

North Yorkshire Council

Environment Executive Members

24 April 2025

Defra Land Use Framework Consultation - North Yorkshire Council Consultation Response

Report of the Assistant Director – Environment and Transport

1.0 PURPOSE OF BRIEFING

- 1.1 To provide a summary and overview of our proposed consultation response in relation to the Defra Land Use Framework Consultation.

2.0 BACKGROUND

- 2.1 The Government has launched a national conversation about land use, to minimise trade-offs and optimise the use of land in England.
- 2.2 It is the Government's intention that a new Land Use Framework will interact with other foundational strategies being developed by DEFRA; the Environmental Improvement Plan, a 25-year roadmap for farming, and a food strategy. And across government, the Land Use Framework will support sustainable growth, interacting with the Strategic Spatial Energy Plan to accelerate moves to clean power by 2030, and driving the ambition to build 1.5 million new homes.
- 2.3 This is seen as critical to the delivery of this Government's missions, and the long-term prosperity of the country. The Government is undertaking this consultation before publishing a Framework to ensure that the work is truly informed by what would make this toolkit most useful, what principles should be apply, and what might need to change to help deliver it.
- 2.4 As part of the consultation process, several regional workshops have taken place to focus on more locally specific land use issues. A workshop was held on York on 10 April hosted by the York and Humber Climate Change Commission with support from the Defra Land Use Framework development team – that was attended by officers from NYC who contributed to the wider regional response.
- 2.5 A further roundtable event relating to this consultation, hosted by the York and North Yorkshire Combined Authority and chaired by the mayor, was held on 11 April. Again, NYC officers took part in that discussion, along with representatives from National Parks and National Landscapes in North Yorkshire.

3.0 GOVERNMENT VISION FOR LAND USE IN ENGLAND

- 3.1 Land in England is changing in response to the climate and biodiversity crises, global shocks, the needs of consumers and businesses, and Government policy. In recent years, farmers have seen some of their most valuable land impacted by increasingly frequent extreme weather events. At the same time, communities have rightfully demanded change to clean up our rivers, lakes and seas.

- 3.2 We want to meet these challenges head on and start a public discussion on how land can deliver our missions for Growth and Clean Energy, boost food security, and meet our statutory climate and nature targets. This Government will be an active partner in the delivery of a fair land use transition which will:
- Make space for nature recovery, water, and emissions reduction. England's land use will need to change as we move towards 2050 to help deliver our legally binding targets under the Environment Act and Climate Change Act.
 - Support sustainable and resilient food production. The food system needs to support farmers and landowners to invest in the long-term viability of their businesses, contribute to food security and increase their resilience to climate change.
 - Deliver new infrastructure and housing. Decision makers at every level need information and tools to deliver sustainable development, including 1.5 million new homes new energy and water infrastructure, and the relatively small area of land use change it requires. We want to use strategic spatial planning to assess gains and losses against national and regional objectives, moving responsibility for managing land use trade-offs away from individual projects.
 - Fix the foundations for resilient long-term economic growth. Supporting sustainable economic growth over the coming decades will mean investing in its natural capital foundations and long-term climate resilience.
 - Co-create plans for delivery. Land use change that improves the overall productivity of land alongside wider social and environmental benefits will only happen with the right skills, data, incentives and structures in place. We want to collaborate with land managers, businesses, and communities to define what these are and our plan to deliver them.
- 3.3 The consultation sets out our analysis of the scale of long-term land use change required and is the start of a conversation about how and where it could be delivered. This conversation will aim to define how we can use England's land to give the best combination of benefits, and how we can support land managers and other decision makers to deliver this.

4.0 PURPOSE OF THIS CONSULTATION

- 4.1 Policy decisions that impact how land is used are often far too remote from the lived experience of farmers, developers, planners, and the citizens whose work shapes our places and landscapes. The Devolution White Paper set out our plan to shift power away from Whitehall and into the hands of those who know the land and their communities best. This consultation process will help define what role the Framework will play in this transition. It is not our intention to use the Framework to bind decision makers or prescribe specific land uses in specific places; we want it to inform decisions, not impose them.
- 4.2 A thriving natural environment and stable climate are the foundations of our economy and are essential to food security and profitable farm businesses. Changes in English land use is required to reverse the decline of our natural environment, help absorb greenhouse gases, adapt to the impacts of climate change, and increase the resilience of our food systems, infrastructure, homes and communities.
- 4.3 These foundations will support Government's commitment to build 1.5 million homes, and the new infrastructure needed to deliver resilient and sustainable growth and clean energy.
- 4.4 Advances in spatial data science, including earth observation data, mean we can now map potential long-term changes in land use more effectively. We want to use the analysis included in our accompanying annex to support discussions on how land is used, and the changes to policy needed to support land managers and communities.

- 4.5 A Land Use Framework will develop and support delivery of a shared vision for English land use. This consultation document will inform the subsequent development of a Land Use Framework in 2025.
- Section one of the consultation starts with evidence to underpin decisions on land use change.
 - Section two sets out draft principles for decision making.
 - Section three outlines potential policy levers that could be developed as part of a Land Use Framework such as improving access to data and developing targeted land management incentives.
 - Section four describes the process of co-creation that will inform the Land Use Framework.
- 4.6 The Framework will be published in 2025. It will include:
- Principles that Government will apply to policy with land use implications.
 - A description of how policy levers will develop and adapt to support land use change.
 - A release of land use data and analysis to support public and private sector innovation in spatial decision making, and the development of tools to support land managers in practice.
- 4.7 The evidence base that underpins this consultation is a basis for wider reform that includes a Farming Roadmap, a Food Strategy and the review of the Environmental Improvement Plan. It also supports the Government's wider strategic planning agenda, including the Industrial Strategy, long-term housing strategy, New Towns Taskforce, National Integrated Transport Strategy, Ten Year National Infrastructure Strategy and the Strategic Spatial Energy Plan.
- 4.8 These land use challenges are not unique to England. With the other UK nations, we have an opportunity to learn from others and to lead by example in managing the land use challenges that are shared by every country committed to the Paris Agreement on Climate Change and Convention on Biological Diversity. The Land Use Framework will play a critical role in delivery of our domestic and international commitments, including our Carbon Budgets, National Biodiversity Strategies and Action Plans, and Nationally Determined Contribution to international action on climate change.

5.0 CONSULTATION QUESTIONS

- 5.1 A link to the full consultation document which sets out the Land Use Framework's objectives, and the rationale behind them, is provided in paragraph 7.1 of this report.
- 5.2 The consultation questions are set out under the following headings:
- Principles – taking a spatial approach – Questions 1 - 3
 - Incentivising changes to long-term food security – Questions 4-8
 - Increasing private investment in nature-based solutions – Question 9
 - Making space for nature – Question 10
 - Bringing nature closer to communities – Question 11
 - Spatial planning for development and infrastructure – Question 12-13
 - Connecting plans and strategies – Question 14
 - Planning for climate resilient land use change – Questions 15-16
 - Improving land use data – Questions 17-18
 - Understand land's capability – Question 19
 - Reducing data costs where it benefits the public or economy – Question 20
 - Supporting land managers with new skills for changing land uses – Question 21
 - Accelerating sharing of best practice and evidence – Question 22

- Policy co-creation – Questions 23-24

6.0 NYC INTERNAL CONSULTATIONS

6.1 This consultation opened in late January and closes on 25 April.

6.2 The Objectives set out in the draft Management Plan cover a wide range of matters that potentially impact on NYC policy and service delivery. Hence, internal consultation has been undertaken with officers in the following service areas when preparing the response:

- Planning policy
- Flood management
- Environmental policy
- Climate change
- Natural capital and ecology
- Tree and woodland management
- Economic development and skills
- Public health

7.0 MORE INFORMATION

7.1 The full Consultation document is available at: [Land Use Consultation.pdf](#)

7.2 There is also a 43-page Analytical Annex with additional supporting information; [LU_analytical annex.pdf](#)

8.0 FINANCIAL IMPLICATIONS

8.1 There are no financial implications as a direct result of responding to the consultation. Any wider financial implications will be considered further down the line and reported on as appropriate in line with the governance process.

9.0 LEGAL IMPLICATIONS

9.1 No impact as part of this consultation response, any impact will be considered further down the line and reported on as appropriate

10.0 EQUALITIES IMPLICATIONS

10.1 No impact as part of this consultation response, any impact will be considered further down the line and reported on as appropriate

11.0 CLIMATE CHANGE IMPLICATIONS

11.1 No impact as part of this consultation response, any impact will be considered further down the line and reported on as appropriate

12.0 RECOMMENDATIONS

12.1 That the Executive Member for Environment, in line with delegated authority, note the North Yorkshire Council statutory consultation process and

12.2 Authorise the submission of the Council's response to the Defra Land Use Framework consultation as set out in Appendix A to this report.

APPENDICES

Appendix A – Text of proposed NYC consultation response to be submitted to Defra

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Corporate Director of Environment
County Hall
Northallerton
24 April 25

Report Author– Hugh Clear Hill, Principal Environmental Policy Officer

National Land Use Framework Consultation April 2025

Proposed response from North Yorkshire Council

To be sent by email to: landuseconsultation@defra.gov.uk by closing date of Friday 25/4/25

DRAFT – v4 - 16/4/25

Context

North Yorkshire Council is the largest unitary authority by area in England, covering over 8000 km². The county is largely rural and includes two National Parks (the Yorkshire Dales NP and North York Moors NP – and three National Landscapes (the Howardian Hills NL, Nidderdale NL and part of the Forest of Bowland NL) that together cover almost half of North Yorkshire. The quality of the landscape and the environment underpins the very important tourist / visitor economy of the county.

The county contains a wide variety of landscapes and land use types - from peat uplands managed for grouse shooting and extensive livestock farming through to fertile lowland values with more intensive agriculture. Woodland cover is lower than in some part of the country but still an important element of land use with initiatives such as the White Rose Forest community forest working to increase tree planting and woodland cover over the next 25 years.

Catchment management and water quality, flooding and resource challenges are a significant issue across North Yorkshire and often integrally connected to land management decisions. The County also has a substantial length of coast.

North Yorkshire is facing pressures for infrastructure development including for new housing, industry, renewable energy and transport developments.

North Yorkshire Council is the Responsible Authority for the Local Nature Recovery Strategy (LNRS) for North Yorkshire and York that is currently in preparation – and the Council is currently preparing a new Local Plan for the whole of North Yorkshire following the creation of the unitary authority in 2023.

General comments from North Yorkshire Council (NYC)

The draft framework focuses heavily on land use change on agricultural land. Improving the quality and management of existing non-agricultural land is also part of the equation on meeting nature and climate targets but this isn't even mentioned as something to consider outside the framework (unlike Category 1 land use change which does get a mention as being out of scope.)

NYC agrees that land use change is needed to meet habitat and carbon commitments and thus it is good to see that outcomes other than food production are prominently featured in the documentation. However, the Council considers that there should also be clearer objectives set out in terms of maintaining food security as part of the overall framework.

NYC supports the approach that spatial data will play a key role in making decisions maximise co-benefits and minimise trade-offs. However, data used to map land use change potential needs to be robust and reliable and needs to be available at a scale that can be used by decision makers. The process of co-creation as set out in the framework is welcomed.

Notes on specific aspects of Analytical Document:

Page 18 Table 4 Scale of change to meet Environment Act and climate change targets in line with current assumptions, broken down according to our land use change categories.

- There is no category for increasing the quality of already non-agricultural land. This isn't land use change but should be part of the calculations of a land use framework that is designed to deliver targets?
- Categories two through to four differ in both their difficulty of implementation and in their effectiveness to deliver Environment Act and climate change targets. Category two is easier to achieve than Category four but Category four likely contributes more to targets than Category two.
- I would have expected to see more of an inverted triangle in the percentages from Category two through to four, with small amounts of change delivered over large areas and larger amounts of change over smaller areas – with each category effectively contributing a fairly equal amount.
- Instead, the scale of change for Category three and category four land use change is ambitious (adding up to 18% of agricultural land either entirely or primarily managed for nature). This is potentially good for species recovery, creating high quality habitat over a larger area.
- Be aware that many habitats have been created by agricultural interventions and these interventions will need to continue, e.g. hay cutting and grazing. What pays for/secures this maintenance if agriculture is not part of these sites? E.g. Lowland meadow is shown in Figure 4 as having the highest potential for habitat creation and needs annual interventions.
- It would have been good to see much higher ambition in Category two changes alongside three and four. Regenerative agriculture practices, such as planned grazing, have huge potential to increase land productivity and deliver environmental benefits on that land. Crucially this increase in productivity could also free up grassland to be primarily managed for nature.
- Later mapping (e.g. comparison of scenario A and B in Figure 10 and elements of the document's narrative suggest that land use change will be concentrated in Northern Uplands – high potential for habitat creation AND least impacts on food production. This would lead to Category 4 change of higher than 10%.

Figure 2-3 Maps showing habitat opportunity

Good to see an acknowledgement that broadleaf trees have a higher potential opportunity than other habitats and (hopefully) that habitats with less spatial opportunity should be prioritised.

Maps seems to forecast habitat opportunity based on broad environmental factors that would allow its creation. There is no explicit consideration of how much of each habitat already exists in a location, or how new and existing habitat can be effectively connected.

The amount of existing habitat and the connections to this will help determine the quality of the habitat created. Having higher quality habitat may mean a lower quantity of habitat is needed overall.

Figure 4 and 5 Potential size of habitat opportunity types and peat restoration

- Good to see an acknowledgement that broadleaf trees have a higher potential opportunity than other habitats and (hopefully) that habitats with less spatial opportunity should be prioritised. I would question some of the percentage and rankings, however.

- It makes sense that lowland meadow has wider opportunity than other grassland types as the pH range and altitude it can occur is so much wider than for other grassland types, but does 14% of the agricultural area of England have soil nutrient conditions that would allow creation of lowland meadow? Maybe over a long timescale and with interventions such as nutrient stripping.
- How is the potential for 'ancient seminatural woodland' so high?! You cannot create ancient woodland by 2030 or 2050. You can restore PAWS to broadleaf, but all ancient woodland only covers 2% of England (and presumably isn't counted in current agricultural land). Broadleaf woodland isn't included in the graph, maybe this is a typo?
- How is lowland heathland creation potential higher than upland heathland creation potential? Is this because more areas of peat in the lowlands are not already heath compared to uplands? Upland heathland creation potential seems low.
- For blanket bog creation opportunity there is no acknowledgement that blanket bog creation would displace and reduce current upland heath
- 'Peat' restoration states that only deep peat and wasted former deep peat can be restored. Figure 5 shows only blanket bog peat, grassland peat and cropland peat, no mention of heath on peat. Either they really mean 'peat' to be 'blanket bog' restoration, or they are overall ignoring the carbon and habitat potential of shallow peat.

Figure 7 – 9 Suitability of two land use types simultaneously.

Good to see comparisons and co-benefits/trade-offs looked at. Aim will hopefully be for multiple factors to be compared simultaneously at the same location.

Figure 10 Modelled relative proportion of land use change in England's National Character Areas

Useful to see NCAs as allows some understanding of implications locally. Looks like change would be directed to Northern Uplands in both scenario A and B. A combination of both scenarios would strengthen this.

General notes on pre-consultation

Good that place based workshop were carried out and that Cumbria was able to represent northern upland farmers. Good that constraints such as food production and identity and aesthetics of rural landscapes are acknowledged. It's also good to see lack of alignment of natural boundaries with governance boundaries is acknowledged. The scale and boundaries of land use planning is really important.

Other general observations

The land use framework is habitat based. Some species will not respond positively to more and/or better habitat at a large scale. How will these species be captured alongside the land use framework?

Response to Specific Questions in the Consultation Document

Land Use Consultation – Planning Policy & Place

Question	Response
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<p>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?</p>	<p>Neither agree nor disagree</p> <p>Reasons for choice:</p> <p>It is unclear based on the figures in this report how the national ‘30 by 30’ target will be met given the relatively small changes in agricultural land anticipated. This does not even take into account the relatively poor condition of some of the exiting protected areas.</p> <p>On the face of it a change in land use for residential use to 2050 of 1.1% for residential use may seem relatively low. However, 25 years is not a significant period given the finite amount of land within England and the expectation that further housing land will be required beyond 2050. Should the trend be continued over a much longer period it would be more transformative in land use terms.</p> <p>The figures seem to apply a very high density (1.33 million homes at 2.4 people per household = 3,192,000 people over a land area of 32,700 hectares (327km²) = 97 people per hectare (or 9,761/km²). Whilst this is over simplistic means of comparison, it seems on the face of it to apply a very low land take as to what might be expected in areas of lower density housing such as North Yorkshire).</p> <p>Whilst we know the distribution of housing due to housing targets applied on an area basis from MHCLG, we do not as yet know the detail of how future energy needs may be we do not fully understand the distribution of national infrastructure for energy needs to accommodate additional housing. We expect to have a better understanding of this through the Strategic Spatial Energy Plan but this is in its early stages of being commissioned by NESO.</p> <p>The Council recognises the climate and biodiversity crises. In 2022 the former North Yorkshire County Council declared a climate emergency alongside many other councils across England. This has been carried through to the current existing council (North Yorkshire Council).</p> <p>The Council has published the Climate Change Strategy 2023-2030. The local plan has a strong focus on climate change. There are clear targets for land use change within this strategy which include:</p> <ul style="list-style-type: none"> • Plant 37,000 hectares of new woodland by 2038.
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- Increase amount of hedgerows in the region by 20% by 2038, alongside improvements in hedgerow width and health; and
- 100% of upland and lowland peatlands under restoration by 2038.

The strategy is clear over the benefits and the need to link ecosystems, biodiversity and nature recovery with climate change.

We appreciate the need for land use change to benefit both the climate and biodiversity. However, a transition of 9% away from agricultural production in England (Category 4) seems significant. What potential is there to make an increase in category 2 (small changes maintaining the same agricultural land use) as this improves environmental and climate benefits without reducing agricultural use and impacting food security?

The consultation puts forward that land use changes are able to be offset by a continued trend of technological innovation. Should this be achievable the impacts of this land use change would not be as dramatic. The technical annex also states that all land use changes would benefit food in the longer term.

It is recognised that some of these changes are legislative targets such as those within the Environment Act, whilst some of these are policy targets such as those in 30by30 meaning Government's commitment to the international target of protecting 30% of the UK's land and sea for nature by 2030.

Some of the targets are area based whilst others are output based a result of modelling. This seems a reasonable.

At this stage it is less clear what the economic and social impacts of land use transition may be and this should be receiving greater focus in working towards a land use framework as there may be long term impacts on communities given the scale of change which may be concentrated in certain geographical locations.

Given potential effect of the framework, should a Strategic Environmental Assessment be required as part of preparing the framework?

These changes may be significant in policy terms for local plans. This focus would represent a paradigm shift, where focus so far has been more on land use in respect of housing and

	<p>employment need. Upskilling would be required of officers to understand the implications and respond positively.</p>
<p>QUESTION 2: Do you agree or disagree with the land use principles proposed?</p>	<p>Agree</p> <p>Reasons for choice:</p> <p>Continued domestic food production need to be recognised in the Framework as an important principle. Where land is suitable for food production this should be an important consideration as long as this can be achieved in an environmentally sustainable way which also enhances biodiversity. It is important that strategic spatial planning and land targeting is interpreted at a local level so it can be informed by local data and needs.</p> <p>It is at this point challenging to understand what these principles would mean at local authority level.</p> <p>For land use planning, many of the principles will be relevant for example the co-design principle will likely have an important influence in shaping local plans. Some of these are already being practiced, for example Principle 3 – ‘policies which seek to be fit for the long term.’ The local plan is a long-term strategy seeking to plan for the next 15 years and therefore will have an important role in this.</p>

<p>QUESTION 3: Beyond Government departments in England, which other decision makers do you think would benefit from applying these principles?</p>	<ul style="list-style-type: none">• Combined and local authorities (including local planning authorities)• Landowners and land managers (including environmental and heritage groups) <p>Combined Authorities and local authorities would benefit from applying these principles. For this to be effective there needs to be ongoing monitoring and access to data. Guidance on their delivery is also important. This should include resources and training of officers and members.</p> <p>There is a role for all landowners and land managers to apply these principles when considering land strategies. However, it should be recognised that England’s landownership is dominated by large landowners and therefore there needs to be focus on those who have the biggest opportunities to make positive changes. It is important to give land managers, of all types, the resources and (help/training) to optimise their own land holdings.</p>
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<p>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?</p>	<p>A soil health strategy with links to both carbon sequestration and future agricultural viability would be useful to support the wider strategy.</p> <p>There needs to be stronger incentives to reflect LNRS objectives, including a clear LNRS delivery strategy with dedicated resources made available to LNRS Responsible Bodies, otherwise all that work that has gone into the LNRS process is in danger of going to waste.</p> <p>Promoting sustainable practices of land, ocean and freshwater management; creating spaces where people, plants & wildlife can thrive together to produce food with better management of natural resources (Category 1, Category 3.1); invest/incentivise re-generative farming practices as part of Category 3.1. Incentive of protection against climate change impact that regenerative farming/farming with nature can offer e.g. improved soil health, better water management.</p> <p>Comprehensive and consistent government policies and guidance are essential to facilitate delivery at a local level. Unfortunately the recent handling of the closure of the Sustainable Farming Incentive (SFI) element of ELMs, at very short notice, has done immense damage to the confidence of many farmers in engaging with emerging opportunities and new approaches to the management of their land.</p> <p>What is really needed is a system that can provide advice <i>alongside</i> funding – with local points of contact for landowners associated with long-term, stable funding. It may be appropriate to concentrate funding where we want to deliver strong change, not diluted across all areas.</p>
<p>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?</p>	<p>Ideally, we should provide land managers with funded examples that will inspire change – perhaps along the lines of the former ADAS experimental husbandry / demonstration farms? This could help to incentivise actions heavily then gradually pull back and incentivise other changes as the really focus measures become mainstream.</p> <p>For example, this could include exemplar sites which utilise agroforestry systems.</p>

<p>QUESTION 6: What should the Government consider in identifying suitable locations for spatially targeted incentives?</p>	<p>The equitable distribution of incentives so they don't just benefit large landowners and estates. Linking spatial approaches to LNRS objectives to promote landscape scale ecosystem services.</p> <p>Information from the local planning authority e.g. are there any proposed developments which could change the characteristics of the location.</p> <p>The framework needs to consider existing habitats and habitat connectivity to drive habitat quality and ensure that new habitat doesn't inadvertently displace existing good habitat of another type.</p> <p>Government should consider holistic effects including impacts on the economy, jobs and communities. Similar to land use planning, the sustainability of incentives and their impacts spatially is vital it is pleasing to see at the high level this is part of the consultation.</p>
<p>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?</p>	<p>Multi parameter mapping that helps weigh up competing factors e.g. approach adopted in the woodland opportunity mapping in the Nidderdale National Landscape NNL Woodland Opportunity Plan, with a simple scoring systems, traffic light colouring systems. Funding and provision of advice is the targeted to areas highlighted by the opportunity mapping.</p>

QUESTION 8: In addition to promoting multifunctional land uses and spatially targeting land use change incentives, what more could be done by Government or others to reduce the risk that we displace more food production and environmental impacts abroad? Please give details for your answer.

- **Monitoring land use change or production on agricultural land**
- **Accounting for displaced food production impacts in project appraisals**
- **Protecting the best agricultural land from permanent land use changes**
- Other (please specify):

Support to invest in re-generative farming practices that produce higher yields; better pricing for farmed food produce – offset the land that will be used for environmental purposes; condition of land – invest for more effective agricultural land – biodiversity; raise the profile of & support to local food businesses; improve local food supply chains through public procurement & dynamic purchasing; further develop/expand food enter[prise zones (or concepts of) into other geographical areas. Invest in the establishment and maintenance of these zones.

Continuing to protect the best and most versatile agricultural land from changes to other uses is important for the continued vitality of the food production sector. However, the system probably now needs review and the lack of a national-scale detailed ALC or BMV map for England causes issues. (see also response to Q19 below)

<https://publications.naturalengland.org.uk/publication/5844183762599936>

Monitoring through the planning system is an important part of understanding delivery and the need for review. There may be opportunities to integrate indicators with the land use planning system that support objectives within the Land Use Framework.

In our view clear strategies for land use will help, and managers to be better able to make informed decisions on land use that reduce the risk of food displacement.

<p>QUESTION 9: What should Government consider in increasing private investment towards appropriate land use changes?</p>	<p>Natural Finance will need clear guidance and frameworks if it is to succeed and be credible.</p> <p>North Yorkshire Council, working with the North Yorkshire and York Combined Authority, is one of four pilot areas for the Defra supported Local Investment in Natural Capital (LINC) programme. LINC is providing useful learning on the role of local authorities in the development of a pipeline of 'investible propositions' for private sector investment in natural capital projects. It is important that this work continues to have appropriate support so it can get to the stage of large-scale roll out and delivery.</p>
<p>QUESTION 10: What changes are needed to accelerate 30by30 delivery, including by enabling Protected Landscapes to contribute more? Please provide any specific suggestions.</p>	<ul style="list-style-type: none"> • 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): <p>Long-term and consistent funding is required for the Protected Landscapes, including revenue as well as capital. There is a need to ensure enforcement of existing land use protections (and simplify guidance) e.g. EIA regulations, Hedgerow Regulations, so that new gains aren't undermined by losses elsewhere. More flexibility will be required in how long-term nature criteria of 30x30 is secured, especially to allow tenants on short-term lease to participate. Confirmation of a long-term extension of Farming in Protected Landscapes (FiPL) funding extension would be very welcome.</p> <p>The Levelling Up and Regeneration Act duty to further the purposes of protected landscapes is an important step in this process.</p>

<p>QUESTION 11: What approaches could cost-effectively support nature and food production in urban landscapes and on land managed for recreation?</p>	<p>Provision of small council or charity owned farms in / near urban areas to enable entry into the industry, whilst providing nature friendly farming and public access.</p> <p>Securing an increased proportion of edible planting; utilisation of land for community allotments/growing spaces; dedicated growing spaces on new developments with resources for maintenance of these spaces (from the developers). Clear ownership (preferably community) for these spaces to ensure they are maintained long term. Link schools and community projects to growing spaces.</p> <p>Vertical farms, green roofs, maintained communal orchards/gardens, water features for nature/water capture and pollution attenuation, nature solutions to sewage waste, material use that supports nature land use, i.e. less concrete, more wood which would promote sustainable forestry, hedges instead of fences, easily maintained grass mixes that are more than just grass, wet areas.</p> <p>Local Plans and Supplementary Planning Documents can have an important role in promotion of opportunities for food growing. From the provision of more allotments within urban areas through allocating land for this purpose to more strategic proposals through planning for Green and Blue infrastructure opportunities exist to enhance provision for urban food growth through the planning system. Strategic sites can incorporate measures using master planning approaches by setting aside land etc.</p> <p>At present <u>research</u> has suggested that around 9% of food production per person per year is cultivated within urban areas but could be considerably improved through promoting behavioural measures which encourage food growth in private gardens and allotments. Some of these measures can be supported through council or public health measures.</p> <p>Designing features in new development such as green roofs and rainwater harvesting can help increase biodiversity as well as strategies for urban tree planting. This can be supported through both development plan policy and guidance. Examples include <u>Norwich City Council – Landscape and Trees Supplementary Planning Document (SPD) (2016)</u>.</p> <p>Measures such as Urban Greening Factor Standard and Urban Tree Canopy Cover Standards through GI policies can help to increase nature within urban areas whilst addressing the climate agenda as well. Policy CC1 of the Colchester local plan for example requires a Canopy Cover</p>
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	<p>Assessment for all major applications with proposals should seek where appropriate to increase the level of canopy cover on site by a minimum of 10%.</p>
<p>QUESTION 12: How can Government ensure that development and infrastructure spatial plans take advantage of potential co-benefits and manage trade-offs?</p>	<p>Accurate strategic mapping of differing land use priorities across the country.</p> <p>Data gathering – perhaps a need to start new widescale data collection similar to Phase 1 in 1990’s? But it is also important not to ignore existing data. Provide time/resources for organisations to feed in their data.</p> <p>Strong policy frameworks that integrate robust policies based on up-to-date evidence e.g. Green and Blue infrastructure evidence with effective monitoring have the potential to maximise opportunities for co-benefits and manage trade-offs. Government needs to provide effective national policy with guidance that helps inform those responsible for preparing plans.</p> <p>Coordination of wider strategies with land use planning such as Local Nature Recovery Strategies, Forestry strategies etc. can help to ensure mutual benefits. Having regard to this from the outset enables better forward planning and the integration and coordination within and between strategies.</p> <p>Planning at sub-regional level through Spatial Development Strategies will help ensure that policies are targeted towards being landscape scale which is required for land use change to be implemented effectively.</p> <p>Development on grey-belt land may help to utilise land better where it is not serving a green belt function nor has the opportunity to increase nature provision. This would allow the better use of land that is already in use to be used more effectively.</p> <p>The training of officers but also land managers to raise awareness and increasing understanding of potential co-benefits will be essential, this may be of benefit to being part of future work programme of the Planning Advisory Service.</p>

<p>QUESTION 13: How can local authorities and Government better take account of land use opportunities in transport planning?</p>	<p>By ensuring settlements are better connected with more sustainable transport options such as cycling and rail.</p> <p>Avoid important habitat in planned routes (reducing costs) plan to connect nature as well as transport by providing green corridors, make carparks and hubs more nature friendly – green roofs, solar panels on roofs to reduce need for biofuels and more land take.</p>
<p>QUESTION 14: How can Government support closer coordination across plans and strategies for different sectors and outcomes at the local and regional level?</p>	<p>By strengthening the links between LNRSs and some of the mechanisms that would help to deliver them (such as BNG and habitat banking), which is currently quite weak. There needs to be stronger incentives to reflect LNRS objectives, including a clear LNRS delivery strategy with dedicated resources made available to LNRS Responsible Bodies, otherwise all that work that has gone into the LNRS process is in danger of going to waste.</p> <p>Ensure clear Governance of land-use framework through LAs and CAs with statutory board for monitoring implementation including representatives from all sectors. Link with overseeing of local implementation of food strategy. Incorporated into the local planning process.</p> <p>National rulesets or principles for mapping that allow local data to be used.</p> <p>As part of the Land Use Framework, Government should make it clear what plans may relate to land use for example local plans, Spatial Development Strategies, transport plans, Local Nature Recovery Strategies etc. There should also be clarity on who partners are to ensure actions are targeted.</p> <p>It may help coordinate activities if those responsible authorities for Local Nature Recovery Strategies are also key coordinating leads for Land Use monitoring. A requirement to produce a statement setting out engagement and involvement amongst partners would help keep this process transparent. The RTPI has <u>called</u> for Local Nature Recovery Strategies in the long term to be given a wider remit to cover the whole environment, essentially to become Local Environment Improvement Plans</p>

<p>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</p>	<p>Yes</p>
<p>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.</p>	<ul style="list-style-type: none"> • Providing better information on local climate impacts to inform local decision making and strategies (for example, translating UK Climate Projections²⁹ 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 scenario³⁰) • 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):

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

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

Data available on smart devices without software needed and available in detail for practitioners to use in GIS software.

The standard UK Habitat Classification system is a nested classification and so is flexible – it provides different levels that can be used for different audiences but overall allows continuity and can preserve detail.

Bring disparate data together into 'best guess' maps – stitch different datasets together use best data available in each location to give wider coverage than any one dataset.
Start with new up to date real data – use this in the future to model land use changes.

Update Ancient Woodland Inventory nationally.

Woodland coverage very good, woodland *quality* data lacking.

<p>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.</p>	<ul style="list-style-type: none">• 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 <p>Appropriate funding of Local Environmental Record Centres as these are repositories of much of the currently available biodiversity data.</p> <p>Clarify rules to allow access for surveys/data collection, rather than requiring lengthy permissions and/or make land ownership more easily accessible.</p> <p>Citizen science projects using apps can be very powerful – provide funding/and adaptable platform that can be used nationally/regionally.</p> <p>Important SFI data is not currently publicly available – this should be reconsidered.</p>
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<p>QUESTION 19: What improvements are needed to the quality, availability and accessibility of ALC data to support effective land use decisions?</p>	<p>Land managers and decision makers need to be able to identify not just if land is Grade 1 or 2 land but is it sufficiently utilised? Some Grade 1 and Grade 2 land is now not suitable for intensive food production, e.g. too close to rivers and flooding too often.</p> <p>The ALC maps are now outdated being prepared in 1988. They are also not fine grain enough to allow for any proper consideration at site level. A major issue is the lack of mapping showing Grade 3a and 3b split, 3a being considered to be part of Best and Most Versatile land alongside Grade 1 and Grade 2.</p> <p>CPRE have recently prepared a report Decision-making in land use planning and the Agricultural Land Classification System: stick, twist, or bust? (February 2025) https://www.cpre.org.uk/wp-content/uploads/2025/02/Grouped-Insight-ALC-report-for-CPRE-Feb-2025.pdf</p> <p>This report identifies the following issues:</p> <ul style="list-style-type: none">o the use of old climate data for ALC grading. Using more up-to-date data drastically reduces the amount of predicted BMV land, the nation's best land for food production.o the impact of intensive farming practices degrading prime agricultural land in lowland peatlands and potentially impacting on its ALC gradingo ALC survey data use in planning decisions, which has allowed over 14,000ha of BMV land to be lost to developmento legacy system issues relating to the age of the ALC system and its evolution over time, creating conditions for it to be misinterpreted and misused by decision-makers. <p>To improve the system the report makes the following recommendations:</p> <ol style="list-style-type: none">1: Conduct a review and update of the ALC system, including implementing ADAS' 2022 recommendations to, at a minimum, update the ALC's climate dataset12: Re-survey lowland peatlands3: Better protect BMV land in the planning system4: Use an updated ALC system as one tool in the Land Use Framework <p>NYC supports many of the recommendations made within this report.</p>
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<p>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?</p>	<p>Land ownership data should be free to access on PSA license?</p>
<p>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.</p>	<ul style="list-style-type: none"> • Development and planning • Farming • Environment and forestry • Recreation and access • Other (please specify): <p>A shortage of dedicated biodiversity and land use expertise within LPAs represents a significant challenge.</p> <p>There are gaps in practitioners with bridging skills – ecologists that understand farming, farm advisors that understand ecology. Grants and funding are becoming so complex that officers have to specialise and there is less joined up thinking e.g. woodland officers, wetland officer (planning complexities), grassland officer, Agri-environment officer. These roles can still exist but with regular cross-disciplinary discussions and training.</p> <p>There are particular gaps in the advice available to land managers outside Protected Landscapes – it would be useful to create local advice structures for non-PL land.</p>
<p>QUESTION 22: How could the sharing of best practice in innovative land use practices and management be improved?</p>	<p>Monitoring of impact on species and nature alongside land use changes so we can evidence an assess changes. Land managers can implement change but lack monitoring skills – let land managers do what they need to do but researchers work alongside them take care of evidence and monitoring.</p> <p>Ideally, we should provide land managers with funded examples that will inspire change – perhaps along the lines of the former ADAS experimental husbandry / demonstration farms? This could help to incentivise actions heavily then gradually pull back and incentivise other changes as the really focus measures become mainstream.</p>

<p>QUESTION 23: Should a Land Use Framework for England be updated periodically, and if so, how frequently should this occur?</p>	<ul style="list-style-type: none"> • Yes, every 5 years • Yes, every 3 years • Yes, another frequency or approach. Please provide details. • No • I don't know <p>Change takes time to embed. Targets/guidance may need amending according to latest climate data and world situation – but the but principles of sustainable food production and improving biodiversity should remain.</p> <p>A high-level annual review of progress to action may be appropriate.</p>
<p>QUESTION 24: To what extent do you agree or disagree with the proposed areas above? Please include comments or suggestions with your answer.</p>	<p>Agree</p> <p>Reasons for choice:</p> <p>Currently there are many disparate and sometimes competing strategies. An overarching direction needs to be given, and this should be supported by mapping to lay out the opportunities and the Government's priorities.</p>