

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.

Neither agree nor disagree.

The Countryside Alliance does not have the expert capacity in the scientific or assessment basis underpinning these proposals for a Land Use Framework. Based on the evidence supplied in the consultation document and Analytical Annex we acknowledge that the assessment appears reasonable. However, the consultation documents acknowledge considerable uncertainty. It also remains to be seen how the specified objectives are to be delivered and whether such delivery will achieve the various relevant statutory and non-statutory targets. The burden of delivering any resulting strategy for land use change will overwhelmingly fall on private landowners and land managers.

The most significant land-use change outlined in the documents is the 14% of land area that will see serious or complete loss of agricultural production, and we are concerned to ensure that overall agricultural productivity loss is minimised and does not undermine food security. The proposed approach would seem to be an advance over current land use practice, which we regret has to date involved taking prime agricultural land out of production for use as sites for renewable energy generation and afforestation. This current trend must not just be halted but reversed.

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.

Neither agree nor disagree.

We have no particular objection to the proposed principles and especially welcome the statement that decisions must be fit for the long term, with the caveat that they should also be kept under review as discussed below.

Noting the principle of playing to the strengths of the land, we would question the aesthetic impact of radical change on certain landscapes and how it may impact tourism and other interests. For example, well-loved upland landscapes appear as they do as a result of human management over centuries connected to hill farming, and while they may be less agriculturally productive, they are considered iconic parts of the UK landscape and are hugely attractive to visitors. The Analytical Annex values the annual benefits of natural capital at £37bn, stating that more than half this figure derives from cultural services such as nature-based recreation and tourism.

Lastly, we believe the government should adopt an additional principle of avoiding increased reliance on imports resulting from land use change, something discussed in the documents.

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)

We assume that institutional landowners, such as Network Rail, would fall within the scope of the 'Landowners and land managers' category but would otherwise suggest them as an additional group.

- Others (please specify)

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?

Long-term decision-making relies upon the recognition that where the market is no longer a viable source of revenue from a given area of land due to change of use, there must be certainty over how its continued management will be funded. Farmers' recent experiences with agricultural transition funding, specifically the sudden closure of the Sustainable Farming Incentive scheme, have undermined confidence in long-term planning and changes to revenue streams.

Decisions on land management need to be taken over the long-term, especially where significant investment is being made. Much land management decision-making is so long-term as to be multi-generational, and for that reason, we suggest that the government should revisit the changes to the inheritance tax regime as announced in the 2024 Autumn Budget. One possible policy action would be to offer a future inheritance

tax incentive in exchange for investment in nature recovery, which would provide a powerful incentive for private investment without an immediate cost to the public purse.

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?

Agricultural funding schemes authorised under the Agriculture Act 2020 already provide opportunities to implement schemes that incentivise nature-friendly farming, whether through multifunctional land use systems such as agroforestry or otherwise. Such schemes were always going to be iterative, and we urge their continued development in collaboration with practitioners. We would reiterate the importance of maintaining confidence in the long-term reliability of funding streams.

The government must appreciate that farms are businesses and not charities, and as such, it must recognise the importance of maintaining their commercial viability. It should work directly with people who own and manage land to ensure the land holding remains economically viable, in addition to providing environmental and other benefits. We cannot end up with parts of landholdings ceasing to be economically productive, resulting in a loss of viability for the entire holding.

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

The Countryside Alliance advocates the introduction of the Rural Community Impact Assessment (RCIA) as a tool for evaluating how government policies, programs, or projects may affect rural areas and populations. Ideally, the RCIA would assess the impact any new government policy would have on the rural economy, the fabric of rural life, food security, and culture and heritage.

Generally, the RCIA would be a new requirement within the normal policymaking process to consider the impact of policy proposals on rural communities through a formal, published review. The specific questions for the review should be devised with input from the rural sector. The process would serve as a complementary adjunct to the existing Regulatory Impact Assessment (RIA) process as outlined in the HM Treasury Green Book.

We propose the RCIA for use in a wide variety of contexts, among which we believe it would provide an excellent tool for helping the government identify suitable locations for spatially targeted incentives.

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?

Collaboration with trade bodies and other representative bodies for landowners, land managers and farmers to identify the most effective solutions.

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

Land use change should be monitored and done in such a way that it is reversible, so that land can be taken back into agricultural production if needed in the future. It should also be kept under review, bearing in mind the possibility of a changing climate altering the suitability of land over time, for example, by shifting northwards the most suitable land for crop production.

- Accounting for displaced food production impacts in project appraisals
- Protecting the best agricultural land from permanent land use changes

While we cannot confirm the validity of the modelling presented in the Analytical Annex, we agree with the principle that domestic food security is national security and must be protected. Any reduction in available agricultural land must be offset by increased productivity, with account taken of population growth. This may require deliberately leaving the best and most productive land for agricultural use, taking account of local land suitability, such as that of the East of England for arable farming and the South West for dairy.

- Other (please specify)

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

In general, we believe that tax incentives are likely to be the most effective means of promoting private investment. However, we recognise the importance of proper targeting and avoiding over-incentivisation that could risk encouraging greenwashing, tax-avoiding corporations to acquire large-scale landholdings and implementing environmental schemes of dubious overall benefit. There should be an ongoing commitment to involving

and supporting communities, especially where their residents rely for their livelihoods on current land uses.

Lastly, we note with disappointment consultation documents' failure to recognise the level of private investment that is already being made, especially in the uplands, in terms of peatland restoration by grouse moor owners, and more widely by private landowners, in connection with game shooting. Management connected to shooting takes place over 7.6 million hectares. The consultation references cover crops but entirely ignores why cover crops are already widely planted, which is as habitat creation and management by shoots. The government should recognise and celebrate the important work shoots are already doing, and recommit to working in collaboration with rural communities, keepers and shoots.

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

We urge the swift instatement of a third round of the Landscape Recovery scheme.

- Other (please specify)

We would also support simplifying management regimes to take more of an outcomes-driven approach and give land managers greater flexibility. The last government consulted on how to simplify the overly complex system of current landscape designations with differing and overlapping regimes depending on whether the designation originated from European or domestic law. For example, there is a regime covering SSSIs, but some SSSIs are also designated SPAs or SACs under EU law, which remains post-Brexit. This means that SSSI consenting is required on SPAs and SACs but they are also subject to the Habitats Regulations. The current legal framework is not delivering for nature in terms of species recovery and ensuring sites are in good condition. The current approach is overly bureaucratic and can often become a tick-box exercise rather than being outcomes-driven and where land managers can deploy different approaches on different sites. There is also an overly precautionary approach on the part of regulators rather than a proper assessment of risk. Therefore, as part of developing a land use strategy the landscape designations should be reviewed.

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

[No response]

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

[No response]

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

[No response]

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

We are deeply concerned about the ever-increasing number of plans and strategies noted in the consultation document, from housing and transport to energy and biodiversity, etc. The sheer number of these makes it increasingly hard for the government and stakeholders to grasp and co-ordinate delivery across them. We also note the forthcoming food and farming strategy that has yet to be completed and is surely a key element of any land use strategy – the two must at least be complementary and co-ordinated in delivery. In general, we believe there should be fewer strategies and that those that already exist should be consolidated where possible.

When development is being contemplated, it is also of huge importance to maintain buy-in from local communities while avoiding unnecessary delay to the delivery of necessary infrastructure. Our analysis of the current Infrastructure Bill leads us to have concerns that pushing for development on too short a timescale, without leaving room for full consideration, could threaten irreversible damage to communities and land and undermine necessary democratic engagement.

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]

Yes

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)

We think all these elements are important but believe that that by making the change modelling tools that are already used by government agencies available to the public, and specifically to land managers, would allow them to be deployed at a local level. A new tool could be created that allows a land manager to input details such as the size of their landholding and their soil type, then produce a tailored recommendation for the kinds of initiatives they could most productively pursue. We would also support further investment in relevant education, training and skills.

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)

In addition to the above we believe that following open data standards and creating or facilitating APIs that allow open access to government data by third party applications.

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

[No response]

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

[No response]

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?

[No response]

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)

[No response]

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

[No response]

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, every 5 years

This should be kept under review.

QUESTION 24: To what extent do you agree or disagree with the proposed areas [of co-ordination between government departments]...? Please include comments or suggestions with your answer.

- 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]

Agree

Co-ordination is clearly a cross-cutting government responsibility. Oversight of land use transition may be a suitable function for the Office of Environmental Protection, or consideration could be given to a cross-government role to oversee delivery across departments and strategies.

It is of primary importance that any co-ordination or oversight function must bear responsibility for collaborating directly with people on the ground. One of the lessons the government should have learned over the last six months, with the breakdown it has seen

in its relationship with rural communities, is that a top-down management approach does not work.

Large-scale land use change, and the benefits envisaged from it, cannot be delivered without the support and work of practitioners. As such, the government should properly recognise the work that is already being done and privately funded by rural interests, including in association with shooting and angling. Such practitioners must not be disparaged or ignored but recognised as key to delivery. The government cannot deliver its environmental targets without those who own and manage the land.