

## **Land Use consultation**

**ADEPT comments, April 2025**

### **About ADEPT**

The Association of Directors of Environment, Economy, Planning and Transport (ADEPT) represents directors of place who are responsible for providing day-to-day services including local highways, recycling, waste and planning as well as the strategic long-term planning and delivery of sustainable places. ADEPT members are at the very heart of delivering clean sustainable growth, tackling climate change at a local level. We manage the projects that are fundamental to creating more resilient, inclusive and safe communities, economies and infrastructure.

ADEPT is a membership based professional organisation with:

- 100+ county, unitary and combined authority members
- 5 sub-national transport bodies
- 22 Corporate Partner members across England.

### **General comments on the land use consultation proposals**

We were pleased to see the long-awaited consultation document published at the end of January and support its overall ambition to align with the government's wider strategic planning agenda for growth, infrastructure and housing. However, there is a lack of clarity about what the Land Use Framework will be, how it will fit into decision-making, and whether it is simply a process for improved data capture and use or a delivery mechanism too.

If the Framework is to provide the mechanism for a fair and effective land use transition, it is unclear who will do this and how, and what accountability there will be. There is a general statement in favour of greater local and regional democratic accountability over land use decision making (p28), and a recognition that land use considerations should be embedded across strategic government decisions (p36), but that is all. It is essential that the Land Use Framework itself should address these issues in more detail.

The document recognises that most land is in private ownership and that ownership is highly concentrated (p20) but the issue of property rights is discussed mainly in relation to financial incentives to encourage appropriate land use change. Given the scale of the challenges we now face in terms of food and energy security and the nature and climate emergencies, a more comprehensive review of land ownership and property rights is required.

The focus of the document is on agricultural land and the extent and type of land use changes needed to meet the Climate Change Act and Environment Act targets. This misses the potential for increasing the multifunctional benefits of non-agricultural and urban land, including the urban fringe. There is no mention of land required for minerals extraction and the future restoration and uses of that land.

There is also a simplistic assumption that taking some land out of agricultural use will not reduce the overall level of food production because productivity will increase on the land that remains in agricultural use (p16). This is debatable, especially when there is evidence in recent years of food

production having been badly affected by the impacts of climate change – floods, drought, storms and heatwaves. It also does not account for changes in agricultural practice needed to protect the environment and restore nature – we need a fundamental shift towards sustainable and regenerative farming that will affect the amount of land needed for food production.

We agree that land use changes should be designed to help deliver legally binding nature and climate targets (p14). It should be a key objective of the Land Use Framework to deliver the changes required to meet the pathway set out in the recent Seventh Carbon Budget (CB7) in terms of reducing agricultural emissions and storing carbon by means of woodland creation and peatland restoration/extension. In terms of climate adaptation, the Third National Adaptation Programme (NAP3) called for a key consideration of the Land Use Framework to be that land use should be suitable for future climate conditions and should contribute to adaptation, such as by restoring soil health to reduce the impact of flooding and drought.

The document contains a few scattered references to public health, including the principle of multifunctional land (p18) and the importance of access to green space/outdoors for people's health and wellbeing (p25). We would like to see greater emphasis on this aspect of land use and consideration given to how health outcomes can be improved by improving access to land and nature including river corridors and other waterways.

Disappointingly, the document says little about the role of combined and local authorities beyond brief mentions of Strategic Development Strategies (p27), transport planning and Local Nature Recovery Strategies (p28). Local authorities play an essential part in the delivery of national policy objectives. To do this effectively requires national policies to be aligned with one another and for integrated working within and between government departments. Local authorities face a huge policy agenda in relation to land use – housing development, energy infrastructure, nature recovery, planning reform, etc. – but often experience a lack of integration between these policies. For example, it was somewhat surprising the Sustainable Farming Incentive was closed unexpectedly last month when this land use consultation was underway and when many local authorities are engaging with farmers and land managers as they develop Local Nature Recovery Strategies.

This impact of this policy disconnect is exacerbated by the extreme financial pressures on local authorities, the lack of capacity to deal with new initiatives, and the continued short-term nature of some funding streams. Pressures on local capacity will be intensified in the many areas that will now go through local government reorganisation and the creation of strategic (combined) authorities under the devolution programme.

The planning system is in the middle of a major reform programme. The successful delivery of the Land Use Framework will require certainty and integration within the reformed planning system so that there is a 'golden thread' from the National Planning Policy Framework (NPPF), through National Development Management Policies, Ministerial Statements and other guidance, and Local Plans. There is to be a new statutory requirement to produce Spatial Development Strategies (SDSs). The Land Use Framework consultation does not give sufficient weight to the importance of a properly functioning planning system in determining land use changes: as illustrated by the fact there is a single, very specific mention of the NPPF (p25), and a single mention of SDSs (p27) as setting the overarching spatial strategy for local plans. The Land Use Framework must be more articulate in the way it defines its interrelationship with the NPPF and SDSs.

The Planning and Infrastructure Bill now at the House of Commons Committee stage contains provisions for a more strategic approach to nature recovery where development is required to

discharge an environmental obligation. The Nature Restoration Fund (NRF) made up of a new type of developer contribution, and the Environmental Delivery Plans (EDPs) to be brought forward by Natural England, will affect land use in the relevant areas. Again, the Land Use Framework will need to define its interrelationship with the NRF and EDPs.

In the context of the Environmental Improvement Plan, we have been calling for government support for the principle of Local Environmental Improvement Plans (LEIPs) to join up a range of strategies, plans and resources at a local level. We were pleased to note that the [English Devolution White Paper](#) made a brief reference to giving combined authorities a clear mandate to take a leadership role in wider environmental delivery and responding to the impacts of climate change (p77). We were also pleased to note that the recent [Corry Review](#) of Defra's regulatory landscape (recommendations 8 and 9) aligned with our position on LEIPs, and we would hope to see this reflected in the Land Use Framework.

### Responses to 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?

Don't know.

The document is not very clear on this. Figure 4 suggests that 9% of agricultural land will need to change use, does this mean it must become multifunctional (categories 2, 3.1 and 3.2)? A further 9% may need to be taken out of agricultural use altogether. It is difficult for the non-specialist to have an informed view about whether these figures are sufficient, though they appear to be on the low side. The document states that the amounts of land required to meet ambitious housebuilding targets (including new towns and urban expansions) and infrastructure development (presumably including transport, energy, water and flood alleviation) are "relatively small" (p16). This assumption will need to be reviewed continually as national, regional and local plans are developed across all these sectors.

In relation to the land use implications of climate and environment the Land Use Framework will need to reflect the balanced pathway to net zero recommendations of the Climate Change Committee in CB7. This calls for a transformation in land use including a significant increase in the proportion of land under woodland (from 13% to 19%), equally ambitious targets for peatland restoration, and a reduction in livestock. The CCC estimates that 19% of current agricultural land will be needed for this. For nature restoration, relevant local authorities (i.e. Responsible Authorities) are now preparing the first round of Local Nature Recovery Strategies (LNRs). These are spatial plans that will identify key opportunities for nature recovery across all land use types and will collectively give a national picture that will need to be reflected in the Framework.

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

Agree to an extent but some important principles are missing:

- Sustainability should be added explicitly, currently the text refers to 'decisions fit for the future'. Sustainability includes reducing emissions, increasing carbon storage, promoting resilience, and promoting nature recovery.
- Greater democratic accountability and transparency of decision-making.
- Fairness and inclusion to recognise that decisions about land use change should benefit all communities including those who are disadvantaged in terms of access to nature and healthy food.

Co-design to encourage collaboration and leadership at local and regional levels is necessary. There also needs to be integration across government at national level to ensure that all departments and agencies are taking a joined-up approach to policy and delivery, not just focussing on their own priorities. The “strengths of the land” must go beyond food production and energy generation to include the protection of important nature and heritage sites such as ancient woodlands and threatened species.

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)

All of the above.

Government departments must include arm’s length bodies, other public agencies, and private companies delivering public goods including Network Rail, National Highways, National Energy Systems Operator, Natural England, Environment Agency and water companies. Many of these are large and strategic landowners as well as infrastructure and service providers/regulators.

Landowners and land managers is too broad a definition and would benefit from further categorisation. This will help identify the largest types of landowner which might offer the most likely strategic opportunities for achieving land use change and showing leadership to others. Examples would include the Crown Estate (and associated private estates such as the Duchy of Cornwall), the Church of England and Oxbridge colleges.

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?

Policies and incentives including funding streams need to be clear, co-ordinated, and consistent over the long term. While large corporate landowners and land managers will have their own in-house expertise, smaller farmers / land managers need access to independent expertise and advice. Government strategies and plans need to be aligned (see question 14 below). The Framework should be integrated with the strategic and local planning system and aligned with LNRSs and Biodiversity Net Gain. Changes in policy and complex funding streams make it more difficult for landowners and land managers to engage with land use changes and lead to a lack of trust.

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?

Good information and advice (as question 4 above). Research and development, working with local authorities and others via a [Live Labs approach](#) to develop and share best practice.

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

Identify landowners and land managers with the greatest potential impact, and those that can influence others via leadership, peer support and networking. Consider relevant strategies and plans including Spatial Development Strategies, LNRS, LEIP.

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?

Good information and advice, research and development, peer support and networking (as questions 5 and 6 above).

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?

- Monitoring land use change or production on agricultural land.
- Accounting for displaced food production impacts in project appraisals.
- Protecting the best agricultural land from permanent land use changes.

Agricultural policy should aim primarily to ensure that the best land is kept in food production and that incentives are in place to make this food production more sustainable and regenerative. Planning policies need to be sufficiently robust to protect the best agricultural land and food security in those parts of the country where there are the greatest pressures to use land for energy generation and transmission. Trade policy should ensure that domestic producers are not undercut by imports from countries with lower safety, environmental and employment standards.

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

We strongly support the principle of increasing private investment into nature-based solutions. Potential investors want clarity and certainty, to see clear a stable policy and fiscal environment and good information on which to base decisions. Projects must be managed and monitored effectively to ensure that desired outcomes are delivered.

QUESTION 10: What changes are needed to accelerate 30by30 delivery, including by enabling Protected Landscapes to contribute more?

- 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)

We support legislation to strengthen the purpose and mandate of Protected Landscapes but we are concerned that the funding of the relevant authorities has been reduced considerably and this will impact on their ability to help deliver the 30by30 target. The document states that a delivery strategy will be published later this year; that will require appropriate funding to ensure delivery.

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

Multifunctional land is the key principle here. The document contains a few scattered references to public health, including in the principle of multifunctional land (p18) and the importance of access to green space/outdoors for people's health and wellbeing (p25). We would like to see greater emphasis on this aspect of land use through planning policies to encourage more planting and gardening. Local communities should be supported to identify opportunities for this and to manage

local projects. Multifunctional land in urban areas can bring a range of environmental, social and health co-benefits.

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

The role of SDSs will be key here. They should provide an opportunity to integrate urban expansion and energy, water and transport infrastructure. We understand that MHCLG has convened a Strategic Planning Group that is due to report in May, and we await its recommendations with interest.

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

Active and sustainable travel should be central to all local plans and development management decisions, such as the 15 minute neighbourhood concept that aims to reduce car dependency, promote healthy and sustainable living, and improve wellbeing and quality of life for city dwellers. Transport infrastructure decisions should align with land use goals. Transport routes provide opportunities for enhancing green infrastructure and biodiversity, and many local authorities are exploring how best to maximise these through the management of highways verges and public rights of way.

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

For local authorities this is perhaps the key question in the consultation. As mentioned in the general comments in the introduction to our response, we are disappointed that the document says little about the role of combined and local authorities beyond brief mentions of Strategic Development Strategies (p27), transport planning and Local Nature Recovery Strategies (p28). Local authorities play an essential part in the delivery of national policy objectives. To do this effectively requires national policies to be aligned with one another and for there to be integrated working within and between government departments. Local authorities face a huge policy agenda in relation to land use – housing development, energy infrastructure, nature recovery, planning reform, etc. – but often experience a lack of integration between these.

QUESTION 15: Would including additional major landowners and land managers in the Adaptation Reporting Power process support adaptation knowledge sharing?

Yes. See question 3 above. Landowners and land managers is obviously a very broad heading. It would be helpful to distinguish some categories within this to help identify the largest types of landowner (public and private sector) which might offer the most likely strategic opportunities for achieving land use change and showing leadership to others.

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)

All of the above. As the Climate Change Committee has noted, central government needs to take a much stronger role in leading and coordinating adaptation planning and delivery. We need a much more ambitious National Adaptation Programme with clear leadership across government; and strategic engagement between national and local government to ensure delivery.

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

- Updating existing Government tools, apps, portals or websites
- Changes to support use through private sector tools, apps or websites
- Bringing data from different sectors together into common portals or maps
- Increasing consistency across spatial and land datasets
- More explanation or support for using existing tools, apps or websites
- Greater use of geospatial indicators such as Unique Property Reference Numbers (UPRNs) and INSPIRE IDs to allow data to be more easily displayed on a map

There is a vast amount of spatial data held in many different places and formats, but where it is held by commercial organisations it may not be easily available to public bodies. For relevant local authorities, the experience of developing LNRs has shown that assembling and interpreting this data is a slow and complicated exercise. In simple terms, spatial data needs to be accurate, up to date, accessible, practical and comparable. We support all efforts to improve existing tools and portals to help achieve this but it also requires a more comprehensive approach to develop a national land use data platform that can be used by government departments and agencies, local authorities, and others.

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?

- 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

See question 17 above. We hope that the Framework will include proposals for a new or reformed public authority to take this forward.

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

See question 17 above. Spatial data including the quality of agricultural land needs to be accurate and up to date.

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

We would support all measures to make spatial data as free and easily accessible as possible for public authorities and community groups, it is appropriate to charge for commercial users.

QUESTION 21: What gaps in land management capacity or skills do you anticipate as part of the land use transition?

We have no comments on capacity and skills within the farming advice sector beyond the general comment above about the need to support changes in agricultural practice to protect the environment and restore nature – we need a fundamental shift towards sustainable and regenerative farming.

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

See questions 17 and 18 above. We hope that the Framework will include proposals for a new or reformed public authority to take forward the development of a land use data platform and that sharing best practice should be part of the remit of such authority.

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

Yes, another frequency or approach. This should be aligned with other related planning frequencies and cycles including SDSs, Local Plans, LNRs, etc.

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

Agree with the points about strategic oversight, cross-government coordination, decision making and open policy making. See also comments about question 2 above about the additional principles required the need for integration across government at national level to ensure that all departments and agencies are taking a joined-up approach to policy and delivery, not just focussing on their own priorities.