LAND USE CONSULTATION

Response by Smart Growth UK

11 April 2025

QUESTIONS

What we mean by land use change

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 disagree.

Your assessment claims that, to build 1,500,000 new homes would require 30,000ha, is likely a wild under-estimate, though as you don't say what % you expect to be brownfield and whether that's based on net or gross density, you don't say. It suggests you foresee average density of 50 homes per hectare, a gross over-estimate on greenfield sites where net densities of 20-30/ha are typical. It also omits the roads, other infrastructure, schools, shops, healthcare, open space necessitated by such housing. Roads (including lengthy access roads) are very land hungry with this sort of development. You also omit land use changes for climate impacts like loss of land to sea-level rise, land which cannot be protected from frequent flooding or sustained droughts. The rapid increase in food insecurity may also necessitate much larger changes in land to sub-optimal uses like arable on inappropriate soils. Climate effects are unquantifiable but progressive and there's a need to protect all land-delivered ecosystem services, so anti-sprawl and brownfield-first policies, together with transit-oriented development and density standards should facilitate big restrictions on all greenfield development.

Principles: Taking a spatial approach

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

Disagree.

1. Of course elected regional & local bodies should have the prime role in decision making, with national intervention restricted to very few cases. National policy should be responsive to contrary views, unlike the current top-down authoritarianism.

2. It's unclear what multi-function means, but mixing nature & housing is a sure-fire recipe for damaging nature as housing = air, noise, light & water pollution, soil-sealing and disturbance over wide areas. Most undeveloped land delivers multiple ecosystem services, however, and protecting these should be a priority.

3. Land, especially greenfield, should be assessed for its full range of ecosystem services and a system which protects & enhances them as much as possible is needed.

4. Some very radical decisions will be needed given the threats of extreme weather & sea-level rise. All decisions should reflect these concerns + food & water security.

5. Yes.

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)

Generally, we would emphasise local authorities above combined authorities as the latter are all too often simply vehicles for imposing Whitehall policies. What's also needed are strong, elected, regional assemblies.

Landowners and land managers (including environmental and heritage groups)

Yes.

Others (please specify)

Quangos (i.e. non-departmental bodies) Investment bodies

Policy think-tanks

The armed forces whose land may benefit from application of the principles or who may need derogations, especially given the need for more defence activity.

Anyone else whose decision-making impacts land-use.

Making the best use of land

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?

We need a national assessment framework for:-

(i) The principal ecosystem services that undeveloped land delivers to support:-

- Food security
- Water security
- Nature

- Drainage
- Flood control
- Carbon retention and sequestration
- Landscape quality

(ii) National, regional and local policies that protect ecosystem services

(iii) A national assessment framework for the threats facing all land from climate threats:-

- Sea-level rise
- Flooding
- Soil erosion, oxidation, salination and loss
- Extreme rainfall
- Drought
- Storms

(iv) National, regional and local policies that increase resilience to climate change Making the best use of land

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?

Great care is needed when mixing uses to ensure the end result is not just disbenefits to one or both. Obviously, we need to find ways of better protecting and enhancing biodiversity within agricultural land, including regenerative farming, but we also need to ensure the end result isn't a big drop in staple food production, or it being used as an excuse for building development on farmland or nature. The abandonment of the Sustainable Farming Incentive does not bode well for Government support of incentives for more environmentally friendly farming. Inadequate levels of funding for rural support need to be addressed. The Government should remember that, as part of a drive to improve UK defence resilience, the country's ability to feed itself necessitates urgent attention, together with an end to building development on farmland or natural areas.

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

Spatial prioritisation should be based on assessment of ecosystem services including food production and nature (and water production) across the whole rural landscape. Only then can rational decisions be made about targeting incentives. This may involve reconsideration of your suggestion that the Framework would not "prescribe specific land uses in specific places".

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?

At national level the most urgent need is for planning guidance that protects undeveloped land from building development, including restoration of brownfield-first and residential density standards, together with anti-soil-sealing provisions. Beyond that, the Framework should set out the policies under which farmers, local authorities and communities could take optimal decisions about local land use, applying for finance, etc..

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

Monitoring and production of accurate statistics should be the basis of any policy. However, the document appears to "assume the consequent" and works on the basis that changes to use of agricultural land are always necessary.

Accounting for displaced food production impacts in project appraisals

This is absolutely essential across a range of disciplines, most importantly in the planning system, but also in appraisals of agricultural and nature support and appraisals of UK defence capability.

Protecting the best agricultural land from permanent land use changes

Over the past 15 years, the weak protections in the English planning system for "best and most versatile" land have been eroded virtually to vanishing point. They only ever protected Grades 1, 2 and 3a despite the importance of 3b to food production. The first step should be revision of the *National Planning Policy Framework* for giving very great weight to the need to protect Grades 1, 2 and 3 from development and only allow it in exceptional circumstances.

Other (please specify)

A great deal more work needs to be done on the (progressive) effects of climate change and associated weather changes on agriculture. This will include loss of land to sea-level-rise and salination, more rapid oxidation of low-land peat supporting agriculture and horticulture, loss of other soils to erosion & deluge, droughts, storminess (wind and rain). Scenarios need to be mapped for varying and increasing levels of such impacts over time. Work is also needed on the effect of urban sprawl on food production, including the effect of water shortages induced by over-development in water stressed areas like the Oxford-Cambridge Arc. DEFRA needs to ensure significant development is only allowed in areas of water abundance - or to create the national water grid under discussion since the 1930s.

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

We would question your basic premise that more private investment is needed to tackle climate and nature initiatives. There is already far too much private investment in unsustainable development - sprawl housing, HGV dominated distribution systems & unsustainable infrastructure (such as the Lower Thames Crossing). Current business activity in rural areas is mostly private already - farming & rural businesses are overwhelmingly private sector.

Is the phrase "natural capital" inducing some kind of confusion? Nature doesn't expect a financial return, just the chance to thrive.

The demolition of England's planning system over the past 13 years has already given private developers far too much power and demonstrates how little interest they have in providing homes (a million consented but unbuilt) or any other public good. The Government can find billions to invest in road building to increase emissions or £22bn to invest in unproven and dubious carbon capture technology, neither of which will repay borrowing, so public money is plainly available. If a desire for private investment is serious, then stop allowing developers a 20% RoR and seek funding for urgently needed things like flood control & soil carbon-sequestration.

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.

Protected landscapes need far stronger protections - and far more landscapes need protecting. The existing network of national parks and (especially) national landscapes is inconsistent and areas strongly in need of protection are, for long-forgotten reasons, omitted. In our response to the 2018 Landscapes Review, we suggested a non-exhaustive list of areas which should qualify for national landscape status:

- Yorkshire Wolds
- Salisbury Plain
- Eden Valley (Cumbria) south of Wetheral
- Northern central Northumberland (i.e. area between Northumberland NP & Coast NL north of Rothbury and Alnwick)
- Mid-Devon between Exmoor and Dartmoor (roughly Taw catchment between Barnstaple, Crediton and Okehampton)
- The Brontë Country (Pennines between Peak and Dales national parks
- Forest of Dean

Additionally, existing NP & NL boundaries need extending. NLs' governance & protection requires considerable strengthening, while the emphasis on promoting leisure in national parks should be reduced. These are minima if nature is to be protected and enhanced in these areas. Instead, there are big threats to protected areas from development & planning protections are being weakened.

Tools: such as greater alignment of existing Defra schemes with the 30by30 criteria

While greater alignment between DEFRA and 30by30 schemes would obviously be welcome, it's the lack of alignment between such schemes and MHCLG's planning regime and DfT's transport policy that remain the biggest threats to both nature and food production. All too often DEFRA appears to be playing second fiddle to those departments despite its role in vital national functions like food & water supply, drainage, flooding, sea defence and protection of nature. It makes little sense to improve funding or protection, if they are being wholly undermined by policies emanating from the rest of Whitehall. Detailed monitoring of any scheme is essential, as is public dissemination of the results.

Resources: such as funding or guidance for those managing protected landscapes for nature

As stated above, much stronger guidance and legislation is needed for the protection of national landscapes in particular. As with landscapes, nature depends on continuity of areas and their freedom from development. However, the very weak protection for green belts, essentially highly ineffective provisions to keep the land from being developed, should give the Government a big opportunity for stronger controls. "Grey belt" provisions are already being misused to justify development of any bit of green belt developers choose and to fragment such habitats further. Funding should be available for any ecologically important site, wherever located and whether or not statutorily protected currently. Detailed monitoring of any scheme is again also essential.

Other (please specify)

As stated above, there is little point in DEFRA pursuing schemes if they are wholly undermined by other policies - pursued particularly by the Treasury, DfT or MHCLG - to undermine protection of nature, landscape or rural ecosystem services more widely. The delivery strategy must include a stronger voice for nature, food and water security, drainage, landscape etc. in other departments' policies.

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

In reality, the Government is only expecting to "deliver" a few tens of thousands of houses but is vainly Hoping that private developers will build up to somewhere near its 1.5 million target. Your point that such homes need to be close to business and employment is significant. They also need to be close to high-frequency networks of rail-based public

transport and built on brownfield land as far as possible, so a strong levy on any greenfield development to fund reclamation of sustainably located brownfield sites is needed. While every effort should be made to encourage nature and food production in existing urban areas, to make SUDS mandatory and to reduce soil-sealing generally, we do not believe there is much potential for these in areas subject to greenfield development. Loss of food production and damage to nature will far outdo any attempts at mitigation. Certainly, some recreational areas could do much more for nature - eliminating upland shooting and restricting it in lowland areas, for instance.

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

While SDSs are welcome, they will only be as useful as national guidance allows. The weakness of the whole system is demonstrated by the phrase "strengthening housing targets and allowing development on poor quality land". This is shorthand for undermining protection of food and water production, landscape, nature and measures to keep land open and soils unsealed. Hoping for co-benefits and trade-offs from such a flawed system involves groundless optimism. Clean energy and water infrastructure, together with the right kind of homes in the right places (i.e medium-density, brownfield homes with a high % of social-rent located so as to optimise public transit and active travel) are worthwhile objectives. Fresh thinking about uplands - an end to burning and drainage on deep peat and its enhancement, tree planting on mineral soils and wider management for nature rather than shooting - is long overdue. While fast development of renewables is vital, that should not be at the cost of damaging land for food production and nature. Offshore should be the main focus, including giving attention to long-neglected tidal power.

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

The type of dispersed and non-continuous development favoured commercially by both housing developers and distribution networks is catastrophically at odds with the other positive objectives sought here such as protection for food and water security, nature and climate. We need to return to sustainable assessment of transport projects and accept that the return to 1980s style promotion of, and reliance on, road and air transport is fundamentally at odds with climate and nature objectives. A vision-led approach is fine if the vision is clear about such things. Yet we have expansion of airports approved, including one whose main business is flying people away to spend UK wealth in other countries. We have roads planned with multi-billion-pound bills, including in national landscapes, with no regard to the well-understood and inevitable result that they will induce new traffic and rapidly undermine any traffic, accident or pollution savings. We urgently need to concentrate development within major urban areas and to serve them with rail-based public transit networks. This would save land for other objectives, reduce transport impacts and protect the climate and nature.

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

The whole policy thrust of the past 15 years has been to weaken local and regional democratic accountability. Regional accountability and policy making were largely eliminated and local planning authorities' ability to plan has been steadily eroded, even down to current proposals to strip local planning committees of their ability to resist unsustainable developments. While ministerial power may have increased nationally, proposals to restore a regional dimension are based around biddable "elected mayors" with little chance for democratic accountability.

There is certainly a siloed and confused network of plans, but this has been deliberately engineered to weaken democratic controls and increase developers' freedom to do what's commercially most attractive. LNRSs are fine, but limiting their objectives to nature recovery precludes action to prevent soil-sealing and loss of nature, food and water production, drainage capacity and landscape. For these reasons, the Framework must have much stronger powers, including shaping the planning system and transport policy to include a range of ecosystem services and their protection and co-ordination.

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 in the text box below.

Yes.

Alternative suggestions:

Current efforts to reduce greenhouse gas emissions are currently being undermined by both transport policies which promote high-carbon transport and degrade low-carbon and by planning policies which promote big increases in low-density sprawl at unsustainable locations, necessitating big increases in vehicle mileage.

Supporting land owners to manage their land better would obviously be beneficial, but the key change will be in radical reform of national planning and transport policies.

Thus, land needs to be protected to prevent loss of Grade 1-3 farmland, land of value for nature and land of importance to flood control and drainage.

We urgently need to recycle more sustainably located brownfield land.

We also need to impose regional policies which direct development away from high-quality farmland, water-stressed areas, areas short of housing or infrastructure to areas with greater capacity (and economic need) for such development.

It would also be positive if "levelling up" were finally to mean something before the societies in left-behind areas boil over completely.

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.

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) (Met Office UK Climate Projections available at: https://www.metoffice.gov.uk/research/approach/collaboration/ukcp);

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: the climate changes we will experience if there is 2°C of global average temperature increase above pre-industrial baselines by 2100);

Supporting the right actions in the right places in a changing climate (for example, prioritising incentives for sustainable land uses where they will be most resilient to climate change);

Other (please specify)

All of the above would be welcome, but most urgent is radical reform of government policies for planning and transport. It would also be helpful if the development sector was seen as a problem in all of this rather than an opportunity. It could be an opportunity, but not if it's given the current free hand. Meanwhile some acceptance that the agricultural sector should have more of a say is needed, concomitant on that sector accepting that it has greater responsibilities.

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

Making sure the Land Use Change Statistics are updated and published regularly - at least once a year and ensuring they include percentages of both brownfield and greenfield land changing to developed uses, including the use involved. There appear to be other public datasets via ONS which decision makers ignore.

Changes to support use through private sector tools, apps or websites

Any public data which is supplied by the private sector must be freely (and promptly) available to the public.

Bringing data from different sectors together into common portals or maps

Once again, this must be publicly available. Increasing consistency across spatial and land datasets

I feel this way because:

Consistency is great so long as it doesn't obscure significant differences between datasets. These may have important underpinning reasons and the differences involved may be significant.

More explanation or support for using existing tools, apps or websites

See above about Land Use Change statistics.

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

Greater resources for local planning authorities to allow them to respond more fully and more quickly. It is vitally important to see how much land is being lost to building development, energy installations and other infrastructure.

Environment and forestry: such as local and volunteer-collected environmental records

Given the whole basis of land use statistics was based on a survey by schoolchildren (the Stamp survey), the ability of the public to respond should not be ignored. Some kind of spatial/land use data collection could form part of a modern geographical curriculum in schools and colleges and a national system to harmonise, collect and publish the data set up.

Government-published land and agricultural statistics

Up to date information on agricultural land quality and productivity is absolutely essential if the flood tide of unsustainable development on land is to be stemmed and a land use framework to have any utility.

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

Updating the ALC, which effectively undervalues Grade 3b land, would be welcome. But it would have to ensure it did not become an exercise by central government to find excuses for taking land out of production for building development.

A comprehensive data set of land characteristics would be very welcome, to include geological/soil information, permeability & water data, agricultural productivity and type, drainage and flood characteristics and biodiversity/bioabundance. The latter must include soil fauna and flora and farmland bird populations.

What's needed is a data system that understands a widened appreciation of natural capital across a range of ecosystem services.

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

Any of the comprehensive data sets that communities customarily require should be available to them and other sets by arrangement. What is to be avoided at all costs is a situation where the development industry can access important data, either by right of special access or economic muscle, while other stakeholders are excluded.

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

Development and planning

Local planning authorities have been increasingly and damagingly unable to carry out their important roles thanks to the general starvation of council funding and Treasury policy which aims to undermine their ability to resist unsustainable development (such as the so-called "presumption in favour of sustainable development" when they are unable to keep local plans up to date). The whole planning system needs relocalising and an end to planning-by-appeal, together with community rights to object/appeal.

Farming

Hill farming in much of the country is close to the margin of viability and, while that might suggest possibilities for landscape-scale natural use, there are long-established communities to consider and destructive alternative destructive uses like shooting or SUV-driving ready to take over land.

Other (please specify)

A professional skill of appraising sustainable development in the round needs to be developed and the Framework should underpin that. It should be based on the UN Sustainable Development Goals. The term "sustainable development" was hijacked by the original 2012 *NPPF* to mean, basically, commercial viability and there is a very urgent need for statutory definitions to balance social, environmental and economic aspects.

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

The work underway is welcome, but to underpin a genuinely useful land use framework, it would need to draw in, and co-ordinate, best practice through a range of disciplines. Obvious areas are nature conservation, drainage and flood control, climate science, food science, the water industry, sea defence, forestry, leisure and recreation, heritage and landscape conservation and the work the armed forces do to protect the land they use as training areas.

Co-creation and engagement on a Land Use Framework: next steps

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

Yes, every 5 years.

Five-yearly updates would allow time for comprehensive engagement with community groups and smaller land owners. It must not become dominated by large estates of whatever ownership.

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

Neither agree nor disagree.

The proposed land use framework must sit above policy in other areas like planning, and transportation. Above all, it must not become subject to the Whitehall pecking order with HM Treasury calling the shots, MHCLG and DfT left to pursue their own unsustainable policies beneath that and DEFRA, despite its crucially important functions in the environment, climate, food, water, drainage and flood control, a very poor last. Any strategic oversight function must be sufficiently independent of departments to ensure genuine cross working and, crucially, the Treasury should be excluded. Those governing such oversight should go beyond cross-government and include a board of experts in the disciplines we cited earlier and research bodies.

Smart Growth UK

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