Campaign for National Parks' (CNP) Health Check highlighted how difficult it was to obtain the necessary data to assess the state of nature in National Parks.[40] This underscores the failure of organisations such as Natural England and the Environment Agency to prioritise the data collection and analysis needed to drive meaningful nature recovery. A critical improvement would be to ensure that environmental, land use, and biodiversity data are consistently reported at the scale of protected landscape boundaries and incorporated into the Land Use Framework (LUF). Doing so would enable a clearer understanding of environmental trends and inform more effective decision-making in these sensitive and ecologically significant areas. A further example of where more robust mapping and data collection is needed is Natural England's Priority Habitat Inventory. Whilst a vital tool that underpins decision-making around nature recovery, it is known to have gaps and mis-recording of priority habitats, therefore undermining its great potential as a tool to inform planning and land use change decisions.

Remote sensing data presents a significant opportunity to enhance spatial data quality, but a clear strategy is required to maximise its potential. Regular aerial surveys using a combination of technologies, including LIDAR, should be implemented to map habitat extent and condition. By ensuring consistent and frequent data collection, it would be possible to monitor changes over time and provide an evidence base for habitat restoration and conservation efforts. Additionally, integrating geological, physical, and environmental data with habitat mapping would provide a more comprehensive understanding of ecosystem dynamics.

Another area that needs improvement is the collaboration between Government agencies and national species monitoring schemes. To ensure these collaborations are sustainable and yield the maximum value from the data collected, there must be a clear understanding of the business models and constraints of different organisations involved. Many valuable datasets are held by non-governmental bodies, and a more strategic approach is needed to integrate these sources into national land use planning effectively. The WWF's WholeScapes approach offers useful lessons in this regard, demonstrating how cross-sector collaboration and integrated data use can enhance landscape-scale decision-making.[41] WholeScapes emphasise the importance of holistic, multi-functional land management that considers economic, environmental, and social factors in tandem. It highlights the need for long-term investment in data collection, ensuring that local monitoring efforts—such as citizen science initiatives—are effectively linked with national datasets. Furthermore, it is important to encourage the production of associated, processed data outputs, for example species distribution models. Raw data, *per se*, often is less informative than data that has been analysed via relevant expert bodies. Additionally, the approach underscores the importance of accessibility, promoting open data platforms that allow land managers, policymakers, and conservation groups to make informed decisions based on shared evidence. By incorporating these lessons, Government agencies could develop a more joined-up approach to data management, ensuring that land use policies are underpinned by high-quality, comprehensive information.

Further integration of existing mapping tools, such as Ordnance Survey data, and Natural England's Green Infrastructure (GI) Maps, could enhance land use planning and decision-making. Greater awareness and application of these tools would help drive decisions towards multifunctional land use,

[40] National Parks Health Check Report - Campaign for National Parks
[41] Wholescape: Seeing the bigger picture | WWF

benefiting both people and nature. This should include an emphasis on the natural capital value of cultural services alongside provisioning and regulation services. In addition, there is a need to incorporate the Natural England's GI standards and mapping, alongside ensuring that Suitable Alternative Natural Greenspaces (SANGs) are factored into land use strategies.[42]

To provide a reliable insight into the threat status of our domestic wildlife, there should be a very investment of resources and funding into the development of the England-level Red List (RL). Several significant gaps currently exist in the taxonomic coverage of the RL, most notably, in the representation of fungi, lichens and bryophytes. In order for the extinction risk of all species groups to be accounted for in a meaningful way, and subsequently addressed, the England-level RL must include samples from across these taxa.

Another valuable and underutilised source of data comes from the farm level, where farmers and land managers already collect crucial information about the land they manage. For instance, soil testing data, including organic carbon levels, nutrients, erosion risk, and slope, is often gathered as part of soil management plans, particularly under schemes like the Sustainable Farming Incentive (SFI). This farm-level data presents a significant opportunity to enhance land management practices and contribute to national data sets for monitoring environmental health. In principle, this data could be aggregated at local to higher levels and anonymised to protect business-sensitive information. Such data could be applied more widely to inform decision-making at the landscape or regional level, supporting objectives like soil health improvement and carbon sequestration. However, a key challenge is ensuring compatibility between different data collection tools and ensuring standardised data collection methods, so the data remains reliable. When applied correctly, this data can not only help farmers manage their land more sustainably but also contribute to assessing their carbon stocks, with a longer-term view to potentially earning income from carbon credits or supporting their efforts to achieve carbon neutrality in farming practices.

By addressing these data challenges and improving coordination between government agencies, conservation bodies, and other stakeholders, it would be possible to develop a more coherent and effective approach to land use decision-making. A stronger, more transparent spatial data framework is essential for achieving climate and nature recovery targets while ensuring that land use decisions balance economic, environmental, and societal needs.

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

The quality, availability, and accessibility of Agricultural Land Classification (ALC) data must be significantly improved to support effective land use decisions. Currently, the ALC system in England is based on outdated climate data, with much of the grading relying on assessments conducted between 1961 and 1980. This creates a serious risk of misclassifying land productivity, leading to poor planning decisions and a failure to adequately protect high-value agricultural land. A recent report by CPRE et al highlights the shortcomings of the current system, showing that reliance on obsolete climate information results in significant overestimations of land capability.[43] This misclassification undermines

[42] Green Infrastructure Home
[43] Grounded-Insight-ALC-report-for-CPRE-Feb-2025.pdf

the Land Use Framework (LUF) by preventing it from accurately identifying and safeguarding the country's most productive farmland. To function effectively, the LUF requires access to precise, up-to-date spatial data that balances agricultural productivity, environmental sustainability, and competing land use pressures.

A key improvement would be for the Government to update the ALC system to incorporate current climatic data and ensure the accessibility of spatial data for all land use decision-makers. An immediate revision is essential to reflect contemporary environmental conditions, as continued reliance on outdated assessments risks allowing development on farmland that should be preserved for food production and sustainable agricultural practices. Updating this data would provide planning authorities with a much stronger evidence base, allowing them to make informed choices that align with both national food security and environmental objectives. In addition, ensuring that ALC mapping is freely available and consistent across all regions would empower planners, farmers, and policymakers with the high-resolution spatial data they need to make well-informed decisions. At present, the fragmented and often inaccessible nature of ALC datasets creates major obstacles for effective land use planning, with decision-makers frequently forced to rely on incomplete information.

Another key consideration is the role of integrated livestock-crop systems in assessing land productivity and sustainability. A report by the European Commission's Sustainable Finance Platform highlights the link between well-managed livestock-crop systems—where the number of animals does not exceed the land's capacity to use their manure—and improved soil health.[44] This type of land use contributes to biodiversity and ecosystem services, the sustainable use and protection of water, and pollution prevention. It also underscores the benefits of on-farm feed production, nutrient cycling, and nitrogen fixation through livestock and leguminous crops in rotations. Recognising these dynamics within ALC data would allow for a more holistic evaluation of land capability that goes beyond simplistic productivity metrics to include wider food system benefits and long-term sustainability considerations.

In addition to updating the ALC grading system, the Government should ensure that spatial data is fully integrated into digital planning tools. Expanding interactive mapping platforms within the Land Use Framework would enable real-time, data-driven assessments of land suitability, improving transparency and coordination in planning decisions. A system where ALC data is embedded within digital platforms would also help prevent conflicts between agricultural, housing, and infrastructure development by allowing all stakeholders to access the same up-to-date information. Finally, a long-term commitment to regularly reviewing and refining ALC methodology is essential to ensure it remains responsive to changes in climate, soil condition, and evolving land use priorities. Without these improvements, the ALC will continue to misrepresent land quality, weakening the Government's ability to balance food production, environmental protection, and sustainable land use.

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?

The Government should prioritise open access or licensing for key spatial datasets to improve land use planning. A critical piece of spatial data which can bring benefit to a wide range of stakeholders

[44] PLATFORM ON SUSTAINABLE FINANCE: TECHNICAL WORKING GROUP

reflecting on a variety of needs - for researchers, the farming sector, industry, policy makers and eNGOs - is the National Soils Inventory database. Despite being created by the British government in the 1970s using taxpayer money, the National Soils Inventory has been held under licence and behind a paywall by Cranfield University. The lack of public access to this vital dataset represents a considerable obstacle to the strategic decision-making and universal learning needed to protect and improve our soils, at field, national and catchment level.

We understand that negotiations are in progress between the Government and the rights holder regarding the potential release of the data, and to that end we urge both parties to reach an agreement that guarantees the open use of the data, entirely free of restriction and cost. Releasing this data has the potential to unlock a new era of universal, strategic soils appreciation and joined-up policy making. In turn, a move to open access would also enable the Government to take a significant step towards the realisation of its environmental ambitions, and - by maximising soil's critical role in food production - support its economic growth ambitions.

Such a step would also represent a clear statement of intent by the Government – as a marker for its ambitions from the Land Use Framework, and as a commitment to taxpayer fairness, value for money and the facilitation of innovation.

As discussed in answer to Question 19, ALC data is particularly outdated, relying on climate assessments from 1961–1980, leading to misclassification of land productivity and poor planning decisions.[45] Updating ALC with current climate data, and making it widely accessible in high resolution would enhance decision-making and transparency.

Better spatial data and improved access are essential for environmental monitoring and nature recovery. There is currently no clear framework to track the effectiveness of ELM schemes, and limited access to structured data hinders the assessment of environmental trends, particularly in protected landscapes. Expanding remote sensing technologies (e.g., LIDAR, high-resolution land cover mapping) would improve habitat monitoring. Open and consolidated access to Ordnance Survey data, integrating Natural England's Green Infrastructure maps, and definitive rights of way maps would also help support more integrated land use planning.

Beyond these points, there is also a pressing need to develop a greater understanding of habitat extent and quality through data sources such as soils data, Ordnance Survey ,LIDAR, land cover mapping, and remote sensing. While open access or open licensing should be the goal, the Government should also explore partnership models that allow effective use of Government-licensed datasets. Establishing common data sources to support shared objectives across sectors would enable better monitoring of biodiversity outcomes. To achieve this, initial efforts should focus on defining key datasets and metrics, with input from NGOs and Local Environmental Record Centres (LERCs). Furthermore, improving access to spatial data on agri-environment actions—and their change over time—at a high enough resolution would help track how public funding influences land use and land use change (LU/LUC). Furthermore, creating data outputs, such as maps of priority areas for conservation, can provide a mechanism that reduces sensitivities around making some types of data (e.g. species records) more widely available.

[45] Grounded-Insight-ALC-report-for-CPRE-Feb-2025.pdf

Other land use datasets and sources of information should also support more informed land use decisions at a local and national scale. For example, the geographic spread of options with the ELM scheme and other publicly-funded conservation initiatives; habitat restoration and creation within Protected Areas; forestry and tree planting programmes, using Forestry Commission's low-risk sensitivity mapping; the extent of permanent habitats being converted to temporary habitats; and nutrient inputs onto land parcels.

Establishing a shared data platform, accessible to all stakeholders, as recommended by Link, would significantly enhance our understanding of habitat extent and quality.[46] By systematically collecting and analysing environmental data, such an observatory would provide a centralised, high-quality evidence base to inform land use planning and policy decisions. This was a recommendation both of the 2023 OEP environmental assessment report and of the 2023 National Infrastructure Commission's report on achieving net zero.[47] This would promote the development of common data sources, facilitating the monitoring of biodiversity outcomes across various sectors and policy measures. Environmental information collected for all development projects should be added to this national data platform, including information from projects that do not receive planning consent. Existing government-held data and resources, including Defra's Magic Map (containing spatial data on habitats, species and landscapes), could provide a solid foundation for this data platform to grow.[48] It would also signpost to other useful data sources, such as the species data platform run by the National Biodiversity Network Trust (NBN Atlas), data from Local Environmental Record Centres and information collected by Local Nature Partnerships and Local Nature Recovery Strategies. Engaging with non-governmental organisations and Local Environmental Record Centres, would ensure that diverse perspectives are considered, leading to more comprehensive and effective environmental strategies. LERCs are valuable information services that help Local Authorities comply with their statutory duties[49] thereby minimising legal and economic risks. To address the challenge of insecure funding streams, centralised funding for LERCs should be re-established, having been removed by Natural England in 2016.

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)**

Local authorities are already significantly overstretched with limited capacity and resources available for the planning departments and enforcement teams to monitor for environmental damage caused by developments. The Office for Environmental Protection (OEP) has identified capacity and skills gaps as key reasons for the current system of environmental assessment not functioning effectively[50].

[46] planning_ahead_on_land_and_sea.pdf
[47] National Infrastructure Assessment - NIC
[48] https://magic.defra.gov.uk/MagicMap.aspx
[49] National Infrastructure Assessment - NIC
[50] https://www.theoep.org.uk/report/environmental-assessments-are-not-effective-they-should-be-duepractical-barriers

Botany and mycology skills gaps are even more acute. Recent research found developments generally have poor compliance with ecological mitigations.[51] Local authority budgets have faced cuts, with a 43% decrease in net expenditure in planning from 2009-2021.[52] This has led enforcement teams to only focus on the most major breaches of planning conditions. A workforce with skills in GIS and ecological 'modelling' will be useful to understand landscapes at scale, and map from an ecological perspective. Ecology-related planning conditions are often forced to be treated as a low priority for most authorities, who do not have capacity or staff with ecological skills to regulate developer behaviour in practice. Similarly, local authorities lack skills and capacity to accurately protect and manage public rights of way and access. Without addressing these capacity gaps, the planning system will not be able to support multifunctional, well-placed land use at the scale and level desired.

One of the significant risks in the land use transition is the shortage of critical skills within key environmental bodies, particularly Natural England, which will face increasing pressures due to ongoing planning reforms and cuts to budgets and staffing. Natural England plays a pivotal role in ensuring that environmental regulations are adhered to and that nature recovery targets are met, but recent job cuts and budget reductions have undermined its capacity. Natural England has suffered from significant budget cuts over recent years, with most recently its annual budget being reduced by 4%, putting 200 jobs at risk.[53]

These reductions have resulted in a shortage of expert staff, particularly in ecological areas like botany, mycology, and aquatic ecology, which are essential for effective land management and planning. In a recent report Natural England said it was asked to make decisions on 20,503 planning applications in 2023-24 and missed the deadlines on 1,692 (8 per cent). Of the missed deadlines, 1,155 (68.3 per cent) were due to "agency resourcing" issues.[54] The union Prospect has likewise previously warned that Natural England losing experienced staff due to poor pay, is affecting its ability to meet its regulatory duties.[55] The Government's focus on expanding housing and infrastructure, along with Natural England's potential role in developing Environmental Delivery Plans (EDPs) through the Planning and Infrastructure Bill, will increase both pressure and expertise demands on the organisation. Given its current capacity constraints, this may prove challenging to manage. To address this, the Government must prioritise the recruitment and retention of specialists, alongside ensuring that adequate training is provided to the remaining workforce to cope with the expanding scope of responsibilities. Without investing in this capacity, the Government's ambition for nature recovery and sustainable land use will struggle to be realised, particularly in the face of ongoing development pressures.

Farming is not a gap in itself, but if this were to be reframed as agroecological/nature-friendly farming there is a need to increase ecological skills, not least aquatic ecology and hydromorphology knowledge, and confidence in farmers to meet the transition at the scale and pace needed. The Farming Resilience

[51] https://wildjustice.org.uk/wp-content/uploads/2024/12/Wild-Justice-Lost-Nature-Report.pdf
[52] https://www.rtpi.org.uk/media/13292/planning-enforcement-resourcing-report-final.pdf
[53] https://www.msn.com/en-gb/money/other/hundreds-of-jobs-protecting-rivers-and-green-belt-to-be-axed/ar-AA1BkgzB#:~:text=At%20least%20200%20jobs%20are%20to%20be,part%20of%20Rachel%20Reeves's%20upcoming%20Spending%20Review.
[54] https://inews.co.uk/news/environment/hundreds-jobs-protecting-rivers-green-belt-axed-3596432?ico=most_popular#:~:text=It%20is%20currently%20unclear%20whether,to%20meet%20its%20regulatory%20duties.
[55] https://prospect.org.uk/news/planning-deadlines-missed-by-natural-england-because-of-staffing-problems-soars-by-a-third

Fund is ended without any sustainable farming advisory service set up to carry on. Government must support farmers to build the skills and capacity they need to undertake land use change.

Farmers are already significant woodland owners, with more than one-third of woodland in England on farmland. Advice for farmers to manage trees and spot signs of pests and disease, should be readily available. Future ecological skills training for farmers should include tree management, which is just as important as skills in tree planting. The skills and arboriculture fund in the Nature for Climate Fund has also been discontinued this year, despite an exceeding demand. A 2023 survey of trees and woodland skills in London organisations (75% respondents were local authorities) revealed the scale of skills gap, despite 87% of organisations expecting their workload to increase in the next five years.[56]

Across all sectors, their risks being a lack of skills and capacity to integrate the necessary, and sometimes very specific, conservation measures needed for conserving species. Practical advice and guidance can be (and is being) developed, and in particular through 'recovery programme' projects, but a key issue is making sure that there is an awareness of the species that need to be conserved in any landscape. Raising awareness of such priorities, for example developing the lists generated through the LNRS mechanism and promoting through, for example Natural England local teams, land management advisors and NGOs could be a first step.

There are skills missing to properly integrate land use decisions and freshwater conservation management to protect riparian and aquatic habitats and species. These animals and plants have declined dramatically as their habitats have been damaged or lost to accommodate farm expansion and intensification and development. River corridor and lake margin management are also important and pond creation and restoration are skills for minimising erosion and flooding. To address these gaps, funding must be made available not just for 'shovel-ready' water restoration projects, but also to support schemes at the design stage and to help projects with training staff to ensure sufficient skills and capacity are in place. Government must also increase funding and resources to boost capacity of the CaBA partnerships model, which as discussed is an effective model for regional and local governance and coordination across land management objectives and stakeholders.

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

Improving the sharing of best practice in innovative land use management in England requires an integrated approach. This includes:

- Establishing/strengthening Peer-to-Peer Learning Networks (such as the Innovative Farmers Network, farm clusters, farmer-network NGOs) and community-led initiatives where land managers are incentivised to engage in regular exchange sessions, workshops, and field demonstrations.

[56] https://ltoa.org.uk/doclink/london-trees-and-woodland-skills-survey-report-2023/eyJ0eXAiOiJKV1QiLCJhbGciOiJIUzI1NiJ9.eyJzdWIiOiJsb25kb24tdHJlZXMtYW5kLXdvb2RsYW5kLXNraWxscy1zdXJ2ZXktcmVwb3J0LTIwMjMiLCJpYXQiOjE2OTQ1OTYxNjUsImV4cCI6MTY5NDY4MjU2NX0.nHFLOlEWYnpGAGAcyu-SedyJKCpo0PIN2IFjk7jPI0k 58% had experienced a low volume of applicants, with 53% reporting applicants lacked sufficient knowledge, and 40% lacked practical skills.

- Investing in independent advice and training, for example, increasing the Future Farming Resilience Fund to train farmers transitioning to agroecology, ensuring whole-farm planning supports both economic resilience and environmental gains.
- Pilot Projects and Demonstration Sites showcasing how innovative, multifunctional land use practices can deliver environmental, social, and economic benefits.
- Developing digital platforms that aggregate successful case studies, methodologies, and technical guidance on innovative land management practices. Contributors to such platforms could include farmers, NGOs, academic institutions, government agencies, and industry.

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

Yes, we recommend the Land Use Framework for England be updated every 3 years. The evidence base underpinning the Land Use Framework should be kept up to date. The Government should report on progress against Land Use Framework targets every 3 years and update the analysis in light of the data and progress against targets and any updated environmental targets (for example, any updates to the Environmental Improvement Plan).

The updated Land Use Framework should then feed in to other policies, plans and decisions. While it will be impossible to have all plans on the same timeframe, in their next iteration plans should take account of the updated Land Use Framework.

QUESTION 24: To what extent do you agree or disagree with the proposed areas above? Please include comments or suggestions with your answer.

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.

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

We strongly agree that the proposed areas of action are not only useful but essential for the successful implementation of the Land Use Framework. For this process to have real impact, the Government must speak with one voice on land use and clearly articulate how its various policy objectives interact spatially. Implementing the principles outlined in this consultation is a good starting point, but broader reforms to how land-related policies are coordinated across departments will also be necessary.

A strategic oversight function should be established at the heart of Government, ideally hosted within the Cabinet Office, to ensure long-term vision, coherence, and accountability across departments. This would help align priorities and ensure the right information and policy levers are in place to support sustainable land use over time.

The proposed cross-government spatial analysis function will be critical to provide robust, evidence-based advice on competing demands for land. However, it must be underpinned by strong biodiversity evidence and ecological expertise, alongside economic, social, and climate-related data.

We also strongly support the proposal to embed land use considerations in strategic Government decisions. Land use is central to a wide range of policy areas—from food production and housing to climate adaptation and biodiversity—and it is vital that these interconnections are recognised and addressed early in decision-making processes.

Finally, we welcome the commitment to open policy-making. These processes should be developed in close collaboration with research institutions, as well as civil society stakeholders such as conservation organisations, land managers, and local communities. Many of these groups bring crucial place-based knowledge and technical expertise, which will strengthen the legitimacy, feasibility, and effectiveness of land use policy.

Together, these steps will help ensure that the Land Use Framework is not only well-informed, but also widely supported and successfully implemented.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 88 organisations to use their joint voice for the protection of the natural world and animals.

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The following organisations have inputted into this briefing and support our recommendations.

Friends of the Earth
CPRE – The Countryside Charity
Institute of Fisheries Management

Soil Association
WWF- UK
Humane World for Animals UK
The English Organic Forum
Organic Farmers & Growers CIC
People's Trust for Endangered Species
WWT
Froglife
Buglife
River Action
Plantlife
ZSL
Bat Conservation Trust
The Rivers Trust
The Ramblers
FOUR PAWS UK
People's Trust for Endangered Species (PTES)
The Floodplain Meadow Partnership
Amphibian and Reptile Conservation
The British Mountaineering Council (BMC)
Compassion in World Farming
Beaver Trust
River Restoration Centre
The Wildlife Trusts